

ANN ARBOR HISTORIC DISTRICT COMMISSION**Staff Report**

ADDRESS: 530 N Division Street

DISTRICT: Old Fourth Ward Historic District

REPORT DATE: June 13, 2019

REPORT PREPARED BY: Jill Thacher, Historic Preservation Coordinator

REVIEW COMMITTEE DATE: Monday, June 10, 2019

UNDER REVIEW: Whether the residential building at 530 North Division Street should be classified as a contributing structure (aka historic resource) in the Old Fourth Ward Historic District, or whether the designation should be amended to noncontributing.

BACKGROUND: The owner of 530 N Division requested a working session with the Historic District Commission to get feedback on a proposal to remodel the exterior of the building. At that working session on March 14, 2019, the HDC expressed reservations about the proposed work being able to meet the federal and local standards and guidelines as a contributing structure. The HDC directed staff to revisit the building's contributing/noncontributing status and place that discussion on their April 11, 2019 agenda. At the April 11 meeting, the HDC requested that staff hold a public hearing at a future meeting and give the applicant time to collect more information to submit to the commission.

The April 11 staff report is attached. The property owner has provided the following new information, which is attached:

- 1) Petition for the Re-Classification of the Structure at 530-532 North Division as a Non-Contributing Resource
- 2) Appendix A
- 3) Structural engineering report for 530-532 North Division

LOCATION: The site is located on the east side of North Division, north of East Kingsley and south of High Street.

STAFF FINDINGS: The owner has provided information in a document called *Petition for the Re-Classification of the Structure at 530-532 North Division as a Non-Contributing Resource* to challenge the original designation of this structure as a historic resource.

Staff believes the argument is relevant pertaining to historic integrity and that it should be considered closely by the Historic District Commission. The SOI states that in order to retain historic integrity, a property will possess several and usually most of seven "aspects of integrity" – location, design, setting materials, workmanship, feeling, association. Staff agrees that, based on the information provided, the property certainly does not meet several of these aspects, particularly: workmanship, which we know to be deficient given the structural engineer's report; feeling; and association. Other aspects of integrity could be argued either way or require more information (for example, design, since the building is encased in artificial siding) to be answered.

POSSIBLE ACTIONS: If the HDC feels that the property was correctly designated as a contributing structure, no action is necessary. If a member of the HDC feels that it is appropriate to change the status of the resource from contributing to non-contributing, the following motion template is suggested.

I move that the property at 530-532 North Division Street, in the Old Fourth Ward Historic District, be designated as a non-contributing resource based on field study, previous surveys, historic documentation, and information provided by the owner, because it does not meet the Secretary of the Interior's National Register criteria.

ANN ARBOR HISTORIC DISTRICT COMMISSION**Staff Report**

ADDRESS: 530 N Division Street
DISTRICT: Old Fourth Ward Historic District
REPORT DATE: April 11, 2019
REPORT PREPARED BY: Jill Thacher, Historic Preservation Coordinator
REVIEW COMMITTEE DATE: Monday, April 8, 2019

WHAT'S UNDER REVIEW? Whether the residential building at 530 North Division Street retains historic significance as a contributing structure (aka historic resource) in the Old Fourth Ward Historic District, or whether the designation should be amended to noncontributing.

BACKGROUND: The owner of 530 N Division requested a working session with the Historic District Commission to get feedback on a proposal to remodel the exterior of the building. At that working session on March 14, 2019, the HDC expressed reservations about the proposed work being able to meet the federal and local standards and guidelines as a contributing structure. The HDC directed staff to revisit the building's contributing/noncontributing status and place that discussion on their April 11, 2019 agenda.

HISTORY: The building that we see today was constructed in 1929. It consists of two houses that were placed side-by-side and joined together as a duplex. At least part of the house on the south half was present by 1888. It was modified between 1916 and 1925 by removing a side wing and extending the back. In 1929 a house was moved onto the site (possibly from the triangular parcel across North Division that became home to a gas station in that same year) and connected to the north side of the existing house. A large gable-front roof was constructed to span both halves of the duplex.

LOCATION: The site is located on the east side of North Division, north of East Kingsley and south of High Street.

APPLICABLE REGULATIONS:

From the Secretary of the Interior and the State Historic Preservation Office, and included in the City of Ann Arbor Historic District Design Guidelines:

Contributing Resources. A contributing (historic) resource is one that adds to the historic association, historic architectural quality, or archaeological values for which a property is significant because it was present during the period of significance, relates directly to the documented significance, and possesses historic integrity.

Non-Contributing Resources. A non-contributing (non-historic) resource is one that does not add to the historic architectural qualities or historic association of a district because it was not present during the period of significance, does not relate to the documented significance, or due to alteration, additions, and other changes it no longer possesses historic integrity.

STAFF FINDINGS:

The definitions of contributing and non-contributing can be broken down into a series of questions. The “resource” in question is the residential building at 530 N. Division.

For a contributing resources, all of the following must be answered with a yes.

Q. Was the resource present during the period of significance?

A. Yes. The building as we see it today was constructed in 1929.

Q. Does the resource relate directly to the documented significance (*of the historic district*)?

A. The *Old Fourth Ward Historic District Study Committee Report* from September 1982 categorizes this building as a complementary historic structure.

“Complementary Historic Structures are defined as those buildings which were built before 1931 and which are not designated as Significant. They do contribute to the overall historic character of the district by providing a complementary setting for the more outstanding structures. While individually they are less outstanding and unique than the higher level, taken as a whole they establish the basic neighborhood characteristics of style, scale and mass.” P.9

Staff believes this structure still contributes to these basic neighborhood characteristics.

When the city’s Chapter 103 Historic Preservation code was updated in 2008, all Old Fourth Ward structures that were categorized as Significant or Complementary were recategorized as Contributing Resources. Structures categorized as Contemporary Structures (per the report, all structures built after 1931) were recategorized as Noncontributing Resources. The period of significance of all Ann Arbor historic districts was defined as 1944 and earlier.

Q. Does the resource possess historic integrity?

A. The building retains the following historic characteristics that contribute to its integrity:

- The footprint of the building appears the same as shown on the 1931 Sanborn Fire Insurance Map.
- The massing of the building appears unaltered from when it was constructed in 1929.
- A 1947 aerial photo shows the same roof form that exists today.
- The building retains a bumpout on the south side that appears on the 1931 Sanborn.
- Evidence of wood clapboard siding is present under several layers of siding, including vinyl and asphalt brick.

The building has been altered in the following ways:

- A bumpout with a shed roof was added to the front elevation near the center, and the front door on the northern half of the building was moved onto this bumpout.
- The windows on the northern half of the front elevation are assumed to have been rearranged when the door was moved.
- A new front deck spans the width between the two front doors.
- The building is clad in vinyl siding over asphalt over wood clapboard.
- The windows have all been replaced.

The following are unknown:

- Whether other windows were rearranged, or if they are in their original openings.
- The condition of the wood siding beneath the various layers of siding.
- Whether the gabled canopy over the south front door is original or not. Both canopies appear to use sawed off porch posts as angled supports. The pattern of the milling appears old, but it is not known whether these were originally posts or always used as supports.

A resource is non-contributing if any one of the following are answered with a yes.

Q. Was the resource built after 1944?

A. No, it was present in 1929.

Q. Does the resource not relate to the documented significance?

A. No, staff believes the the resource retains the same significance present when the *Old Fourth Ward Historic District Study Committee Report* was published in 1982. It contributes to the basic neighborhood characteristics of style, scale, and mass. See the

Q. Does the resource no longer possess historic integrity due to alteration, additions, and other changes?

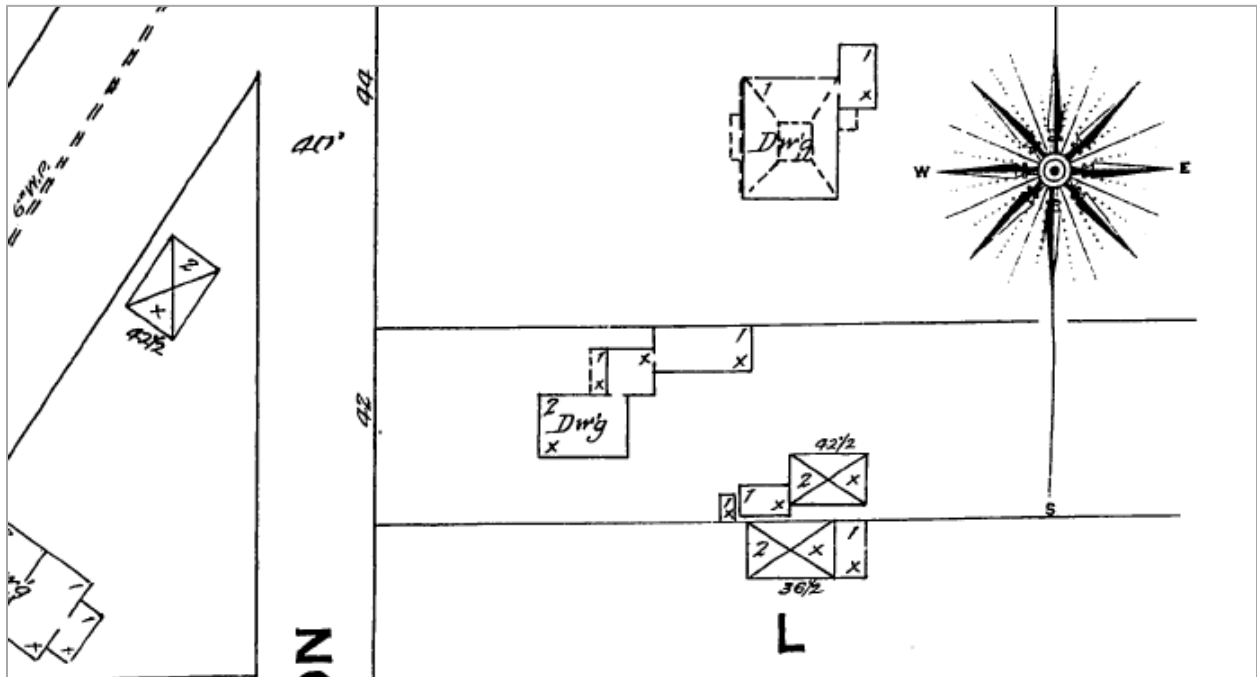
A. No, staff believes the alterations to the building are not substantial enough to eliminate all historic integrity.

POSSIBLE ACTIONS: If the HDC wants to change the status of the resource from contributing to non-contributing, a public hearing must be held first. If a commissioner feels that this change is warranted, staff suggests that s/he make a motion to hold a public hearing and consider the matter further at a future (named) regular meeting. If the motion passes, staff will schedule a public hearing on that date, and the HDC may take action after.

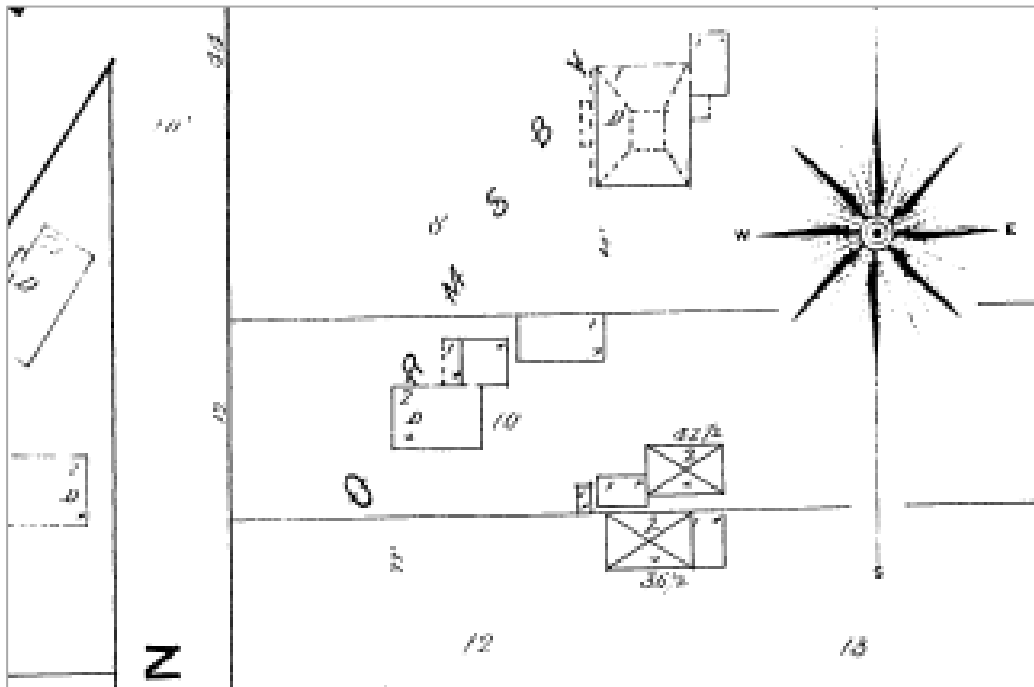
ATTACHMENTS: Sanborn summary, 1975 city survey sheet

Sanborn Fire Insurance Maps

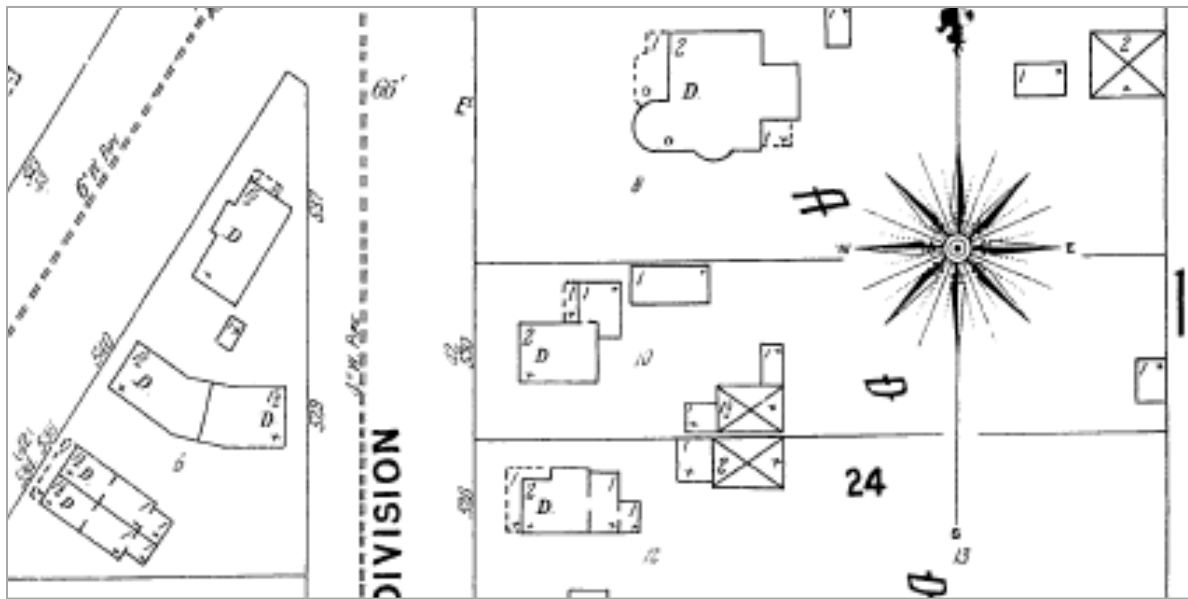
1888 Sanborn Map



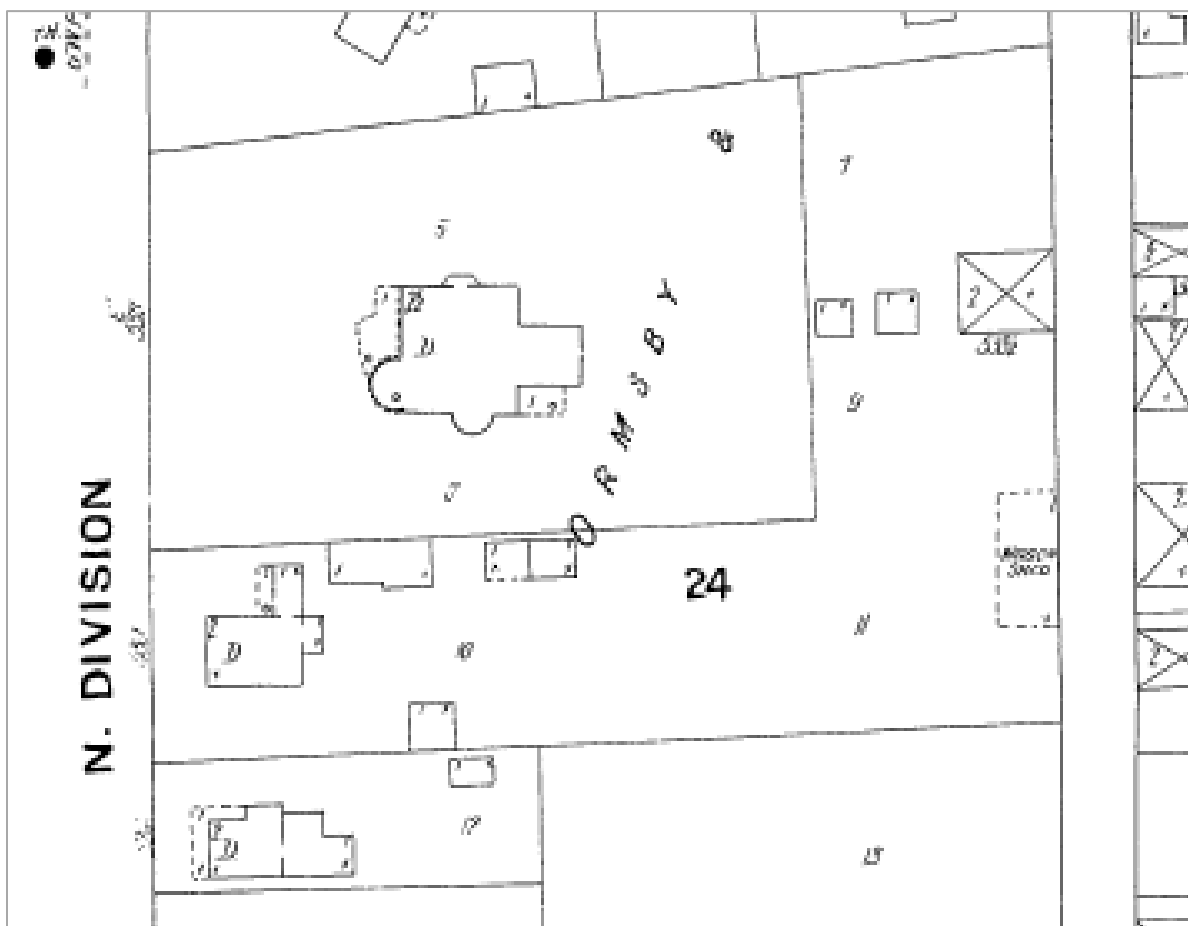
1892



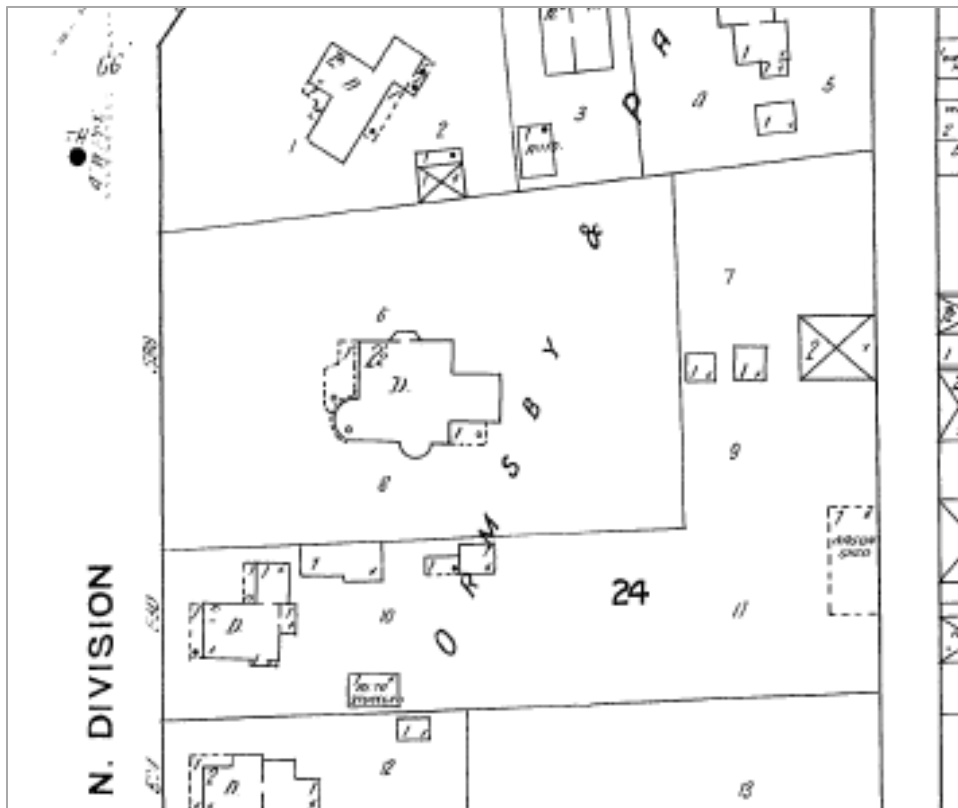
1899



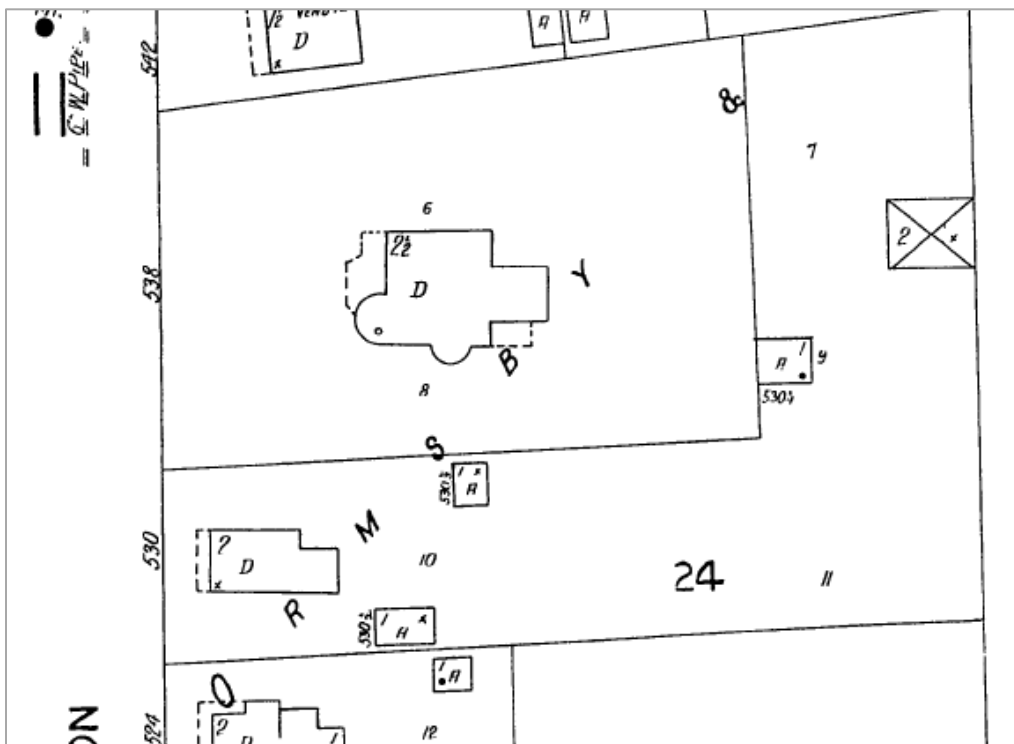
1908



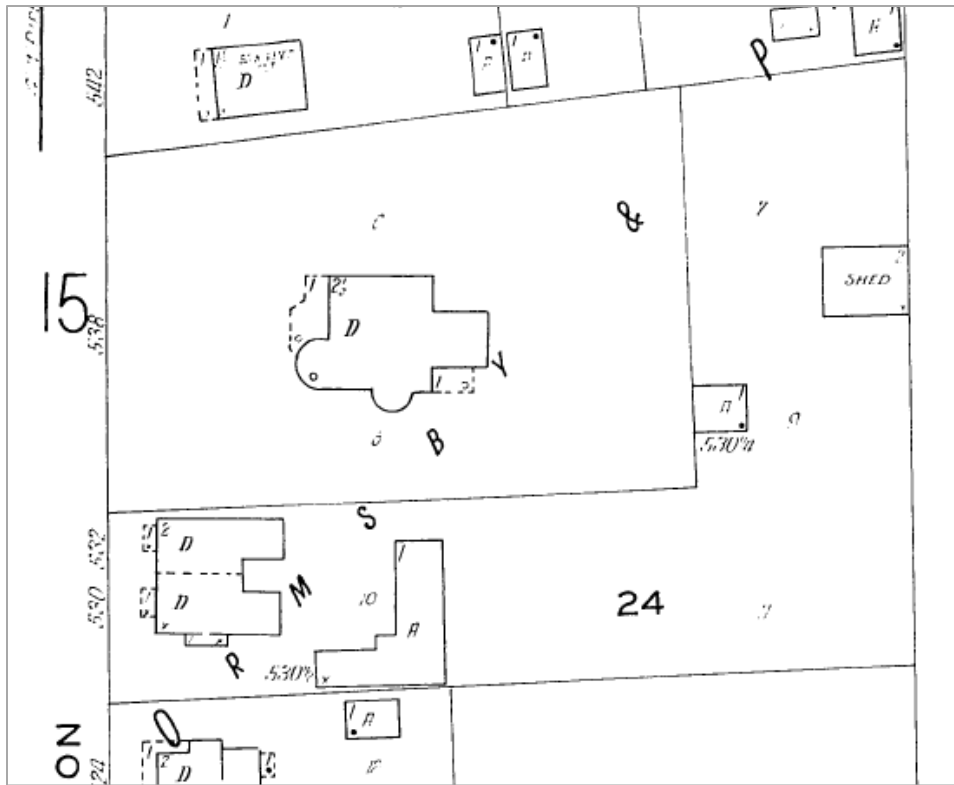
1916



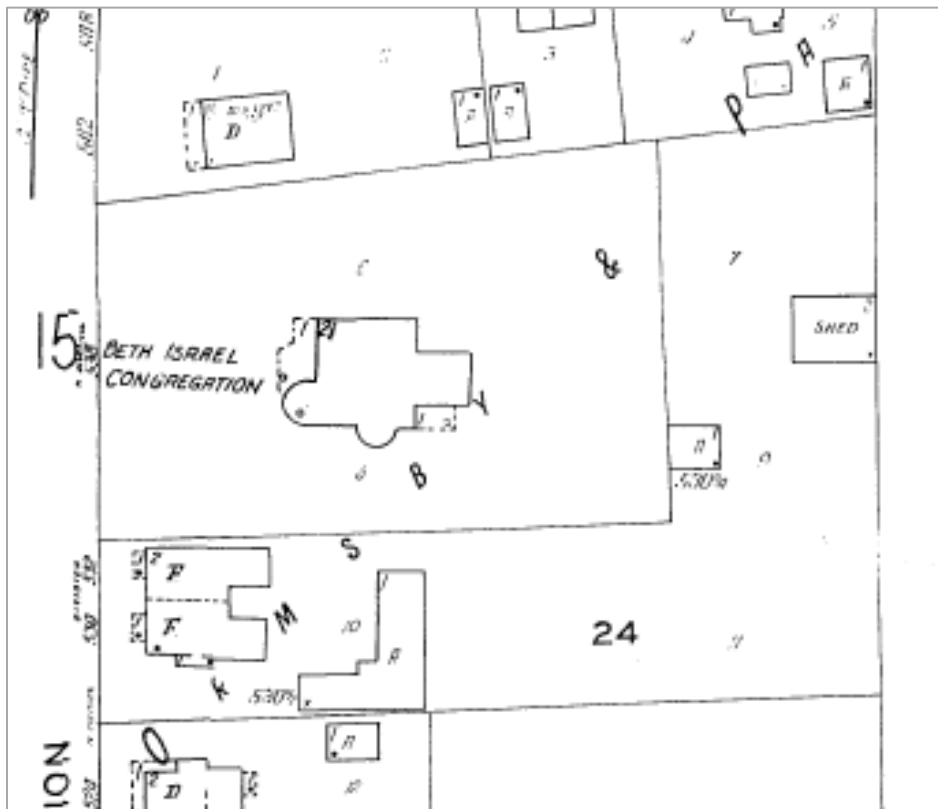
1925



1931



1931-48



SURVEY NAME _____ SURVEY DATE 7 Oct 75 BY Arbuckle-Hamp

ADDRESS 530-532 N. DIVISION

HISTORIC NAME _____ CURRENT NAME _____

LOCATION _____ SECTION _____ BLOCK _____ PARCEL _____ BUILDING _____

TYPE _____ USE PRIMARY 1 SECONDARY _____ ORIGINAL 1 ZONING _____

No. of FLOORS 2 No. OCCUPIED 2 CELLAR OCCUPIED ? No ATTIC OCCUPIED ? No

FRONT DIRECTION West SURFACE MATERIAL Asphalt brick ROOF COVERING Asphalt

64

ITEMS TO BE GRADED - PUT A CHECK OR "X" IN THE APPROPRIATE SQUARE SPACE

STRUCTURAL CONDITION	GOOD <input checked="" type="checkbox"/>	FAIR <input type="checkbox"/>	POOR <input type="checkbox"/>	10
MAINTENANCE QUALITY	GOOD <input checked="" type="checkbox"/>	FAIR <input type="checkbox"/>	POOR <input type="checkbox"/>	10

ALTERATIONS	NONE or MINOR <input checked="" type="checkbox"/>	MODERATE <input type="checkbox"/>	EXTENSIVE <input type="checkbox"/>	15
	APPROPRIATE <input checked="" type="checkbox"/>	INAPPROPRIATE <input type="checkbox"/>		



PERIOD or STYLE	<u>VERNAICULAR</u>
DATE	ADD'N
NATIONAL IMPORT.	
LOCAL EXCELLENCE	
NOTABLE	
WORTHY OF MENTION	<input checked="" type="checkbox"/> 15
POOR	

INCIDENCE	
RARE	
MODERATE	<input checked="" type="checkbox"/> 10
COMMON	<input checked="" type="checkbox"/>

TOTAL	60
CATEGORY	C

PHOTO DATE	
BY	
ROLL	FRAME

PETITION FOR THE RE-CLASSIFICATION OF THE STRUCTURE AT 530-532 NORTH DIVISION AS A NON-CONTRIBUTING RESOURCE

EXECUTIVE SUMMARY:

This document makes the case that the resource at 530-532 North Division Street in the Old Fourth Ward Historic District (OFW) was classified as a Contributing Historic Resource in error and does not meet the requirements by the definition of both the State Historic Preservation Office (SHPO) and the Secretary of the Interior's guidelines to be listed as a Contributing Historic Resource.

The resource first appears on the 1866 birds eye map and was occupied by John Goetz and his family as a single-family home. Although the house and the outbuildings on the lot changed multiple times (see Appendix A), it remained a single-family home until just prior to the end of the original period of significance as outlined in the OFW founding documents.

In 1929 or 1930, the house was conjoined with another house that was moved to the site, completely and forever changing the original form and function that it likely exhibited for the vast majority of the period of significance.

At the time the structures were conjoined, a new roofline was added using severely undersized framing and scrap lumber, presumably for cost and expedience, and in a manner that destroyed any historical context that the original homes may have had, and without regard for long-term structural integrity. See the structural engineers report, Appendix B.

The structure continued to change in form and use patterns well past the period of significance. It went from two conjoined single-family homes to a boarding house sometime in the 1940's. Sometime after this the building was converted to 4 apartments, likely in the 1950's or thereafter and at the time bathrooms and kitchens were added, and interior walls and presumably stairs were moved. When the current owner purchased the building in 1999, it was in a severe state of disrepair, literally a derelict building with homeless people squatting in the basement on one apartment. There are no records with the City of Ann Arbor of any of these changes.

By this point the building had forever lost most, if not all of its Historic Integrity based on the Secretary of the Interior's definition of Historical Integrity and SHPO's guidelines for how to properly evaluate a resource within historic district boundaries.

According to the Secretary of the Interior, which SHPO also uses as their guideline for assessing whether a resource is a Contributing Historic Resource: [To retain historic integrity a property will always possess several, and usually most, of the aspects.](#) *The retention of specific aspects of integrity is paramount for a property to convey its significance.*

There are 7 aspects of Integrity:

- Location
- Design
- Setting
- Materials
- Workmanship
- Feeling
- Association

In the Historic Integrity Analysis section below, this document will show in detail that this resource does not meet the definition of most, if not all, of these 7 aspects.

In SHPO's guidelines for historic districts, it states that in order for a resource to be classified as a Contributing Resource, resources within an historic district must include an individual evaluation of each resource. From the document:

Each resource in the district is photographed and the photograph is linked to a data sheet that provides information about the resource and its history.

These criteria include association with a significant person or event, significant design and construction, or the ability to yield more information. Evaluation also requires assessing a resource using the seven aspects of integrity established by the Secretary of the Interior: location, design, setting, workmanship, feeling, materials, and association.

*In addition to developing the historic context for the district and determining how the individual resources fit within it, the study committee must **assess the physical condition of the individual resources** within the district.*

This resource in its current form is not associated with a significant person or event. Other than Sanborn maps, no other documentation or photographs of the resource, nor historical information about the history of the building in its current form or the original homes that were conjoined are assembled that can substantiate any aspects of its history or historical integrity.

As shown in Appendix B, the structural engineers report, any assessment of the physical condition of this resource would have yielded information that is at odds with its inclusion as a Contributing Historic Resource. The current resource is severely compromised structurally, in a manner that is irreversible without a completely rebuild. It does not meet the definitions of historic integrity in the Location, Design, Setting, Materials, Workmanship, and Feeling categories.

This new information about historic integrity, lack of residents of note and severe structural deficiencies for the HDC should be considered for the determination of the status of this resource, and should be an acceptable basis for the HDC to deem this structure as Non-Contributing. See detail in the Historic Integrity Analysis section below.

Moved buildings can also be problematic as historical resource by the definition of Historic Integrity, with the guidelines stating:

Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved.

And:

A moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association.

Since more than 50% of this building was moved to the site and conjoined in a structurally unsound manner just prior to the end of the period of significance, its historical relationship and context was forever altered so it no longer yields information about the context of the resource and its larger association with the OFW and its immediate environment (see Appendix A).

The Secretary of the Interior and SHPO also state that a Contributing Historical Resource must create context both with the historic district it is in and the immediate surroundings. These

documents explicitly state that it is not enough to have a single context, like chronological time period, define its historical integrity. Similarly building form at a particular time is in and of itself does not create historic integrity. From the Secretary of the Interior's Standards for Preservation Planning:

A historic context is an organizational format that groups information about related historic properties, based on a theme, geographic limits and chronological period. A single historic context describes one or more aspects of the historic development of an area, considering history, architecture, archeology, engineering and culture and identifies the significant patterns that individual historic properties represent.

and:
historic contexts should not be constructed so broadly as to include all property types under a single historic context

and the document further suggests chronological period as subordinate to the other contexts:
The chronological period and geographical area of each historic context should be defined after the conceptual basis is established

Neither do massing and form alone create a justification to classify a building as a Contributing Historic Resource. Per the SHPO guidelines:

The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

The founding documents of the OFW define the district as having the following contexts:

- The architectural styles within the district – specifically Greek Revival, Gothic, Italianate, Queen Anne and Shingle to varied revival styles of the twentieth century.
- The inventory of outstanding and significant historic structures
- The neighborhood's relationship to well-known educators and early schools
- Ann Arbor's first synagogue, many churches and only remaining livery barn
- While having a mix of uses, it was primarily residential – apartments, boarding houses and single-family homes
- Its chronological time period of significance

From the founding documents of the OFW, Complementary Resources were defined specifically as buildings which were built before 1931 and are not designated as Significant – a single context. While most resources in OFW have other characteristics that give them Historical Integrity, this resource lacks context and most if not all characteristics that define historical integrity or association to the OFW or the surrounding area (see Appendix A) and detailed analyses below.

This resource then became a Contributing Historic Resource when Complementary Resources were re-classified in 2006, in this case without the historical and structural analysis as required by SHPO above. We believe that without sufficient information available to the HDC coordinator at the time, the ruling of this resource as Contributing was in error. Had this new information been available, it would have revealed this resource to be lacking historical (and structural) integrity by the standards of the Secretary of the Interior and SHPO.

We respectfully posit that in light of this new information and analysis, this resource would be much more accurately classified as a Non-Contributing Resource, and request that the Historic District Commission re-classify this resource accordingly.

See below for detailed analysis of the points from this summary.

HISTORIC INTEGRITY – DEFINITIONS & ANALYSIS

SHPO's Definitions of Historic Integrity:

What is a Historic Resource? According to the SHPO:

A historic resource is typically at least fifty years old, although resources of lesser age may qualify if they can be shown to have exceptional significance.

A contributing (historic) resource, is one that adds to the historic association, historic architectural quality, or archaeological values for which a property is significant because it was present during the period of significance, relates directly to the documented significance, and possesses historic integrity.

A non-contributing (non-historic) resource is one that does not add to the historic architectural qualities or historic association of a district because it was not present during the period of significance, does not relate to the documented significance, or due to alteration, additions, and other changes it no longer possesses historic integrity.

Significant time periods for the district and the resources in it should be identified in addition to the historic themes.

In addition to the significant themes and time periods, any significant people associated with a resource or district should be identified.

From the SHPO as well as the Secretary of the Interior, determining the context or theme of an historic resource is clearly not only about a time period in which it existed. What are those historic themes? Per SHPO, and the US Secretary of the Interior:

The U.S. Secretary of the Interior has identified thirty broad themes under which the majority of historic resources can be classified. They are:

Agriculture, Architecture, Archaeology, Art, Commerce, Communication, Community Planning & Development, Conservation, Economics, Education, Engineering, Entertainment/Recreation, Ethnic Heritage, Exploration/Settlement, Health/Medicine, Industry, Invention, Landscape Architecture, Law, Literature, Maritime History, Military, Performing Arts, Philosophy, Politics/Government, Religion, Science, Social History, Transportation, Other

The relationship of the existing resources to a theme should be noteworthy.

What are our themes for the OFW? According to the founding document - age, architectural styles, a concentration of outstanding and significant resources, places of worship, early and groundbreaking schools, notable educators and students, and a mix of residential types. It creates the context of the neighborhood.

The SHPO provides a guideline of how to evaluate a property within its historic context.

- *Identify what the property represents: the theme(s), geographical limits, and chronological period that provide a perspective from which to evaluate the property's significance. Historic contexts are historical patterns that can be identified through consideration of the history of the property and the history of the surrounding area.*
- *Determine what the property type is and whether it is important in illustrating the historic context.*
- *Determine how the property represents the context through specific historic associations, architectural or engineering values, or information potential (the Criteria for Evaluation).*

- *Determine what physical features the property must possess in order for it to reflect the significance of the historic context. These physical features can be determined after identifying the following:*
 - *Types of properties that are associated with the historic context*
 - *The ways in which properties can represent the theme, and*
 - *The applicable aspects of integrity*

The SHPO instructs us to look at the history of the property in context with those around it to help determine its significance. Yes, this property is residential, but was in a different context, a single-family home, up until the last few years of the period of significance, whereupon the building was radically changed and forever altered.

By moving a building on this site and conjoining it with the existing house, this resource would perhaps not be eligible for classification as a Contributing Resource if one were trying to list it. This resource's use patterns and the structure itself has also radically and irrevocably changed since the end of the period of significance. It no longer holds any context of its residential patterns of use during the period of significance, nor does it maintain structural integrity.

Where it used to be 2 individual residences when first conjoined right before the period of significance, it then subsequently got chopped up into boarding house rooms and then became 4 separate apartments, as it is today. **The resource no longer carries the residential typology it had at any time during the period of significance, no give any indication of the neighborhood's historic themes. It therefore does not illustrate the historic context.**

No one of note or associated with educational achievement lived in the home. It was not affiliated with the religious or educational context of the neighborhood

Yes, the resource in its present form existed in place right before the end of the original period of significance, but we learn from the Secretary of the Interior that a resource's form at a particular point in time alone is not a sufficient criterion for a resource to become Contributing.

HISTORICAL INTEGRITY DEFINED AND COMPARED TO THIS RESOURCE:

A Contributing resource must also have an elusive quality known as *Integrity*. Per the National Register, whom SHPO cites as their guideline:

Integrity is the ability of a property to convey its significance.

Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity.

To retain historic integrity a property will always possess several, and usually most, of the aspects. *The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The following sections define the seven aspects and explain how they combine to produce integrity.*

SEVEN ASPECTS OF INTEGRITY

- ***Location*** - *the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened.*

*The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. **Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved***

This resource is a moved home for more than 50% of its current footprint. Therefore, it likely could not be listed as a Contributing Resource in an independent analysis because it is no longer the original house, but a result of being conjoined with a moved structure in a form that is not consistent stylistically with other homes in the neighborhood and radically changed its contextual relationship in the neighborhood.

- ***Design*** - Design is the **combination** of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration).

A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing

Design can also apply to districts, whether they are important primarily for historic association, architectural value, information potential, or a combination thereof. For districts significant primarily for historic association or architectural value, design concerns more than just the individual buildings or structures located within the boundaries. It also applies to the way in which buildings, sites, or structures are related: for example, spatial relationships between major features; **visual rhythms in a streetscape**

A structure's massing and form are only part of the criteria that is needed in combination with others. The resource should be the result of a conscious decision, aesthetics and planning, rather than one based on expediency and cost. The resource's relation to the other buildings around it should also be taken into account.

This resource underwent a major change right at the end of the period of significance that forever altered its form and function. The change was performed in a haphazard and structurally unsound manner, resulting in a roof structure that is woefully inadequate and only still standing by the amazing properties of old growth wood.

This resource has no rhythm with any houses on the block or the wider neighborhood. It is wider, shorter and squattier than any other building on the block based on its height to width ratio. It carries none of the materials or building styles that are represented in the neighborhood in their historic form.

See Appendix A for its relationship to the other local resources.

- ***Setting*** - *the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space.*

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

This resource has been fundamentally altered from its form and function during the period of significance. Since the end of the period of significance, this home has gone from 2 single-family homes conjoined to a boarding house and then to a 4-plex apartment. None of the characteristics

of the resource from that time period are retained, and the physical environment is completely different in nature.

With the addition of a moved structure, and the use patterns that defined the resource continuing to change long after the period of significance, this should have originally disqualified it from Contributing status.

Finally, the physical conditions under which the property was re-developed to not adequately represent any care or concern for the structural integrity of the property. The work irrevocably changed the construction of the resource, two homes that likely would have had historic integrity had basic architectural styling or structural integrity been preserved. It does not reflect any design concept other than putting an inexpensive roof over two joined boxes.

- **Materials** - Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

[A property must retain the key exterior materials dating from the period of its historic significance.](#)

No original materials can be seen on or in the resource. There are no patterns throughout the home, inside or out, that inform the use or style of the structure. Any original materials that make up the structure itself are inadequate to support the building long-term.

The materials and form of the building also do not represent or create context with other structures throughout the district.

- **Workmanship** – Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site.

Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.

Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles.

This structure has been a student rental for at least 40 years, a boarding house before that, two single-family conjoined homes before that, and a single-family rental house before that, with most of this happening right before the end of the original period of significance thru the 1970's.

With all these changes to the building, there are no remaining items that define the original workmanship. There is no evidence of heightened awareness of craft in this building, in fact it is the opposite. It was cobbled together when the houses were conjoined, load paths and structural integrity were not preserved, and the building as a result has major structural issues. See Appendix B.

- **Feeling** - Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character.

There are no expressions or aesthetics of this property as it was during the period of significance. At most, you could say that 2 conjoined homes were its last iteration during that period. Even that changed radically subsequently however, with no records of those changes.

The home subsequently became a boarding house and then an apartment building, losing the original materials and all of its original use characteristics. To this day, it evokes no feeling of the history of the Old Fourth Ward or retains any context in the neighborhood.

- **Association** - Association is the direct link between an important historic event or person and a historic property.

No one of note ever lived in this house in its current iteration.

*Ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.*

It is difficult to argue that this property retains any of its identity in the period of significance taken as a whole, in its form, its function or its appearance when considering the history of the home itself or in context with the other homes in the district. It does not meet several or most of these 7 aspects, and therefore by definition it should not be classified as a Contributing Historic Resource.

HISTORICAL CONTEXT OF THE OFW AND THIS RESOURCE'S RELATIONSHIP

The Secretary of the Interior's Standards for Preservation Planning outlines a process that determines when an area should be examined for historic properties, whether an identified property is significant, and how a significant property should be treated. From the Standards for Preservation Planning (underlines added by author of this document for emphasis):

Decisions about the identification, evaluation, registration and treatment of historic properties are most reliably made when the relationship of individual properties to other similar properties is understood. Information about historic properties representing aspects of history, architecture, archeology, engineering and culture must be collected and organized to define these relationships. This organizational framework is called a "historic context." The historic context organizes information based on a cultural theme and its geographical and chronological limits. Contexts describe the significant broad patterns of development in an area that may be represented by historic properties. The development of historic contexts is the foundation for decisions about identification, evaluation, registration and treatment of historic properties.

A series of preservation goals is systematically developed for each historic context to ensure that the range of properties representing the important aspects of each historic context is identified, evaluated and treated. Then priorities are set for all goals identified for each historic context. The goals with assigned priorities established for each historic context are integrated to produce a comprehensive and consistent set of goals and priorities for all historic contexts in the geographical area of a planning effort.

Planning is a dynamic process. It is expected that the content of the historic contexts described in Standard I and the goals and priorities described in Standard II will be altered based on new information obtained as planning proceeds. The incorporation of this information is essential to improve the content of the plan and to keep it up-to-date and useful. New information must be reviewed regularly and systematically, and the plan revised accordingly.

Using these guidelines, the founding document of the Old Fourth Ward Historic District was created. From that document, the significance of the district is described partly as such:

The Old Fourth Ward Historic District is a special place, rich in historic associations and containing some of the finest old homes and churches in Ann Arbor...

The neighborhood became a popular boarding house area for professors and students – many of whom achieved national as well as local prominence in the course of their careers. The Old Fourth Ward was also home for several early schools...

Of the more than 400 structures within the proposed district, almost one-third date from before 1900; most of the remaining structures were erected soon after the turn of the century. Although many of these buildings have been altered, outstanding examples remain of all the architectural styles representative of Ann Arbor's historic past – Greek Revival, Gothic, Italianate, Queen Anne and Shingle to varied revival styles of the twentieth century.

In addition to including some of Ann Arbor's finest old churches and mansions, the firehouse, Harris Hall and the Armory, the proposed district contains the city's oldest apartment houses, its second oldest surviving public schoolhouse, the first university cooperative housing in America, the city's first synagogue, the first home for the elderly, the town's only surviving brick livery barn, and the building that once housed one of the most prominent private schools in the Midwest.

The context of the historic district was therefore created by the following attributes:

- The range of historic architectural styles within the district that represent Ann Arbor's past
- The inventory of outstanding and significant historic structures
- The neighborhood's relationship to well-known educators and early schools
- Ann Arbor's first synagogue, many churches and only remaining livery barn
- While having a mix of uses, it was primarily residential – apartments, boarding houses and single-family homes
- Its chronological time period of significance

The historic district originally was created in 1982 with two tiers of structures – Significant and Complementary. Significant structures were photographed and catalogued along with a brief history and notable facts from the past. Complementary structures were classified only as “buildings which were built before 1931 and are not designated as Significant”. This document is still being used as a basis for ruling on the Contributing status of historic resources.

Note that the subject property was majorly altered and forever changed by having another house conjoined right before that cutoff date, likely in 1929-1930. For the vast majority of the period of significance, this property had a completely different appearance and use.

Had the resource been altered only 2-3 years later, it would not have existed in its present form on the Sanborn map from 1931 and would not have been listed as a Complementary Resource, and therefore not have become a Contributing Resource. This is an important consideration as it relates to the present setting and location aspects of historic integrity as defined by the Secretary of the Interior, as well as the period of significance inclusion as noted within this report.

Those tiers were later discarded and all structures existing as they were built before 1944 became Contributing structures. All Complementary structures then became Contributing, by definition, based on the date they existed as their only criteria. Many structures have other attributes, but

EVERY structure in its form before 1931 was then classified as Complementary if not Significant, and therefore became Contributing.

Further input on developing Historical contexts from the Secretary of the Interior's Planning Standards Document:

Developing Historic Contexts

Available information about historic properties must be divided into manageable units before it can be useful for planning purposes. Major decisions about identifying, evaluating, registering and treating historic properties are most reliably made in the context of other related properties. A historic context is an organizational format that groups information about related historic properties, based on a theme, geographic limits and chronological period. A single historic context describes one or more aspects of the historic development of an area, considering history, architecture, archeology, engineering and culture and identifies the significant patterns that individual historic properties represent.

Historic contexts, as theoretical constructs, are linked to actual historic properties through the concept of property type. Property types permit the development of plans for identification, evaluation and treatment even in the absence of complete knowledge of individual properties. Like the historic context, property types are artificial constructs which may be revised as necessary. Historic contexts can be developed at a variety of scales appropriate for local, State and regional planning.

Creating a Historic Context

Generally, historic contexts should not be constructed so broadly as to include all property types under a single historic context or so narrowly as to contain only one property type per historic context. The following procedures should be followed in creating a historic context.

1. Identify the concept, time period and geographical limits for the historic context

Existing information, concepts, theories, models and descriptions should be used as the basis for defining historic contexts. Biases in primary and secondary sources should be identified and accounted for when existing information is used in defining historic contexts.

The identification and description of historic contexts should incorporate contributions from all disciplines involved in historic preservation. The chronological period and geographical area of each historic context should be defined after the conceptual basis is established...

2. Assemble the existing information about the historic context

3. Synthesize information

4. Define property types

A property type is a grouping of individual properties based on shared physical or associative characteristics. Property types link the ideas incorporated in the theoretical historic context with actual historic properties that illustrate those ideas. Property types defined for each historic context should be directly related to the conceptual basis of the historic context...

Comparing this resource to the historic district context as defined in the founding documents:

In defining property types, chronological period and boundaries are secondary to the conceptual basis for the historical contexts. The resource at 530-532 does not fit any of the attributes that create the context of the Old Fourth Ward Historic District with the exception of its chronological

time period, and even that is only by about 2 years. That decision led to the erroneous classification of this resource as Contributing years later.

Looking at the following attributes of the OFW Historic District context:

- The range of historic architectural styles within the district
 - Subject property does not have any of the architectural styles listed in the founding document. In fact, it would be hard to classify it as any architectural style! Its current form was cobbled together strictly for expediency and cost, in the last ~2 years of the period of significance.
- The inventory of outstanding and significant historic structures
 - This is not an outstanding or significant structure
- The neighborhood's relationship to well-known educators and early schools
 - No one of note lived in this house in the twentieth century. In the 19th century, a saloon owner and a machine shop owner owned the house, but at that time the building was not recognizable in any way to its current form.
- Ann Arbor's first synagogue, many churches and only remaining livery barn
 - Not a place of worship, although some of the demolished outbuildings shown on the early Sanborn maps were likely for horses.
 - A wide array of outbuildings appear and disappear on this property throughout the Sanborn maps. The house itself also changes form many times.
- While having a mix of uses, it was primarily residential – apartments, boarding houses and single-family homes
 - The use patterns of this resource have changed continually, most of the largest changes happening after the period of significance.
 - Originally a single-family home
 - Then a home that was leased by the family who owned it
 - This was its use pattern up until being conjoined with a home moved on the site just ~2 years before the end of the period of significance
 - Then after being conjoined, 2 homes that were rented out separately for several years
 - Then it became a boarding house with many rooms
 - Then it became a 4-plex apartment building, which is how it was when I purchased it in 1999. The date of that change and records associated with it do not exist in the city records.
 - As a result, the context of how the house was used during the period of significance is no longer the same nor is it evident.
- Its chronological time period of significance
 - The property barely squeaked under the wire in chronological significance but based on the above rules from the Secretary of the Interior, "*historic contexts should not be constructed so broadly as to include all property types under a single historic context*", this cannot be the sole basis for designating this property as a Contributing Resource
 - By classifying ALL properties that were originally listed as complementary as "buildings which were built before 1931 and are not designated as Significant", the founding document did exactly that, thereby originally classifying this resource in error.
 - Due to that error, the property became Contributing in 2006 when all Complementary resources became Contributing, not because it matched any of the contextual

relationships of the neighborhood. The resource did not have its history researched and documented, nor was the physical condition inspected. These factors led to its erroneous classification.

Further Definition of Classifying Resources in Historic Districts:

Since chronological date as a sole determiner of status of Contributing vs. Non-Contributing is not allowed by the Secretary of the Interior's Planning Standards Document, there must be other collective attributes that the resource demonstrates to be a Contributing Resource.

The SHPO defines a historic district as the following:

A historic district is defined as a significant concentration, linkage, or continuity of resources united historically or aesthetically by plan or design. The district's identity is a result of the interrelationship between individual resources that work together to create a visual sense of its history. Historic Resources and their Broader Context Individual resources and historic districts typically have little meaning when considered in isolation; they must be viewed in the larger context of the history and culture of their time and place. The history of a district identifies the significant themes and trends, time periods, people and events that shaped the development of a historic resource or district.

This means an historic resource must possess other things than age in common with those other contributing resources. The structure must rhyme with the others and tell a story, even if only by its outside appearance in context with others. Through architecture, through materials, through its use patterns and through its physical appearance, it should be an obvious link to the past.

This resource does not meet the criteria to be included in the Old Fourth Ward Historic District by definition, or by its historic context as evidenced in the founding documents.

An HDC can also look at a particular resource by comparing them to other properties and the context in which they occur.

While the city planning staff can only defend and interpret the resource as it is currently classified, the Historic District Commission is tasked with making judgement calls as they relate to particular resources. It is well within their purview to make determinations about whether the standards as outlined in the Secretary of the Interior and SHPO's guidelines. We believe that a thorough and unbiased review of this resource would show it to be Non-Contributing.

DEFINING ESSENTIAL PHYSICAL FEATURES OF AN HISTORIC RESOURCE:

DEFINING THE ESSENTIAL PHYSICAL FEATURES

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.

The essential physical features are those features that define both why a property is significant (Applicable Criteria and Areas of Significance) and when it was significant (Periods of Significance).

Criteria A and B

A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).

The character and use patterns have changed completely since the period of significance, and if the whole of the period of significance is taken in context, this resource ~~also~~ retains none of physical features that made up its appearance during the vast majority of the period of significance. It also contains none of the other patterns in the neighborhood.

Criterion C

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Massing alone then, like chronological date, is not enough if the majority of other themes or contexts is lost. This resource looks completely different than it did for the overwhelming majority of the period of significance and retains none of the use patterns.

COMPARING SIMILAR PROPERTIES

For some properties, comparison with similar properties should be considered during the evaluation of integrity. Such comparison may be important in deciding what physical features are essential to properties of that type. In instances where it has not been determined what physical features a property must possess in order for it to reflect the significance of a historic context, comparison with similar properties should be undertaken during the evaluation of integrity.

This resource does not compare well to other homes in the immediate area (see Appendix B), or the district as a whole. Because it contains no historical context, architectural familiarity or value, or physical historical features by itself, SHPO states that it should be compared with similar properties.

Because there are no properties similar to the resource in the Old Fourth Ward Historical District, a reasonable course of action would be to compare it to the homes in the immediate area. As such, this property does not compare well, with vastly different proportions, rooflines, styling and streetscape

DETERMINING THE RELEVANT ASPECTS OF INTEGRITY

Each type of property depends on certain aspects of integrity, more than others, to express its historic significance. Determining which of the aspects is most important to a particular property requires an understanding of the property's significance and its essential physical features.

Criteria A and B

A property important for association with an event, historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship

Criterion C

A property significant under Criterion C must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association.

A moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association.

This resource does not contain historic features or convey architectural values as a result of a moved structure that completely changed its form and function of both the moved home and the original home. Being a moved structure that retains no original context should be enough to disqualify it as from being a Contributing Resource.

Setting and Environment

In addition to the requirements above, moved properties must still have an orientation, setting, and general environment that are comparable to those of the historic location and that are compatible with the property's significance.

The property's environment and setting are completely different than during the period of significance and have continued to change radically since that time. The resource contains no context with the immediate area

By the definitions of Historic Integrity, this property as a moved structure should likely not be classified as a Contributing Resource.

- It contains none of either home's original architectural features.
- It compares poorly with other homes in the immediate area and in the district as a whole.
- It has been greatly altered in its use patterns and occupancy since the period of significance
- It was poorly built when conjoined and its physical condition has deteriorated beyond simple repair.
- There are no recognizable historic features that create context with other structures or within the district. In context of buildings on the street, there are several recognizable features of many of the homes (see appendix B, local area):
 - Exposed original basement foundations, either cut stone or Bessemer decorative block.
 - This resource does not have any exposed original foundation; any exposed foundation is newer replacement.
 - The homes on the block are a few steps up to the first floor.
 - This resource is sitting lower and at grade level on the approach side.
 - The roof peaks on the block are steeper and more Victorian in nature.
 - The roofline of this resource is not original and not in context with the neighboring homes, either in pitch or height from the street.
 - Some adjacent buildings are unique to their lot, like the corner house that straddles Division and Detroit Streets.
 - This resource has no unique identifiable features that give it context on its particular lot.
 - The adjacent homes have easily identifiable original (and non-original) fenestration and other features.
 - This resource does not maintain any features that are readily identifiable as original to either of the conjoined homes.
 - The homes on the block have easily identifiable original trim patterns, eave depths, porches and other exterior elements and materials.
 - This resource does not have readily identifiable historic features or proportions.

Neither the resource itself nor its context in the neighborhood give it historical context then, either in how the house itself appears or is constructed, or in its relation to the neighboring houses. Very few if any of the aspects of *Integrity* are intact or recognizable from the period of significance, not enough to create context in the neighborhood.

In Appendix A, the neighboring houses are catalogued to show historic context of the local area. This resource does not show any similar details, massing, proportions or other details that have any rhythm or rhyme on the streetscape. It is an anomaly on the block and in the neighborhood. As a result this property was also never included in a photographic or narrative record for the Old Fourth Ward

ERRONEOUS CLASSIFICATION OF THIS RESOURCE AS CONTRIBUTING

When Complementary Historic Structures automatically became Contributing Historic Resource, this resource was not properly reviewed and received that designation in error.

Had the guidelines of the Secretary of the Interior and SHPO been applied to this individual resource as directed, an unbiased and thorough this property would almost certainly not have qualified as a Contributing Historic Resource. While a cursory review was undertaken at the time, nothing remotely like what is called for in the guidelines was completed for this resource.

From the SHPO Rules for Establishing a Historic District:

Step 3: The Historic Resource Survey:

*Photographic Inventory and Historic Research PA 169 requires the historic study committee to do a photographic inventory of resources in the proposed district. This inventory is called a historic resource survey and instructions for conducting the survey can be found in the Manual for Historic and Architectural Surveys in Michigan (available from the State Historic Preservation Office). **Each resource in the district is photographed and the photograph is linked to a data sheet that provides information about the resource and its history.***

What Resources Are Surveyed

Since the historic district commission reviews work to both historic and non-historic resources in local historic districts, then all resources in the district must be photographed.

Step 4: Evaluate the Resources in the Proposed District

*Resources in a proposed district are evaluated individually using the criteria established by the Secretary of the Interior for the National Register of Historic Places to determine if they are historic (contributing) or non-historic (non-contributing). **These criteria include: association with a significant person or event, significant design and construction, or the ability to yield more information.** **Evaluation also requires assessing a resource using the seven aspects of integrity** established by the Secretary of the Interior: location, design, setting, workmanship, feeling, materials, and association.*

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation discusses the criteria in detail.

Evaluating the Physical Integrity of the Resource

*In addition to developing the historic context for the district and determining how the individual resources fit within it, **the study committee must assess the physical condition of the individual resources within the district.** The Secretary of the Interior has identified seven qualities that work together to comprise integrity.*

In determining how the individual resource fits into the historic district at large, the SHPO state that the study committee must assess the physical condition of the resource and relate them to the seven qualities of historic Integrity as outlined in the Secretary of the Interior's guidelines. From the document:

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.

As we see above, a resource must comprise many or most of the 7 qualities of integrity (not just one or two) in order to be classified as a Contributing Resource, and it must retain enough physical features to convey its historic identity. Furthermore, the context of the resource must also be intact – what its use patterns were in the period of significance. This resource clearly does meet those thresholds

NONE of the property's historic identity or integrity from the vast majority of the period of significance, nor its physical structure, materials or context was taken into account in becoming a Contributing Resource as should have happened according to the rules.

From PA 169 on Establishing Historic Districts:

399.203 Historic districts; establishment; study committee; duties; public hearing; notice; actions; availability of writings to public.

Sec. 3.

(1) A local unit may, by ordinance, establish 1 or more historic districts. The historic districts shall be administered by a commission established pursuant to section 4. Before establishing a historic district, the legislative body of the local unit shall appoint a historic district study committee. The committee shall contain a majority of persons who have a clearly demonstrated interest in or knowledge of historic preservation and shall contain representation from 1 or more duly organized local historic preservation organizations. The committee shall do all of the following:

- (a) Conduct a photographic inventory of resources within each proposed historic district following procedures established or approved by the department.*
- (b) Conduct basic research of each proposed historic district and the historic resources located within that district.*

From the Secretary of the Interior's Standards for Preservation Planning Rules for Establishing a Historic District:

A single historic context describes one or more aspects of the historic development of an area, considering history, architecture, archeology, engineering and culture and identifies the significant patterns that individual historic properties represent.

Major decisions about identifying, evaluating, registering and treating historic properties are most reliably made in the context of other related properties.

The chronological period and geographical area of each historic context should be defined after the conceptual basis is established

Property types link the ideas incorporated in the theoretical historic context with actual historic properties that illustrate those ideas. Property types defined for each historic context should be directly related to the conceptual basis of the historic context.

Historic contexts should not be constructed so broadly as to include all property types under a single historic context

We see from this document that context for individual resources must be developed by a collection of aspects that describe the significance of an historic district, and importantly that one single context is not enough to broadly include all property types under that context. It is also showing chronologic time period as secondary only after other contexts have been developed.

This is exactly what happened in the Old Fourth Ward Historic District, however. This resource that was formerly Complementary because “those built prior to 1931, but not significant,” acquired Contributing Resource status in a cursory fashion without any meaningful review of this resource, as the formerly Significant Historic Resources received in 1982.

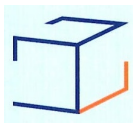
From the Old Fourth Ward Historic District’s founding document - “Complementary Historic Structures are defined as those buildings which were built before 1931 and which are not designated as Significant”. That clearly shows that one single context – this structure’s form at a point in time – is the reason for its inclusion. The HDC relies on this document to make determinations of status to this day.

Of note, the Secretary of the Interior’s Standards for Preservation Planning Rules for Establishing a Historic District also gives permission to change these properties as artificial constructs when necessary.

Like the historic context, property types are artificial constructs which may be revised as necessary.

Planning is a dynamic process. It is expected that the content of the historic contexts described in Standard I and the goals and priorities described in Standard II will be altered based on new information obtained as planning proceeds. The incorporation of this information is essential to improve the content of the plan and to keep it up-to-date and useful. New information must be reviewed regularly and systematically, and the plan revised accordingly

This shows that resources within a historic district can and should be reviewed based on new information that comes to light, and in fact that this is an important method of making sure historic districts remain relevant and useful. A historic district according to the Secretary of the Interior should not be frozen in time, but remain dynamic and use new information to improve the content and context of the historic district. This is in fact the purpose of an historic district commission.



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June 5, 2019

Doug Selby
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734-262-0825
doug@homewithmeadowlark.com

House at 530-532 North Division Street, Ann Arbor MI

Dear Doug,

This letter and attached photographs will document findings from my inspection of the subject property on May 7th, 2019.

This structure was presented as two houses that were put together under a common roof sometime just prior to 1931. I was able to confirm that there is a common wall with 2 top plates visible in the attic and a center load-bearing wall throughout the home that ends at a newer foundation wall on one side of the basement with remnants of what is presumed to be the original rubble crawl space wall. This is consistent with the narrative for the property as presented.

A chimney with factory-made brick was added in the center of the home when the houses were joined or sometime after. This is currently the chimney that vents the hot water heater and boiler for the house. Remnants of an older chimney on the south side of the house remain but it does not penetrate into the attic.

The house interior was remodeled cosmetically 20 years ago with some limited older fixtures and tile of what appears to be about 1950's vintage. The variety of trim patterns in each apartment and within individual apartments suggest different eras of remodeling throughout the years. The north side apartments have some rooms with plaster that has been repaired several times. The south side apartments are 100% drywall. There is evidence of bathrooms and kitchens being added to the home with plumbing and electrical wiring that dates from the 1950's or 1960's.

ATTIC

The attic rafters are newer lumber, consistent with the time period of the houses being joined. This does not match the ceiling joists on the floor of the attic, which are older lumber and inconsistently at about 24-inches on center. The attic rafters are 2x4's at about 32-inches on center. Some rafters have been notched by about 1 inch, presumably to let in a 1x piece of lumber as a purlin at some point in the past.

There are some cripple walls and rafters that have been added in the attic to support the rafters. These are made from post-WWII modern lumber. Some are scabbed together scraps of lumber, nailed for support in the middle. These were likely added to keep the roofline from collapsing. The work was sloppy and without a great deal of craftsmanship.

The spans in the attic are far too long for the 2x4's supporting the roof loads, even with the cripple walls and rafters. The cripples rest on 2x4 ceiling joists that are not adequate to bear any weight, let alone a significant portion of the roof load.

This roof structure is severely undersized, and I would worry about these roof members failing during a heavy snow load or with a roof replacement. It is frankly hard to believe this roof structure has lasted as long as it has.

FLOOR AND WALL STRUCTURES

The north and south sides of the structure have different floor layouts and different bearing lengths that support the floor joists. There is evidence of a change in the direction of floor joists between the first and second floors on the south side from the direction in which the floor sags. Joists running different directions between first and second floors is a condition consistent with older balloon-framed homes. The north home floor joist direction on the second floor is unknown.

The south side apartments likely had the original interior walls moved or reorganized at some point after being joined with the north apartments. The layout of the apartments and the floor joist spans are not consistent with a balloon-framed single-family home of a pre-1900 vintage. The floor joists on the second floor exhibit a 2-5/8" slope over a 6' length with over 3" from edge to center. This severe sagging of what is likely the original floor joists indicates stress from improper load paths, perhaps where a staircase to the second floor would have been located or where 2nd story walls were added. There is no interior staircase on the south side of the building currently, but presumably there was one at some point.

The north side floor exhibits less of a severe sag, but still significant at 1-5/8" over a 6' length and over 2" from edge to center. These kinds of slopes to floor systems are worrisome since it is often caused by improper load paths, notched and compromised joists from poor remodeling work, insect damage, or some combination of these factors. It is recommended that these floors be reinforced or re-built.

The exterior walls exhibit some visible wane to them over their length, particularly visible on the north side exterior wall. There are several layers of siding that could be contributing to the appearance; however, the exterior walls are not plumb or square in several areas. It is possible that a combination of structural factors is contributing to the overall slumping of the building.

No framing members other than in the basement were visible in the course of this inspection. The conditions I have noted above are observable over the finishes and create a framework to make some conjectures about that structural integrity of the building overall and what caused these changes, but I cannot be more specific about the condition or the nature of the changes to the structure without seeing the underlying structure.

FOUNDATION

The foundation is different on the north and south sides of the home.

The north side of the structure has a modern block foundation, replaced 20 years ago, on 3 sides. The south side of the north foundation has an older but definitely post-WWII concrete wall supporting what is presumed to be the original crawl space foundation rubble wall of the north side of the south structure. The block wall foundation supporting the north structure is in good condition, plumb and square with cores filled and rebar. The south side of the north structure is a mix of modern (presumed from the 1960's or 1970's) supporting walls in good condition and original rubble walls that need extensive repairs or replacement.

The south side foundation is a mix of crawl space and 6' stone rubble walls. There is a brick and stone rubble wall at the south bump-out that looks to be from a different area and is poorly made. The front half of the

foundation is on a crawl space with no access to inspect the condition of the sills or the floor joists, which are within inches of the dirt floor in most areas. Portions of the sill are likely in the dirt itself. There is evidence of a compromised rubble foundation in the area of the crawl space.

It is my opinion that the south side foundation should be replaced since there is no access to make repairs to this area as needed and the foundation is in poor condition. The north side modern foundation is in good condition and does not need replacement.

SUMMARY

Many components of this structure have been compromised over the years, starting with the current roof structure which was improperly built and severely undersized. The degree of structural degradation ranges from moderate to severe in several areas of the building.

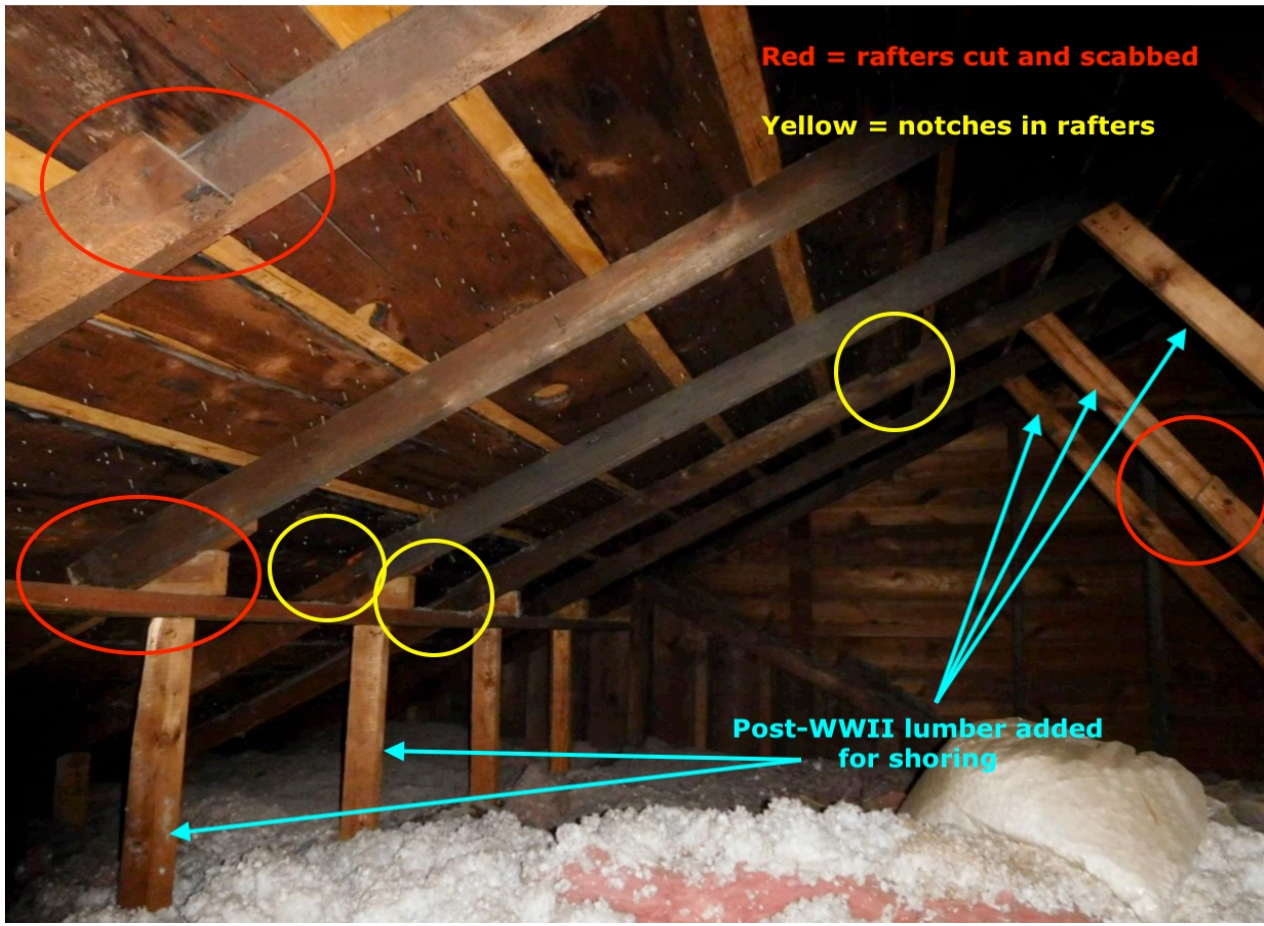
It is my recommendation that the rafters should be entirely replaced with properly sized lumber that does not need knee-walls for support unless the second-floor ceiling joists are also completely replaced with lumber adequate to support those loads.

The floor systems in the house sag in many areas and show signs of stress ranging from moderate to severe. It is my recommendation to replace or repair these floor structures with adequately-sized and supported lumber if the house is remodeled. It is likely the floor systems are severely compromised in some areas and will need total replacement.

The south side foundation should be completely replaced, and the crawl space dug out so that proper support and repairs can be made to the wood frame structure.

Overall, from what is observable without removing finishes, this structure is in poor condition and is showing signs of stress in many areas. I recommend a major renovation of the structure if any work on the building is undertaken. This would include replacing the roof structure, gutting much of the interior structure to repair problem spots and repairing or replacing floor structures in some areas.

I cannot be more specific about recommended repairs to the structure without seeing more of the underlying conditions. I have included labeled photos below as supporting documentation.





Support Knee-walls with resting on 2x4 ceiling joists and 7-8' apart - lumber notched and broken in some areas

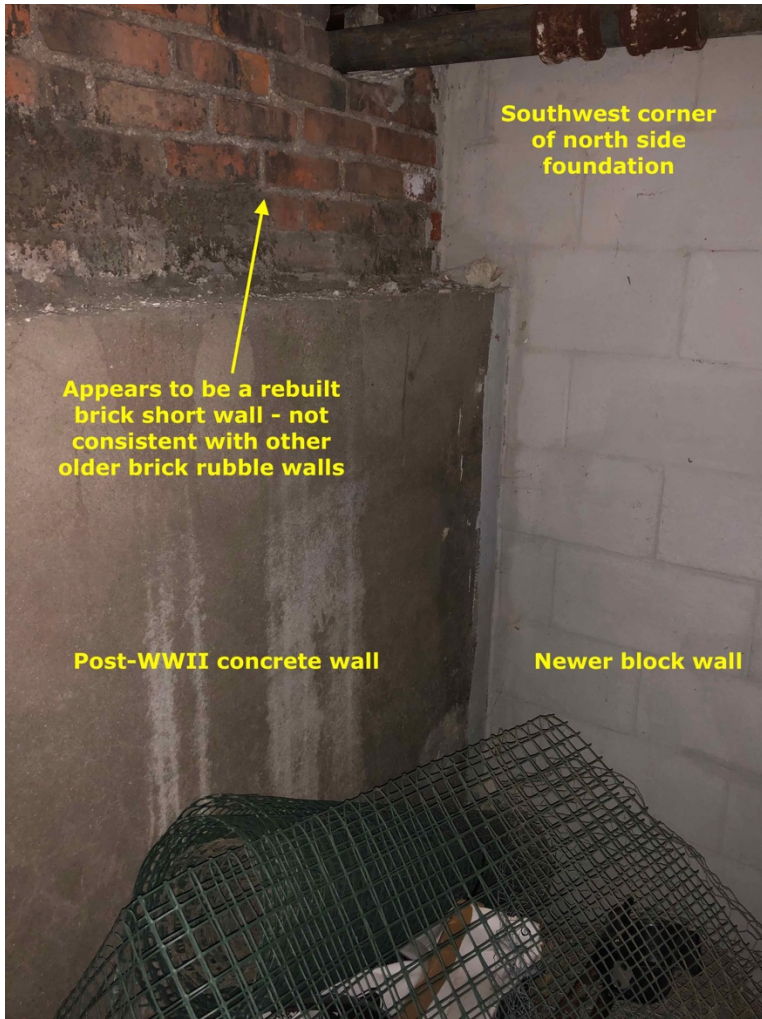
Gable framing on north side is notched in areas and built with scabbed lumber



South side floor structure - 2-5/8" fall over 6 feet



North side floor structure - 1-5/8" fall over 6 feet







Sincerely,

David R. Arnsdorf, PE