

**FORT SMITH HISTORIC DISTRICT COMMISSION
REGULAR MEETING
APRIL 4, 2024, 5:30 P.M.
DARBY COMMUNITY CENTER, 220 NORTH 7TH STREET**

AGENDA

I. CALL TO ORDER

II. ROLL CALL

III. STATEMENT OF QUALIFICATIONS

IV. APPROVAL OF MINUTES – MARCH 7, 2024

V. CITIZENS FORUM

VI. PUBLIC HEARING

- | | |
|---|---|
| <p>A. Historic Name: Artie Y. Berry House
Alternate Name: McCartney House</p> <p>Construction Date: c. 1905</p> <p>Address: 703 North 6th Street</p> <ul style="list-style-type: none">• Replace shingles on roof | <p>Owner: Gregg and Anne Marie Lodes</p> <p>Style Influence: Primary – Colonial Revival
Secondary – Classical Revival</p> <p>Significance: (1) Very Significant</p> |
| <p>B. Historic Name: Daniel A. Anderson House
Construction Date: c. 1891
Address: 715 North 6th Street</p> <ul style="list-style-type: none">• Replace siding and paint exterior of home | <p>Owner: Tedd and Emily Lodes</p> <p>Style Influence: Queen Anne/Eastlake</p> <p>Significance: (1) Very Significant</p> |

VII. STAFF DISCUSSION

VIII. NEXT MEETING DATES

Study Session – April 25, 2024 – 5:30 pm
Regular Meeting – May 2, 2024 - 5:30 pm

IX. ADJOURN

FORT SMITH HISTORIC DISTRICT COMMISSION STATEMENT OF QUALIFICATIONS AND PROCEDURES

Good evening. It is 5:30 p.m. and the _____, 2024, regular meeting of the Fort Smith Historic District Commission is called to order.

Morghan, will you please call the roll?

It is established that a quorum is present.

If anyone this evening wishes to address an agenda item or present any matter of business that is not on the agenda during the Citizens Forum, you may do so by completing one of the appropriate forms that are placed on the table next to you and giving it to our staff person, Morghan Barnhill. Those wishing to address agenda items or bring up any matter during the Citizens Forum will be allotted two (2) minutes. Those persons addressing controversial agenda items will be allotted five (5) minutes per side with three (3) minutes for rebuttal per side.

This evening the Commission will be reviewing requests for exterior changes to properties in the Belle Grove Historic District.

The qualifications of the members of the Commission, the staff of the Commission, and any consultants used are on file with the city and are hereby made a part of each and every application heard this evening. The guidelines and procedures adopted by the Commission are also made a part of each and every application. Each application heard this evening is considered on its own merits and is not to be considered as establishing a precedent for any other application.

Any person aggrieved by the decision of the Commission may within ten (10) days of the date of decision file a written request with the Commission that the Commission forward to the Fort Smith Board of Directors a written report summarizing the actions taken by the Commission with reference to the application in question.

**FORT SMITH HISTORIC DISTRICT COMMISSION
REGULAR MEETING
MARCH 7, 2024, 5:30 P.M.
DARBY COMMUNITY CENTER, 220 NORTH 7TH STREET**

Chairman Mila Masur called the meeting to order. On roll call, the following commissioners were present: Mila Masur, Debbie Kraus, Gary Duke, Nate Deason, and Robert Clock. Chairman Masur read aloud the Statement of Qualifications and spoke on the procedures.

Chairman Masur then called for a motion on the minutes from the February 1, 2024, meeting. Commissioner Duke moved, seconded by Commissioner Deason, to approve the minutes. The motion carried with no objections.

Morghan Barnhill, Historic Preservation Coordinator, indicated there was a citizens' forum present.

Mr. Andre Good was present with questions in regard to the status of Quinn Chapel AME Church located at 721 North 8th Street. He noted the Neighborhood Services Historic District report indicated the case was closed and a lien had been placed on the property. Ms. Barnhill responded that she would reach out to the correct City personnel to confirm the next steps and would keep Mr. Good updated.

- A. Historic Name: Elizabeth McGill Center Owner: McGill Center, Inc.
Construction Date: c. 1942 Style Influence: Plain/Traditional
Address: 521 North 6th Street Significance: (3) Significant Within a Group Context**

- **Add solar panels to roof of building**

Chairman Masur introduced item A. The Commission asked Mr. McGill about the 3 different placement options for the proposed solar panels that were provided in the packet. He explained that the most ideal location for the panels would be on the roof of the structure facing North 6th Street, but he knew that it was not recommended to have panels on the front façade of a structure, so he provided two additional options for the back of the building as well as in the parking lot. Ms. Barnhill presented the staff report and recommended approval of the item contingent upon the solar panels being located at the rear of the property.

With no further comments or questions, Chairman Masur called for a motion. Commissioner Deason moved, seconded by Commissioner Kraus, to approve option B, the panels being located on the rear side of the roof. Chairman Masur called for a vote. The vote was 5 in favor and 0 opposed.

- B. Historic Name: Fred Werli House Owner: Jerry and Irina Weiner
Construction Date: c. 1917 Style Influence: American Foursquare
Address: 519 North 5th Street Significance: (1) Very Significant**

- **6 foot metal fence surrounding front of house**

Chairman Masur introduced item B. Ms. Barnhill presented the staff report and recommended approval. Chairman Masur called for a motion. Commissioner Kraus moved, seconded by Vice Chair Clock, to approve. Chairman Masur called for a vote. The vote was 5 in favor and 0 opposed.

- C. Historic Name: Eugene Adler House Owner: High Ridge Realty**

Alternate Name: Sutton-Brizzolara House

Construction Date: c. 1891

**Style Influence: Primary: Queen Anne / Eastlake
Secondary: Stick**

Address: 418 North 6th Street

Significance: (2) Moderately Significant

- **Paint exterior of home**

Chairman Masur introduced item C. Chairman Masur, Commissioner Deason, and Commissioner Duke asked Ms. Lodes to clarify which part of the home would be painted with new colors. Ms. Lodes explained that the siding and trim would be different colors, but all accents would remain the same. Ms. Barnhill presented the staff report and recommended approval. Chairman Masur called for a motion. Commissioner Duke moved, seconded by Commissioner Kraus, to approve. Chairman Masur called for a vote. The vote was 5 in favor and 0 opposed.

The meeting adjourned at approximately 5:53 p.m.

APPROVED: _____
Mila Masur, Chairman



Belle Grove Historic District
 c/o City of Fort Smith Planning Dept.
 P.O. Box 1908 or 623 Garrison Ave., Rm 331
 Fort Smith, AR 72902

Certificate of Appropriateness Application Form

(please use blue or black ink only)

PROPERTY LOCATION

Historic Name of Property _____

Address 703 N. 6th Street

Lot Number _____

Block Number _____

OWNER

Name Gregg R. & Anne Marie Lodes

Address 703 N. 6th Street Phone 215-820-7093

PERSON FILING APPLICATION, IF OTHER THAN OWNER Glodes8808@aol.com

Name _____

Address _____ Phone _____

BUILDING DATA

Construction Date: 1906

Type of Construction: Wood Frame Brick _____ Stone _____ Other _____

Original Use:

Single Family Residential Multi-Family Residential _____

Hotel/Boarding House _____ Office _____

Commercial/Retail _____ Industrial _____

Vacant _____ Combined Uses _____

Other _____

CONCISE DESCRIPTION OF PROPOSED WORK: (Attach additional papers if necessary)

Roof replacement with new roof color
" Olde English Pewter "

PROJECT ARCHITECT/ENGINEER:

Name Able Roofing (Richard Miner)
Address 3902 Pointer Trail East
Van Buren, AR Phone 479-474-0006
72956

MINOR WORK APPROVAL

_____ staff _____ date

Upon being signed and dated above by the Planning Director or designee, this application becomes the Minor Work Certificate of Appropriateness. It is valid until _____. Issuance of a Minor Work Certificate shall not relieve the applicant, contractor, tenant, or property owner from obtaining any other permit required by City code or any law. Minor work projects not approved by staff will be forwarded to the Certificate of Appropriateness Committee for review at its next meeting.

CATEGORIES OF MINOR WORK

- (A) Emergency, temporary maintenance and repair which does not permanently alter the distinctive features of the subject building, structure or property, all required City of Fort Smith permits are obtained, and the owner of the property commits to apply for a certificate of appropriateness to make permanent repairs within thirty (30) days of the date on which the administrative staff grants written approval of the emergency, temporary repair;
- (B) The installation of HVAC equipment that is located in the rear or on the side of the property and is entirely screened from public view with wood lattice panels or plantings;
- (C) The installation of electrical and telephone panels, cable connections, satellite dishes, gas meters, or window air conditioning units that are located on a building's rear facade;
- (D) The installation of a roof ventilation device not larger than twelve inches height and located

on the rear of the building's roof;

(E) The installation of a privacy fence that is made of wood with flat boards in a single row, no taller than six feet, located in the rear of the property and set back from the building's front facade at least one-half the distance between the front facade and the property's rear property line;

(F) Installation of a picket fence that is made of wood, no taller than three (3) feet, with pickets no wider than four (4) inches and spacing between pickets of not more than three (3) inches, and painted white or neutral color;

(G) Removal of a chain link fence;

(H) Installation of storm windows that match the design, configuration, and color of the existing windows;

(I) Repair and replacement of a sidewalk or driveway on public and private property that does not involve a change in size material, and location;

(J) The construction, replacement, or repair of a public street or alley; and,

(K) The painting of or installation of shingles on the roof of any building or structure provided the paint colors or shingle color is consistent with the Commission's adopted list of approved paint and shingle colors for use within the historic district.

CERTIFICATE OF APPROPRIATENESS

Please include the following items that are application specific:

On Existing Buildings:

- COMPLETE THE CERTIFICATE OF APPROPRIATENESS APPLICATION FORM
- CURRENT COLOR PHOTOGRAPH OF EXISTING APPEARANCE OF STRUCTURE showing its present condition and the existing materials, colors, and textures.
- ELEVATION DRAWINGS- Dimensional drawings of all elevations showing proposed exterior architectural changes.
- PAINT SAMPLES required when changing color. Provide manufacturer's samples or samples of actual paint. Indicate manufacturer's name and the name of the color.
- SIDING SAMPLE- Provide a piece of the siding or a manufacturer's brochure showing a picture of the siding and indicating the specifications.
- WINDOWS- indicate window frame material- wood, vinyl or aluminum- indicate size and style.
- SHINGLES- Provide a sample of the shingle and manufacturer's name and color of the shingle.
- OTHER EXTERIOR DETAIL NOT LISTED ABOVE. Provide sample of the detail along with the

manufacturer's name and specifications.

On New Construction:

- COMPLETE THE CERTIFICATE OF APPROPRIATENESS APPLICATION FORM.
- SITE PLAN OF PROPERTY (Recommended scale: 1 inch= 20 feet) Include location of all structures and outside equipment (trash, mechanical, common mail boxes, walls, fences, external lighting fixtures, existing and proposed structures, etc.) Show parking areas, driveways, walks, and other hard surface areas. Indicate on the site plan, materials to be used. A surveyed drawing of the perimeter of the lot(s) is required for all Category III applications that involve a change of footprint.
- ELEVATION DRAWINGS- Dimensional drawings of all exterior elevations. Show textures, architectural details and materials. An additional drawing showing landscaping is desirable. (Recommended Scale: at least 1/4 inch = 1foot).
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- SHINGLES- Provide a sample of the shingle and the manufacturer's name and color of the shingle.
- OTHER EXTERIOR DETAIL NOT LISTED ABOVE. Provide sample of the detail along with the manufacturer's name and specifications.

Certificates of Appropriateness are effective immediately upon issuance. Any work done outside the scope of the Certificates of Appropriateness renders it null and void.

I hereby certify I am the owner, agent of the owner, or other person in control of the property and that the information given herein, and as shown on the application and Certificate of Appropriateness, is true and that I am authorized to obtain this Certificate of Appropriateness. I understand that if the construction and/or installation for which this Certificate of Appropriateness is issued, is contrary to the requirements of city codes or regulations, violations must be corrected. Approval by the Historic District Commission does not excuse the applicant, owner or agent from compliance with any other applicable codes, ordinances or policies of the City of Fort Smith unless expressly stated by the Commission or its staff.

Upon approval of commission, all applicants must purchase a permit from the City Building Inspector.

Penalties: Violation of the ordinance constitute a misdemeanor, and violators upon being found guilty shall be fined not less than \$10 nor more than \$500. Each day that a violation continues to exist shall constitute a separate offense**. (Reference State Act 14-172-204)

** (If cited for violation, applicant may appeal in court)

SIGNATURE OF APPLICANT Gregg R Lodes 2/29/24
(Date)

The Planning Department will mail notices of hearing on all Certificate of Appropriateness applications to adjacent property owners at least 10 days prior to the date of the hearing and publish a notice of the Historic District Commission at least 1 time in a newspaper serving the population of Fort Smith at least 15 days prior to the hearing date.

Application is: Approved _____, Denied _____, Deferred _____

Reason for approval, denial or deferral:

Signature of Historic District Chair

Date Action Taken

Date of Issuance





Arkansas Architectural Resources Survey Form

**ARKANSAS
HISTORIC
PRESERVATION
PROGRAM**

1. Resource Number:

2. NR Eligibility:

01-Eligible 02-Ineligible 03-Listed 05-Arkansas Register Listed
06-Contributing in a Listed District 08-Contributing in a Potential District

3. Contributing/Non-Contributing:

4. Destroyed: (Y or N) Date:

Above for AHPP Use Only

Survey Data

5. Date Recorded:

6. Recorded By: M. Ford (Cox McLain
Environmental Consulting, Inc.)

7. Survey Number:

8. Historic Name: Artie Y. Berry House

9. Alternate Name: McCartney House

10. District Name: _____

11. Quad Map:

12. Geographic Location: S T R

13. UTM Coordinates: Z E N

14. Town/Nearest Community: Fort Smith

15. Street Address/Directions to Resource: 703 6TH ST N

16. Owner: LODES, GREGG R & ANNE MARIE

17. Owner Address: 703 N 6TH ST

18. Owner Phone Number: () -

19. Informant Name & Phone Number: _____

Descriptive Data

20. Threats to Property: Other: _____

- 1-None/Property Stable 2-Neglect/Deterioration 5-Private Development 6-Extractive Industry
- 7-Urban Encroachment 8-Government Activity 9-Other

21. Historic Use: Other: _____

22. Present Use: Other: _____

0101-Single Family Dwelling 0102-Multi-Family Dwelling 0301-General Retail Store 0308-Bank 0309-Office
0401-Church 0601-School 1200-Cemetery 9800-Structure Abandoned/Unoccupied. 9900-Other

23. Setting: Other: _____

1-Rural, Undisturbed 2-Rural, Built-Up 3-Urban Encroachment 4-Small Town 5-Urban 9-Other

24. Total Number of Site Features: Stone wall; Wood fence
(e.g. concrete walls, ponds, statuary) _____

25. Total Number of Ancillary Structures:
(e.g. outbuildings, etc.) _____

26. Style Influence: Primary: Secondary: Other: _____

01-Plain/Traditional 04-Greek Revival 05-Italianate 09-Queen Anne/Eastlake 10-Classical Revival
15-Craftsman 18-Art Deco 19-Art Moderne 21-Standard Commercial 19th Century
22-Standard Commercial 20th Century 24-English Revival 25-Colonial Revival 26-American Foursquare
29-Ranch 33-Mixed Masonry 35-Folk Victorian 99-Other

27. Plan: Other: _____

01-One Room/Single Pen 03-Double Pen 04-Dogtrot 05-Single Pile w/ Central Hall
17-Shotgun 99-Other

28. Height: Other: _____

01-One 02-One & One-Half 03-Two 04-Two & One-Half 95-Varied 99-Other

29. Basement/Cellar: Other: _____

1-Full 2-Partial 3-No Cellar 8-Unknown 9-Other

30. Wings and/or Projections: A B C Other: _____

01-Rear Shed 02-Rear L 03-Rear T 04-Side 11-Enclosed 12-Rear Room 99-Other

31. Construction: A B Other: _____

01-Log 06-Frame 08-Brick 10-Steel Frame 11-Concrete Block 12-Reinforced Concrete 99-Other

32. Original Wall Material: A B Other: C - 10 Stucco

33. Present Wall Material: A B Other: C - 10 Stucco

01-Log 02-Weatherboard 03-Novelty Siding 04-Board/Batten 05-Brick
07-Stone 10-Stucco 12-Cut Stone 13-Field Stone 14-Asbestos
16-Concrete Block 17-Wood Shingle 18-Cast Concrete 21-Horizontal Board 23-Vertical Board
31-Vinyl Siding 32-Aluminum Siding 97-Unknown 98-Original Material 99-Other

34. Roof Types: A B C Other: _____

01-Gable 02-Gable w/ Parapet 03-Clipped Gable 04-Gable on Hip 06-Hip 07-Pyramid
08-Gambrel 09-Mansard 12-Flat 13-Flat w/ Parapet 14-Shed 99-Other

35. Roof Features (if present): A B Other: _____

01-Dormer(s) 02-Steeple 03-Cupola 04-Cresting 05-Clock Tower 07-Tower/Turret
08-Belfry 10-Skylight 99-Other

36. Roof Materials: A B Other: _____

01-Wood 02-Asphalt Shingle 03-Metal 05-Tile 06-Tar Built-up 99-Other

37. Chimney Placement: A B C D Other: _____

1-Exterior End 2-Interior End 3-Other Exterior 4-Interior Central 5-Other Interior 9-Other

38. Chimney Materials: A B C D Other: _____

1-Brick 4-Cut Stone 5-Field Stone 6-Metal 9-Other

39. Foundation Type: A Other: _____

1-Continuous 2-Piers 4-Enclosed Piers 9-Other

40. Foundation Materials: A Other: _____

1-Wood Block 2-Stone 3-Brick 4-Cast Concrete 5-Concrete Block 9-Other

41. Porch Types: A B C Other: _____

01-Full, Front 02-Three-quarter, Front 03-One-Bay, Central Front 05-Wrap-around
06-Awning 07-One-Half, Front 08-Recessed, Front 09-Side 15-Stoop 99-Other

42. Porch Height (Stories): A B C D Other: _____

1-One 2-One & One-Half 3-Two 4-Two & One-Half 9-Other

43. Porch Roof Types: A B C D Other: _____

1-Gable 2-Hip 3-Flat 4-Shed 5-Clipped Gable 6-Integral 9-Other

44. Porch Details: A B C Other: _____

01-Chamfered Posts 02-Turned Posts 03-Columns 04-Balustrade 05-Wood Ornament
08-Columns on Piers 11-Posts 12-Iron Posts 13-Screened-in 14-Iron Railing 99-Other

45. Window Type(s): A B C D Other: 3/3 side windows

1-Double-hung 3-Casement 4-Stationary 6-Hopper 7-Awning 9-Other/Materials

46. Light Pane Arrangement: A / B / C / D /

47. Condition:

1-Excellent 2-Good 3-Fair 4-Deteriorated 5-Ruin

48. Architectural Comments: _____

Features: Sidelight(s), Bay window(s). Alterations to main resource: windows replaced – some; porch support(s) replaced

Historic Data:

49. Architect: _____

50. Builder: _____

51. Construction Date: C-circa D-date Other: _____

52. Historic Context: _____

Artie Y Berry is the earliest identified resident of this house per the 1907 city directory. Berry was a buyer for Berry-Wright Dry Goods Company on Garrison Avenue (Ancestry.com).

53. Ethnic Heritage: A B Other: _____

01-Asian 02-African American 03-European 04-Hispanic 05-Native American
06-Early American/Caucasian 99-Other

54. Please rate the level of significance of this property compared to others within survey area:

1-Very Significant 2-Moderately Significant 3-Significant Within a Group Context
4-Marginal 5-Non-Significant



11317-0011-00216-00
703 North 6th Street



G Street

6th Street



NOTE: PORTION OF REAR ELEVATION NOT VISIBLE FROM PUBLIC ROW

**FORT SMITH HISTORIC DISTRICT COMMISSION
REGULAR MEETING
APRIL 4, 2024, 5:30 P.M.
DARBY COMMUNITY CENTER, 220 NORTH 7TH STREET**

STAFF REPORT

- | | | |
|-----------|--|--|
| A. | Historic Name: Artie Y. Berry House
Alternate Name: McCartney House | Owner: Gregg and Anne Marie Lodes |
| | Construction Date: c. 1905 | Style Influence: Primary – Colonial Revival
Secondary – Classical Revival |
| | Address: 703 North 6 th Street | Significance: (1) Very Significant |
| | <ul style="list-style-type: none">• Replace shingles on roof | |

Finding:

Section 3.5.14 of the Belle Grove Historic District Design Guidelines recommends against introducing a new roof feature that is not compatible in size, scale, material, and color. Section 3.5.17 recommends against radically changing, damaging, or destroying roofs which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Recommendation:

Based on the Belle Grove Historic District Design Guidelines, staff recommends approval.



Belle Grove Historic District

c/o City of Fort Smith Planning Dept.
P.O. Box 1908 or 623 Garrison Ave., Rm 331
Fort Smith, AR 72902

Certificate of Appropriateness Application Form

(please use blue or black ink only)

PROPERTY LOCATION

Historic Name of Property The Anderson House

Address 715 N 6th St. Fort Smith, AR 72901

Lot Number SW/2 LOT 8 and ALL LOT 9 Block Number Block P, Original City of Fort Smith

OWNER

Name HIGH RIDGE REALTY, LLC

Address 715 N 6TH ST Phone 479-831-8803

PERSON FILING APPLICATION, IF OTHER THAN OWNER

Name _____

Address _____ Phone _____

BUILDING DATA

Construction Date: 1885

Type of Construction: Wood Frame X Brick _____ Stone _____ Other _____

Original Use:

Single Family Residential X Multi-Family Residential _____

Hotel/Boarding House _____ Office _____

Commercial/Retail _____ Industrial _____

Vacant _____ Combined Uses _____

Other _____

CONCISE DESCRIPTION OF PROPOSED WORK: (Attach additional papers if necessary)

Remove asbestos siding

Install 4.15" hardie siding (fiber cement siding [8.25 x 144)

Repaint entire exterior of house

PROJECT ARCHITECT/ENGINEER:

Name Tedd Lodes

Address

715 N 6th St. Fort Smith, AR 72901 Phone 479-831-8803

MINOR WORK APPROVAL

_____ staff

_____ date

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(B) The installation of HVAC equipment that is located in the rear or on the side of the property and is entirely screened from public view with wood lattice panels or plantings;

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I hereby certify I am the owner, agent of the owner, or other person in control of the property and that the information given herein, and as shown on the application and Certificate of Appropriateness, is true and that I am authorized to obtain this Certificate of Appropriateness. I understand that if the construction and/or installation for which this Certificate of Appropriateness is issued, is contrary to the requirements of city codes or regulations, violations must be corrected. Approval by the Historic District Commission does not excuse the applicant, owner or agent from compliance with any other applicable codes, ordinances or policies of the City of Fort Smith unless expressly stated by the Commission or its staff.

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** (If cited for violation, applicant may appeal in court)

SIGNATURE OF APPLICANT *T. P. Des* 02/14/24
(Date)

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Application is: Approved _____, Denied _____, Deferred _____

Reason for approval, denial or deferral:

Signature of Historic District Chair

Date Action Taken

Date of Issuance

Sec. 19-61(h) A certificate of appropriateness issued by the historic district commission shall become void unless work pursuant to the certificate of appropriateness is commenced within one year of the date of issuance of the certificate of appropriateness, unless the historic district commission grants an extension to the certificate based on abnormal weather conditions or other circumstances beyond the control of the applicant which have been shown to delay the approved work.

James Hardie

Hardie Plank HZ10 8.25 in. x 144 in. Primed Cedarmill Fiber Cement Lap Siding

★★★★★ (419) [Questions & Answers \(395\)](#)




H Historic Color

SW 0025

Rosedust

FULL DETAILS 

LRV: 33 

RGB: 204 / 141 / 132

Hex Value: #CC8D84

Available in: Interior/Exterior

Color Collections: Interior Historic, Historic
(Colonial Revival)


Color Family(s): Red

H Historic Color

SW 2829

Classical White

FULL DETAILS 

LRV: 76 

RGB: 236 / 225 / 203

Hex Value: #ECE1CB

Available in: Interior/Exterior

Color Collections: Exterior Historic, Historic (Colonial Revival), West Elm Collection 2024

Color Family(s): Yellow

H Historic Color

SW 2804

Renwick Rose Beige

FULL DETAILS 

LRV: 28 

RGB: 175 / 136 / 113

Hex Value: #AF8871

Available in: Interior/Exterior

Color Collections: Exterior Historic, West Elm (Fall/Winter), Historic (Victorian), Pottery Barn Collection 2024

Color Family(s): Orange

H Historic Color

SW 2810

Rookwood Sash Green

FULL DETAILS 

LRV: 13 

RGB: 80 / 106 / 103

Hex Value: #506A67

Available in: Interior/Exterior

Color Collections: Exterior Historic, Color ID (Enthusiast), Historic (Victorian)


Color Family(s): Green

H Historic Color

SW 0003

Cabbage Rose

FULL DETAILS 

LRV: 39 

RGB: 197 / 159 / 145

Hex Value: #C59F91

Available in: Interior/Exterior

Color Collections: Interior Historic, Historic (Victorian), Pottery Barn Collection 2024

Color Family(s): Red

H Historic Color

SW 0006

Toile Red

FULL DETAILS 

LRV: 12 

RGB: 139 / 83 / 78

Hex Value: #8B534E

Available in: Interior/Exterior

Color Collections: Interior Historic, Historic (Victorian), Colormix Forecast 2023 (Lore)

Color Family(s): Red







16 PRESERVATION BRIEFS

The Use of Substitute Materials on Historic Building Exteriors

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The *Secretary of the Interior's Standards for Rehabilitation* generally require that deteriorated distinctive architectural features of a historic property be repaired rather than replaced. Standard 6 of the *Standards for Rehabilitation* further states that when replacement of a distinctive feature is necessary, the new feature must “match the old in composition, design, color, texture, and other visual properties, and, *where possible, materials*” (emphasis added). While the use of matching materials to replace historic ones is always preferred under the *Standards for Rehabilitation*, the Standards also purposely recognize that flexibility may sometimes be needed when it comes to new and replacement materials as part of a historic rehabilitation project. Substitute materials that closely match the visual and physical properties of historic materials can be successfully used on many rehabilitation projects in ways that are consistent with the Standards.

The flexibility inherent in the *Standards for Rehabilitation* must always be balanced with the preservation of the historic character and the historic integrity of a building, of which historic materials are an important aspect. Any replacement work reduces the historic integrity of a building to some degree, which can undermine the historic character of the property over time. With limited exceptions, replacement should only be considered when damage or deterioration is too severe to make repair feasible. When needed replacement is made with a material that matches the historic material, the impact on integrity can be minimal, especially when only a small amount of new material is needed. When a substitute material is used for the replacement, the loss in integrity can sometimes, although not always, be greater than that of a matching material. Also, whether historic or substitute material, there is a point where the amount of replacement can become excessive and the building's historic integrity is diminished to an unacceptable degree, regardless of the material used—that is, a loss of authenticity and the physical features and characteristics closely associated with the property's historic significance.

The term *substitute materials* is used to describe building materials that have the potential to match the appearance, physical properties, and related attributes of historic materials well enough to make them alternatives for use in current preservation practice when historic materials require replacement.

Compelling reasons to use a substitute material instead of the historic material include the unavailability or poor performance of the historic material, or environmental pressures or code-driven requirements that necessitate a change in material. When using a substitute material for replacement it is critical that it match the historic material in all of its visual and physical properties to preserve the historic character of the building and minimize the impact on its integrity.

Substitute materials can be cost-effective, permit the accurate visual duplication of historic materials, and provide improved durability. While the behavior of traditional, historic materials is generally well understood, the behavior of newer materials can be less established and sometimes less predictable. Substitute materials are most successful when the properties of both the original material and the substitute are thoroughly understood by all those involved in the design and construction process. The architect must be adept at the selection of substitute materials and their incorporation into architectural plans and specifications. The contractor or tradesperson in the field must also be experienced with their use.

This Preservation Brief provides general guidance on the use of substitute materials as replacement materials for distinctive features on the exterior of historic buildings. Due to the ever-evolving product market for construction materials, this Brief does not provide specifications for substitute materials. This guidance should be used in conjunction with qualified professionals who are knowledgeable in current construction and historic preservation practices.

This Brief includes a discussion of the appropriate use of substitute materials and provides a path for decision-making in their use. In considering the use of substitute materials, such issues as the deterioration or failure of the historic building component and material must be understood. The existing component's physical and visual properties, profile, surface texture, dimensions, and performance should be identified to establish the basis for evaluating a possible replacement material. The physical and visual properties of the various substitute materials available should also be assessed and compared to the original material for their physical and visual compatibility. Lastly, the suitability of a given substitute replacement material should be determined based on how well the material matches both the physical and visual properties of the existing material as well as any specific performance or application needs. The Brief's descriptions of common substitute materials are not meant to be comprehensive, and, as the performance history of newer materials continues to grow and new materials are developed, available options will change, and our understanding of current material performance will continue to evolve.

Historical Use of Substitute Materials

The tradition of using affordable and common materials in imitation of more expensive and less available materials is a long one. At Mount Vernon, for example, George Washington used wood painted with sand-impregnated paint to imitate rusticated stone. This technique, along with scoring stucco into block patterns, was common in Colonial America to imitate stone.

Nineteenth-century technology made a variety of materials readily available and widely used that were not only able to imitate traditional materials but were also cheaper to fabricate and easier to use. Traditionally, carved stone units were individually worked. Molded or cast materials greatly increased efficiency in creating repetitive elements. Cement-based products such as cast stone could provide convincing imitations of natural stone with carefully chosen aggregates and cements and was typically a commercially manufactured product. It could be tooled like natural stone, though that could reduce much of the cost advantage. These carefully-crafted cementitious products were widely used as trim elements for masonry structures or as the face material for an entire building. At the other end of the spectrum, mail-order catalogs provided a wide variety of forms for molding concrete that were merely evocative of natural stone and did little to match its appearance. Concrete masonry units could be fabricated locally and on site, avoiding expensive quarrying and shipping costs.

Offering similar efficiencies as cast stone for reproducing repetitive and even complex decorative shapes, terra cotta could mimic the surface characteristics of stone with various textures and glazes. It was popular in the late nine-

teenth and early twentieth centuries for details on stone or brick buildings as well as for the entire skin of large and elaborately detailed buildings.

Cast iron was also used to imitate stone, often with very decorative profiles, for a variety of architectural features ranging from window hoods to columns, piers, balustrades, and even whole façades. Cast iron offered its own set of efficiencies including cost, fabrication time, and weight, but required a painted finish.

While cast stone, terra cotta, and cast iron offered efficiencies over quarried and, particularly, carved stone, they were not cheap or impermanent materials. Less costly, but also less durable, stamped or brake-formed sheet metal, typically galvanized, could also be used instead of masonry for cornices, window hoods, roofing tiles, and even entire building façades.

Substitute Materials and Applying the Standards for Rehabilitation

The *Standards for Rehabilitation* are focused on preserving the important and distinctive character-defining features of a historic property (Standards 2 and 6), and they are to be applied in a reasonable manner, taking into account economic and technical feasibility ([36 CFR 67.7](#) and [36 CFR 68](#)). The Standards have an inherent flexibility that facilitates their application to diverse projects, historic properties, and conditions. They are to be applied on a "cumulative-effect" basis, when the overall effect of all work in the context of the specific conditions of the property and the project is consistent with the property's historic character.

The *Standards for Rehabilitation* require that the replacement of a distinctive feature match the old in physical and visual properties. While the use of matching materials is always preferred, the Standards purposely allow for the use of substitute materials when the use of original materials is not reasonably possible, such as in consideration of economic and technical feasibility or in new construction. They also provide additional flexibility in the treatment of secondary, less distinctive features that are less important in defining the historic character of the property. The *Standards for Rehabilitation* recognize that flexibility is appropriate to facilitate "a compatible use for a property ... while preserving those portions or features which convey its historical, cultural, or architectural values" (definition of "Rehabilitation," [36 CFR 67.2\(b\)](#)).

These examples of one material used to imitate another, more often in initial construction than for later repair and replacement purposes, are referred to as *imitative materials* in the *Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, updated in 2017, that accompany the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. These imitative materials, while evoking other materials, usually had distinctive qualities of their own and were not always a very close match in appearance to the historic material they were meant to imitate.

Many of the traditional materials discussed above are still available and used to replace damaged or missing original features, both to replace matching historic materials and sometimes as substitute materials. Because of their extensive use over time and their known physical and chemical properties, cast stone, cast iron, and terra cotta are well understood substitute materials. This continued usage and familiarity means their installation requirements and service life are well established, which in turn makes it easier to determine when and how to use these traditional materials as substitutes for a deteriorated material. However, innovation in replacement materials continues, and new products (many of them consisting of synthetic materials) are continually introduced. These non-traditional products are an increasing part of both the new construction and rehabilitation industries. Some materials, like glass fiber reinforced polymers, glass fiber reinforced concrete, or fiber cement, have been in use long enough for an accurate prediction of their service life and performance. Other newer, non-traditional materials may be too new to have established performance records, thus, understanding their material properties is critical, and their use should be approached with more caution.

When to Consider Using Substitute Materials in Preservation Projects

According to the *Standards for Rehabilitation*, deterioration should generally be addressed through repair if in repairable condition. Repair can entail a variety of treatments that retain the unit of building material and remove and patch or replace only the damaged portion. This approach can be done with traditional methods and materials such as a dutchman, where like-kind material is precisely inserted into wood or stone, or it may employ other materials such as epoxies for wood repair or cementitious compounds for masonry. As long as the repair methods are sound and do not damage or accelerate the deterioration of the historic material, repairs are generally preferable to replacement of an entire element. More complex manufactured products, typical of more recent historic materials (as well as a lot of modern building materials generally), may be more difficult to repair, if they can be repaired at all.

There are situations, however, when the level of deterioration makes localized repairs infeasible and entire fea-



Figure 3: Incremental repair is best done using in-kind material to minimize differences in the performance characteristics that could negatively affect the overall assembly. Photo: NPS.

tures or units of historic material must be replaced. While achieving an effective match of all of the visual qualities of a material can be challenging, even when replacement is in kind, it can be even more challenging when the replacement is a substitute material. A good visual match is not the only consideration when a substitute material is to be used for incremental replacement within a larger assembly of historic material. When an individual siding board or a single block of ashlar is being replaced, it is usually best achieved with the original material. Introduction of a different material into an intact assembly requires that its inherent properties, such as expansion and contraction, moisture resistance, or permeability, be thoroughly considered relative to those of the surrounding historic materials to avoid causing damage.



Figure 4. While occasionally used to imitate other materials such as wood or slate shingle, many asbestos shingles and siding materials had their own distinct shape and profile. No longer manufactured today, alternative materials must be found to replace these materials when they are distinctive features on a historic structure. Drawing: Association for Preservation Technology, Building Technology Heritage Library.



Figure 5. (Left) Asbestos shingles were often used as a substitute for traditional slate roof shingles. The historic asbestos roof on this rehabilitation project had reached the end of its lifespan and required complete replacement. (Right) Given the limited replacement materials available to match the historic asbestos shingles, utilizing natural slate was determined to be the best visual match for the original shingles and design intent in this instance. Photos: Crosskey Architects.

Circumstances in which the use of substitute materials may generally be considered appropriate, taking into consideration technical and economic feasibility reasons, include: the unavailability of historic materials; the unavailability of skilled artisans or historic craft techniques; inadequate durability of the original materials; the replacement of a secondary feature; construction of a new addition; the reconstruction of a missing feature; code-required performance; and for enhanced resilience and sustainability:

- **Unavailability of historic material.** A common reason for using substitute materials is the difficulty in finding a good match using the historic material (particularly a problem for masonry materials where the color and texture are derived from the material itself). This may be due to the actual unavailability of the material or to protracted delivery dates, particularly if the material cannot be sourced domestically. It is not uncommon for a local quarry that is no longer in operation to have been the source of an original stone. If another quarry cannot supply a satisfactory match, a substitute material such as dry-tamp cast stone or textured precast concrete may be an appropriate alternative, if care is taken to ensure that the detail, color, and texture of the original stone are matched. Even when the color is successfully matched, the appearance of a cementitious product may diverge from that of the historic stone as the substitute material ages.

Many manufactured materials that were used historically on buildings are no longer made. Terne-plated steel, which was the material most typically used for painted standing-seam or flat-seam roofing, is no longer made. However, because it was always painted, other metals including galvanized steel or copper can generally be substituted if painted. When the historic material needing to be replaced is a manufactured product developed as an imitation of

a natural material, which was the case with asbestos shingles meant to imitate slate, the natural material may now be an appropriate substitute material to consider for the manufactured one that is no longer produced.

- **Unavailability of skilled artisans or historic craft techniques.** These two issues can complicate any preservation or rehabilitation project. This is particularly true for intricate ornamental work, such as carved wood, carved stone, wrought iron, or cast iron. While skilled craftsmen may not be as difficult to find as they once were, there can still be limitations geographically, even in finding less specialized skills, and particularly if a project is small. Technical advances have allowed some stone or wood carvers to take advantage of computerized equipment, but complex designs will likely still require hand work. It may also be possible to mimic a carved element using a material that can be cast in a mold, adding significant efficiency where an historic element survives from which a mold can be made. Options for casting include aluminum, cast stone, fiberglass, glass fiber reinforced concretes, and terra cotta, but not all carved elements can be duplicated by a casting, and mold-making and casting still require skilled craftsmen.
- **Inadequate durability of the original material.** Some historic building materials were of inherently poor quality or were not durable. In other cases, one material was naturally incompatible with other materials on the building, causing staining or galvanic corrosion. Examples of poor-quality materials are very soft sandstones, which eroded quickly, and brownstone, which is vulnerable to delamination. In some cases, more durable natural stones may be visually similar enough to stand in for these soft stones but cast stone or another material may be needed to achieve an appropriate match.

The ready availability of manufactured ornamental wood features fed a nineteenth-century taste for decorative architectural details that were often used on the exterior of buildings with little concern for how they would be affected by moisture or maintained. Even old-growth wood from decay-resistant species often could not prevent features with severe exposure from eventually needing to be replaced. Today's available commercial supplies of lumber no longer provide the denser, more decay-resistant wood of old-growth forests, so even careful matching to species, which is not always possible, will not yield a replacement equal in performance to the historic material. Old-growth wood is likely to be very expensive, if it can be found, and may not be available from a sustainable, environmentally responsible source. When features with severe exposure need to be replaced or reproduced, substitute materials that are less susceptible to decay can have a longer life, and when the feature is painted, as exterior wood features generally are, the visual effect of a substitute material can be minimal.

- **Replacement of a secondary feature.** When it is necessary to replace a less distinctive, secondary feature that is less important in defining the historic character of the property, there is more flexibility in how it can be replaced. While it may be less important to find an exact match in materials when replacing

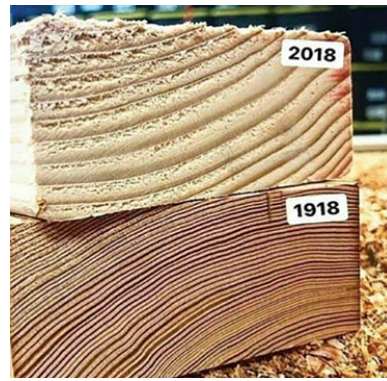


Figure 6. The dramatic difference in the number of growth rings between old-growth wood and wood that was recently harvested from second- or third-growth forests is indicative of the diminished dimensional stability and durability of most lumber currently available. Photo: Zachary Dettmore.

such a feature, the retention of the overall historic character should still guide selection of an appropriate replacement material. For example, replacing secondary features such as those with limited visibility (e.g., siding materials on a rear elevation) may permit replacement materials that are similar in appearance or character without having to be a perfect match.

- **Construction of a new addition.** The *Standards* require that new additions to historic buildings and related new construction be differentiated from the old as well as be compatible with the historic character of the property and its site and environment. Using materials that evoke, without matching, the historic material can be an effective means of achieving the needed balance between compatibility and



Figure 7. A new addition replaced non-historic construction on the rear elevation of this building. Fiber cement gives the addition a compatible appearance without replicating the exposure for thickness of the historic siding. Photo: Ward Architecture + Preservation.

differentiation for new additions and new construction. Even if differentiation is achieved through design rather than materials, there generally is no basis for requiring the use of matching historic materials for new additions and new construction as part of a rehabilitation project.

- **Reconstruction of a missing feature.**

Many buildings lose significant features over the course of their lives for reasons such as those previously discussed. When a missing feature is to be reconstructed, the importance of matching the original material may be less important to the effect replacing the missing feature may have on the overall historic character and appearance of the building. Though replacement of missing features must be substantiated by documentary, physical, or pictorial evidence, in many cases the authenticity of the material may be secondary to the overall visual qualities. The use of a more cost-effective substitute material for the construction of a missing feature can often be an important factor in the feasibility of undertaking such work.

- **Code-required performance.**

Modern building codes are regularly amended to require higher performance levels for new and existing buildings in such areas as life safety, seismic retrofits, and accessibility. Rehabilitation projects often trigger compliance with code requirements that were not in place when a building was constructed. Although building codes may often allow for the retention of historic materials and assemblies, substitute materials can offer an alternative in situations when the historic materials are non-compliant and cannot otherwise be reasonably retained. In these instances, a change in material may be appropriate to meet code requirements, while in other instances selecting the optimal code compliance method for the project may achieve code-compliant solutions that also allow for the preservation of a building's historic materials and finishes.

For example, fire codes may require increased resistance to flame spread for buildings within dense urban environments where building proximity and separation between buildings is a concern. Some substitute materials are non-combustible, have good ratings for flame spread, and can provide an alternative to help meet

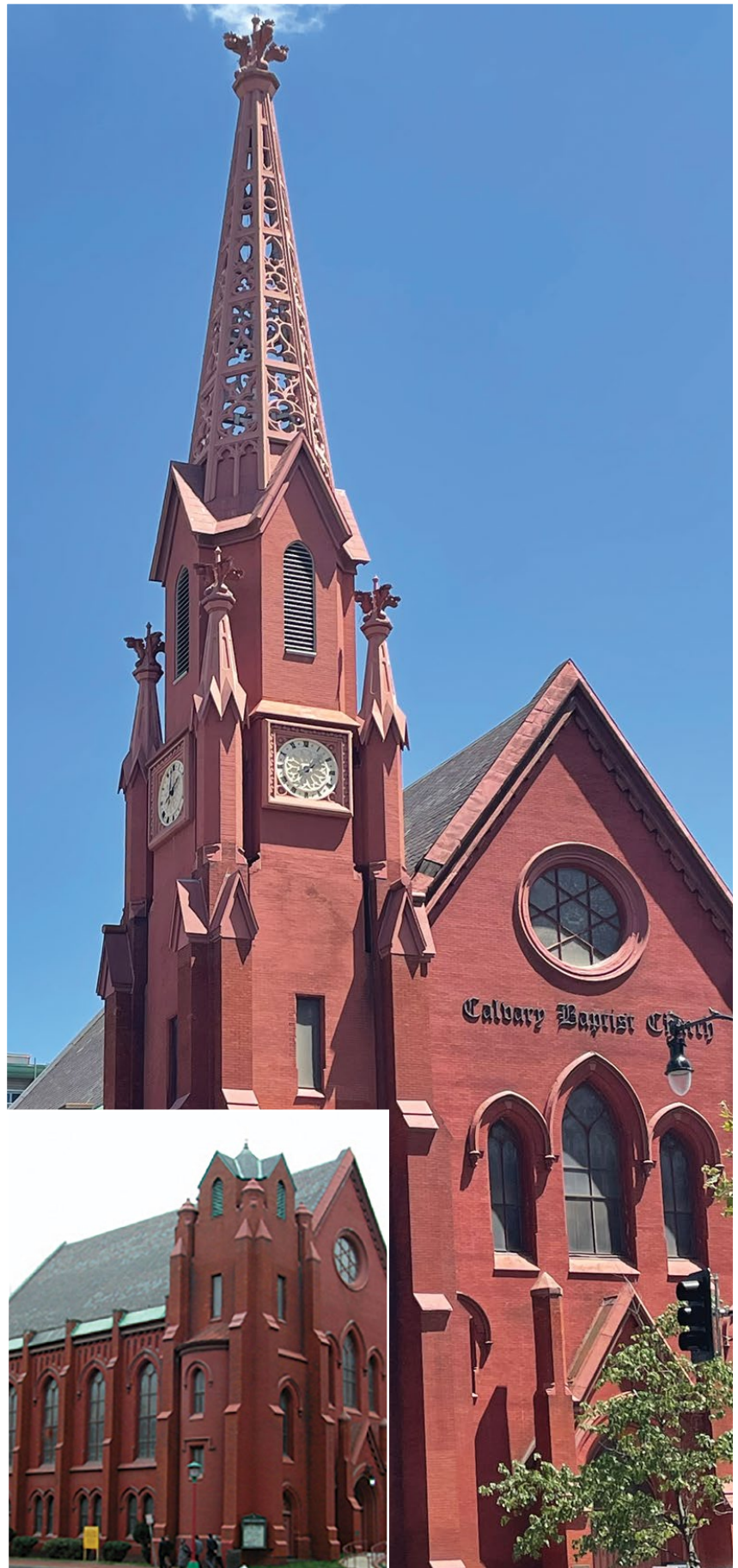


Figure 8. A long-missing cast-iron steeple was reconstructed in aluminum and fiber-reinforced polymer (FRP). Photo: John Sandor, NPS, Inset: Quinn Evans.

fire code requirements. Depending on the building component and the material, however, a substitute material may not resist fire any better than the historic material. In addressing code issues, all feasible alternatives should be considered to minimize the impact on the historic character of the building while still meeting code requirements.

With specific provisions in building code related to issues such as seismic hazards, the choice of materials for features inherently unstable in a seismic event can be a key part of a code-compliant retrofit solution. Elements at risk of falling such as parapets, finials, and overhanging cornices may be made safe by anchoring them to new structural frames. However, for some heavy masonry features, especially where there is deterioration or the feature is difficult to effectively brace, adequately anchoring the existing feature may not prove feasible. In such cases removing and replacing these features with lighter-weight replicas that incorporate a resilient structural framework can help preserve the historic character of the building while improving life safety performance.

- **Enhanced resilience and sustainability.** Wildfires, earthquakes, floods, hurricanes, and other extreme weather events put historic buildings and their occupants at risk and may require adaptive treatments that are more invasive than might be accepted in other circumstances, including related to the use of substitute materials. In these contexts, it is still necessary to try to minimize impacts on a building's historic character as much as possible while still adapting it to be more resilient. Widespread wildfires, for example, have increased demand for fire resistant materials for the exterior building envelope. Flood events may necessitate the replacement of historic materials that have been damaged or inundated with hazardous substances in contaminated floodwaters. When undertaking repairs in such circumstances, substitute materials may offer greater resilience to anticipated future exposure to natural hazard risks.

Similarly, efforts to improve energy efficiency and performance may include the use of substitute materials as replacement components when modifications to building assemblies are required and the historic materials cannot be preserved. When evaluating substitute materials in the context of sustainability objectives, factors such as the environmental impact of production, the full life cycle of products, and the embodied carbon of the materials already in place should be carefully analyzed. There may be more sustainable choices for a replacement material, including the use of more traditional materials in place of manufactured products that may consist of non-renewable resources or hazardous materials. While some synthetic substitute materials are made from recycled materials or are otherwise sustainably produced, many are not repairable, salvageable, or recyclable themselves, and

they may have shorter lifespans to their historic material counterparts. When either greater resilience or sustainability is a factor, all feasible alternatives should be considered in finding a balanced approach that maintains historic character while meeting resilience and sustainability goals.

Substitute Materials and Economic Feasibility

Economic feasibility is inevitably a concern when choosing a material for any part of a project, whether a historic or substitute material, but it should not be the sole determinant factor at the expense of maintaining the



Figure 9. Previously bricked-in openings below the flood line were reopened and new aluminum windows installed with cellular PVC trim detailed to hold back moderate flood waters and survive exposure to water. Photo: John Sandor, NPS.

historic character and historic integrity of a building. Other factors may prompt the consideration of a substitute material, such as the cost of maintaining the historic material, because it is comparatively difficult or costly to reach or access, or the frequency of required maintenance the historic material needs. Additionally, where in-kind replacement material is found to be prohibitively expensive, it may be reasonable to consider a substitute that offers an alternative and is a good physical and visual match. Not all substitute materials are, however, cost-effective replacements. Long-term durability and maintainability are other factors that should be considered in conjunction with initial cost.

Maintenance of a material, particularly where accessibility is difficult or expensive, can be an important part of a

cost evaluation. Maintenance costs should not be considered without also considering life-cycle expenses. While some substitute materials may offer reduced initial costs, they may be as or more costly than traditional materials to maintain over time. For example, many substitute materials are not readily repairable, necessitating full replacement when damaged. The cost to replace a material or assembly at the end of its lifespan may also be greater than the accumulated incremental expense to maintain the historic material, particularly if it is a more traditional, repairable material. Maintenance cost should never be the sole reason for replacing a historic material that is not deteriorated.

Criteria for the Appropriate Use of Substitute Materials

Substitute materials must meet three basic criteria to be considered: they must be compatible with the historic materials in appearance; their physical properties must be similar to those of the historic materials, or the materials must be installed in a manner that tolerates differences; and they must meet certain basic performance expectations over an extended period of time.

- **Matching the Appearance of the Historic Material**

Any material's appearance varies depending on the nature of the material and how it is used. Some historic materials, such as wood and ferrous metals, were typically painted, making the color of the substitute unimportant, though the texture of the surface, which telegraphs through a paint layer, is still an important consideration. Texture can be a large part of distinguishing a material formed by hand from one that is machine-made. Many historic materials, such as most building stones, are used without any coating, making the color, pattern, and reflectivity, as well as surface texture, dependent on the material itself. Matching the color and surface

characteristics of a historic natural material with a man-made substitute can often be quite difficult.

When the color and surface characteristics of an existing material are important, cleaning the material should be the starting point for evaluating a potential matching material. In situations where there are subtle variations in color and texture within the original material, the substitute material should be similarly varied so that it is not conspicuous by its uniformity. If a material is custom fabricated, a sufficient number of samples should be supplied to permit on-site comparison of color, texture, detailing, and other critical visual qualities. For a manufactured product with preset choices of color or texture, it may be necessary to look at samples from more than one manufacturer to find the best match. Similarly, prefabricated products, such as roofing slate, may offer limited, if any, choice of unit size, which can be a critical factor for achieving a good match. A substitute material should not be used to replace distinctive, character-defining materials and features if an adequate match in design and appearance is not possible.

As all exposed materials are subject to ultraviolet degradation, samples of a new material, particularly when custom formulated, should be prepared during the early planning phases to allow for evaluation of the effects of weathering on color stability. When that is not possible, or if a prefabricated product is used, the fabricator or manufacturer may be able to identify regional locations where equivalent products have been installed long enough ago to get a better sense of how the material weathers and performs.

While a perfect match is the desired goal for replacing distinctive features, it is not always possible, even when the same matching material is chosen for the replacement. When any compromise



Figure 10. Polymer slates offer a choice of shapes but not sizes, limiting their ability to achieve a good visual match for some historic slate. With the size of the polymer slates (right) being nearly twice that of the historic slates (left), the scale of the entire feature is incompatibly altered. The molded edges of this material, which contribute to its ability to replicate slate, would be lost if each shingle was resized by cutting. Photo: John Sandor, NPS.



Figure 11. The thickness of the wood siding on the front (left) creates a deeper shadow line than is achieved with the fiber cement siding used on the side (right) elevation. While the exposure can be adjusted, fiber cement siding is not available in a matching thickness. Photo: John Sandor, NPS.

must be made in the precision of the match, it is wise to consider the vantage point from which the material will be seen. Sometimes what seems important at close range, such as variations in the texture of a surface, may be secondary to other aspects of the material when viewed from some distance. The closer a feature is to the viewer, the more closely the material and craftsmanship should match the original. An on-site mock-up using a sample of the proposed material can help evaluate whether it is an adequate visual match.

- **Matching the Physical Properties of the Historic Material**

Carefully chosen substitute materials can often closely match the appearance of historic materials, but their physical properties may differ greatly. These differences are most critical when incrementally replacing components of a larger assembly that retains significant historic material. The chemical composition of the material (e.g., the presence of acids, alkalis, salts, or metals) should be evaluated to ensure that the replacement materials will be compatible with the adjacent historic materials. Materials that will cause galvanic corrosion or other chemical reactions must be isolated from one another.

The thermal- and moisture-driven expansion and contraction coefficients of each adjacent material must be within narrow limits or be accommodated



Figure 12. Cellulose composite materials, like wood, expand and contract with moisture. Here it was used to reconstruct a missing storefront. Unlike solid wood that is dimensionally stable parallel to the grain, this composite moves equally in all dimensions, resulting in gaps that were not adequately anticipated in the design. Photo: John Sandor, NPS.

by carefully designed joints and fasteners. Joints can play a role both in accommodating movement of materials as well as in managing moisture, either to keep it from entering the enclosure assembly or to let it escape from the building envelope, or both. Because some synthetic materials are less permeable to moisture than more traditional materials, installations must take into account the potential to trap moisture and cause deterioration of historic and new materials. An assembly incorporating new and historic materials should be designed so that if material failures occur, the failures occur within the new material rather than the historic one.

During installation, surface preparation is critical to ensure proper attachment. Deteriorated underlying material must be removed or stabilized. Non-corrosive anchoring devices or fasteners that are designed to carry the new material and to withstand wind, rain, snow, and other destructive elements should be used. Since physical failures often result from poor anchorage or improper installation techniques, a structural engineer should be included in planning any major project. For readily available, off-the-shelf materials, manufacturers' recommendations for attachment and spacing should be followed.

Nearly all substitute materials have some properties that are different from the historic materials they may replace. Even when substitute materials are isolated from historic materials and features, it is important to understand the substitute materials' properties in order to use them successfully.

- **Performance of the Material Over Time**

When more traditional materials are used to replace damaged historic materials and features, their performance is predictable in most cases. An exception may be modern wood that has durability and other prop-

erties different than those of historic wood from old-growth forests. Many of the materials used as substitutes have been in use long enough to provide some idea of how they perform over time. Other material may only have test results from accelerated weathering. The length of manufacturer warranties may be an indicator of expected durability and lifespan. Warranties only predict a manufacturer's expectation of a product's performance and are no guarantee that the manufacturers will still be in business at the time needed to stand behind them. Just as new manufacturers emerge with new materials, others disappear. Where possible, projects involving substitute materials in similar installations and exposures should be examined before selecting a new, less-tested material. It is unrealistic to expect a substitute material, which can be quite different in composition than the historic material, not to age differently.

Even traditional materials will not perform well if not used or detailed appropriately, and experienced architects, engineers, fabricators, and installers rely on their professional knowledge and experience to ensure proper installation and techniques when working with familiar materials. This is just one of many reasons that using the original materials for needed replacement is usually the best choice. Some of the materials now available as substitutes have properties that differ greatly from the traditional materials they may be used to replace. It is critical to the successful performance of substitute materials that everyone involved in the selection, design, and installation fully understands the material's properties, especially how it is different than the material it is replacing, and how that will affect the surrounding materials and building systems.

Many traditional building materials can be repaired either with traditional methods and materials or with more modern conservation techniques using substances like epoxies. However, many modern substitute materials (particularly synthetic ones) are not as easily repaired, if repairable at all, as their more traditional counterparts. Confirming that a material is repairable may be important for those used, e.g., where impact or significant wear or abrasion is likely.

Finally, it is critical that the substitute materials be documented as part of the historical record of the building so that proper care and maintenance of all of the building materials continue, ensuring the continued life of the historic building.

Choosing an Appropriate Substitute Material

Once all reasonable options for repair and replacement in kind have been considered and sufficient justification for substitute materials has been established, the choice among the variety of substitute materials currently available must be made. Rapidly developing technologies allow a wide variety of materials to choose from that are intended to mimic historic materials. Many of the materials that were historically used as substitutes for more traditional historic materials have themselves become historic, and some of these early substitutes continue to be reasonable options as substitute materials today. No substitute material will exactly match the historic material in all aspects, but many are able to adequately match the appearance and relevant physical attributes to make for a potential substitute. If a substitute material is not



Figure 13. Cast stone was used to effectively replace individual blocks of sandstone. Both the original (left) and the substitute material (right) retain similar physical and visible properties. Having weathered for over 30 years, some erosion of the binder has revealed quartz grains of the aggregate (inset), but it is only noticeable upon close inspection. Photo: John Sandor, NPS.

an adequate physical and visual match given the specific conditions of the building and the project, then it should not be used to replace distinctive, character-defining materials and features.

Listed below are various building components or features and the substitute materials which may, in some circumstances, be considered for use as possible replacement materials in a historic rehabilitation project consistent with the *Standards for Rehabilitation*. This list includes different substitute material options available today for these building features and poses questions that should be asked and considered when choosing between the original material and various types of substitute materials. This is followed by a list of some of the more commonly used, currently available materials that may have some applications as substitute materials and the properties of each that affect their suitability for use as substitutes. This list should not be read as an endorsement of any of these materials, generally, or their appropriateness for use as a substitute material, but it serves as a reminder that the successful use of any building material requires a careful consideration of its properties relative to where and how it will be used.

Considering Substitute Materials

Considering the use of a substitute material should begin with the following questions about the conditions and location where it will be used:

- Will the significance or visibility of the historic feature require a very precise match?
- Is the entire feature being replaced or just a component of it?
- Are pre-existing conditions contributing to the failure of the existing material, and, if so, how will they be addressed/corrected?
- Is the need for replacement due to inherent deficiencies of the original material?
- Will the material need to resist any environmental hazards such as flooding or fire?

Historic Features and Substitute Materials

Historic Building Features

	Masonry Stone, terra cotta	Architectural Metals Cast & wrought iron, steel, pressed metal	Siding Wood, asbestos	Roofing Wood shingle, slate, tile	Decking Tongue-and-groove & square-edge wood	Molding / Trim Wood
Aluminum	●	●	●			●
Cast Stone & Precast Concrete	●			●		
Fiber Reinforced Concretes	●					
Glass Fiber Reinforced Polymers	●	●				
Fiber Cement			●	●		●
Mineral / Polymer Composite			●	●	●	●
Cellulose Fiber / Polymer Composite			●	●	●	●
Non-composite Polymers		●			●	●
Cellular PVC			●		●	●

The above chart lists materials that are sometimes used as substitutes for replacement of historic building features. Even within a given category, all materials may not be equally suitable as a substitute replacement material for the actual historic material or feature. Any substitute material should be selected based on its specific physical and visual characteristics, conditions, and intended application consistent with the Secretary of the Interior's Standards for Rehabilitation.

Historic Building Features: Criteria for selecting an appropriate replacement material

Masonry

FEATURES: corbels, brackets, balusters, cornices, window and door surrounds, friezes, wall surfaces, horizontal surfaces, incidental ornament, columns

HISTORIC MATERIALS: terra cotta, cast stone, stone, concrete

POTENTIAL SUBSTITUTES: cast stone, pre-cast concrete, GFRC, GFRP, non-composite polymers (polyurethane), cast or stamped metal

Questions to ask about the replacement material:

- Can it serve a structural function?
- How is the material affected by moisture?
- Can the material survive flooding and be reused?
- Can it reproduce the surface texture of the original?
- Is its shrinkage in curing low enough to allow it to be molded from existing stones?
- Can matching color be achieved without a coating and with UV stability?
- Can an adequate match of the surface (color and texture) be achieved with a coating?
- Is a coating required?
- If it is not self-supporting, is it lightweight enough to be supported by an underlying framework?
- Can multiple original units be replicated with a single replacement piece?
- Where thermal movement is different from the original material, how will joints accommodate?
- Is the material combustible?

Architectural Metals

FEATURES: pilasters, door and window surrounds, cornices, incidental ornament, columns, spandrels, ceilings, sheathing, roofing

HISTORIC MATERIALS: cast and wrought iron, steel, bronze, lead, aluminum, and stamped steel (usually galvanized or terne-coated)

POTENTIAL SUBSTITUTES: GFRP, aluminum, non-composite polymer (polyurethane), GFRC, metallic/polymer composite

Questions to ask about the replacement material:

- Will the replacement material serve a structural or cosmetic role?
- Will it expand and contract with temperature change enough to require special accommodation in its installation?
- If part of an assembly of mixed materials, how will any expansion and contraction of the dissimilar materials be accommodated?
- Will the replacement material increase deterioration of the historic or surrounding elements, for instance due to galvanic corrosion, moisture entrapment, jacking of original material, off-gassing creating a corrosive environment, or poor original design of the historic material?
- How will the replacement material mimic the surface color/patina of the original material?
- If a coating is needed, what preparation is needed, and what is its durability or service life of the finish?
- What attachment and support systems are necessary?
- If the original element is structural, but the new material is not, how can supplemental structure be introduced to support the new?



Figure 14. Surface texture is an important aspect in matching the appearance of a historic material, especially when a material is viewed at close range. As seen in these two images, many of the substitute materials produced for siding and trim have an embossed wood grain, making them incompatible for replacing historic wood that was typically planed to a smooth surface. Some substitute products are available with a smooth surface as well. Photos: John Sandor, NPS.

Siding

FEATURES: clapboard, tongue-and-groove or shiplap siding, board and batten, shingles

HISTORIC MATERIALS: wood and asbestos

POTENTIAL SUBSTITUTES: cellular PVC, wood fiber/polymer composite, fiber cement, mineral/polymer composite

Questions to ask about the replacement material:

- What are the widths, lengths, profiles, thicknesses, and textures available?
- What, if any, are the finishing requirements, and/or is it available factory-finished?
- How well does it hold paint, and can prefinished surfaces be renewed?
- What tools are needed to cut it, and can it be machined?
- Does it absorb moisture and, if so, to what effect?
- Can the material survive flooding and be reused?
- Will it expand and contract with temperature change enough to require special accommodation in its installation?
- What characteristics can affect its handling (e.g., weight, flexibility, brittleness)?
- Does it have specific fastening requirements?
- Is it susceptible to insect damage?
- What is its impact resistance?
- Does it have a flame spread rating?
- What is the expected lifespan and/or warranty?

Roofing

HISTORIC MATERIALS: wood shingle, slate shingle, asbestos shingle, clay tile, concrete tile, metal

POTENTIAL SUBSTITUTES: fiber cement, mineral/polymer composite, wood fiber/polymer composite, pre-cast concrete, metal

Questions to ask about the replacement material:

- What sizes and shapes are available?
- What are color choices?
- What is the color stability of the new material, and how will it age/weather?
- What is the impact resistance?
- What is its flame spread rating?
- What are the installation requirements of the new material?
- Can the feature being replaced be custom-produced if ready-made ones of the new material are not an accurate match?
- What is the expected lifespan and/or warranty?



THE SECRETARY
OF THE INTERIOR'S
**STANDARDS FOR
THE TREATMENT
OF HISTORIC
PROPERTIES**

WITH
**GUIDELINES FOR
PRESERVING,
REHABILITATING,
RESTORING &
RECONSTRUCTING
HISTORIC
BUILDINGS**



U.S. Department of the Interior
National Park Service
Technical Preservation Services



Composite Materials: Plastic, Resin, and Vinyl; Fiber-Reinforced Cement Siding; Fiberboard; and Floor Coverings

Plastic is a malleable material composed of synthetic or natural organic materials made from various organic polymers, such as *polyethylene* and *polyvinyl chloride* (PVC), which can be poured into molds or rolled in sheets. It is generally agreed that the term *plastic* was introduced into popular usage in 1907 to describe the first fully synthetic plastic. Improved plastics were available in America by World War I. Production soared during World War II because plastics were needed to make up for the shortage of other materials. In mass production by the 1950s, the industry continued to expand with the development of increasingly more sophisticated plastics.

Vinyl siding came on the market in the late 1950s, and its use, primarily in residential construction, increased as the product improved over the years. Coating canvas awnings with vinyl helped to extend their lifespan, evolving, eventually, into awnings manufactured solely of vinyl. Plastic signs on the exterior of historic commercial buildings changed and radically expanded the role of signage as advertising as well as being important design features themselves. Plastic was used sometimes for decorative trim on storefronts. Vinyl-coated wallpaper was used as early as the 1920s and is still selected for restaurants, commercial spaces, and hospitals because it is durable and washable. Other plastic materials became popular in the 1950s in the form of plastic-laminate sheeting and wall tiles.

Fiber-reinforced plastic (FRP), is made of a polymer matrix mixed with fiber, usually *fiberglass*, to add strength; it is noted for its ability to be molded in thin shells. FRP is sometimes used as a substitute material to recreate missing or deteriorated architectural features in historic buildings. *Acrylic plastic* is a transparent synthetic plastic,

generally identified by one of its trade names—*Plexiglass* or *Lucite*—which was patented in the 1950s as an alternative to glass. *Foamed polystyrene*, better known as *Styrofoam*, was first used in the mid-1950s as building insulation.

Fiber-Reinforced Cement Siding is a composite material made of sand, cement, and cellulose fibers. It was developed in the latter part of the 20th century as a less-hazardous replacement for asbestos cement siding, which preceded it, and was used for siding and roofing shingles from the early 20th century to the 1970s. Fiber-reinforced cement siding is frequently installed in the form of horizontal boards or vertical panels as exterior siding. Fiber-reinforced cement is used on both residential and commercial buildings.

Fiberboard is a composite hardboard material made from pressure-molded wood fibers. It had early precedents in the late 18th century, but was first manufactured in large quantities in the 1920s, with its use expanding in the 1930s and 40s. Fiberboard (or wallboard, as it is commonly known) was marketed by various companies, such as *Masonite*. It was used as sheathing for roofing and siding on the exterior, for insulation, and for interior walls.

The first composite floor covering was *Linoleum*, made from oxidized linseed oil and ground cork or wood flour. Its manufacture in the U.S. began in the late 19th century, about the same time synthetic *rubber floor tile* was also introduced. *Asphalt floor tiles* were first used in the 1920s and remained popular into the 1950s. *Plastic/vinyl* replaced asphalt as a binder in floor tiles in the late 1920s, in part because plastic, unlike asphalt, could be made in lighter colors and a greater variety of colors. Semi-flexible vinyl flooring, manufactured in the form of tiles or rolled sheets, was developed by the 1930s. After the war, it became more affordable and frequently was chosen for both residential and commercial interiors.

Imitative Materials

Imitative building materials are generally common and readily available materials used to simulate a more expensive material. They have a long history in American building construction. **Wood**, cut and planed and sometimes coated with a sand paint, has been used since the 18th century to replicate cut blocks of stone and quoins on the exterior of a building. **Stucco**, applied over any kind of construction (from log to rubble masonry) and scored to resemble stone, could make even a log house look elegant. **Cast iron** and **pressed metal**, whether as a complete façade, a storefront, or an individual feature such as a window hood, cornice, or decorative pilaster, were also used on the exterior of buildings to replicate stone. Not only **architectural terra cotta**, but **cast stone** served as a substitute for stone. **Metal** and **concrete** roofing tiles were used as less-costly alternatives to clay roofing tiles.

In the 20th century, the use of exterior imitative materials expanded as new products were developed. **Asphalt roll siding** that resembled brick could be applied to a wood building, and **asbestos composite shingles** were produced to replace not only wood shingle siding, but also slate roofing shingles. **Aluminum siding** has been used as a replacement for wood siding, followed by **vinyl siding**, **pressed wood siding**, and, more recently, **composite** or **fiber-cement siding**. Manufactured **faux slate roofing** became popular because it costs less than slate and is lighter weight. Over the years, imitative materials have increased in variety as synthetic materials continue to be introduced, including a substitute, an **exterior insulation and finish system (EIFS)**, for another imitative material—stucco. Imitative materials are also used to recreate missing or deteriorated architectural features in historic buildings.

On the interior, imitative materials, such as **scored plaster**, were historically applied to walls to give the appearance of stone. **Painted** or **marbleized finishes** on plaster or wood could further simulate stone, and **decorative graining** could transform the surface of a common wood into a more exotic species. **Scagliola**, which is often applied to brick columns, is a very old technique that uses a plaster-like com-

posite material to simulate marble. **Lincrusta**, an embossed wall covering, was developed in the late 19th century to simulate pressed metal. **Embossed wall coverings** continue to be produced in the 21st century. Concrete, vinyl, and other manufactured flooring materials are designed in many patterns and colors to replicate brick, stone, clay tile, and wood.





Arkansas Architectural Resources Survey Form

**ARKANSAS
HISTORIC
PRESERVATION
PROGRAM**

1. Resource Number: SB0320

2. NR Eligibility:

01-Eligible 02-Ineligible 03-Listed 05-Arkansas Register Listed
06-Contributing in a Listed District 08-Contributing in a Potential District

3. Contributing/Non-Contributing:

4. Destroyed: (Y or N) Date:

Above for AHPP Use Only

Survey Data

5. Date Recorded: 11/30/2021

6. Recorded By: M. Ford (Cox McLain
Environmental Consulting, Inc.)

7. Survey Number: 11317-0009-00216-00_1

8. Historic Name: Daniel A. Anderson House

9. Alternate Name: House at 715 N 6th Street

10. District Name: _____

11. Quad Map: F105

12. Geographic Location: S 9 T 8 R 32

13. UTM Coordinates: Z 15 E 371054 N 3917572

14. Town/Nearest Community: Fort Smith

15. Street Address/Directions to Resource: 715 6TH ST N

16. Owner: LODES, TEDD IAN & EMILY LAUREN

17. Owner Address: 713 N 6TH ST

18. Owner Phone Number: () -

19. Informant Name & Phone Number: _____

Descriptive Data

20. Threats to Property: Other: _____

- 1-None/Property Stable 2-Neglect/Deterioration 5-Private Development 6-Extractive Industry
- 7-Urban Encroachment 8-Government Activity 9-Other

21. Historic Use: Other: _____

22. Present Use: Other: _____

0101-Single Family Dwelling 0102-Multi-Family Dwelling 0301-General Retail Store 0308-Bank 0309-Office
0401-Church 0601-School 1200-Cemetery 9800-Structure Abandoned/Unoccupied. 9900-Other

23. Setting: Other: _____

1-Rural, Undisturbed 2-Rural, Built-Up 3-Urban Encroachment 4-Small Town 5-Urban 9-Other

24. Total Number of Site Features: _____
(e.g. concrete walls, ponds, statuary)

25. Total Number of Ancillary Structures: Garage apartment
(e.g. outbuildings, etc.)

26. Style Influence: Primary: Secondary: Other: _____

01-Plain/Traditional 04-Greek Revival 05-Italianate 09-Queen Anne/Eastlake 10-Classical Revival
15-Craftsman 18-Art Deco 19-Art Moderne 21-Standard Commercial 19th Century
22-Standard Commercial 20th Century 24-English Revival 25-Colonial Revival 26-American Foursquare
29-Ranch 33-Mixed Masonry 35-Folk Victorian 99-Other

27. Plan: Other: _____

01-One Room/Single Pen 03-Double Pen 04-Dogtrot 05-Single Pile w/ Central Hall
17-Shotgun 99-Other

28. Height: Other: _____

01-One 02-One & One-Half 03-Two 04-Two & One-Half 95-Varied 99-Other

29. Basement/Cellar: Other: _____

1-Full 2-Partial 3-No Cellar 8-Unknown 9-Other

30. Wings and/or Projections: A B C Other: _____

01-Rear Shed 02-Rear L 03-Rear T 04-Side 11-Enclosed 12-Rear Room 99-Other

31. Construction: A B Other: _____

01-Log 06-Frame 08-Brick 10-Steel Frame 11-Concrete Block 12-Reinforced Concrete 99-Other

32. Original Wall Material: A B Other: _____

33. Present Wall Material: A B Other: _____

01-Log 02-Weatherboard 03-Novelty Siding 04-Board/Batten 05-Brick
07-Stone 10-Stucco 12-Cut Stone 13-Field Stone 14-Asbestos
16-Concrete Block 17-Wood Shingle 18-Cast Concrete 21-Horizontal Board 23-Vertical Board
31-Vinyl Siding 32-Aluminum Siding 97-Unknown 98-Original Material 99-Other

34. Roof Types: A B C Other: _____

01-Gable 02-Gable w/ Parapet 03-Clipped Gable 04-Gable on Hip 06-Hip 07-Pyramid
08-Gambrel 09-Mansard 12-Flat 13-Flat w/ Parapet 14-Shed 99-Other

35. Roof Features (if present): A B Other: _____

01-Dormer(s) 02-Steeple 03-Cupola 04-Cresting 05-Clock Tower 07-Tower/Turret
08-Belfry 10-Skylight 99-Other

36. Roof Materials: A B Other: _____

01-Wood 02-Asphalt Shingle 03-Metal 05-Tile 06-Tar Built-up 99-Other

37. Chimney Placement: A B C D Other: _____

1-Exterior End 2-Interior End 3-Other Exterior 4-Interior Central 5-Other Interior 9-Other

38. Chimney Materials: A B C D Other: _____

1-Brick 4-Cut Stone 5-Field Stone 6-Metal 9-Other

39. Foundation Type: A Other: _____

1-Continuous 2-Piers 4-Enclosed Piers 9-Other

40. Foundation Materials: A Other: _____

1-Wood Block 2-Stone 3-Brick 4-Cast Concrete 5-Concrete Block 9-Other

41. Porch Types: A B C Other: _____

01-Full, Front 02-Three-quarter, Front 03-One-Bay, Central Front 05-Wrap-around
06-Awning 07-One-Half, Front 08-Recessed, Front 09-Side 15-Stoop 99-Other

42. Porch Height (Stories): A B C D Other: _____

1-One 2-One & One-Half 3-Two 4-Two & One-Half 9-Other

43. Porch Roof Types: A B C D Other: _____

1-Gable 2-Hip 3-Flat 4-Shed 5-Clipped Gable 6-Integral 9-Other

44. Porch Details: A B C Other: _____

01-Chamfered Posts 02-Turned Posts 03-Columns 04-Balustrade 05-Wood Ornament
08-Columns on Piers 11-Posts 12-Iron Posts 13-Screened-in 14-Iron Railing 99-Other

45. Window Type(s): A B C D Other: _____

1-Double-hung 3-Casement 4-Stationary 6-Hopper 7-Awning 9-Other/Materials

46. Light Pane Arrangement: A / B / C / D /

47. Condition:

1-Excellent 2-Good 3-Fair 4-Deteriorated 5-Ruin

48. Architectural Comments: _____

Features: Decorative door surround(s), Balcony, Cornice, Prominent chimney, Bay window(s). Alterations to main resource: _____

windows replaced – some; wall cladding replaced - some; roof replaced w/incomp. materials; Since 1992, the balustrade has _____

been replaced and the side wing has been enclosed. The second story porch on the NE facade was enclosed between 1950-92.

Historic Data:

49. Architect: _____

50. Builder: _____

51. Construction Date: C-circa D-date Other: _____

52. Historic Context: _____

Benjamin Wolf is listed as the earliest occupant of the house per the 1907 city directory. Wolf was a German-born merchant _____

associated with Mayer & Co. _____

53. Ethnic Heritage: A B Other: _____

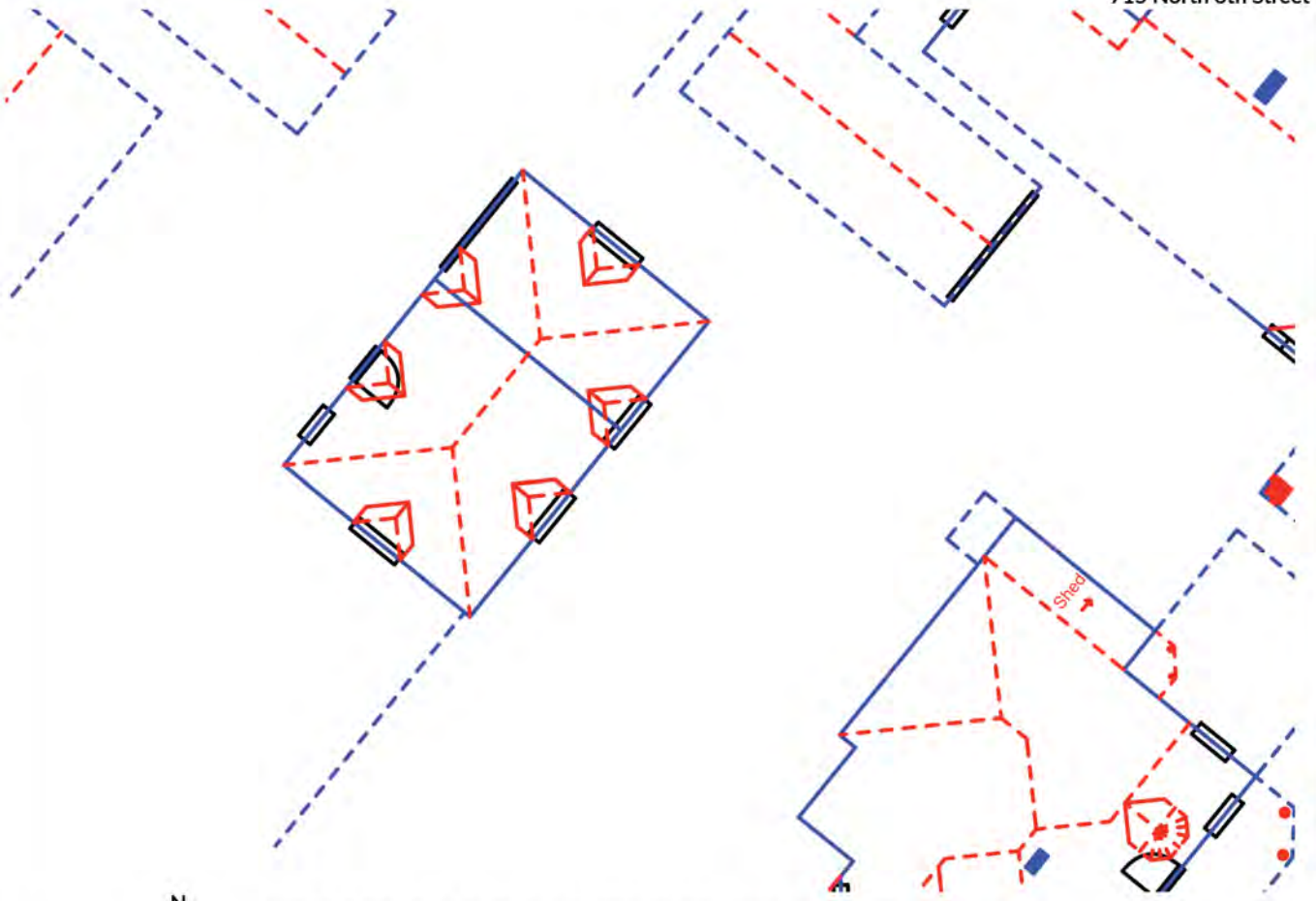
01-Asian 02-African American 03-European 04-Hispanic 05-Native American
06-Early American/Caucasian 99-Other

54. Please rate the level of significance of this property compared to others within survey area:

1-Very Significant 2-Moderately Significant 3-Significant Within a Group Context
4-Marginal 5-Non-Significant



11317-0009-00216-00
715 North 6th Street



NOTE: PORTION OF REAR ELEVATION NOT VISIBLE FROM PUBLIC ROW

**FORT SMITH HISTORIC DISTRICT COMMISSION
REGULAR MEETING
APRIL 4, 2024, 5:30 P.M.
DARBY COMMUNITY CENTER, 220 NORTH 7TH STREET**

STAFF REPORT

B. Historic Name: Daniel A. Anderson House Owner: Tedd and Emily Lodes
 Construction Date: c. 1891 Style Influence: Queen Anne/Eastlake
 Address: 715 North 6th Street Significance: (1) Very Significant

- Replace siding and paint exterior of home

PAINT:

Finding:

Section 3.4 states that earth tone colors were commonly used in the Victorian Period from 1865 to 1900. After 1900, lighter colors, including white were used. Section 3.2.10 of the Belle Grove Historic District Design Guidelines recommends repainting with colors that are appropriate to the historic building and district. Section 3.4.2 recommends selecting an exterior paint-color scheme that is appropriate for historic buildings and enhances the architectural details.

Recommendation:

Staff recommends approval.

SIDING:

Finding:

Section 3.0 of the Belle Grove Historic District Design Guidelines states that to the greatest extent possible, the Commission encourages the maintenance and preservation of original historic exterior materials in all cases. The Commission is aware that the application of artificial siding frequently compromises the aesthetic integrity of a building through the removal of original architectural details and the alteration of both original sheathing materials and overall proportional relationships that are essential to preserving the building's historic character and visual identification with a particular period of the past. Therefore, the Commission will adhere to the Secretary of the Interior's Guidelines for Rehabilitation for substitute materials and will consider substitute siding materials used only on a limited basis and only when they will match the appearance and general properties of the historic material and will not damage the historic resource.

The Arkansas Architectural Resources Survey Form recorded on 11/30/2021 indicates the present wall material is asbestos siding. The Secretary of the Interior's Guidelines for Rehabilitation lists fiber-reinforced cement siding as a less hazardous replacement for asbestos cement siding and is frequently installed in the form of horizontal boards or vertical panels as exterior siding. Additionally, the National Park Service lists fiber cement as potential substitute materials on wood and asbestos siding for Historic Building Features.

Recommendation:

Based on the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings as well as the provided chart of approved substitute materials from the National Park Service, staff recommends approval.