

September 22, 2014

To: Raleigh Historic Development Commission

Re: Guidelines Revisions

I am a former chair of the commission and I spent 6 years on the COA committee reviewing hundreds of cases. I started these notes back then and have been refining them ever since. The current debate prompted me to compare the existing guidelines with the existing proposed revisions. The following comments are with regard to the proposed revised guidelines.

I find the current guidelines to be quite good and the revisions to make them stronger. The following notes suggest further refinements.

#### General

- Historic Development Commission

#### Section 1

- For transparency and educational purposes COA section needs to talk about how the process works. Suggest that the section include information such as:
  - Preservation philosophy: 1<sup>st</sup> preserve fabric, 2<sup>nd</sup> repair fabric...
  - standards for review differ for
    - Individual Landmarks
    - Contributing Structures
    - Non-contributing structures
    - State owned Contributing structures
  - How the special character essay relates to the text of the main body of the guidelines
  - How to review proposed work:
    - Do the specifics appear not incongruous?
    - Does the whole appear not incongruous?
    - Does the proposed work appear not incongruous in context?
- COA analysis methodology: Perhaps craft a score card for approval similar to New Bern's demolition denial scorecard in that congruity is quantified and the net score determines the outcome. The LEED scorecard may be a better model as it allows requisites, and then a combination of other factors. This might help demystify.

Section 2

- Suggest adding a section on subdividing/combining lots requiring that the resulting lots reflect the historic built pattern of the subdivision. Perhaps: When subdividing lots the resulting lots must reflect the typical proportion of the well related historic lots in the district being mindful of the street width to lot depth ratio.
- 2.7 - Current lamp of choice is a harsh orange color sodium vapor. Metal halide is quite distorted color. LEDs are available with low color temperature (2,700-3,200 degrees kelvin) and CRI in excess of 80.

Section 3

- Everything should be relative to well-related buildings as defined in the draft revision.

Section 4

- Everything should be relative to well-related buildings
- 4.2 - Very concerned about the wording "New additions are appropriate as long as they do not destroy historic features, materials, and spatial relationships that are significant to the original building and site." This reads as very permissive, which I know isn't the intent. perhaps something like "New additions are **not inappropriate if** they do not destroy historic features, materials, and spatial relationships that are significant to the original building and site, **and providing they meet the rest of the criteria in these guidelines.**"
- 4.2.11 - Clarify - "It is not appropriate to construct an addition that significantly changes the proportion of original built mass to open space on the individual site." What tips the scale? Would an 1800sf addition to a 1200sf building do it? The phrase "individual site" would suggest this is not in relation to the overall development pattern, but to the existing historic structure. It seems several approved additions ignore this guideline. If this is what we want it seems to hinge on the question of what is a **significant** change.  
Dictionary def: "of a noticeably or measurably large amount"  
Zoning seems to define a significant increase to be 150% or more.  
Define "significantly" as percentage of lot coverage greater than 150% of the historic fabric of the lot in question or the average historic portions of the well related nearby lots, whichever is larger.  
Define what goes into lot coverage. Suggest primary structures, accessory buildings, and impervious surface.
- 4.3 - Add: If a new building is to be constructed on the site of contributing structure demolished in the last 3 years the infill will be limited in footprint and square footage of the demolished structure.

- 4.3.7 --“ height within 10% of well related”... Consider 500 block of Polk street. North street wall alternates 2 story /1 story/2/1/2/1/2. Does this mean within 90% of the smallest and 110% of the largest??  
Measured to where?
- It seems if 4.2.11 is important to us there should be an analogous guideline in 4.3. Perhaps something like:  
Design new buildings to have no more lot coverage than 150% of the average of the total lot coverage of the historic portions of well related nearby lots.
- Allow infill to be a replication providing a plaque is posted at the house side of the sidewalk facing the street noting the building as such if it is not apparent to a typical observer. (Have height, finish, material, font size, language, and plaque size requirements.)
- I strenuously object to the proposed change in language to “Compatible and consistent” from “compatible. It is a much higher bar and potentially contradictory with the requirement to differentiate the new from the old. It also could disallow modern materials that are actually more appropriate in a given application. I believe the concerns that “compatible” is too broad can be addressed by defining the term.
- I agree with adding style when used relative to repairs and replacement of historic elements on a given structure.
- I strenuously disagree with making Style a criteria for infill or additions unless the district is a restoration and has a clear interpretive program that includes readily accessible interpretive materials such as on site signage.

#### Section 5

- (nothing)

#### Section 6

- Definitions
  - Add: COMPATIBLE:  
In the context of historic development patterns.  
In the context of fenestration : visually similar (texture, spacing, etc),  
in the case of materials: texture, modulus of elasticity, expansion coefficient, etc .  
For instance, with regard to material:  
1) For repairs and changes to historic fabric, “Compatible” material is defined as being of the same proportion, shape, edge definition, surface texture, finish and having similar coefficients of expansion as the historic material with which it is being integrated.  
2) For additions, “Compatible” material is defined as being of the same proportion, shape, edge definition, surface texture, and finish as is found in the historic structure.

- 3) For new construction, "Compatible" material is defined as being of the similar proportion and shape as found in well related nearby buildings. I would also follow a similar track on design elements and setting: 2 definitions each: Additions and new construction, with additions the stricter and new construction looser.
- o LIFE-CYCLE — The lifespan of a material, feature, or system starting with manufacture and ending with disposal/recycling.
  - o NOMINAL SIGHTLINE—"An imaginary line extending from a hypothetical six foot tall pedestrian on the street to the top of a building and beyond." (From where on the street?)
  - o TECHNICALLY FEASIBLE—Possible to accomplish using reasonable skill with available materials, labor, and technology.

**Oakwood Special Character - Add:**

- o Break the districts into zones and discuss the qualities of that zone in terms of the criteria in the guidelines including, but not limited to,:
  - porches (are they appended or inset),
  - lot shape
  - sidewalk
  - setbacks
  - Alignment of house bodies.
- o Homes on corner lots being larger structures on smaller lots, with the exception of Elm street, Euclid st, Pell street, ...

Sincerely,  
Curtis Kasefang