

CITY OF SAINT PAUL  
HERITAGE PRESERVATION COMMISSION STAFF REPORT

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FILE NAME: C & E Flats Housing Proposal  
 DATE OF APPLICATION: April 23 and 28, 2015  
 APPLICANT: Exeter Group LLC, Thomas Nelson  
 ARCHITECT: BKV Group, Inc., Mike Krych  
 OWNER: IAF 2400 University LLC  
 DATE OF PRE-APPLICATION REVIEW: May 14, 2015  
 HPC SITE/DISTRICT: University Raymond Commercial Heritage Preservation District  
 CATEGORY: Contributing  
 CLASSIFICATION: Rehabilitation/Addition/Alteration  
 STAFF INVESTIGATION AND REPORT: Amy Spong  
 DATE: April 28, 2015

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**A. SITE DESCRIPTION:**

The General Motors Truck Company Building at 2390-2400 University Avenue was designed by Buechner and Orth and constructed in 1928. The one-story, flat roofed, commercial building wraps around the Twin Cities State Bank designed by the same firm. The University Avenue elevation's base is faced in St. Cloud granite and has square buff brick accents above the four storefronts and rhythmic buff brick 'T's' above the brick columns separating the storefronts. The Raymond Avenue elevation has two of the truck servicing bays remaining while the other five original bays have been infilled with brick and concrete or modified for window openings. Both street facing facades are clad in dark brown variegated texture brick rising to a brickwork cornice and a low parapet.

The building is representative of the many trucking companies settling in the University-Raymond Commercial Historic District between World War I and the Great Depression and was one of the largest automotive servicing buildings in the Twin Cities at the time of its construction. The building is categorized as contributing to the historic and architectural character of the University-Raymond Commercial Historic District which is significant for its development as the city's largest industrial neighborhood and a national transportation center. Many of the buildings are associated with the Minnesota Transfer Railway or the early trucking industry and are excellent examples of early twentieth-century factory, warehouse, and office structures. Many designed by prominent architects such as Buechner and Orth, Ellerbe and Round, and Toltz, King and Day. District buildings designed by Buechner and Orth are the Northwestern Furniture Exposition Building (1906), the Simmons Mattress Company (1909), Twin Cities State Bank (1914), and the General Motors Truck Company Garage (1928).

**B. PROPOSED CHANGES:**

The applicant proposes to construct a five-story, U-shaped structure onto the roof of the existing L-shaped building. The market rate apartment addition will be approximately 19,000 square feet per floor with amenities such as a gym, pool and indoor parking, which will be in the historic garage. The addition will be setback from the University (77 feet) and Raymond (8 feet) elevations and from the historic Chittenden and Eastman Building to the west (30 feet 9 inches). The new addition is proposed with both paired and single windows in an ordered pattern and main materials are metal and fiber cement panels in earth tone colors.

The applicant proposes some rehabilitation for the historic building mainly on the Raymond and south elevations. The University elevation will remain with commercial uses and the non-historic storefronts will remain. The rehabilitation for the Raymond and south elevations are described in more detail in the application. Masonry will be cleaned and repaired and some of the blocked window openings will be reopened with new steel sash and insulated glass. Many

of the existing pedestrian entries will be retained with new doors.

### **C. BACKGROUND:**

As part of the City's annual solicitation for potential Metropolitan Council grants, a call for ideas is sent out to all developers, community organizations, and other economic development partners asking if they have any potential grant applications for the Livable Communities Demonstration Account (LCDA), LCDA-TOD (Transit-Oriented Development), and Tax Base Revitalization Account (TBRA) and TBRA-TOD programs. This call went out in January 2015. Potential applicants were asked to fill out the City's pre-application form; pre-apps were due to the City on February 13, 2015. Exeter Group submitted its pre-app for an LCDA-TOD Development grant on February 13, 2015, asking for \$620,000 for a green roof, sidewalks, utilities and bike racks for the C & E Flats project. All pre-apps were reviewed by a PED staff team, which then recommended to PED's Leadership Team on March 6, 2015 which applications should proceed to the Met Council process. The staff team recommended that C&E Flats proceed; the Leadership Team concurred. After this action, it was brought to the staff team's attention that HPC staff had some concerns about the impact of the proposed project on the integrity of the University Raymond Commercial District and perhaps even its National Register certification (which would affect the ability of the developer to tap historic tax credits). Further, the project had not gone through the HPC design review process yet. Given this information, the staff team recommended that Exeter hold off until the second round of LCDA-TOD grants, due in November 2015. By that time, it was reasoned, the project would be through the HPC process and, presumably, approved. The Leadership Team concurred, and met with Exeter representatives to explain the new strategy. In response to concerns from Exeter that waiting until November might jeopardize the need argument (since the project would be under construction) and would not mesh with the timing for certain upgrades (such as the green roof) and thus might result in those components being removed from the project altogether, the Leadership Team decided to allow the application to go ahead for Round 1.

HPC staff first met with the applicants on March 24, 2015 and was introduced to the project with similar plans the HPC is reviewing. Staff responded to the overall proposal and 1) expressed concern over the project as a whole and the amount of outreach the applicants did before talking with the HPC about the proposal, 2) discussed potential long-term consequences with altering a contributing building with such a large roof-top addition, 3) made some specific suggestions to possibly minimize the negative effect (i.e. flip the U so more of the massing is at the rear, change windows and siding to be more compatible, rethink the recessed area to not reflect the Sullivanesque historic C & E Building), and 4) discussed timing and the review process by the HPC. In mid-April staff emailed the applicant a link to *Preservation Brief #14: New Exterior Additions to Historic Buildings: Preservation Concerns* and encouraged careful review of this document as it is a useful tool in helping to interpret and design additions to historic properties based on the Secretary of the Interior's Standards as well as the University Raymond district design guidelines which based on the same ten Standards.

### **D. PRE-APPLICATION REVIEW MEETING FORMAT**

Typically, the HPC allows for 20-30 minutes for review of each project. The informal review format is as follows:

- Staff will make a brief presentation (5 minutes) identifying issues that should be addressed by the HPC.
- The applicant will make a brief presentation (5 minutes) describing the historic

preservation design considerations pertaining to the project scope.

- The HPC will discuss the project and consider whether the project is consistent with the applicable design review guidelines and the SOI. While committee members may discuss the appropriateness of a design approach in addressing the guidelines or SOI, their role is not to design the project. Given the nature of some large rehabilitation projects, the HPC may suggest that the applicant retain a preservation architect.
- At the end of the review, the HPC Chairperson will summarize the issues that were identified, the position of the committee members, and list all recommendations for revisions. The summary includes majority as well as minority or split opinions. The summary should cite all applicable design guidelines and Standards.

Although the HPC works to provide comments that will result in a project that will be recommended for approval by the HPC, the discussion is preliminary and cannot predict the final recommendation of staff, public comment, and the decision of the full HPC during the Public Hearing Meeting.

It is assumed that one pre-application review will take place prior to a project being submitted for an HPC Public Hearing Meeting. On certain occasions, the HPC may recommend that an additional pre-application reviews take place. If another pre-application review is scheduled, then neighboring property owners may be notified of the review within at least 350 feet from the project site.

#### **E. GUIDELINE CITATIONS:**

##### **Sec. 74.06.3. - Design review guidelines, purpose and intent.**

(a) The following guidelines for design review serve as the basis for the heritage preservation commission's permit review decisions in the University-Raymond Commercial Historic District. The guidelines define the most important elements of the historic district's unique physical appearance and are intended to state the best means of preserving and enhancing these elements in rehabilitation or new construction. When applying the guidelines, the commission, in clearly defined cases of economic hardship, will also consider deprivation of the owner's reasonable use of property.

(b) The commission shall conduct its design review for all projects in the district according to the secretary of the interior's "Standards for Rehabilitation" (1995). These standards shall be applied to all district projects in a reasonable manner and take into consideration their economic and technical feasibility. The ten (10) standards are:

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

(2) The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

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

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

(5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

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

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

(8) Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

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

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

(c) Restoration and rehabilitation.

(1) *Masonry and walls.*

a. *Use of materials.* Original masonry and mortar should be retained whenever possible without the application of any surface treatment. A similar material should be used to repair or replace, where necessary, deteriorated masonry. New masonry added to the structure or site, such as new foundations or retaining walls, should be compatible with the color, texture and bonding of original or existing masonry. Formstone, stucco and wood or metal siding or paneling should not be used.

b. *Cleaning.* Masonry should be cleaned only when necessary to halt deterioration or to remove graffiti and stains and always with the gentlest method possible such as low pressure water (under 300 psi) and soft bristle brushes. Brick and stone surface should not be sandblasted with dry or wet grit or other abrasives. Abrasive cleaning methods can erode the hard surface of the material and accelerate deterioration. Chemical cleaning products which could have an adverse chemical reaction with the masonry material such as acid on limestone or marble should not be used. Chemical solvents should not be used at all except for removing iron and oil stains. It is preferable to use water with a non-ionic biodegradable detergent. Mortar should be repointed and window frames should be caulked before cleaning.

Waterproof or water repellent coatings or surface consolidation treatments should not be applied unless required to solve a specific technical problem that has been studied and identified and determined to comply with applicable design guidelines. In general, however, coatings are frequently unnecessary, expensive, and can accelerate deterioration of the masonry.

c. *Repointing.* Repointing should be done on those mortar joints where there is evidence of moisture problems or when mortar is missing to allow water to stand on



the mortar joint. Using pneumatic hammers to remove mortar can seriously damage the adjacent brick and only motorized tools that do not damage brick should be used. Vertical joints should be hand chiseled. When repointing, it is important to use the same materials as the existing mortar. This includes matching the color, texture, coefficients of expansion and contraction, and ingredient ratio of the original mortar mix, creating a bond similar to the original. A professional mortar analysis can give this information. Repointing with Portland cement mortar may create a bond stronger than is appropriate for the building materials, possibly resulting in cracking or other damage. Old mortar should be duplicated in joint size, method of application and joint profile.

d. *Painting.* The original or early color and texture of masonry surfaces should be retained, including early signage wherever possible. Brick or stone surfaces may have been painted or whitewashed for practical and aesthetic reasons and paint should not be indiscriminately removed from masonry surfaces as this may subject the building to damage and change its appearance. If masonry surfaces were not originally painted or ever intended to be painted, they should not be painted.

(2) *Windows and doors.*

a. *Openings.* Existing window and door openings should be retained. New window and door openings should not be introduced into the principal elevations. Enlarging or reducing window or door opening to fit stock window sash or new stock door sizes should not be done. Infilling of window openings or installing new openings may be permissible on secondary facades if standard sizes approximate the size and proportions of the opening. Generally, a secondary facade will be considered as any facade not facing the street and not having the ornamentation and higher quality materials usually associated with street facades.

b. *Panes, sashes and hardware.* It is desirable to retain original windows and doors, but they may need replacement for functional reasons. Replacement is clearly acceptable for functional reasons if new materials closely match original materials. Different materials may be acceptable on a case-by-case basis. Window panes should be two-way glass. No reflective or spandrel glass is permitted. The stylistic period or periods a building represents should be respected. Shutters are generally inappropriate in the district. Missing or irreparable windows should be replaced with new windows that match the original in material, size, general muntin and mullion proportion and configuration and reflective qualities of the glass. Replacement sash should not alter the setback relationship between window and wall.

Heating and air conditioning units should not be installed in the window frames when the sash and frames may be damaged. Window installations should be considered only when all other viable heating and cooling systems would result in significant damage to historic materials. Window installations may be acceptable in minor facades.

c. *Storm windows.* Storm windows and doors should be compatible with the character of the building and should not damage window and door frames, or require removal of original windows and doors. Exterior storm windows should be appropriate in size and color and should be operable.

d. *Awnings and canopies.* Awnings and canopies should not be used when they conceal richly detailed entries and windows. Aluminum or plastic awnings shall not be used. Large lettering or font styles inconsistent with the historical and architectural character shall not be used on awnings. Awnings should have a traditional shape

such as a tent shape or be rounded when the opening is arched.

e. *Lintels, arches, and sills.* Lintels, sills, architraves, pediments, hoods and steps should be retained or repaired if possible. Existing colors and textures should be matched when repairing these elements.

f. *Storefronts.* Original or storefronts determined to have historical, architectural or engineering significance should be retained and repaired including windows, sash, doors, transoms, signage, and decorative features where such features contribute to the architectural and historic character of the building. Where original or early storefronts no longer exist or are too deteriorated to save, the commercial character of the building should be retained through: (1) contemporary design which is compatible with the scale, design, materials, color and texture of the historic buildings; or (2) an accurate restoration of the storefront based on historical research and physical evidence. Storefronts or new design elements on the ground floor, such as arcades, should not be introduced which alter the architectural and historic character of the building and its relationship with the street or its setting or which cause destruction of significant historic fabric. Materials which detract from the historic or architectural character of the building, such as mirrored glass, should not be used. Entrances through significant storefronts should not be altered.

(3) *Roofs, cornices and other details.*

a. *Roof shape.* The original roof shape should be preserved. New skylights and vents should be behind and below parapet level. When the roof is visible from street level, the original material should be retained if possible, otherwise it should be replaced with new material that matches the old in composition, size, shape, color, and texture.

b. *Cornices and other details.* All architectural features that give the roof its essential character should be preserved or replaced. Similar material should be used to repair/replace deteriorating or missing architectural elements such as cornices, brackets, railings, shutters, steps and chimneys, whenever possible. If an accurate reconstruction of a missing cornice is not feasible, due to cost, structural issues or lack of pictorial documentation, then the intricacy of detail is least important for new elements at or near the roof line. The same massing, proportions, scale and design theme as the original should be retained.

(d) Signs and accessories.

(2) *Accessories.*

a. *Grills, exhaust fans, etc.* Grills, exhaust outlets for air conditioners, bath and kitchen exhaust fans should be incorporated into filler panels, if possible. They may be painted the same color as the filler panel.

(e) **New construction.**

(1) *Generally:* New construction refers to totally new structures, moved-in structures and new additions to existing structures. Any new construction should possess height, massing, setback, materials and rhythms compatible with surrounding structures. The reproduction of historic design and details is recommended only for limited cases of infill or small scale construction. Guidelines for new construction focus on general rather than specific design elements in order to encourage architectural innovation.

a. *Setback.* There are a variety of setbacks expressed in the University- Raymond Commercial Historic District. However, new setbacks should relate to adjacent historic buildings

b. *Massing, volume, height.* Most of the structures of the district are distinguished by their boxy profiles; preservation of this aspect is the most essential element for maintaining district unity. New construction should be compatible with the massing, volume, and height, of existing structures in the historic district.

c. *Rhythm.* The rhythm in the University-Raymond Commercial Historic District can be found both in the relation of several buildings to each other, and in the relation of elements on a single building facade. Rhythm between buildings is usually distinguished by slight variations in height, windows and doors, and details, including vertical and horizontal elements. Rhythm may be accentuated by slight projections and recessions of the facade, causing the scale of the building to match that of its neighbors. The rhythm of new construction should be compatible with that of existing structures.

d. *Roofs, cornices.* New roof, and cornice designs should be compatible with existing adjacent structures. Generally, roofs in the district are flat. It is more important for roof edges to relate in size and proportion, than in detailing.

e. *Materials and details.* Brick and pressed brick, Bedford stone and Mankato-Kasota stone, terra-cotta, ceramic tile, concrete, metal and glass are the most commonly used materials in the district.

The materials and details of new construction should relate to the materials and details of existing adjacent buildings. New buildings in the district should possess more detailing than typical modern commercial buildings, to respond to the surrounding buildings and to reinforce the human scale of the district. Walls of buildings in the district are generally of brick with stone trim. They display the colors of natural clay, dark red, buff, and brown. When walls are painted, similar earthtones are usually used.

f. *Windows, doors.* Windows should relate to those of existing buildings in the district in the ratio of solid to void, distribution of window openings, and window setback. The proportion, size, style, function and detailing of windows and doors in new construction should relate to that of existing adjacent buildings. Window and door frames should be wood or bronze-finished aluminum.

g. *Parking.* The preferred location of parking lots is behind the buildings rather than in front or beside them. If street frontage is the only option, the lots should be screened from street and sidewalk either by walls or plantings or both. If walls are used, their materials should be compatible with the walls of existing adjacent buildings. Walls should be at least eighteen (18) inches high. Walls or plantings should be located to disrupt the street plane as little as possible.

h. *Landscaping, street furniture.* Traditional street elements of the area should be preserved. New street furniture and landscaping features should complement the scale and character of the area.

(C.F. No. 05-52, § 2, 2-23-05)

**Sec. 74.06.4. - Guidelines for non-contributing and contemporary buildings.**

(a) *Change to contributing status.* A building classified as non-contributing to the historic district but built within the period of significance established for the district that has been substantially altered may be reclassified as a contributing building, if it is returned to its original historic facade by means of restoration or replication.

(b) *Noncontributing and contemporary building additions and alterations.* Additions and alterations to noncontributing and contemporary buildings must be sympathetic and subordinate to original building and adjacent structures. These changes must help the original better fit its context. Guidelines for new construction shall apply to noncontributing and contemporary buildings.

(C.F. No. 05-52, § 2, 2-23-05)

**Secretary of the Interior's Standards for Rehabilitation (1990)**

**New Additions to Historic Buildings**

**Recommended:**

- Placing functions and services required for the new use in non-character defining interior spaces rather than installing a new addition.
- Constructing a new addition so that there is the least possible loss of historic materials and so that character-defining features are not obscured, damaged, or destroyed.
- Locating the attached exterior addition at the rear or on an inconspicuous side of a historic building; and limiting its size and scale in relationship to the historic building.
- Designing new additions in a manner that makes clear what is historic and what is new.
- Considering the attached exterior addition both in terms of the new use and the appearance of other buildings in the historic district or neighborhood. Design for the new work may be contemporary or may reference design motifs from the historic building. In either case, it should always be clearly differentiated from the historic building and be compatible in terms of mass, materials, relationship of solids to voids, and color.
- Placing new additions such as balconies and greenhouses on non-character-defining elevations and limiting the size and scale in relationship to the historic building.
- Designing additional stories, when required for the new use that are set back from the wall plane and are as inconspicuous as possible when viewed from the street.

**Not Recommended:**

- Expanding the size of the historic building by constructing a new addition when the new use could be met by altering non-character-defining interior spaces.
- Attaching a new addition so that the character-defining features of the historic building are obscured, damaged, or destroyed.
- Designing a new addition so that its size and scale in relation to the historic building are out of proportion, thus diminishing the historic character.
- Duplicating the exact form, material, style, and detailing of the historic building in the new addition so that the new work appears to be part of the historic building.
- Imitating a historic style or period of architecture in new additions, especially for contemporary uses such as drive-in banks or garages.
- Designing and constructing new additions that result in the diminution or loss of the historic character of the resource, including its design, materials, workmanship, location, or setting.
- Using the same wall plane, roof line, cornice height, materials, siding lap or window type to make additions appear to be a part of the historic building.
- Designing new additions such as multistory greenhouse additions that obscure, damage, or destroy character-defining features of the historic building.
- Constructing additional stories so that the historic appearance of the building is radically changed.

**F. PRELIMINARY FINDINGS: These findings are preliminary and focus on the general rather than the specific given the project is in the schematic phase. They should be considered a starting point rather than a complete analysis.**

1. The site is located within the University Raymond Heritage Preservation District and is categorized as contributing to the District. This District has also been certified by the National Park Service as meeting the criteria for listing on the National Register of Historic Places (This certification as a contributing resource proceeds the Phase II Architectural History Investigation for the Central Transit Corridor (2004) mentioned in the application as not demonstrating its original property). This certification allows developers who own contributing buildings to access both the federal and state historic tax credits for rehabilitation of historic resources. If the proposed addition moves forward, the building's status as contributing will be reclassified as a non-contributing building and future use of tax credits may not be possible.
2. On February 23, 2005, the University Raymond Commercial Heritage Preservation District was established under Council File No. 05-52 § 1 and Chapter 73 of the Legislative Code states the Heritage Preservation Commission shall protect the architectural character of heritage preservation sites through review and approval or denial of applications for city permits for exterior work within designated heritage preservation sites §73.04.(4). The period of significance for the University-Raymond Commercial Historic District is 1891 to 1941.
3. **Sec. 74.06.3.(b)(1,2, 9 and 10) Standards for Rehabilitation.** Historic buildings should be used for their original purpose or have a new use that requires minimal alteration to the building (1). Adding five floors of new residential units is not a minimal alteration. The new work is *differentiated from the old* but is not *compatible with the massing, size, scale, and architectural features* in order to *protect the historic integrity of the property and its environment* (9). The new addition is not easily reversible as much of the core of the building would be destroyed and possibly exterior elevations if it were *removed in the future* (10). *The essential form and integrity of the historic property and its environment would be impaired and does not meet these Standards.*
4. **Sec. 74.06.5. – Demolition.** A large portion of the roof will be removed to allow for the new structure and there is also a tall, brick chimney that will likely be removed and will result in the loss of that character-defining feature.
5. **74.06.3(c) Restoration and Rehabilitation.** More detailed information is necessary to determine full compliance with applicable guidelines. A more detailed window and door schedule should be completed to determine which openings are original and which openings are not. Every effort should be made to restore original openings and close non-original openings if not needed for code purposes.
6. **74.06.3(e) New Construction.** The addition as viewed from University and Raymond Avenues does have a simple boxy profile which is an important element to maintain in this commercial district. A distinction must be made between free-standing new construction (infill) and appropriate additions to historic buildings. The Secretary of the Interior's Standards for Rehabilitation provide specific guidelines for additions and *Preservation Brief #14* further assists in reviewing rooftop additions to historic urban districts. The colors and stylized "recesses" recalls the pivotal C & E Building but the addition should relate more to the General Motor Truck Company Building its proposed to be attached to rather than the C & E. Even the name of the project references the C & E rather than recalling the unique history of the General Motor Truck Building.
7. **74.06.3(e)(1)(a) Setback.** The Standards recommend *designing additional stories, when required for the new use that are set back from the wall plane and are as inconspicuous as possible when viewed from the street.* The addition is set back from the wall plane but is not

inconspicuous when viewed from Raymond and University Avenues. Rooftop additions, in general are not recommended for one, two and three-story historic buildings given difficulties designing them as unobtrusive as possible, challenges in diminishing the historic structure and nearby structures, and negatively impacting important views. The shallow setback along Raymond Avenue may also have negative impacts to the contributing Twin Cities State Bank Building at the corner. Light will be impacted on the upper floors at the rear and possibly the side which may impact viability and long-term use.

**74.06.3(e)(1)(b) Massing, Volume, Height.** The proposal does not comply with guidelines for massing, volume and height as the rooftop addition will *result in the diminution or loss of the historic character of the resource, including its design, materials, workmanship, location, and setting.* The addition will add *additional stories so that the historic appearance of the building is radically changed.* The new addition is designed so that *its size and scale in relation to the historic building are out of proportion, thus diminishing the historic character.* A Conditional Use Permit (CUP) will also be required for height and reviewed and approved by the Planning Commission.

The boxy massing which is *the most essential element for maintaining district unity* will be diminished for the General Motor Truck Building and the nearby historic buildings: Twin Cities State Bank and the C & E Building. An aspect of the boxy character is that the historic buildings maintain their overall height or step down at the back. The addition will “step up” at the back of the building. There are several other contributing one and two story buildings in the Historic District and if additional stories are incrementally added over time, this may result in an overall diminishing character of the District.

8. **74.06.3(e)(1)(e) Rhythm.** There is a consistent rhythm with historic building facades facing University and Raymond Avenues with respect to setback but there is variety in heights (lack of rhythm). The rooftop addition is proposed at just under the height of the historic C & E Building to the west. The C & E Building is a significant historic building that can be seen from all sides given it's the tallest building along the southern stretch of University. Views of this building will be impacted with the addition. *Elements* of the new addition do not relate to the elements of the General Motors Truck Building or nearby buildings—mostly window and bay spacing, massing and the recesses on University and Raymond.
9. **74.06.3(e)(1)(d) Roofs, Cornices.** The historic building's flat roof will be altered by adding a new large structure, however, the addition is proposed with a flat roof and simple cornice and relate to the existing and nearby structures for roofs and cornices.
10. **74.06.03(e)(1)(e) Materials and Details.** The proposed general materials of metal and fiber cement panels and details do not *relate to the materials and details of existing adjacent buildings.* The new addition does not *possess more detailing than typical modern commercial buildings* which is recommended *to respond to the surrounding buildings and to reinforce the human scale of the district.* *Walls of buildings in the district are generally of brick with stone trim. They display the colors of natural clay, dark red, buff, and brown. When walls are painted, similar earth tones are usually used.* The panels are proposed to be in earth tones but do not relate to the brown brick of the General Motors Truck Building.
11. **74.06.3(e)(1)(f) Windows and Doors.** Often, the first floor windows differ from upper floor windows for multistory historic buildings in the District. Window openings also differ between primary, street-facing elevations to secondary, side elevations. Nearby upper floor windows of adjacent historic buildings have divided light double-hungs, Chicago-style windows (fixed center with side double-hungs), and further east multi-paned steel windows. The proposed addition windows do not relate to nearby historic windows or the windows on the historic portion in style, function, distribution, proportion and solid-to-void ratio. *The proposed pattern of the windows are not a traditional double-hung as seen in most of the adjacent buildings and have both horizontal and vertical orientations created both by the*

*openings and the mullion patterns. The guideline states, window and door frames should be wood or bronze-finished aluminum and bronze aluminum is proposed.*

- 12. 74.06.3(e)(1)(g) Parking.** Parking is proposed on the inside of the structure which is consistent with its original use.
- 13.** As currently proposed and designed, the rooftop addition will adversely affect the Program for the Preservation and architectural control of the University-Raymond Commercial Historic District (Leg. Code §73.06 (e)).

**G. ATTACHMENTS:**

- 1.** HPC Pre-Application
- 2.** Site Plans, Floor Plans, and Elevations
- 3.** Street View Images, before and after
- 4.** Preservation Brief #14



C & E Flats  
2390-2400 University Avenue West, Saint Paul  
St. Paul Heritage Preservation Commission Pre-Application  
Submitted April 23, 2015



LANDSCAPE RESEARCH LLC



**C&E Flats**  
**St. Paul Heritage Preservation Commission Pre-Application**  
**Submitted April 23, 2015**

**Project Description**

Exeter Group LLC (“Exeter”) proposes to construct a five-story, market rate apartment addition (119 units) to the property at 2390-2400 University Avenue. The new addition (19,000 s.f. per floor) will be built on the rear portion of the General Motors Truck Company Building (1928) in the locally designated, University-Raymond Commercial Historic District.

The proposed development, “C&E Flats”, will respond to the demand for transit oriented rental housing along the Central Corridor Light Rail “Green Line” while respecting the property’s place within the historic district by keeping the original building and its uses intact (parking facility with storefronts and commercial space) and constructing a compatible yet differentiated structure above with generous setbacks, proper scale and appropriate materials and colors.

C&E Flats will also provide desired amenities (gym, pool, indoor parking) for the neighboring C&E Lofts Historic Apartments (“C&E Lofts”), Exeter’s 104 unit, award winning historic adaptive re-use completed in 2012, along with highly sought after, high quality mixed-use density that will enhance the vitality of the entire historic district.

**Existing Building Description**

The one-story, brown brick General Motors Truck Company Building (39,200 s.f.) has two wings that wrap around the three-story Twin Cities National Bank building (1914) at the corner of University and Raymond Avenues. The northern wing has two storefronts (3,000 s.f. each) at the University Avenue elevation and the southern wing (33,200 s.f.) consists primarily of two separate parking garages (14’7” clear height and 18’2” clear height) with facilities for offices, truck maintenance and secure cash vault areas utilized by the most recent tenant, Loomis Armored. There are multiple vehicular and pedestrian entries off of both Raymond Avenue and the parking lot facing the non-primary south elevation.

The University Avenue (north) elevation is brown brick with small square buff brick accents above the storefronts and rhythmic buff brick “T’s” above at the top of the brick columns separating the storefront bays. There is a dark bronze sheet metal parapet cap, two (2) remaining historic light fixtures and a non-historic blade sign for a former small theater tenant. Two (2) of the historic storefronts have been modified with recessed entries and the windows are non-original.

The Raymond Avenue (east) elevation is brown brick with a dark bronze sheet metal parapet cap. There are three (3) non-historic exterior lights and a small “Loomis” sign

over the northern garage entry. The elevation has eight (8) window openings approximately 12 feet high in varying widths. Two (2) of the openings have windows removed and replaced with bricks. The remaining six (6) openings have original steel frame windows, which have been painted and covered by wooden or metal panels.

The non-primary south elevation is buff brick with a dark bronze sheet metal parapet cap. There are three (3) non-historic exterior lights and no signage. The elevation has eight (8) window openings approximately 12 feet high in varying widths and eleven (11) transom windows approximately 5 feet high in varying widths. The eight (8) original steel frame windows are in place and seven (7) have been painted and covered with insulation, 2'x4's and metal panels.

### **Property History**

The General Motors Truck Company Building was designed by the local architecture firm, Buechner & Orth. Charles William Buechner (1859-1924) and Henry W. Orth (1866-1946) formed a partnership in 1902 and practiced together until Buechner's death in 1924. The firm is credited with a number of private residences in the Lowry Hill neighborhood of Minneapolis as well as commercial buildings in St. Paul's Midway area. The firm designed the neighboring Twin Cities State Bank in 1914 and the General Motors Truck Company Building was completed in 1928, four years after Buechner's death.

The building was historically unheated and occupied by the General Motors Truck Company until the Glendening Company moved into the building ca. 1950. At that time, the southern portion (Raymond Avenue) was used as a motor freight station and the northern portion (University Avenue) was used for vehicle storage. For the past 40 years, the building was used by Loomis, for the armored car fleet. The recent addition of light rail lines along University Avenue has contributed to the decline of commercial and industrial uses and an increase in residential units.

The Phase II Architectural History Investigation for the Central Transit Corridor (The 106 Group, 2004) determined that the property did not demonstrate its original property type due to the alterations at University Avenue (creation of storefronts) and Raymond Avenue (infill of doors and windows). The investigation also determined that the property is not an outstanding example of a significant historical property type and it is not individually eligible for the National Register of Historic Places under any of the criteria.

The building is contributing to the local, University-Raymond Commercial Historic District.



## **Recent Use & Sale/Leasing Activity**

An Exeter affiliate acquired the property in 2011. Until October 2014, the 33,200 s.f. southern garage and commercial portion of the property had been occupied by Loomis Armored for approximately 40 years for truck maintenance, parking, offices and a cash vault. The two retail spaces totaling 6,000 s.f. on University Avenue were a small theatre and a martial arts studio. The property is currently 100% vacant.

In July 2012, Exeter engaged Welsh Companies, LLC (dba Colliers International) to market the building for lease and for sale. This listing initially ran for one year, but was subsequently extended. The Colliers brokers listed the property on several MLS services and leveraged their industry contacts to ensure that the widest possible audience for the building was reached. Despite conducting a few dozen tours and issuing a limited number of offers to interested parties, only one genuine prospect was found and discussions did not go beyond the exploratory level. The one genuine prospect was a brewery that preferred to lease only a small portion of the preferred southeast corner space fronting Raymond and the parking lot, ideally in conjunction with additional housing, which Exeter was unable to deliver within their timeframe. Leasing only the southeast corner would have left the property with an overabundance of deep, windowless, difficult to lease garage space.

As noted, the bulk of the interest in the building was related to the southeast corner of the former Loomis space, an industrial space with high ceilings, engaging window openings and several drive-in doors. While several tours of the retail space fronting University Avenue were conducted, not a single party seriously pursued a lease for that space. Based on the feedback we received from these tours, the primary concerns potential tenants had with the University Avenue retail spaces were: 1) the bus stop on University Avenue located directly in front of the storefronts partially obscuring visibility and attracting lingering crowds during high commute hours; 2) the lack of parking directly in front of the main entry and 3) the lack of immediate residential density in the neighborhood.

## **{Findings per “University-Raymond Commercial Historic District-Preservation Program and Design Review Guidelines” (2004)}**

### **Rehabilitation and New Addition**

Exeter Group proposes to rehabilitate the existing one-story building and retain the current uses with storefronts at University Avenue and parking commercial spaces in the rear portion of the building.

The proposed new construction is U-shaped in plan and will be constructed on the roof of the one-story General Motors Truck Company Building. The new addition will be set back at all elevations to minimize alterations to viewscapes.

### Rehabilitation (General Motors Truck Company Building)

In general, the proposed project retains the historic parking, commercial and storefront uses of the building and restores the exterior elevations.

#### Masonry:

Will be cleaned and repaired following the guidelines in the National Park Service Briefs #1 *Cleaning and Water-Repellant Treatments for Historic Masonry Buildings* and #2 *Repointing Mortar Joints in Historic Masonry Buildings*.

#### Windows/Doors:

As recommended, existing window and door openings will be retained. Along Raymond Avenue, non-historic metal panels and existing windows which have asbestos containing materials will be properly abated, removed and replaced with matching industrial steel sash windows; these new windows will have insulated glass and will provide for better energy efficiency in the heated and cooled areas (lobby, commercial) at the ground floor. Existing non-historic vehicular doors would be replaced with a new steel garage door at the northern garage entry and new insulated glass garage door at the southern commercial entry. The three (3) existing pedestrian entries would remain and non-historic doors replaced with new doors. The northern most pedestrian entry would be widened to accommodate a double door for the housing lobby entrance.

At the non-primary south elevation facing the surface parking lot there are eleven (11) pedestrian level window or vehicular openings and eleven (11) transom level window openings. In all eleven (11) transom level openings the existing steel windows will remain with new interior storms installed behind for proper insulation. In the eleven (11) pedestrian level window openings, non-historic metal panels and existing windows on the first five (5) openings from east to west will be removed and, as proposed along Raymond, be replaced with matching industrial steel sash windows; these new windows will have insulated glass and will provide for better energy efficiency in the heated and cooled areas (lobby, commercial) at the ground floor.

The remaining six (6) pedestrian level openings along the south elevation will house a parking garage. Two (2) of the openings have non-historic metal panels and existing windows which will remain. One (1) of the openings has an original, uncovered window which will be retained and backed by a new interior storm for proper insulation. The other three (3) openings are vehicular entries with existing non-historic steel doors. One (1) will remain and be fixed in place and the other two (2) will be replaced with new steel garage doors.

The two (2) pedestrian entries along the south elevation will remain with new doors. A third pedestrian egress door will be added for code compliance.

#### Storefronts:

The non-historic storefront system along University Avenue will be retained. The historic light fixtures will be repaired and retained.



### New Construction (Proposed rear addition)

In general, the proposed new addition does not destroy historic materials and will be set back at all elevations to delineate the separation between the historic elevations and new construction. The proposed addition is differentiated from the historic one-story building in design and is compatible in colors, rhythms, and massing. As recommended, “any new construction should possess height, massing, setback, materials and rhythms compatible with surrounding structures.” Design details are elaborated below, but the new construction will be setback between a three-story building at the east and a seven-story building at the west.

#### Setback:

The new addition will be significantly set back, 77 feet, from the University Avenue façade, 8 feet (inset area 13 feet back) from the Raymond Avenue façade, and 30 feet, 9 inches from the Chittenden & Eastman Building. Historic images and proposed viewsapes are provided to illuminate the efforts to limit alterations to the area. Viewsapes of Raymond Avenue are also provided though historic images of the view have not been discovered.

#### Massing/Volume/Height:

The massing and height is appropriate in the area. As recommended the proposed addition is “boxy” and will be shorter than the adjacent Chittenden & Eastman Building.

#### Rhythm:

The rhythm in the district is “distinguished by slight variations in height, windows and doors, and details, including vertical and horizontal elements.” As recommended the proposed windows follow the rhythm of the surrounding buildings and the façade is “accentuated by slight projections and recessions.” The recessed areas at the center of the elevations facing University and Raymond also allow for sidewalls to hide ventilation panels. The guidelines recommend “grills, exhaust outlets for air conditioners, bath and kitchen exhaust fans should be incorporated into filler panels” that are painted to blend. The proposed ventilation panels are minimized in the design with the majority at the sidewalls of the recessed areas. The filler panels incorporate the rhythm of the building and will be painted to match surrounding materials.

#### Materials:

The guidelines recommend the use of brick, stone, terra cotta, ceramic tile, concrete, metal and glass. The proposed addition incorporates metal panels and cement fiber panels; both will be earth tone colors as recommended.

#### Windows:

As recommended the window and door frames are bronze aluminum finish and relate to the proportion and size of windows at existing adjacent buildings.



Saint Paul Heritage Preservation Commission  
Department of Planning and Economic Development  
25 Fourth Street West, Suite 1400  
Saint Paul, MN 55102  
Phone: (651) 266-9078

## HERITAGE PRESERVATION COMMISSION DESIGN REVIEW APPLICATION

This application must be completed in addition to the appropriate city permit application if the affected property is an individually designated landmark or located within an historic district. For applications that must be reviewed by the Heritage Preservation Commission refer to the HPC Meeting schedule for meeting dates and deadlines.

### 1. CATEGORY

Please check the category that best describes the proposed work

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Repair/Rehabilitation | <input type="checkbox"/> Sign/Awning          | <input checked="" type="checkbox"/> New Construction/Addition/<br>Alteration |
| <input type="checkbox"/> Moving                | <input type="checkbox"/> Fence/Retaining Wall | <input checked="" type="checkbox"/> Pre-Application Review Only              |
| <input type="checkbox"/> Demolition            | <input type="checkbox"/> Other _____          |  |

### 2. PROJECT ADDRESS

Street and number: 2390-2400 University Ave Zip Code: 55114

### 3. APPLICANT INFORMATION

Name of contact person: THOMAS NELSON  
Company: EXETER GROUP LLC  
Street and number: 332 Minnesota Street, Suite W2300  
City: Saint Paul State: MN Zip Code: 55101  
Phone number: (62) 805.9369 e-mail: TNelson@ExeterMN.com

### 4. PROPERTY OWNER(S) INFORMATION (If different from applicant)

Name: IAF 2400 University LLC  
Street and number: 332 Minnesota Street, Suite W2300  
City: Saint Paul State: MN Zip Code: 55101  
Phone number: (651) 294.2440 e-mail: R.Stolpestad@ExeterMN.com



**5. PROJECT ARCHITECT (If applicable)**

Contact person: Mike Krych  
Company: BKV Group, Inc.  
Street and number: 222 North 2nd Street  
City: Minneapolis State: MN Zip Code: 55401  
Phone number: (612) 339.3752 e-mail: mkrych@bkvgroup.com

**6. PROJECT DESCRIPTION**

Completely describe ALL exterior changes being proposed for the property. Include changes to architectural details such as windows, doors, siding, railings, steps, trim, roof, foundation or porches. Attach specifications for doors, windows, lighting and other features, if applicable, including color and material samples.

*Please see additional sheets.*

*Attach additional sheets if necessary*

**7. ATTACHMENTS**

Refer to the *Design Review Process sheet* for required information or attachments.

**\*\*INCOMPLETE APPLICATIONS WILL BE RETURNED\*\***

**ARE THE NECESSARY ATTACHMENTS AND INFORMATION INCLUDED?**

☒ **YES**

Will any federal money be used in this project?  
Are you applying for the Investment Tax Credits?

YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>

I, the undersigned, understand that the Design Review Application is limited to the aforementioned work to the affected property. I further understand that any additional exterior work to be done under my ownership must be submitted by application to the St. Paul Heritage Preservation Commission. Any unauthorized work will be required to be removed.

Signature of applicant: \_\_\_\_\_

Date: 4.28.15

Signature of owner: \_\_\_\_\_

Date: 4.28.15

**FOR HPC OFFICE USE ONLY**

Date received: \_\_\_\_\_

**FILE NO.** \_\_\_\_\_

Date complete: \_\_\_\_\_

District: \_\_\_\_\_/Individual Site: \_\_\_\_\_

Pivotal/Contributing/Non-contributing/New Construction/Parcel:

Type of work: Minor/Moderate/Major

\_\_\_\_ Requires staff review

Supporting data: **YES NO**  
Complete application: **YES NO**

The following condition(s) must be met in order for application to conform to preservation program:

**It has been determined that the work to be performed pursuant to the application does not adversely affect the program for preservation and architectural control of the heritage preservation district or site (Ch.73.06).**

\_\_\_\_\_  
HPC staff approval

Date \_\_\_\_\_

\_\_\_\_ Requires Commission review

Submitted:

- ☐ 3 Sets of Plans
- ☐ 15 Sets of Plans reduced to 8 1/2" by 11" or 11" by 17"
- ☐ Photographs
- ☐ CD of Plans (pdf) & Photos (jpg)
- ☐ City Permit Application
- ☐ Complete HPC Design Review application

Hearing Date set for: \_\_\_\_\_

City Permit # \_\_\_\_\_ - \_\_\_\_\_



CONSULTANTS

PROJECT TITLE

C&E Flats

KEY PLAN

ISSUE #	DATE	DESCRIPTION
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NOT FOR  
CONSTRUCTION

CERTIFICATION

I hereby certify that this plan, specification or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Architect under the laws of the State of Minnesota

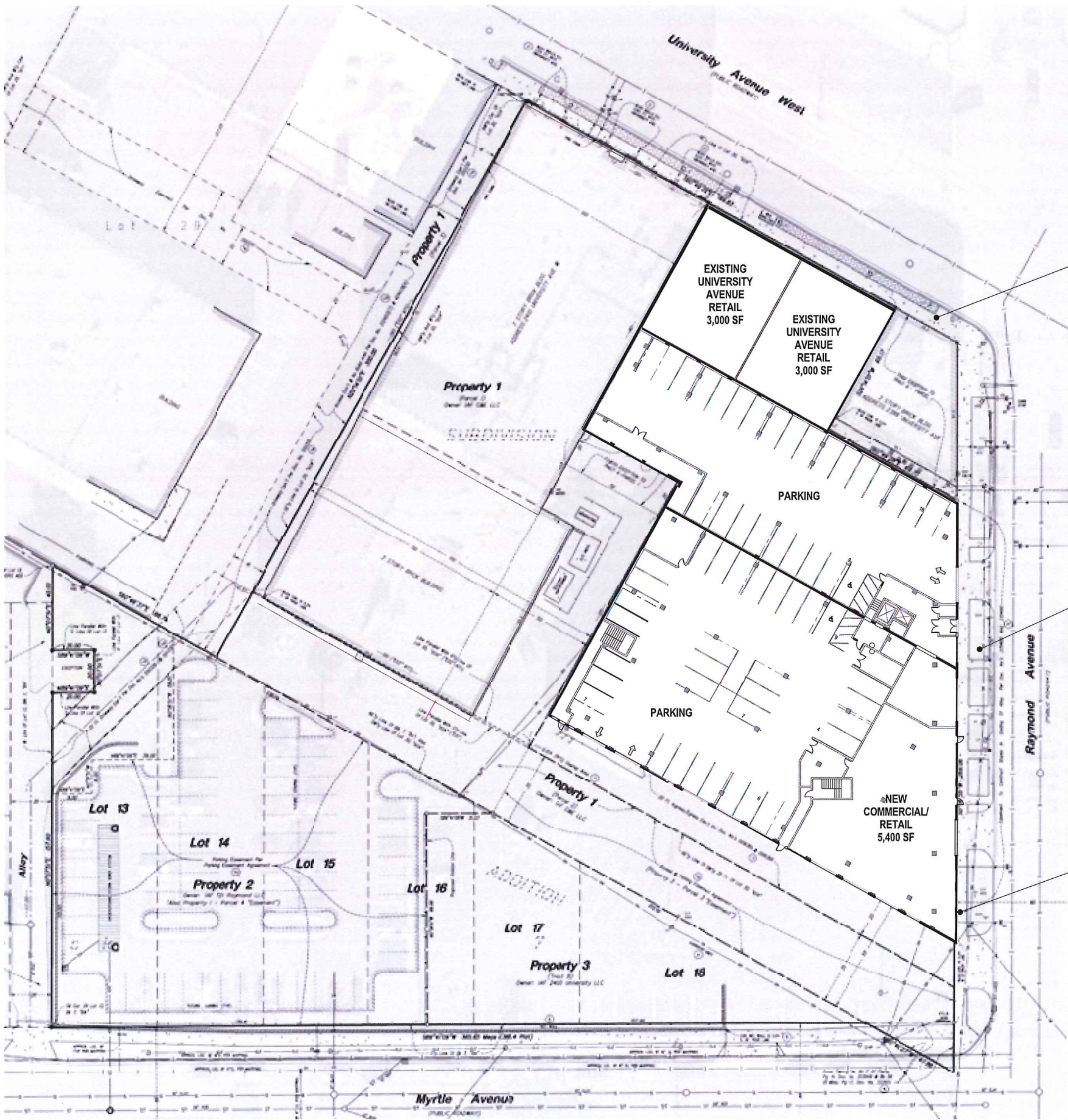
License Number	Date
DATE	4/21/2015
DRAWN BY	Author
CHECKED BY	Checker
COMMISSION NUMBER	TEST

SHEET TITLE

SITE PLAN

SHEET NUMBER

A010



1 C&E FLATS - SITE PLAN

A010 1"=20'-0"



CONSULTANTS

PROJECT TITLE

C&E Flats

KEY PLAN

ISSUE #	DATE	DESCRIPTION
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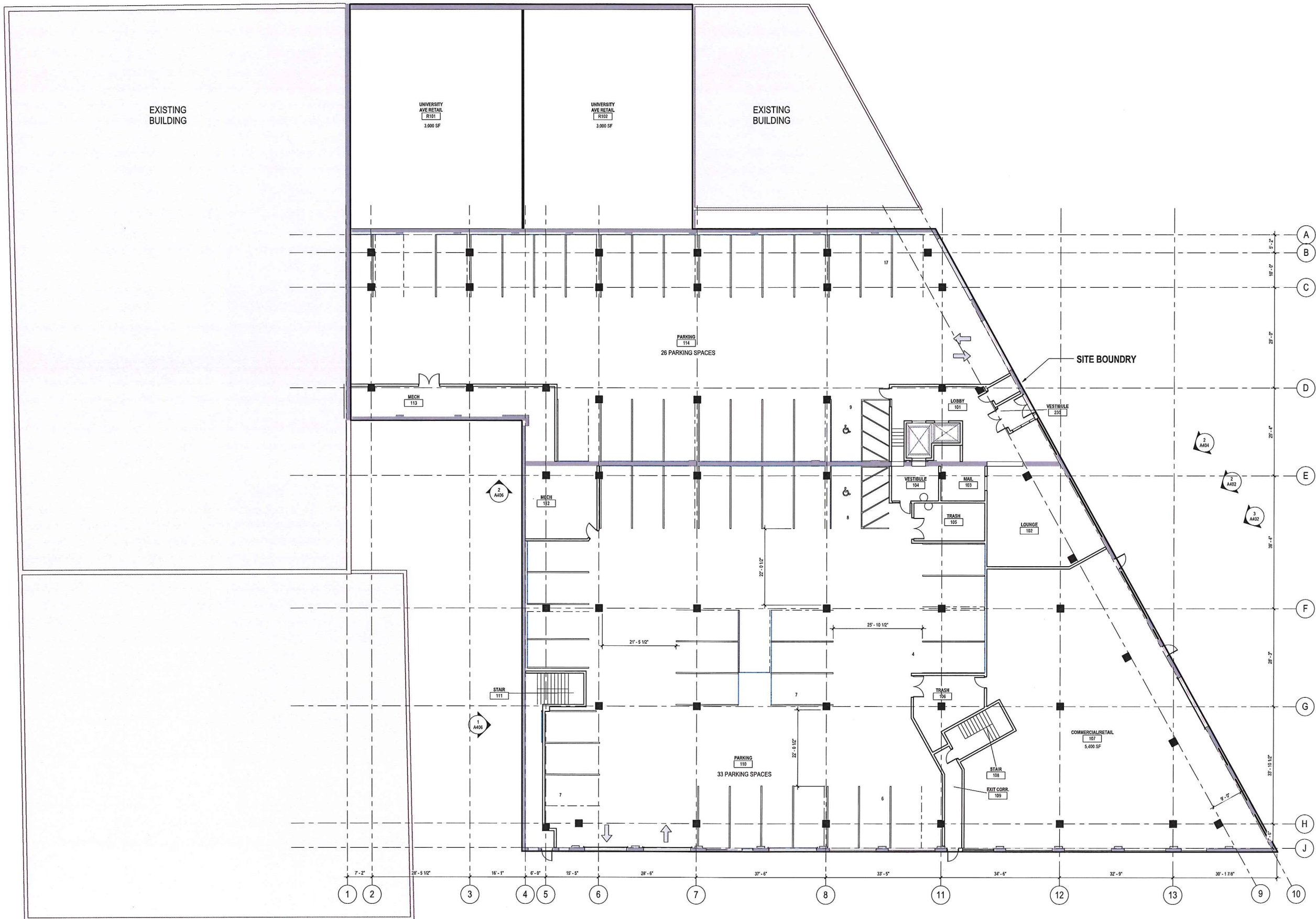
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CHECKED BY	Checker
COMMISSION NUMBER	TEST

SHEET TITLE

LEVEL 1 FLOOR  
PLAN

SHEET NUMBER

A101



CONSULTANTS

PROJECT TITLE  
C&E Flats

KEY PLAN

ISSUE #	DATE	DESCRIPTION
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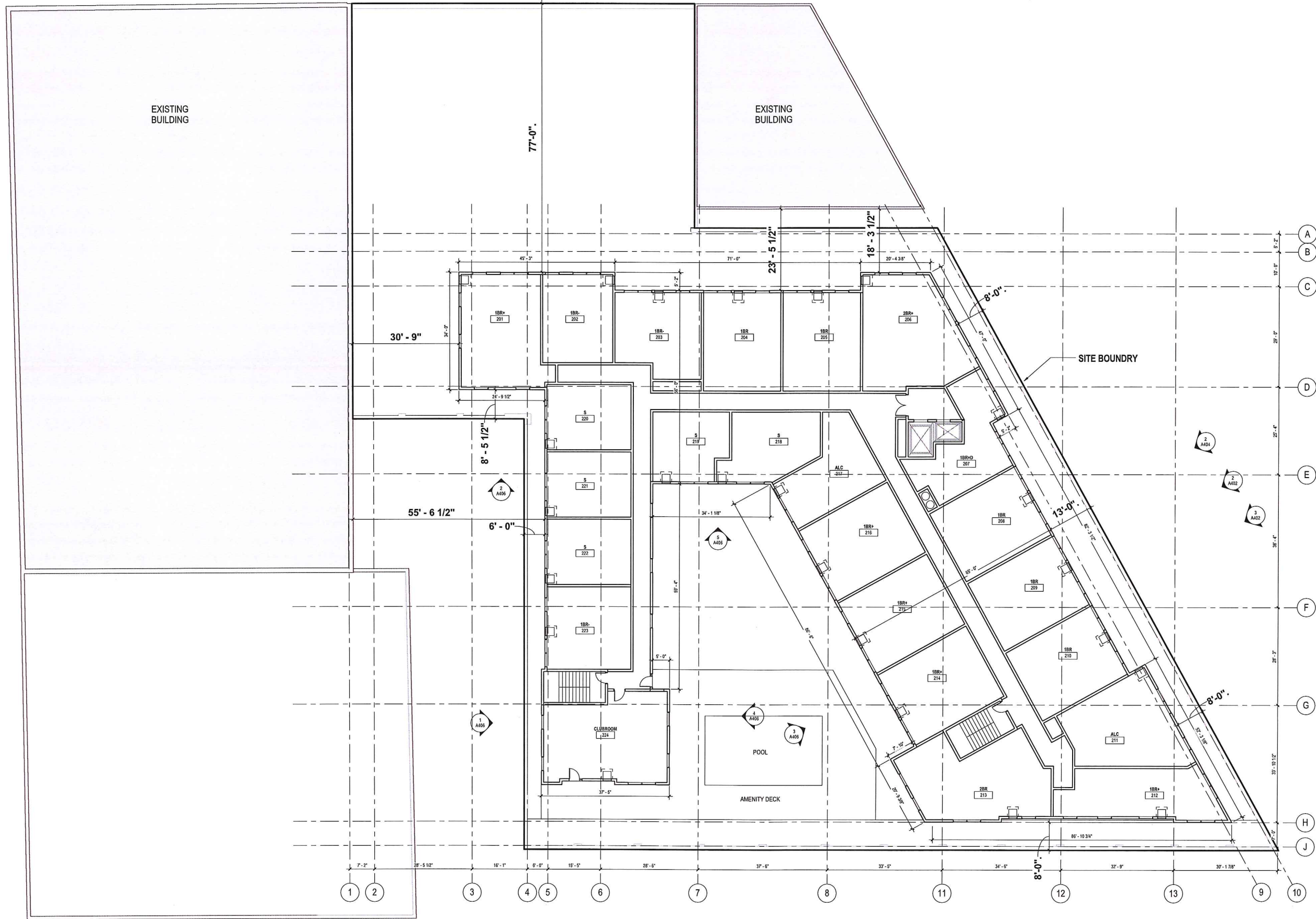
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DRAWN BY	Author
CHECKED BY	Checker
COMMISSION NUMBER	TEST

SHEET TITLE

LEVEL 2 FLOOR  
PLAN

SHEET NUMBER

A102







CONSULTANTS

PROJECT TITLE

C&E Flats

KEY PLAN

ISSUE #	DATE	DESCRIPTION
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SHEET TITLE

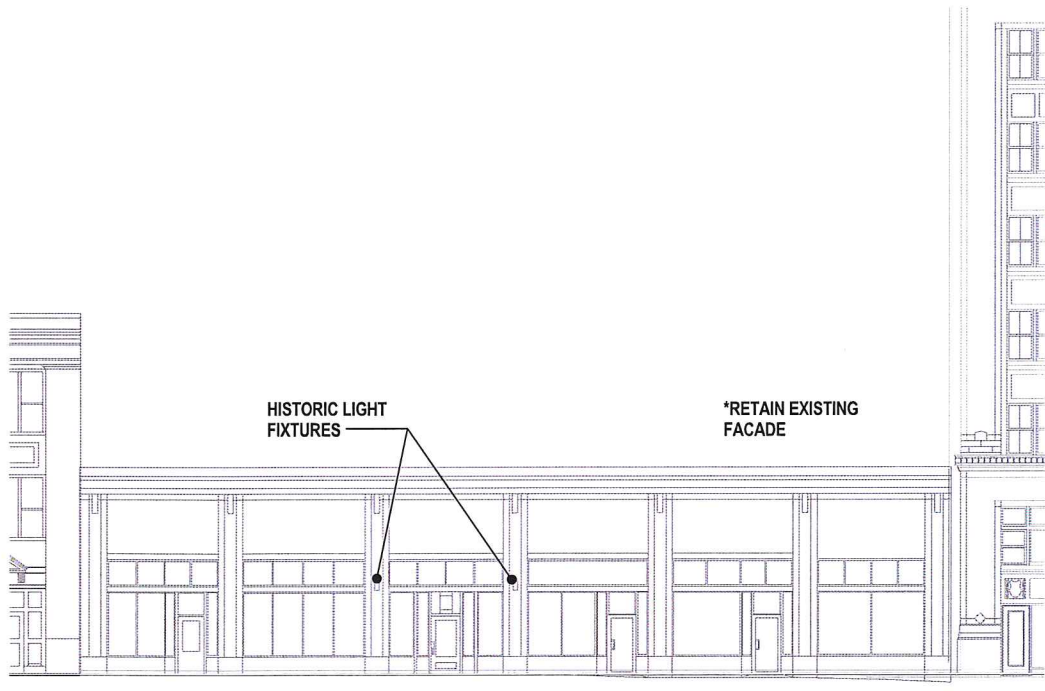
EXTERIOR  
ELEVATION

SHEET NUMBER

A401



1 NORTH ELEVATION - EXISTING IMAGE  
A401 NOT TO SCALE



2 NORTH ELEVATION - EXISTING  
A401 1/8" = 1'-0"



ISSUE #	DATE	DESCRIPTION
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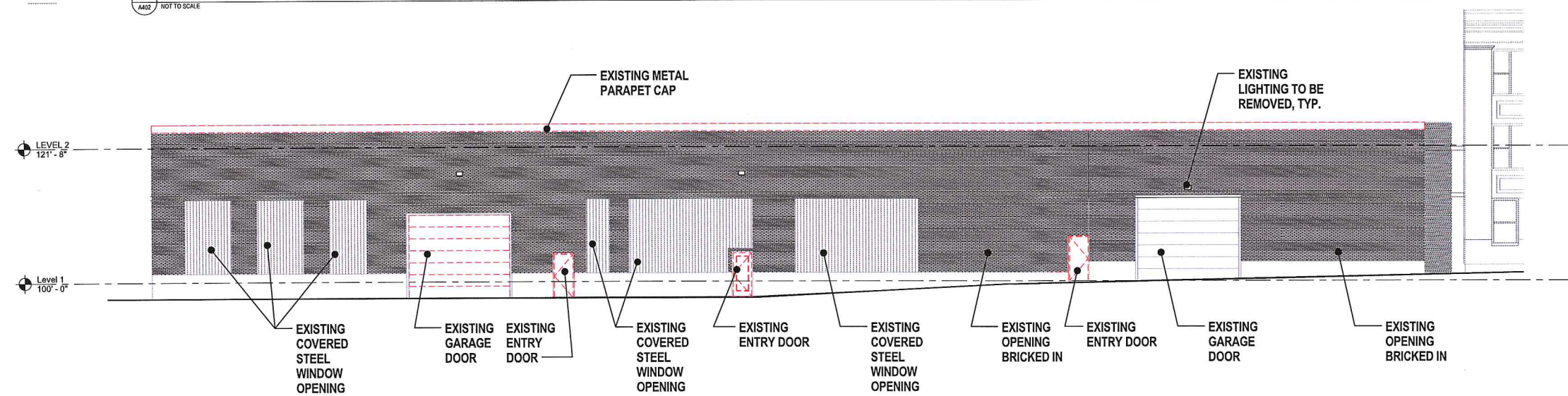
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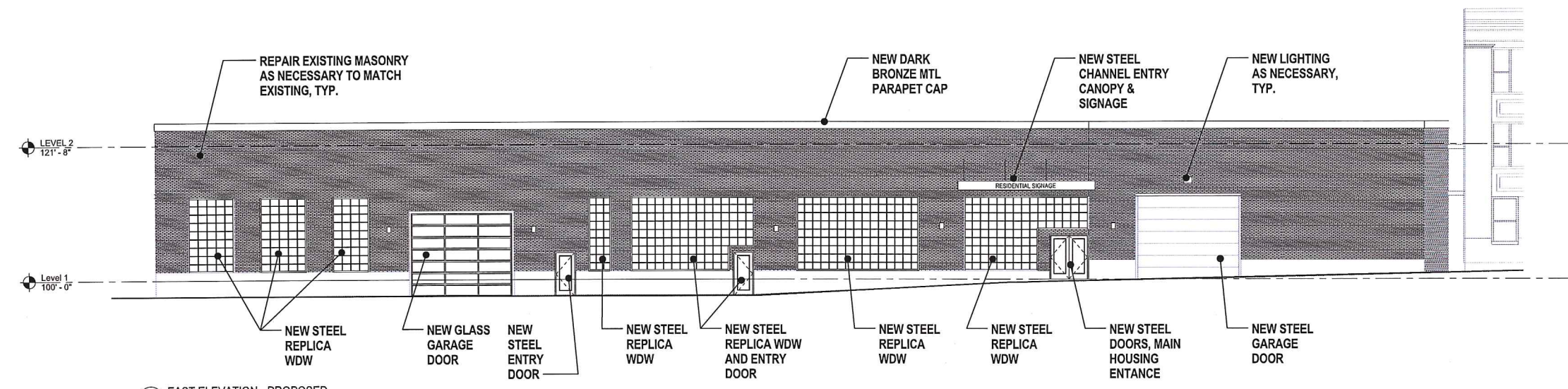
License Number	Date
DATE	4/21/2015
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COMMISSION NUMBER	TEST



1 EAST ELEVATION - EXISTING IMAGE  
A402 NOT TO SCALE



2 EAST ELEVATION - EXISTING  
A402 1/8" = 1'-0"



3 EAST ELEVATION - PROPOSED  
A402 1/8" = 1'-0"



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**SHEET TITLE**

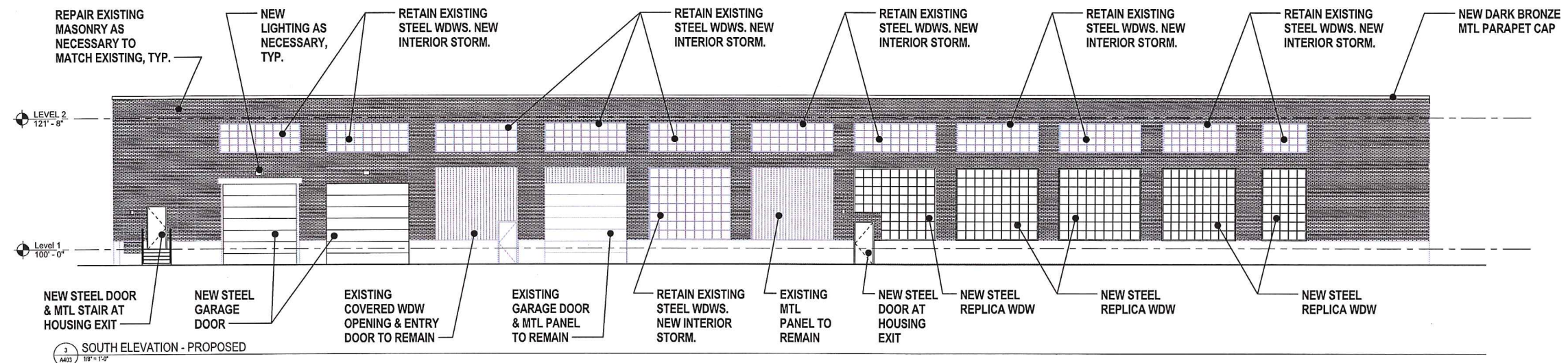
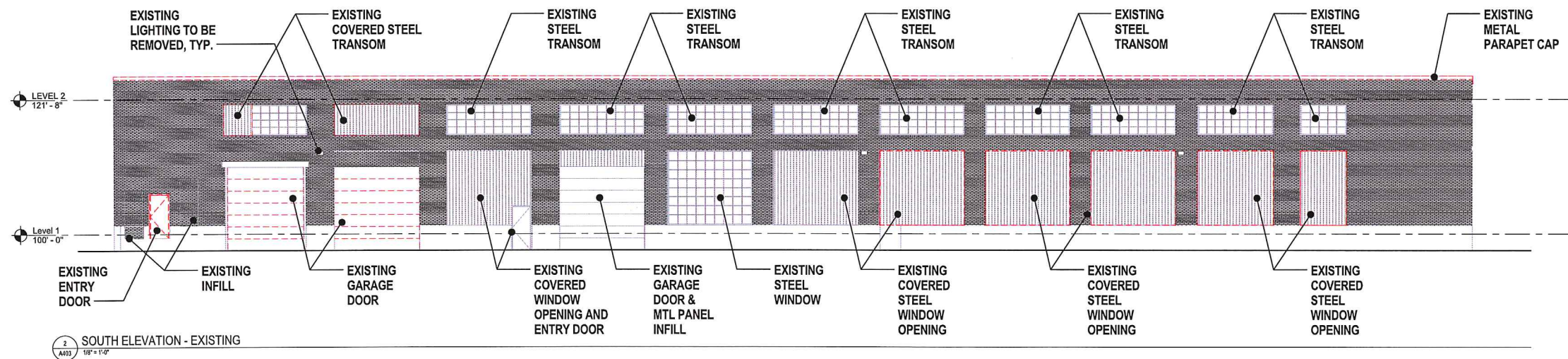
EXTERIOR  
ELEVATIONS

**SHEET NUMBER**

A403



1 SOUTH ELEVATION - EXISTING IMAGE  
A403 NOT TO SCALE





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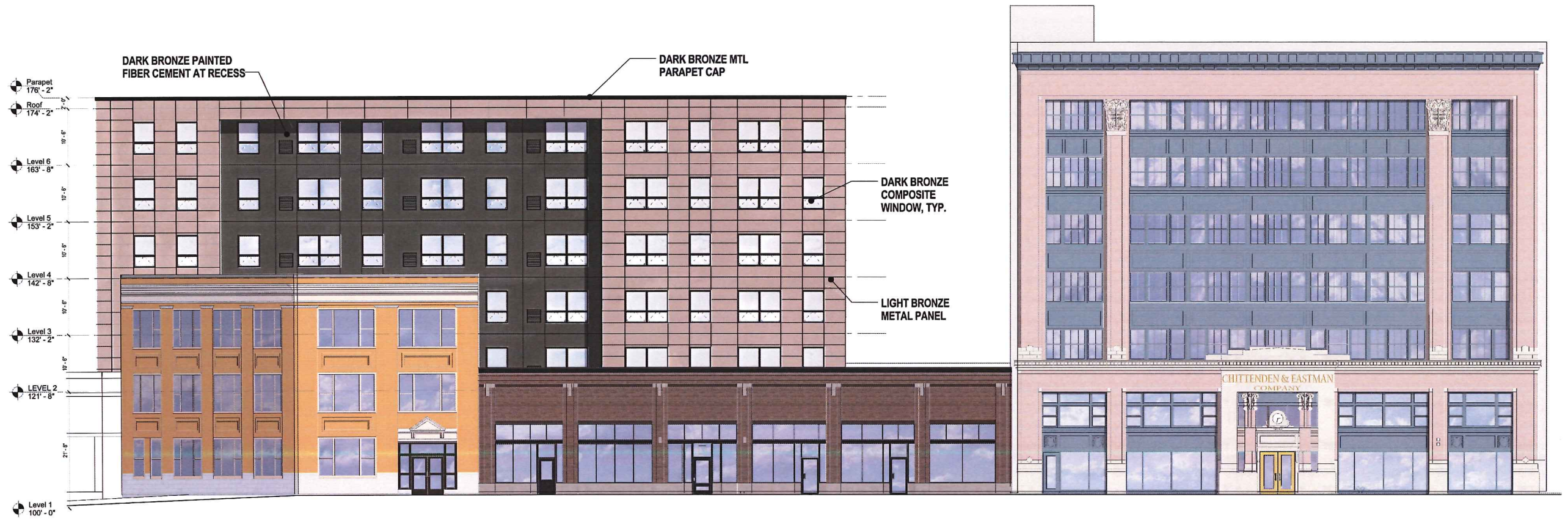
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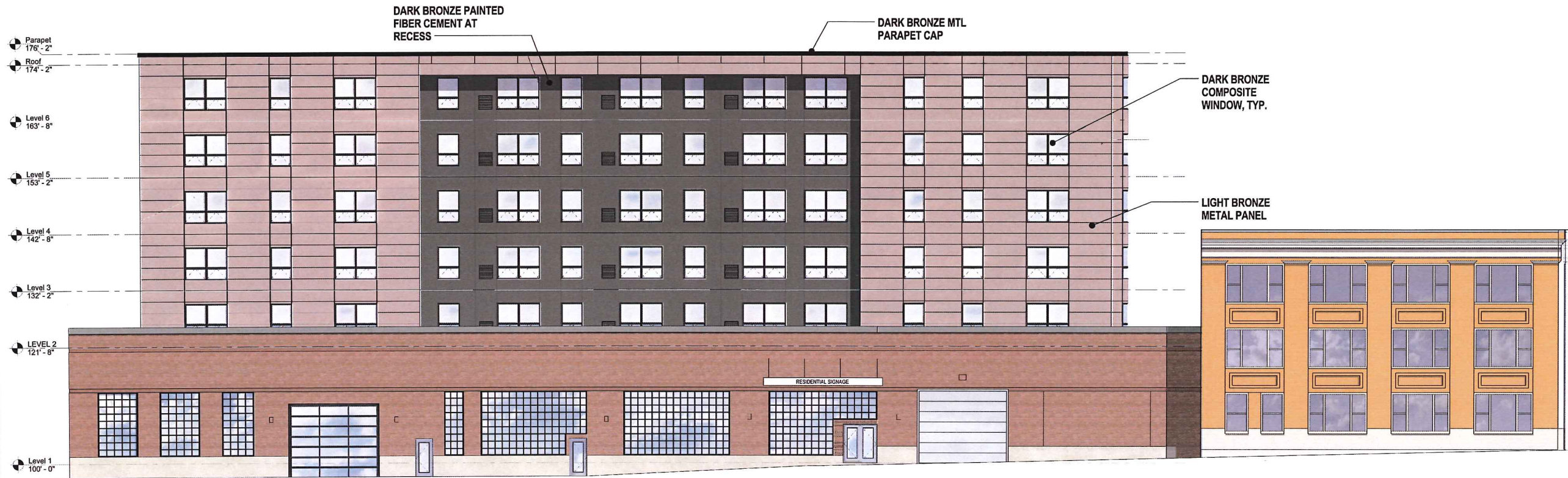
EXTERIOR  
ELEVATIONS

SHEET NUMBER

A404  
© 2015 BKV Group, Inc. EOE



1 NORTH ELEVATION  
A404 1/8" = 1'-0"



2 EAST ELEVATION  
A404 1/8" = 1'-0"



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COMMISSION NUMBER	TEST

SHEET TITLE

EXTERIOR  
ELEVATIONS

DARK BRONZE PAINTED  
FIBER CEMENT AT  
RECESS

ELEVATION BEYOND

DARK BRONZE PAINTED  
FIBER CEMENT AT  
RECESS

DARK BRONZE MTL  
PARAPET CAP

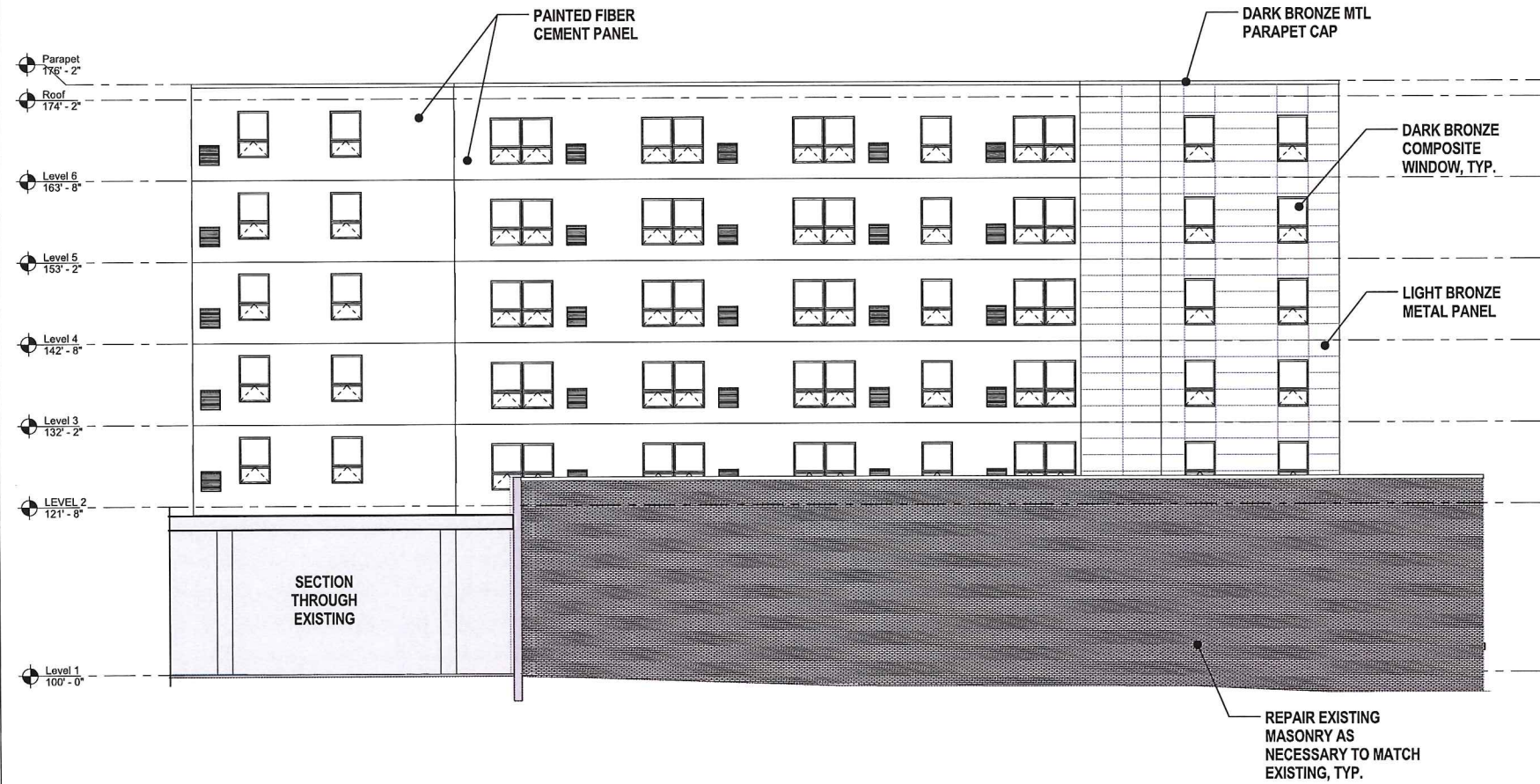
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COMPOSITE  
WINDOW, TYP.

LIGHT BRONZE  
METAL PANEL

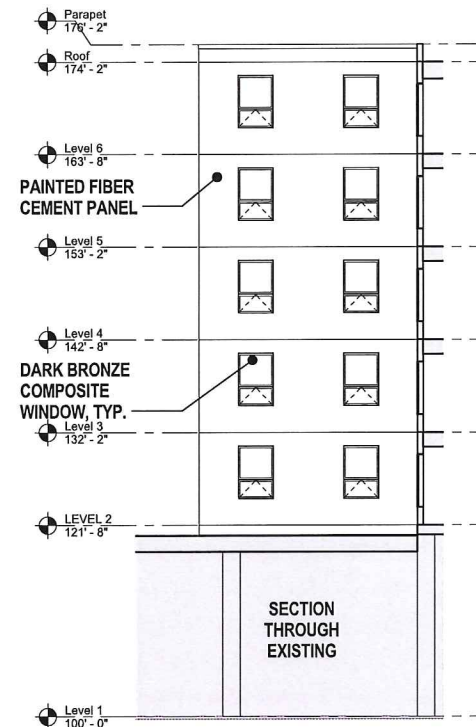
SOUTH ELEVATION

A405 1/8" = 1'-0"

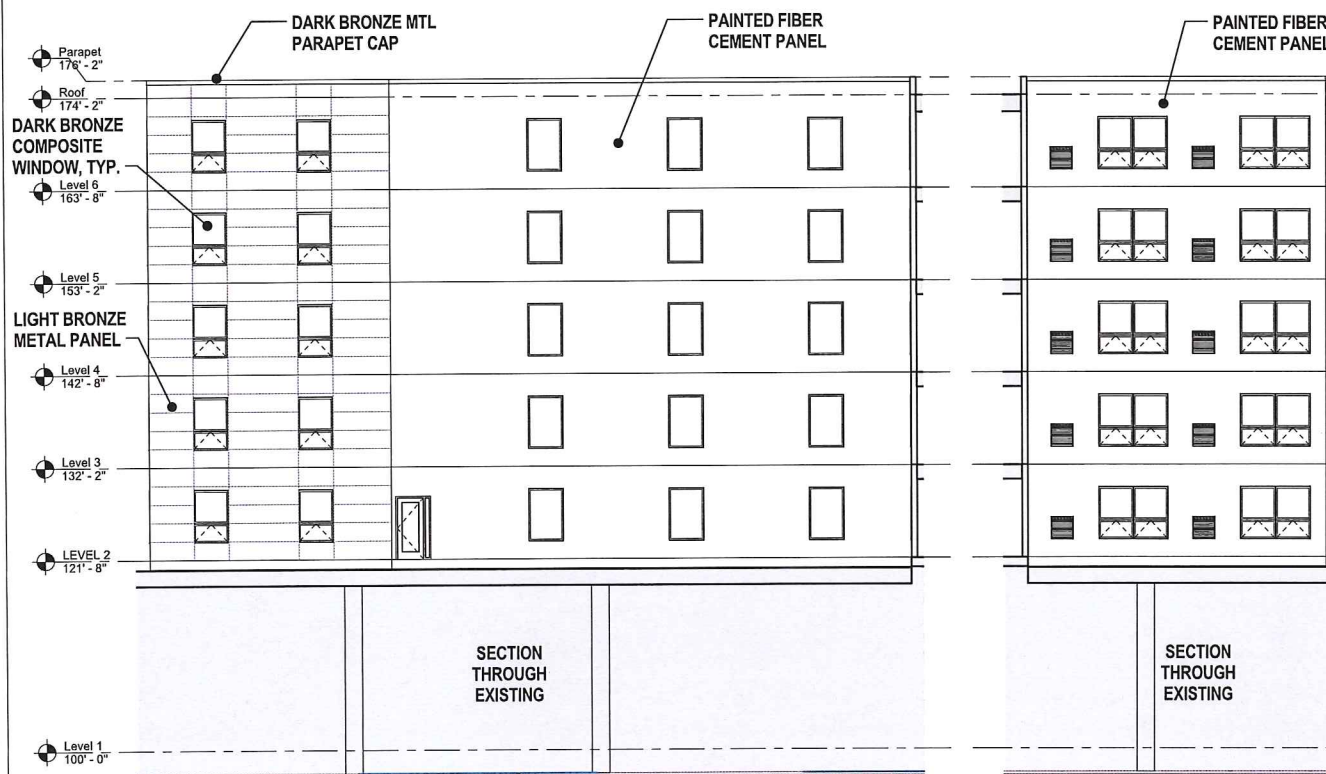




1 WEST ELEVATION  
A406 1/8" = 1'-0"



2 SOUTH - PARTIAL ELEVATION  
A406 1/8" = 1'-0"



4 COURTYARD EAST ELEVATION  
A406 1/8" = 1'-0"



5 COURTYARD SOUTH ELEVATION  
A406 1/8" = 1'-0"



3 COURTYARD WEST ELEVATION  
A406 1/8" = 1'-0"



# C&E FLATS



General Motors Truck Company Building - 1929

Historic Images

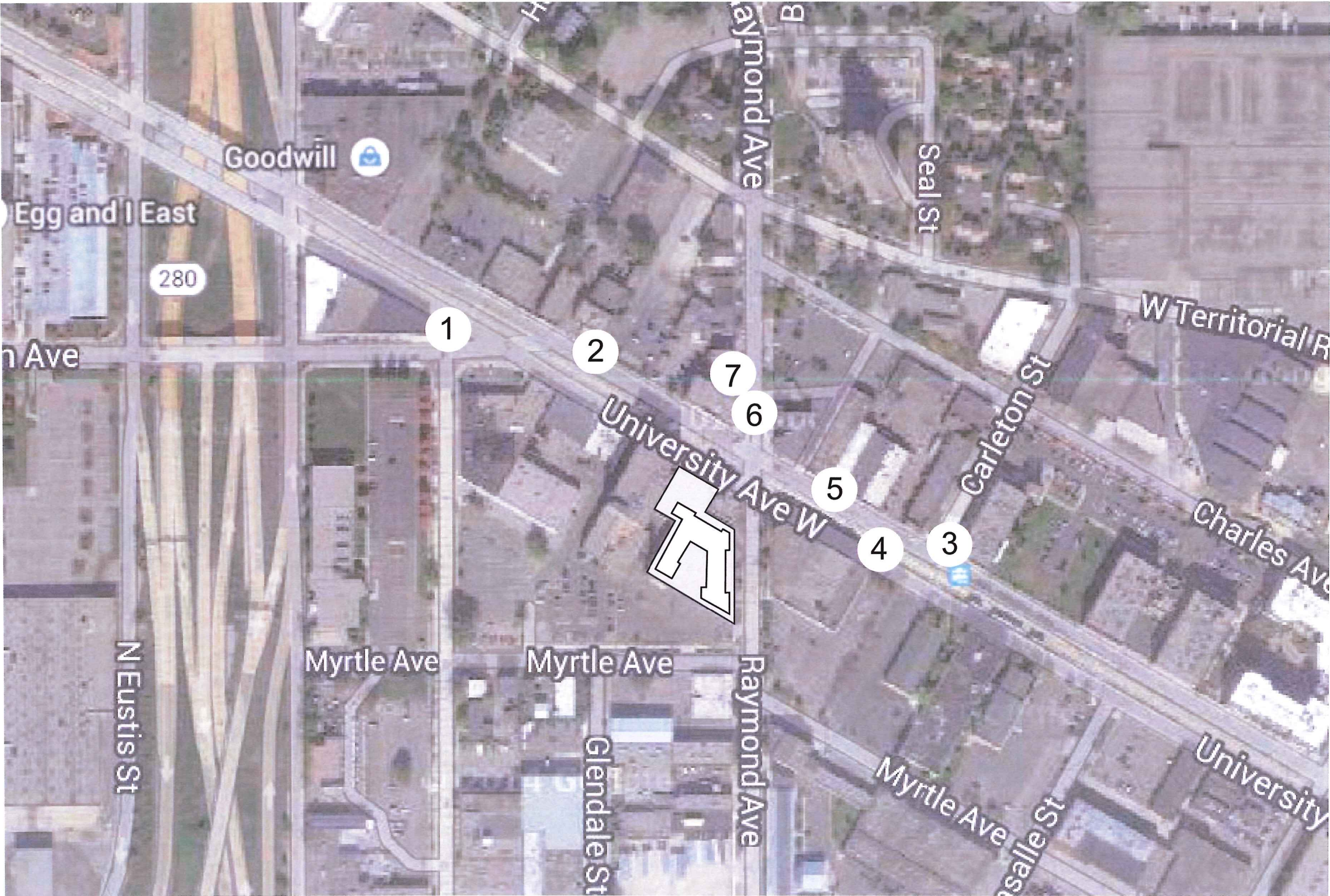
04/22/2015



General Motors Truck Company Building - CA. 1950



C&E FLATS



Viewscape Key



# C&E FLATS



Image 1

View Corridor From West

04/22/2015



# C&E FLATS



Image 2

View Corridor From West

04/22/2015



C&E FLATS



Image 3

View Corridor From East

04/22/2015



# C&E FLATS



Image 4

View Corridor From East

04/22/2015



# C&E FLATS



Image 5

View Corridor From East

04/22/2015



# C&E FLATS



Image 6

View Corridor From North

04/22/2015



# C&E FLATS



Image 7

View Corridor From North

04/22/2015



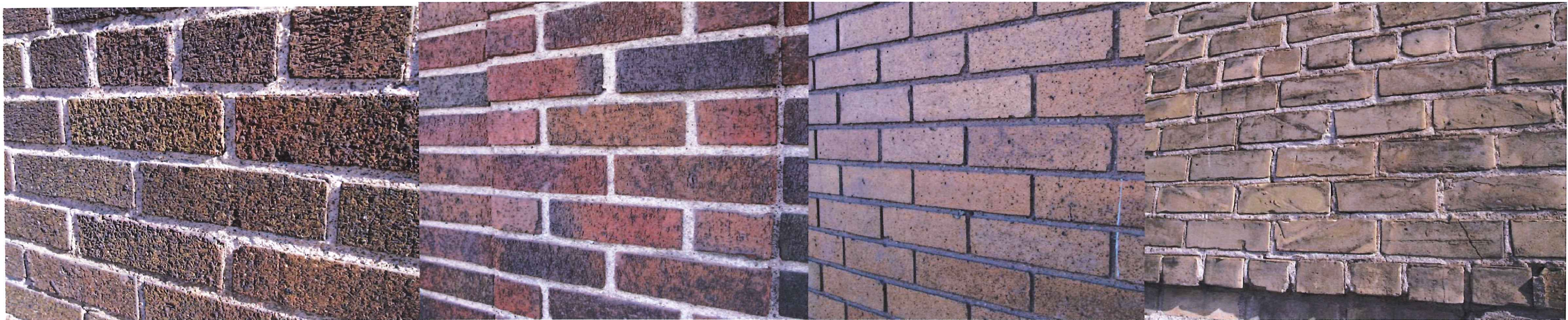
C&E FLATS



Material Palette Study



Material Palette



2345 University

Existing North and East Elevation of Project

Existing South Elevation of Project

2410 University



# 14 PRESERVATION BRIEFS

## New Exterior Additions to Historic Buildings: Preservation Concerns

Anne E. Grimmer and Kay D. Weeks



National Park Service  
U.S. Department of the Interior

Technical Preservation Services



A new exterior addition to a historic building should be considered in a rehabilitation project only after determining that requirements for the new or adaptive use cannot be successfully met by altering non-significant interior spaces. If the new use cannot be accommodated in this way, then an exterior addition may be an acceptable alternative. Rehabilitation as a treatment "is defined as the act or process of making possible a compatible use for a property through repair, alterations, and *additions* while preserving those portions or features which convey its historical, cultural, or architectural values."

The topic of new additions, including rooftop additions, to historic buildings comes up frequently, especially as it

relates to rehabilitation projects. It is often discussed and it is the subject of concern, consternation, considerable disagreement and confusion. Can, in certain instances, a historic building be enlarged for a new use without destroying its historic character? And, just what is significant about each particular historic building that should be preserved? Finally, what kind of new construction is appropriate to the historic building?

The vast amount of literature on the subject of additions to historic buildings reflects widespread interest as well as divergence of opinion. New additions have been discussed by historians within a social and political framework; by architects and architectural historians in terms of construction technology and style; and

by urban planners as successful or unsuccessful contextual design. However, within the historic preservation and rehabilitation programs of the National Park Service, the focus on new additions is to ensure that they preserve the character of historic buildings.

Most historic districts or neighborhoods are listed in the National Register of Historic Places for their significance within a particular time frame. This period of significance of historic districts as well as individually-listed properties may sometimes lead to a misunderstanding that inclusion in the National Register may prohibit any physical change outside of a certain historical period—particularly in the form of exterior additions. National Register listing does not mean that a building or district is frozen in time and that no change can be made without compromising the historical significance. It does mean, however, that a new addition to a historic building should preserve its historic character.



*Figure 1. The addition to the right with its connecting hyphen is compatible with the Collegiate Gothic-style library. The addition is set back from the front of the library and uses the same materials and a simplified design that references, but does not copy, the historic building. Photo: David Wakely Photography.*





Figure 2. The new section on the right is appropriately scaled and reflects the design of the historic Art Deco-style hotel. The apparent separation created by the recessed connector also enables the addition to be viewed as an individual building.

## Guidance on New Additions

To meet Standard 1 of the *Secretary of the Interior's Standards for Rehabilitation*, which states that "a property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment," it must be determined whether a historic building can accommodate a new addition. Before expanding the building's footprint, consideration should first be given to incorporating changes—such as code upgrades or spatial needs for a new use—within secondary areas of the historic building. However, this is not always possible and, after such an evaluation, the conclusion may be that an addition is required, particularly if it is needed to avoid modifications to character-defining interior spaces. An addition should be designed to be compatible with the historic character of the building and, thus, meet the *Standards for Rehabilitation*. Standards 9 and 10 apply specifically to new additions:

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

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

The subject of new additions is important because a new addition to a historic building has the potential to change its historic character as well as to damage and destroy significant historic materials and features. A new addition also has the potential to confuse the public and to make it difficult or impossible to differentiate the old from the new or to recognize what part of the historic building is genuinely historic.

The intent of this Preservation Brief is to provide guidance to owners, architects and developers on how to design a compatible new addition, including a rooftop addition, to a historic building. A new addition to a historic building should preserve the building's *historic character*. To accomplish this and meet the *Secretary of the Interior's Standards for Rehabilitation*, a new addition should:

- Preserve significant historic materials, features and form;
- Be compatible; and
- Be differentiated from the historic building.

Every historic building is different and each rehabilitation project is unique. Therefore, the guidance offered here is not specific, but general, so that it can be applied to a wide variety of building types and situations. To assist in interpreting this guidance, illustrations of a variety of new additions are provided. Good examples, as well as some that do not meet the Standards, are included to further help explain and clarify what is a compatible new addition that preserves the character of the historic building.



Figure 3. The red and buff-colored parking addition with a rooftop playground is compatible with the early-20th century school as well as with the neighborhood in which it also serves as infill in the urban setting.



## *Preserve Significant Historic Materials, Features and Form*

Attaching a new exterior addition usually involves some degree of material loss to an external wall of a historic building, but it should be minimized. Damaging or destroying significant materials and craftsmanship should be avoided, as much as possible.

Generally speaking, preservation of historic buildings inherently implies minimal change to primary or “public” elevations and, of course, interior features as well. Exterior features that distinguish one historic building or a row of buildings and which can be seen from a public right of way, such as a street or sidewalk, are most likely to be the most significant. These can include many different elements, such as: window patterns, window hoods or shutters; porticoes, entrances and doorways; roof shapes, cornices and decorative moldings; or commercial storefronts with their special detailing, signs and glazing patterns. Beyond a single building, entire blocks of urban or residential structures are often closely related architecturally by their materials, detailing, form and alignment. Because significant materials and features should be preserved, not damaged or hidden, the first place to consider placing a new addition is in a location where the least amount of historic material and character-defining features will be lost. In most cases, this will be on a secondary side or rear elevation.

One way to reduce overall material loss when constructing a new addition is simply to keep the addition smaller in proportion to the size of the historic building. Limiting the size and number of openings between old and new by utilizing existing doors or enlarging windows also helps to minimize loss. An often successful way to accomplish this is to link the addition to the historic building by means of a hyphen or connector. A connector provides a physical link while visually separating the old and new, and the connecting passageway penetrates and removes only a small portion of the historic wall. A new addition that will abut the historic building along an entire elevation or wrap around a side and rear elevation, will likely integrate the historic and the new interiors, and thus result in a high degree of loss of form and exterior walls, as well as significant alteration of interior spaces and features, and will not meet the Standards.



*Figure 4. This glass and brick structure is a harmonious addition set back and connected to the rear of the Colonial Revival-style brick house. Cunningham/Quill Architects. Photos: © Maxwell MacKenzie.*

## *Compatible but Differentiated Design*

In accordance with the Standards, a new addition must preserve the building's historic character and, in order to do that, it must be differentiated, but compatible, with the historic building. A new addition must retain the essential form and integrity of the historic property. Keeping the addition smaller, limiting the removal of historic materials by linking the addition with a hyphen, and locating the new addition at the rear or on an inconspicuous side elevation of a historic building are techniques discussed previously that can help to accomplish this.

Rather than differentiating between old and new, it might seem more in keeping with the historic character



simply to repeat the historic form, material, features and detailing in a new addition. However, when the new work is highly replicative and indistinguishable from the old in appearance, it may no longer be possible to identify the “real” historic building. Conversely, the treatment of the addition should not be so different that it becomes the primary focus. The difference may be subtle, but it must be clear. A new addition to a historic building should protect those visual qualities that make the building eligible for listing in the National Register of Historic Places.

The National Park Service policy concerning new additions to historic buildings, which was adopted in 1967, is not unique. It is an outgrowth and continuation of a general philosophical approach to change first expressed by John Ruskin in England in the 1850s, formalized by William Morris in the founding of the Society for the Protection of Ancient Buildings in 1877, expanded by the Society in 1924 and, finally, reiterated in the 1964 Venice Charter—a document that continues to be followed by the national committees of the International Council on Monuments and Sites (ICOMOS). The 1967 *Administrative Policies for Historical Areas of the National Park System* direct that “...a modern addition should be readily distinguishable from the older work; however, the new work should be harmonious with the old in scale, proportion, materials, and color. Such additions should be as inconspicuous as

possible from the public view.” As a logical evolution from these Policies specifically for National Park Service-owned historic structures, the 1977 *Secretary of the Interior’s Standards for Rehabilitation*, which may be applied to **all** historic buildings listed in, or eligible for listing in the National Register, also state that “the new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.”

### *Preserve Historic Character*

The goal, of course, is a new addition that preserves the building’s historic character. The historic character of each building may be different, but the methodology of establishing it remains the same. Knowing the uses and functions a building has served over time will assist in making what is essentially a physical evaluation. But, while written and pictorial documentation can provide a framework for establishing the building’s history, to a large extent the historic character is embodied in the physical aspects of the historic building itself—shape, materials, features, craftsmanship, window arrangements, colors, setting and interiors. Thus, it is important to identify the historic character before making decisions about the extent—or limitations—of change that can be made.



Figure 5. This addition (a) is constructed of matching brick and attached by a recessed connector (b) to the 1914 apartment building (c). The design is compatible and the addition is smaller and subordinate to the historic building (d).





Figure 6. A new addition (left) is connected to the garage which separates it from the main block of the c. 1910 former florist shop (right). The addition is traditional in style, yet sufficiently restrained in design to distinguish it from the historic building.

A new addition should always be subordinate to the historic building; it should not compete in size, scale or design with the historic building. An addition that bears no relationship to the proportions and massing of the historic building—in other words, one that overpowers the historic form and changes the scale—will usually compromise the historic character as well. The appropriate size for a new addition varies from building to building; it could never be stated in a square or cubic footage ratio, but the historic building's existing proportions, site and setting can help set some general parameters for enlargement. Although even a small addition that is poorly designed can have an adverse impact, to some extent, there is a predictable relationship between the size of the historic resource and what is an appropriate size for a compatible new addition.

Generally, constructing the new addition on a secondary side or rear elevation—in addition to material preservation—will also preserve the historic character. Not only will the addition be less visible, but because a secondary elevation is usually simpler and less distinctive, the addition will have less of a physical and visual impact on the historic building. Such placement will help to preserve the building's historic form and relationship to its site and setting.

Historic landscape features, including distinctive grade variations, also need to be respected. Any new landscape features, including plants and trees, should be kept at a scale and density that will not interfere with understanding of the historic resource itself. A traditionally landscaped

property should not be covered with large paved areas for parking which would drastically change the character of the site.

Despite the fact that in most cases it is recommended that the new addition be attached to a secondary elevation, sometimes this is not possible. There simply may not be a secondary elevation—some important freestanding buildings have significant materials and features on all sides. A structure or group of structures together with its setting (for example, a college campus) may be of such significance that any new addition would not only damage materials, but alter the buildings' relationship to each other and the setting. An addition attached to a highly-visible elevation of a historic building can radically alter the historic form or obscure features such as a decorative cornice or window ornamentation. Similarly, an addition that fills



Figure 7. A vacant side lot was the only place a new stair tower could be built when this 1903 theater was rehabilitated as a performing arts center. Constructed with matching materials, the stair tower is set back with a recessed connector and, despite its prominent location, it is clearly subordinate and differentiated from the historic theater.



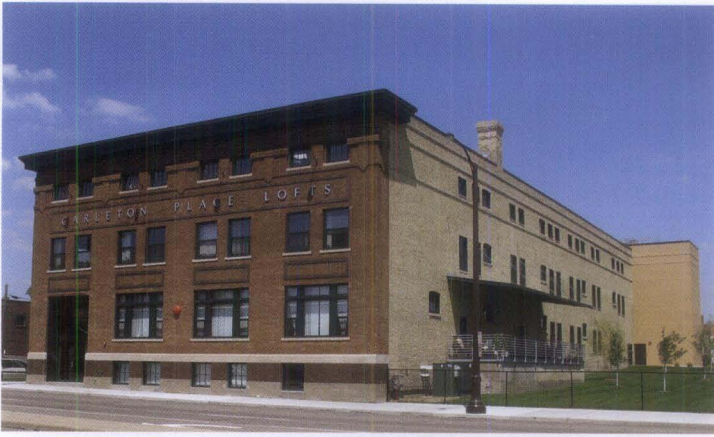


Figure 8. The rehabilitation of this large, early-20th century warehouse (left) into affordable artists' lofts included the addition of a compatible glass and brick elevator/stair tower at the back (right).



Figure 9. A simple, brick stair tower replaced two non-historic additions at the rear of this 1879 school building when it was rehabilitated as a women's and children's shelter. The addition is set back and it is not visible from the front of the school.



Figure 10. The small size and the use of matching materials ensures that the new addition on the left is compatible with the historic Romanesque Revival-style building.

in a planned void on a highly-visible elevation (such as a U-shaped plan or a feature such as a porch) will also alter the historic form and, as a result, change the historic character. Under these circumstances, an addition would have too much of a negative impact on the historic building and it would not meet the Standards. Such situations may best be handled by constructing a separate building in a location where it will not adversely affect the historic structure and its setting.

In other instances, particularly in urban areas, there may be no other place but adjacent to the primary façade to locate an addition needed for the new use. It may be possible to design a lateral addition attached on the side that is compatible with the historic building, even though it is a highly-visible new element. Certain types of historic structures, such as government buildings, metropolitan museums, churches or libraries, may be so massive in size that a relatively large-scale addition may not compromise the historic character, provided, of course, the addition is smaller than the historic building. Occasionally, the visible size of an addition can be reduced by placing some of the spaces or support systems in a part of the structure that is underground. Large new additions may sometimes be successful if they read as a separate volume, rather than as an extension of the historic structure, although the scale, massing and proportions of the addition still need to be compatible with the historic building. However, similar expansion of smaller buildings would be dramatically out of scale. In summary, where any new addition is proposed, correctly assessing the relationship between actual size and relative scale will be a key to preserving the character of the historic building.





Figure 11. The addition to this early-20th century Gothic Revival-style church provides space for offices, a great hall for gatherings and an accessible entrance (left). The stucco finish, metal roof, narrow gables and the Gothic-arched entrance complement the architecture of the historic church. Placing the addition in back where the ground slopes away ensures that it is subordinate and minimizes its impact on the church (below).

## Design Guidance for Compatible New Additions to Historic Buildings

There is no formula or prescription for designing a new addition that meets the Standards. A new addition to a historic building that meets the Standards can be any architectural style—traditional, contemporary or a simplified version of the historic building. However, there must be a balance between differentiation and compatibility in order to maintain the historic character and the identity of the building being enlarged. New additions that too closely resemble the historic building or are in extreme contrast to it fall short of this balance. *Inherent in all of the guidance is the concept that an addition needs to be subordinate to the historic building.*

A new addition **must preserve significant historic materials, features and form, and it must be compatible but differentiated from the historic building.** To achieve this, it is necessary to carefully consider the **placement or location** of the new addition, and its **size, scale and massing** when planning a new addition. To preserve a property's historic character, a new addition must be visually distinguishable from the historic building. This does not mean that the addition and the historic building should be glaringly different in terms of design, materials and other visual qualities. Instead, the new addition should take its design cues from, but not copy, the historic building.



A variety of design techniques can be effective ways to differentiate the new construction from the old, while respecting the architectural qualities and vocabulary of the historic building, including the following:

- Incorporate a simple, recessed, small-scale hyphen to physically separate the old and the new volumes or set the addition back from the wall plane(s) of the historic building.
- Avoid designs that unify the two volumes into a single architectural whole. The new addition may include simplified architectural features that reflect, but do not duplicate, similar features on the historic building. This approach will not impair the existing building's historic character as long as the new structure is subordinate in size and clearly differentiated and distinguishable so that the identity of the historic structure is not lost in a new and larger composition. The historic building must be clearly identifiable and its physical integrity must not be compromised by the new addition.





Figure 12. This 1954 synagogue (left) is accessed through a monumental entrance to the right. The new education wing (far right) added to it features the same vertical elements and color and, even though it is quite large, its smaller scale and height ensure that it is secondary to the historic resource.



Figure 13. A glass and metal structure was constructed in the courtyard as a restaurant when this 1839 building was converted to a hotel. Although such an addition might not be appropriate in a more public location, it is compatible here in the courtyard of this historic building.



Figure 14. This glass addition was erected at the back of an 1895 former brewery during rehabilitation to provide another entrance. The addition is compatible with the plain character of this secondary elevation.

- Use building materials in the same color range or value as those of the historic building. The materials need not be the same as those on the historic building, but they should be harmonious; they should not be so different that they stand out or distract from the historic building. (Even clear glass can be as prominent as a less transparent material. Generally, glass may be most appropriate for small-scale additions, such as an entrance on a secondary elevation or a connector between an addition and the historic building.)
- Base the size, rhythm and alignment of the new addition's window and door openings on those of the historic building.
- Respect the architectural expression of the historic building type. For example, an addition to an institutional building should maintain the architectural character associated with this building type rather than using details and elements typical of residential or other building types.

These techniques are merely examples of ways to differentiate a new addition from the historic building while ensuring that the addition is compatible with it. Other ways of differentiating a new addition from the historic building may be used as long as they maintain the primacy of the historic building. Working within these basic principles still allows for a broad range of architectural expression that can range from stylistic similarity to contemporary distinction. The recommended design approach for an addition is one that neither copies the historic building exactly nor stands in stark contrast to it.



## Revising an Incompatible Design for a New Addition to Meet the Standards

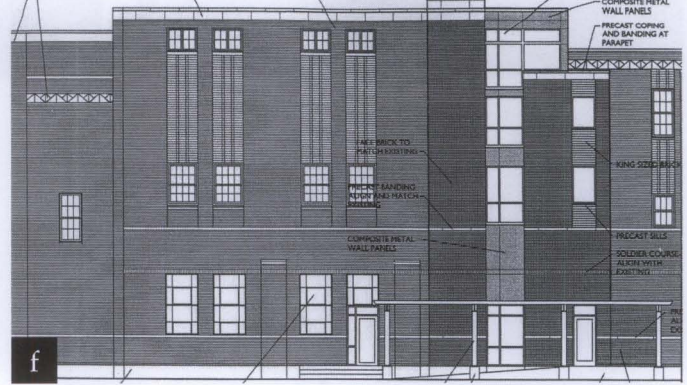
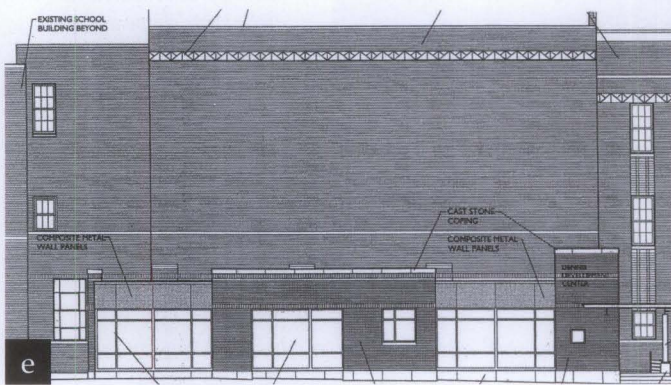
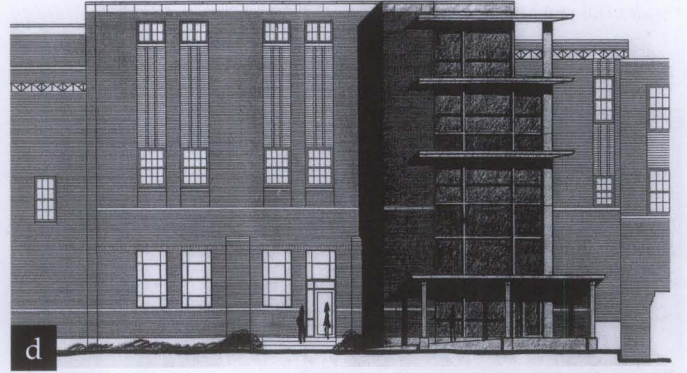
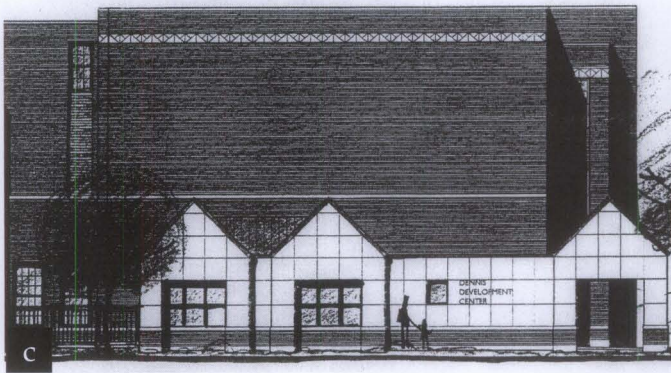


Figure 15. The rehabilitation of a c. 1930 high school auditorium for a clinic and offices proposed two additions: a one-story entrance and reception area on this elevation (a); and a four-story elevator and stair tower on another side (b). The gabled entrance (c) first proposed was not compatible with the flat-roofed auditorium and the design of the proposed stair tower (d) was also incompatible and overwhelmed the historic building. The designs were revised (e-f) resulting in new additions that meet the Standards (g-h).



## Incompatible New Additions to Historic Buildings

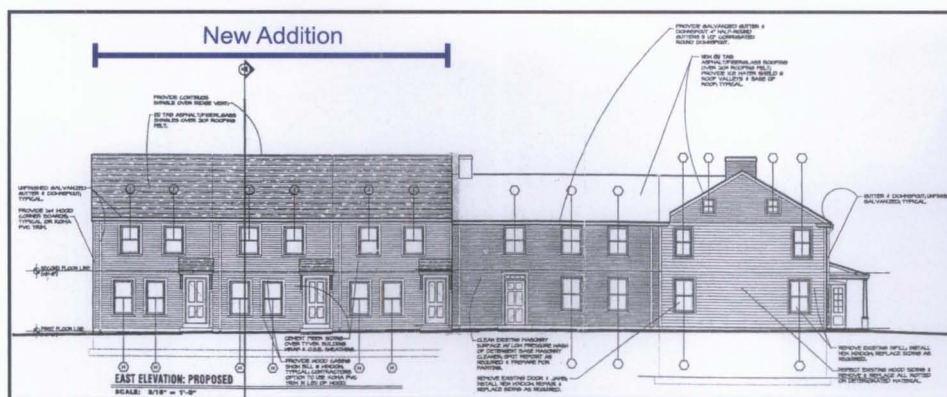


Figure 16. The proposal to add three row houses to the rear ell of this early-19th century residential property doubles its size and does not meet the Standards..



Figure 17. The small addition on the left is starkly different and it is not compatible with the eclectic, late-19th century house.



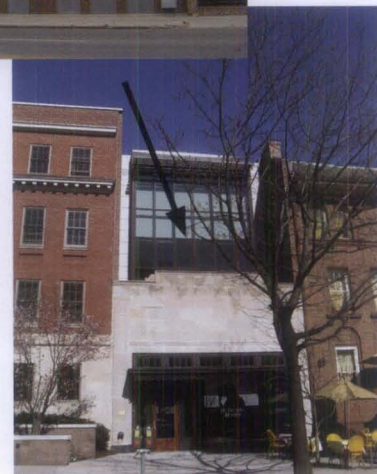
Figure 18. The expansion of a one- and one-half story historic bungalow (left) with a large two-story rear addition (right) has greatly altered and obscured its distinctive shape and form.



Figure 19. The upper two floors of this early-20th century office building were part of the original design, but were not built. During rehabilitation, the two stories were finally constructed. This treatment does not meet the Standards because the addition has given the building an appearance it never had historically.



Figure 20. The height, as well as the design, of these two-story rooftop additions overwhelms the two-story and the one-story, low-rise historic buildings.





## New Additions in Densely-Built Environments

In built-up urban areas, locating a new addition on a less visible side or rear elevation may not be possible simply because there is no available space. In this instance, there may be alternative ways to help preserve the historic character. One approach when connecting a new addition to a historic building on a primary elevation is to use a hyphen to separate them. A subtle variation in material, detailing and color may also provide the degree of differentiation necessary to avoid changing the essential proportions and character of the historic building.

A densely-built neighborhood such as a downtown commercial core offers a particular opportunity to design an addition that will have a minimal impact on the historic building. Often the site for such an addition is a vacant lot where another building formerly stood. Treating the addition as a separate or infill building may be the best approach when designing an addition that will have the least impact on the historic building and the district. In these instances there may be no need for a direct visual link to the historic building. Height and setback from the street should generally be consistent with those of the historic building and other surrounding buildings in the district. Thus, in most urban commercial areas the addition should not be set back from the façade of the historic building. A tight urban setting may sometimes even accommodate a larger addition if the primary elevation is designed to give the appearance of being several buildings by breaking up the facade into elements that are consistent with the scale of the historic building and adjacent buildings.



Figure 21. Both wings of this historic L-shaped building (top), which fronts on two city streets, adjoined vacant lots. A two-story addition was constructed on one lot (above, left) and a six-story addition was built on the other (above, right). Like the historic building, which has two different facades, the compatible new additions are also different and appear to be separate structures rather than part of the historic building.



Figure 22. The proposed new addition is compatible with the historic buildings that remain on the block. Its design with multiple storefronts helps break up the mass.



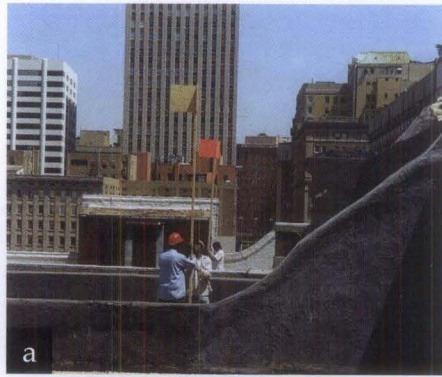


Figure 23. Colored flags marking the location of a proposed penthouse addition (a) were placed on the roof to help evaluate the impact and visibility of an addition planned for this historic furniture store (b). Based on this evaluation, the addition was constructed as proposed. It is minimally visible and compatible with the 1912 structure (c). The tall parapet wall conceals the addition from the street below (d).

## Rooftop Additions

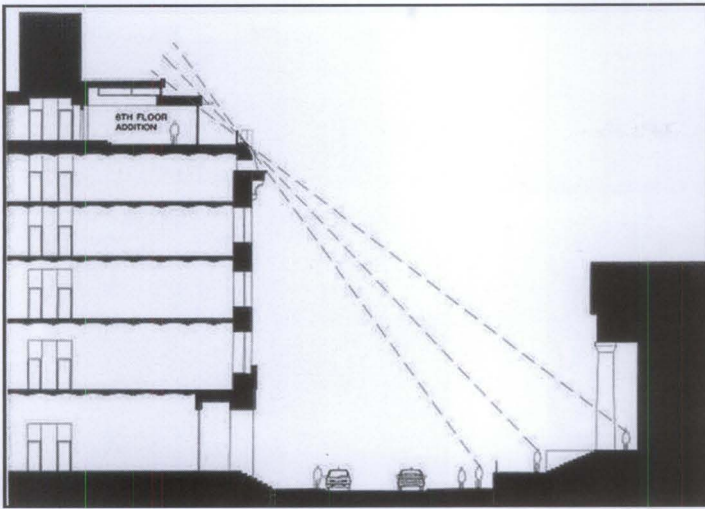
The guidance provided on designing a compatible new addition to a historic building applies equally to new rooftop additions. A rooftop addition should preserve the character of a historic building by preserving historic materials, features and form; and it should be compatible but differentiated from the historic building.

However, there are several other design principles that apply specifically to rooftop additions. Generally, a rooftop addition should not be more than one story in height to minimize its visibility and its impact on the proportion and profile of the historic building. A rooftop addition should almost always be set back at least one full bay from the primary elevation of the building, as well as from the other elevations if the building is free-standing or highly visible.

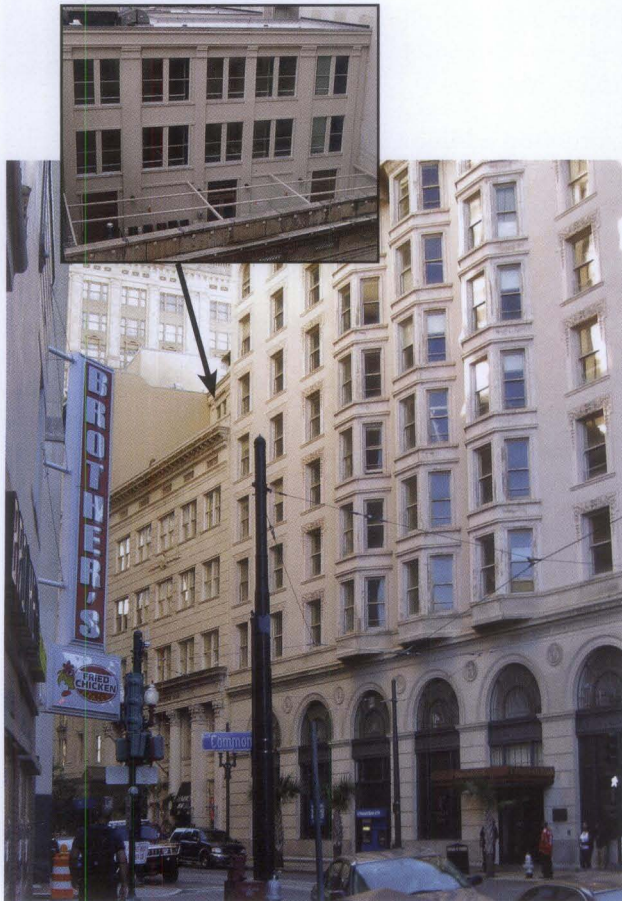
It is difficult, if not impossible, to minimize the impact of adding an entire new floor to relatively low buildings, such as small-scale residential or commercial structures, even if the new addition is set back from the plane of the façade. Constructing another floor on top of a small, one, two or three-story building is seldom appropriate for buildings of this size as it would measurably alter the building's proportions and profile, and negatively impact its historic character. On the other hand, a rooftop addition on an eight-story building, for example, in a historic district consisting primarily of tall buildings might not affect the historic character because the new construction may blend in with the surrounding buildings and be only minimally visible within the district. A rooftop addition in a densely-built urban area is more likely to be compatible on a building that is adjacent to similarly-sized or taller buildings.

A number of methods may be used to help evaluate the effect of a proposed rooftop addition on a historic building and district, including pedestrian sight lines, three-dimensional schematics and computer-generated design. However, drawings generally do not provide a true "picture" of the appearance and visibility of a proposed rooftop addition. For this reason, it is often necessary to construct a rough, temporary, full-size or skeletal mock up of a portion of the proposed addition, which can then be photographed and evaluated from critical vantage points on surrounding streets.





**Figure 24. How to Evaluate a Proposed Rooftop Addition.**  
A sight-line study (above) only factors in views from directly across the street, which can be very restrictive and does not illustrate the full effect of an addition from other public rights of way. A mock up (above, right) or a mock up enhanced by a computer-generated rendering (below, right) is essential to evaluate the impact of a proposed rooftop addition on the historic building.



**Figure 25.** It was possible to add a compatible, three-story, penthouse addition to the roof of this five-story, historic bank building because the addition is set far back, it is surrounded by taller buildings and a deep parapet conceals almost all of the addition from below.

**Figure 26.** A rooftop addition would have negatively impacted the character of the primary facade (right) of this mid-19th century, four-story structure and the low-rise historic district. However, a third floor was successfully added on the two-story rear portion (below) of the same building with little impact to the building or the district because it blends in with the height of the adjacent building.







Figure 27. Although the new brick stair/elevator tower (left) is not visible from the front (right), it is on a prominent side elevation of this 1890 stone bank. The compatible addition is set back and does not compete with the historic building. Photos: Chadd Gossman, Aurora Photography, LLC.

## Designing a New Exterior Addition to a Historic Building

This guidance should be applied to help in designing a compatible new addition that will meet the *Secretary of the Interior's Standards for Rehabilitation*:

- A new addition should be simple and unobtrusive in design, and should be distinguished from the historic building—a recessed connector can help to differentiate the new from the old.
- A new addition should not be highly visible from the public right of way; a rear or other secondary elevation is usually the best location for a new addition.
- The construction materials and the color of the new addition should be harmonious with the historic building materials.
- The new addition should be smaller than the historic building—it should be subordinate in both size and design to the historic building.

The same guidance should be applied when designing a compatible **rooftop** addition, plus the following:

- A rooftop addition is generally not appropriate for a one, two or three-story building—and often is not appropriate for taller buildings.
- A rooftop addition should be minimally visible.
- Generally, a rooftop addition must be set back at least one full bay from the primary elevation of the building, as well as from the other elevations if the building is freestanding or highly visible.
- Generally, a rooftop addition should not be more than one story in height.
- Generally, a rooftop addition is more likely to be compatible on a building that is adjacent to similarly-sized or taller buildings.

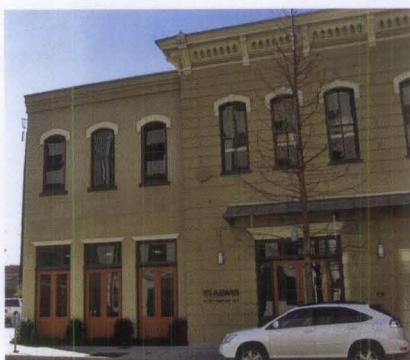


Figure 28. A small addition (left) was constructed when this 1880s train station was converted for office use. The paired doors with transoms and arched windows on the compatible addition reflect, but do not replicate, the historic building (right).





Figure 29. This simple glass and brick entrance (left) added to a secondary elevation of a 1920s school building (right) is compatible with the original structure.

## Summary

Because a new exterior addition to a historic building can damage or destroy significant materials and can change the building's character, an addition should be considered only after it has been determined that the new use cannot be met by altering non-significant, or secondary, interior spaces. If the new use cannot be met in this way, then an attached addition may be an acceptable alternative if carefully planned and designed. A new addition to a historic building should be constructed in a manner that preserves significant materials, features and form, and preserves the building's historic character. Finally, an addition should be differentiated from the historic building so that the new work is compatible with—and does not detract from—the historic building, and cannot itself be confused as historic.

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Figure 30. The small addition on the right of this late-19th century commercial structure is clearly secondary and compatible in size, materials and design with the historic building.





Figure 31. An elevator/stair tower was added at the back of this Richardsonian Romanesque-style theater when it was rehabilitated. Rough-cut stone and simple cut-out openings ensure that the addition is compatible and subordinate to the historic building. Photo: Chuck Liddy, AIA.

## Acknowledgements

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This publication has been prepared pursuant to the National Historic Preservation Act of 1966, as amended, which directs the Secretary of the Interior to develop and make available information concerning historic properties. The Technical Preservation Services Branch, National Park Service, prepares standards, guidelines and other educational materials on responsible historic preservation treatments for a broad public audience. Additional information about the programs of Technical Preservation Services is available on the website at [www.nps.gov/history/hps/tps](http://www.nps.gov/history/hps/tps). Comments about this publication should be addressed to: Charles E. Fisher, Technical Preservation Publications Program Manager, Technical Preservation Services-2255, National Park Service, 1849 C Street, NW, Washington, DC 20240. This publication is not copyrighted and can be reproduced without penalty. Normal procedures for credit to the author and the National Park Service are appreciated.