Exhibit 3 Item 4-B, July 18, 2024 Historical Advisory Board Meeting THE SECRETARY OF THE INTERIOR'S **STANDARDS** FOR THE TREATMENT OF HISTORIC PROPERTIES WITH

GUIDELINES FOR PRESERVING, REHABILITATING, RESTORING & RECONSTRUCTING HISTORIC BUILDINGS



Under the National Historic Preservation Act (NHPA), the Secretary of the Interior is responsible for establishing professional standards and for providing guidance on the preservation of the nation's historic properties. The Secretary of the Interior's Standards for the Treatment of Historic Properties apply to all grants-in-aid projects assisted through the Historic Preservation Fund (authorized by the NHPA) and are intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and districts. The Standards address four treatments: preservation, rehabilitation, restoration, and reconstruction. The treatment Standards, developed in 1992, were codified as 36 CFR Part 68 in the July 12, 1995, Federal Register (Vol. 60, No. 133). They replaced the 1978 and 1983 versions of 36 CFR Part 68, entitled The Secretary of the Interior's Standards for Historic Preservation Projects. The revised Guidelines herein replace the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, published in 1995 to accompany the treatment Standards.

The Secretary of the Interior's Standards for the Treatment of Historic Properties are regulatory only for projects receiving Historic Preservation Fund grant assistance and other federally-assisted projects. Otherwise, these Guidelines are intended to provide general guidance for work on any historic building.

Another regulation, 36 CFR Part 67, focuses on "certified historic structures" as defined by the Internal Revenue Service Code of 1986. The Standards for Rehabilitation cited in 36 CFR Part 67 should always be used when property owners are seeking certification for federal tax benefits.

THE SECRETARY OF THE INTERIOR'S **STANDARDS** FOR THE TREATMENT OF HISTORIC PROPERTIES WITH **GUIDELINES** FOR PRESERVING, REHABILITATING, RESTORING & RECONSTRUCTING HISTORIC BUILDINGS

Revised by Anne E. Grimmer

from The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings Kay D. Weeks and Anne E. Grimmer (1995)

> U.S. Department of the Interior National Park Service Technical Preservation Services Washington, D.C.

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Front Cover: Spooner Hall, University of Kansas, Lawrence, KS, Henry van Brunt, 1894.

HISTORICAL OVERVIEW

Masonry. Detail, decorative sandstone door surround.

Wood. Detail, Pope-Leighey House, Alexandria, VA, Frank Lloyd Wright, 1940. Photo: Courtesy National Trust for Historic Preservation, Paul Burk, photographer.

Metals. Detail, Dunbar Molasses Factory, New Orleans, LA, c. 1920.

Glass. Detail, St. John's Abbey, Collegeville, MN, Marcel Breuer, 1958-61.

Paint and Other Coatings. Interior detail, Mabel Tainter Memorial Theater, Menomonie, WI, Harvey Ellis, 1889. Photo: Miller Dunwiddie Architecture.

Composite Materials. Composite siding, Private Residence, Washington, DC, William Lescaze, 1940.

Simulative Materials. Detail, wood used to simulate cut stone.

Roofs. Asphalt roof shingles on a 1920s-era house.

Windows. Paired wood windows with stained glass lunette on a Romanesque revival-style rowhouse.

Entrances and Porches. Decorative stone entrance with etchedglass revolving door on early-20th century office building.

Storefronts. Ellicott City, MD.

Curtain Walls. Simms Building, Albuquerque, NM, Flatow & Moore, 1954. Photo: Harvey M. Kaplan.

Structural Systems. Boiler Maker Shops, Navy Yard Annex, Washington, DC, 1919.

Mechanical Systems. Historic Radiator.

Spaces, Features, and Finishes. Interior, Saenger Theater, New Orleans, LA, Emile Weil, 1927. Photo: Courtesy Saenger Theater.

Site. Vineyard, Charles Krug Winery, St. Helena, CA. Photo: Rocco Ceselin. Inset: Redwood Cellar, 1872, Charles Krug Winery. Photo: Rien van Rijthoven.

Setting. Late-19th-century residential historic district.

Accessibility. Gradual slope added to sidewalk and paving for accessibility. Schmidt Brewery, St. Paul, MN, late 19th-early 20th century.

Life Safety. Code-required, supplemental stair railing.

Resilience to Natural Hazards. Farnsworth House, Plano, IL, Mies van der Rohe, 1951. Photo: Courtesy Farnsworth, A Site of the National Trust for Historic Preservation.

Sustainability. Traditional sustainable features include deep porches and window shutters in southern architecture.

New Additions and Related New Construction. Private Residence, Washington, DC, Cunningham/Quill Architects. Photo: © Maxwell MacKenzie.

CHAPTER HEADS

Preservation. Old Santa Fe Trail Building (National Park Service Intermountain Regional Office), Santa Fe, NM. This adobe building was designed by John Gaw Meem in the Spanish-Pueblo Revival style, and constructed for the National Park Service through the auspices of the Civilian Conservation Corps (CCC) and the Works Project Administration (WPA) in 1939. Photo: MRWM Landscape Architects.

Rehabilitation. The Arcade, Providence, RI, 1828. Photo: Northeast Collaborative Architects, Ben Jacobson, photographer.

Restoration. Montpelier, Montpelier Station, VA. National Trust for Historic Preservation, Administered by The Montpelier Foundation. Photo: Courtesy The Montpelier Foundation.

Reconstruction. The Cathedral of Saint Michael the Archangel, Sitka, AK, built early 1840s, reconstructed 1961. Photo: Barek at Wikimedia Commons.

Photographs not individually credited are from National Park Service files.

ACKNOWLEDGEMENTS

This edition of The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings has been produced in part to ensure that the National Park Service continues to fulfill its responsibility to promote the preservation of the historic buildings that are part of the nation's cultural heritage. This has been a collaborative effort undertaken by the office of Technical Preservation Services (TPS) in the National Park Service, with the assistance of other National Park Service programs, State Historic Preservation Offices (SHPO), the Advisory Council on Historic Preservation, Federal Agency Historic Preservation Officers, the National Trust for Historic Preservation, and others. The comments and suggestions provided by these agencies and organizations, together with important contributions from the TPS professional staff, have been invaluable in the development of this revised and updated guidance on preserving, rehabilitating, restoring, and reconstructing historic buildings that accompany The Secretary of the Interior's Standards for the Treatment of Historic Properties.

PREFACE

The year 2016 was significant as the Centennial of the National Park Service, which was established as a new bureau within the Department of the Interior by the Organic Act on August 25, 1916. As directed in this legislation, the National Park Service has served for one hundred years as steward of the "Federal areas known as national parks, monuments and reservations...to conserve the scenery and the natural and historic objects and the wild life therein and to...leave them unimpaired for the enjoyment of future generations."

The year 2016 also marked the 50th anniversary of the passage of the National Historic Preservation Act on October 15, 1966. The Act increased the scope and responsibilities of the National Park Service with regard to the preservation of cultural resources. The National Historic Preservation Act charges the National Park Service (through authority delegated by the Secretary of the Interior) to establish and administer a national historic preservation program and to develop and promulgate standards and guidelines for the treatment of historic properties.

The Secretary of the Interior's Standards for Historic Preservation Projects were first issued in 1978. In 1979 they were published with Guidelines for Applying the Standards and reprinted in 1985. The Standards were revised in 1992, when they were retitled *The Secretary of the Interior's Standards for the Treatment of Historic Properties.* The Standards were codified in the Federal Register in 1995, the same year that they were published with guidelines as *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings.* These Standards and Guidelines provide a critical part of the framework of the national preservation program. They are widely used at the federal, state, and local levels to guide work on historic buildings, and they also have been adopted by Certified Local Governments and historic preservation commissions across the nation.

In 2010 the National Park Service issued A *Call to Action: Preparing for a Second Century of Stewardship and Engagement*, a plan to chart a path for its next 100 years. This plan identified a number of actions with the goal to "preserve America's special places in the next century," which included updating National Park Service policies and guidance. The project to update The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Build-ings was undertaken as part of this broader effort.

Since these Guidelines were first published in 1995, a greater number of buildings and building types, telling a broader range of stories that are part of the nation's heritage, have been recognized as "historic" and eligible for listing in the National Register of Historic Places. These guidelines have been updated and expanded to address the treatment of these buildings constructed with newer materials and systems from the mid- and late-20th century.

The updated Guidelines have the same organization as the prior version, beginning with an introduction and a historical overview, followed by chapters that focus on each of the four treatments: preservation, rehabilitation, restoration, and reconstruction. The historical overview has been expanded; not only has the information on historic materials, systems, features, and special issues that comprised the previous edition been more fully developed, but new entries have been added on glass, paint and other coatings, composite materials, imitative materials, and curtain walls.

In each of the four chapters, the "Recommended" and "Not Recommended" treatments have been updated and revised throughout to ensure that they continue to promote the best practices in preservation. The section on exterior additions to historic buildings in the Rehabilitation Guidelines has been broadened also to address related new construction on a building site. A section on code-required work is now included in all of the chapters. "Energy Efficiency" has been eliminated, since it is more fully covered by the guidance provided on sustainability in *The Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines on Sustainability* *for Rehabilitating Historic Buildings* (published in 2011), which has general applicability to all the treatments and is incorporated here by reference. Sections on "Resilience to Natural Hazards" have been added, but these topics will be more fully addressed in separate documents and web features. Finally, the updated Guidelines feature all new, and many more, illustrations in color.

Herewith Technical Preservation Services issues the National Park Service Centennial edition of *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, updated and revised in recognition of the 50th anniversary of the National Historic Preservation Act, to ensure that the preservation guidance for historic buildings provided by the National Park Service continues to be meaningful and relevant in the 21st century.

> Technical Preservation Services National Park Service

Technical Preservation Services National Park Service

The office of Technical Preservation Services (TPS) in the Cultural Resources directorate of the National Park Service is responsible for developing and promulgating preservation standards and guidance specifically as it relates to historic buildings. TPS has produced an extensive amount of technical, educational, and policy guidance on the maintenance and preservation of historic buildings. TPS developed the original and current versions of The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. The many technical publications and web features on preserving historic buildings prepared by TPS are well known, especially the Preservation Briefs and the Preservation Tech Notes series. It is not feasible to include a complete list here of all the materials available from TPS because of the sheer volume of information. Materials developed by TPS are available in printed form and/or online from the TPS website at https://www.nps.gov/ tps (or search for Technical Preservation Services at https://www. nps.gov). TPS also administers the Federal Historic Preservation Tax Incentives Program, which encourages private sector investment in the rehabilitation and reuse of historic buildings.

INTRODUCTION

Using the Standards and Guidelines for Preservation, Rehabilitation, Restoration, and Reconstruction Projects

The Secretary of the Interior's Standards for the Treatment of Historic Properties address four treatments: preservation, rehabilitation, restoration, and reconstruction. As stated in the regulations (36 CFR Part 68) promulgating the Standards, "one set of standards ...will apply to a property undergoing treatment, depending upon the property's significance, existing physical condition, the extent of documentation available, and interpretive goals, when applicable. The Standards will be applied taking into consideration the economic and technical feasibility of each project." These Standards apply not only to historic buildings but also to a wide variety of historic resource types eligible to be listed in the National Register of Historic Places. This includes buildings, sites, structures, objects, and districts.

Guidelines, however, are developed to help apply the Standards to a specific type of historic resource. Thus, in addition to these Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, there are also guidelines for cultural landscapes, historic lighthouses, historic vessels, historic furnished interiors, and historic covered bridges.

The purpose of *The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* is to provide guidance to historic building owners and building managers, preservation consultants, architects, contractors, and project reviewers prior to beginning work. It is always recommended that preservation professionals be consulted early in any project.

The Guidelines are intended as an aid to assist in applying the Standards to all types of historic buildings. They are not meant to give case-specific advice or address exceptions or unusual conditions. They address both exterior and interior work on historic buildings. Those approaches to work treatments and techniques that are consistent with The Secretary of the Interior's Standards for the Treatment of Historic Properties are listed in the "Recommended" column on the left; those which are inconsistent with the Standards are listed in the "Not Recommended" column on the right.

There are four sections, each focusing on one of the four treatment Standards: Preservation, Rehabilitation, Restoration, and Reconstruction. Each section includes one set of Standards with accompanying Guidelines that are to be used throughout the course of a project.

Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project. However, new exterior additions are not within the scope of this treatment. The Standards for Preservation require retention of the greatest amount of historic fabric along with the building's historic form.

Rehabilitation 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 Rehabilitation Standards acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building's historic character. **Restoration** is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project. The Restoration Standards allow for the depiction of a building at a particular time in its history by preserving materials, features, finishes, and spaces from its period of significance and removing those from other periods.

Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location. The Reconstruction Standards establish a limited framework for recreating a vanished or non-surviving building with new materials, primarily for interpretive purposes.

The Guidelines are introduced with a brief overview of the primary materials used in historic buildings; the exterior and interior architectural features and systems; the building's site and setting; code-compliance requirements regarding accessibility and life-safety resilience to natural hazards; sustainability; and new additions and related new construction. This overview establishes the format of the Guidelines that follow.

Choosing an Appropriate Treatment for the Historic Building

The Guidelines are intended to promote responsible preservation practices that help protect the nation's irreplaceable cultural resources. For example, they cannot, in and of themselves, be used to make essential decisions about which features of the historic building should be saved and which can be changed. But, once a treatment is selected, the Standards and Guidelines provide a consistent philosophical approach to the work. Choosing the most appropriate treatment for a building requires careful decision making about a building's historical significance, as well as taking into account a number of other considerations:

Level of Significance. National Historic Landmarks, designated for their "exceptional significance in American history," and other properties important for their interpretive value may be candidates for *Preservation* or *Restoration*. *Rehabilitation*, however, is the most commonly used treatment for the majority of historic buildings *Reconstruction* has the most limited application because so few resources that are no longer extant can be documented to the degree necessary to accurately recreate the property in a manner that conveys its appearance at a particular point in history.

Physical condition. *Preservation* may be appropriate if distinctive materials, features, and spaces are essentially intact and convey the building's historical significance. If the building requires more extensive repair and replacement, or if alterations or a new addition are necessary for a new use, then *Rehabilitation* is probably the most appropriate treatment.

Proposed use. Many historic buildings can be adapted for a new use or updated for a continuing use without seriously impacting their historic character. However, it may be very difficult or impossible to convert some special-use properties for new uses without major alterations, resulting in loss of historic character and even integrity.

Code and other regulations. Regardless of the treatment, regulatory requirements must be addressed. But without a sensitive design approach such work may damage a building's historic materials and negatively impact its character. Therefore, because the ultimate use of the building determines what requirements will have to be met, some potential uses of a historic building may not be appropriate if the necessary modifications would not preserve the building's historic character. This includes adaptations to address natural hazards as well as sustainability.

ROOFS		
RECOMMENDED	NOT RECOMMENDED	
<i>Identifying, retaining, and preserving</i> roofs and their functional and decorative features that are important in defining the overall historic character of the building. The form of the roof (gable, hipped, gambrel, flat, or mansard) is significant, as are its deco- rative and functional features (such as cupolas, cresting, para- pets, monitors, chimneys, weather vanes, dormers, ridge tiles, and snow guards), roofing material (such as slate, wood, clay tile, metal, roll roofing, or asphalt shingles), and size, color, and patterning.	Removing or substantially changing roofs which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Removing a major portion of the historic roof or roofing material	
	that is repairable, then rebuilding it with new material to achieve a more uniform or "improved" appearance.	
	Changing the configuration or shape of a roof by adding highly vis- ible new features (such as dormer windows, vents, skylights, or a penthouse).	
	Stripping the roof of sound historic material, such as slate, clay tile, wood, or metal.	
Protecting and maintaining a roof by cleaning gutters and downspouts and replacing deteriorated flashing. Roof sheathing should also be checked for indications of moisture due to leaks or condensation.	Failing to clean and maintain gutters and downspouts properly so that water and debris collect and cause damage to roof features, sheathing, and the underlying roof structure.	
Providing adequate anchorage for roofing material to guard against wind damage and moisture penetration.	Allowing flashing, caps, and exposed fasteners to corrode, which accelerates deterioration of the roof.	
Protecting a leaking roof with a temporary waterproof membrane with a synthetic underlayment, roll roofing, plywood, or a tarpau- lin until it can be repaired.	Leaving a leaking roof unprotected so that accelerated deteriora- tion of historic building materials (such as masonry, wood, plaster, paint, and structural members) occurs.	
Repainting a roofing material that requires a protective coating and was painted historically (such as a terneplate metal roof or gutters) as part of regularly-scheduled maintenance.	Failing to repaint a roofing material that requires a protective coating and was painted historically as part of regularly-scheduled maintenance.	
Applying compatible paint coating systems to historically-painted roofing materials following proper surface preparation.	Applying paint or other coatings to roofing material if they were not coated historically.	
Protecting a roof covering when working on other roof features.	Failing to protect roof coverings when working on other roof features.	
Evaluating the overall condition of the roof and roof features to determine whether more than protection and maintenance, such as repairs to roof features, will be necessary.	Failing to undertake adequate measures to ensure the protection of roof features.	

ROOFS		
RECOMMENDED	NOT RECOMMENDED	
Repairing a roof by ensuring that the existing historic or compat- ible non-historic roof covering is sound and waterproof. Repair may include the limited replacement in kind or with a compatible substitute material of missing materials (such as wood shingles, slates, or tiles) on a main roof, as well as those extensively deteriorated or missing components of features when there are surviving prototypes, such as ridge tiles, dormer roofing, or roof monitors.	Replacing an entire roof feature when repair of the historic roof- ing materials and limited replacement of deteriorated or missing components are feasible.	
Using corrosion-resistant roof fasteners (e.g., nails and clips) to repair a roof to help extend its longevity.		



[16] The deteriorated asphalt shingles of this porch roof are being replaced in kind with matching shingles.

ROOFS		
RECOMMENDED	NOT RECOMMENDED	
Replacing in kind an entire roof covering or feature that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples of such a feature could include a large section of roofing, a dormer, or a chimney. If using the same kind of material is not feasible, then a compatible substitute material may be considered.	Removing a feature of the roof that is unrepairable and not replac- ing it, or replacing it with a new roof feature that does not match. Using a substitute material for the replacement that does not convey the same appearance of the roof covering or the surviving components of the roof feature or that is physically or chemically incompatible.	
Replacing only missing or damaged roofing tiles or slates rather than replacing the entire roof covering.	Failing to reuse intact slate or tile in good condition when only the roofing substrate or fasteners need replacement.	
Replacing an incompatible roof covering or any deteriorated non- historic roof covering with historically-accurate roofing material, if known, or another material that is compatible with the historic character of the building.		
The following work is highlighted to indicate that it is specific to Rehabilitation projects and should only be considered after the preservation concerns have been addressed.		
Designing the Replacement for Missing Historic Features		
Designing and installing a new roof covering for a missing roof or a new feature, such as a dormer or a monitor, when the historic feature is completely missing. It may be an accurate restoration based on documentary and physical evidence, but only when the historic feature to be replaced coexisted with the features currently on the building. Or, it may be a new design that is compatible with the size, scale, material, and color of the historic building.	Creating an inaccurate appearance because the replacement for the missing roof feature is based upon insufficient physical or historic documentation, is not a compatible design, or because the feature to be replaced did not coexist with the features currently on the building. Introducing a new roof feature that is incompatible in size, scale, material, or color.	

ROOFS		
RECOMMENDED	NOT RECOMMENDED	
Alterations and Additions for a New Use		
Installing mechanical and service equipment on the roof (such as heating and air-conditioning units, elevator housing, or solar panels) when required for a new use so that they are inconspicu- ous on the site and from the public right-of-way and do not damage or obscure character-defining historic features.	Installing roof-top mechanical or service equipment so that it dam- ages or obscures character-defining roof features or is conspicuous on the site or from the public right-of-way.	
Designing rooftop additions, elevator or stair towers, decks or ter- races, dormers, or skylights when required by a new or continu- ing use so that they are inconspicuous and minimally visible on the site and from the public right-of-way and do not damage or obscure character-defining historic features.	Changing a character-defining roof form, or damaging or destroying character-defining roofing material as a result of an incompatible rooftop addition or improperly-installed or highly-visible mechanical equipment.	
Installing a green roof or other roof landscaping, railings, or furnishings that are not visible on the site or from the public right-of-way and do not damage the roof structure.	Installing a green roof or other roof landscaping, railings, or furnish- ings that are visible on the site and from the public right-of-way.	



[17] New wood elements have been used selectively to replace rotted wood on the underside of the roof in this historic warehouse.