



**SR-2 – ADVISORY STAFF REPORT (04-03-2026)**

*This advisory report, prepared by staff, represents the opinion and advice of professional staff, and does not represent nor direct the separate review and decision of the Historic District Commission. This report serves as an addendum to SR-1, an objective staff summary of the proposal and property.*

**ADDRESS:** 264 WATSON

**HISTORIC DISTRICT:** BRUSH PARK

**MEETING DATE:** 04-08-2026

**APPLICATION NUMBER:** HDC2026-00106

**ADVISORY STAFF REPORT PREPARED BY J. ROSS**

**STAFF OBJECTIONS TO APPROVAL:**

*This first section describes itemized conclusions/concerns, which, in staff's professional opinion, would prevent the issue of an unconditional Certificate of Appropriateness (COA). "None" means staff has no objections and believes a COA is warranted, with no conditions. The Historic District Commission is not required to accept staff opinions or recommendations.*

1. The extant wood windows are distinctive and historic character-defining features of the building. The submitted application materials do not substantiate that these windows are deteriorated beyond repair

**STAFF ANALYSIS AND DISCUSSION:**

*This second section expands on the reasoning and analysis leading to staff's conclusions given in the first section above. The Historic District Commission is not required to accept staff opinions or recommendations.*

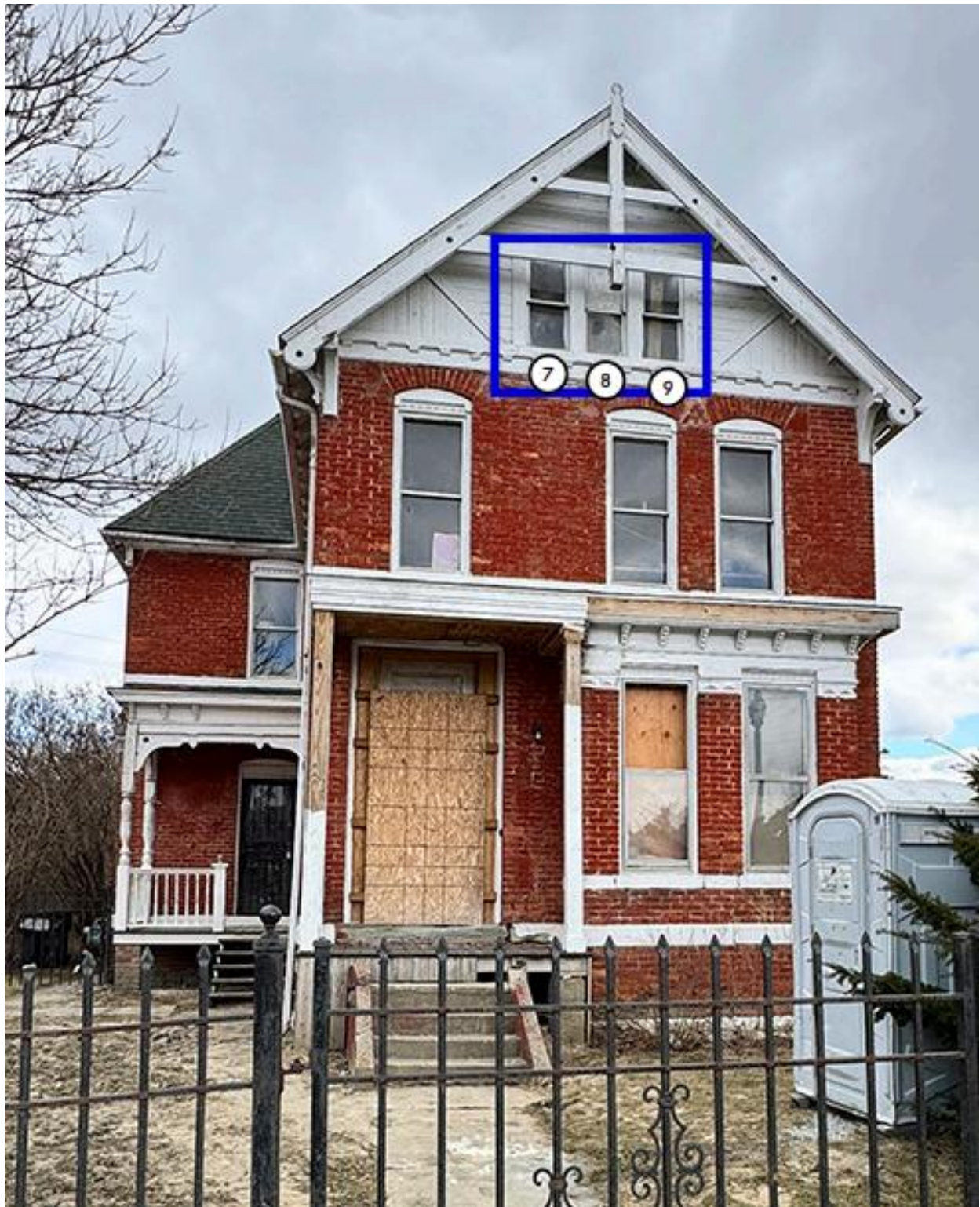
- Please note that the application includes drawings which depict a number of additional exterior work items which are associated with the planned rehabilitation of the house. Most of the items were approved by the Commission via a COA that was issued on 12/11/2024, while others were approved at a staff level. In late 2025, the applicant submitted a permit set of drawings to the building department for the which include work item that were approved by the Commission in 2024 in addition to work items approved at a staff level. Staff therefore reiterates that the **current scope of work which has been submitted to the Commission for review at the 04/08/2026 meeting only includes the following items:**
  - Remove all existing historic wood windows and their associated brickmould to the masonry opening and install new aluminum-clad wood windows per the submission.
- See the below pictures of the house, provided by the applicant, which indicate the windows proposed for replacement:



264 Watson, east side wall, by applicant. Windows proposed for removal outlined in blue



264 Watson, west side wall, by applicant. Windows proposed for removal outlined in blue



264 Watson, front façade. Windows proposed for removal outlined in blue



264 Watson, rear wall, by applicant. Window proposed for removal outlined in blue

- All window openings are arched with the exception the three attic windows at the front façade and the second story window at the rear. Many of the windows proposed for replacement appear to have exterior aluminum storm windows which have been painted white to match the sashes and brickmould/casing. Sills are masonry (see below photo for typical appearance).



Photo by applicant, showing typical conditions at existing windows

- The Elements of Design speak to the prevalence of wood within district. Specifically see the following Elements of Design #s 7, 8, and 10:
  - (7) *Relationship of materials*. By far the most prevalent material in the district is

common brick; other forms of brick, stone and wood trim are common; wood is used as a structural material only east of Brush. Some later buildings have stucco wall surfaces. Originally, roofs were wood or slate with an occasional example of tile; asphalt replacement roofs are common.

- (8) *Relationship of textures.* The most common relationship of textures in the district is the low-relief pattern of mortar joints in brick contrasted to the smoother or rougher surfaces of stone or wood trim. Slate, wood, or tile roofs contribute particular textural values where they exist, especially in the case of slates or shingles of other than rectangular shape.
- (10) *Relationship of architectural detail.* On the buildings of the Victorian period, elaborate detail in wood, stone, or sheet metal was common; areas treated include porches, window and door surrounds, cornices, dormers, and other areas. Later buildings are generally simpler, but include less elaborate detail in similar areas.
- It is staff's opinion that the wood window sashes and associated brickmould/casing proposed for removal are historic, distinctive character-defining features of the house.
- Please see exterior photos of the windows proposed for removal on pages 11-23 of the applicant's submission document [HDC2026-00106 .pdf](#). The applicant also provided a narrative window condition assessment with photos (mainly taken from the interior) to support the submitted assessment [HDC2026-00106 ArchitectEngineerConsultant.pdf](#) (pages 4-29).
- It is staff's opinion that the submitted documents do not support the assessment that the building's wood windows are deteriorated beyond the point of reasonable repair. Therefore, their removal and replacement with new windows does not align with the Standards.
- Should the Commission determine that the proposed work items are appropriate and issues a Certificate of Appropriateness for the project, staff notes that the application does not depict how the arched portion will be matched. Any approval should be conditioned upon the applicant submitting this information to staff for review and approval prior to the issuance of the COA.



**Photo by applicant, showing typical conditions at existing windows  
STAFF RECOMMENDATION:**

*This third and final section takes staff's itemized "objections" identified in the first section, and presents them in the form of "conditions" in support of a proposed approval recommendation or "reasons" in support of a proposed denial recommendation, in the form required by Section 21-2-78 of the City Code. The Historic District Commission is not required to accept staff opinions or recommendations.*

Section 21-2-78, Determinations of Historic District Commission

**Recommendation 1 of 1, Denial – Replace existing wood windows with new aluminum-clad wood windows**

Staff recommends that the proposed work will be inappropriate according to the Secretary of the Interior's Standards for Rehabilitation and the Brush Park Historic District's Elements of Design, specifically:

- Standards #2, 5, & 6:

*2). The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*

*5). Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

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

- Element of Design # 7, 8, & 10

For the following reasons;

1. The extant wood windows are distinctive and historic character-defining features of the building. The application does not adequately substantiate that the existing wood windows proposed for replacement are deteriorated beyond repair.

**REPORT PREPARED BY: JRR**