



**SR-2 – ADVISORY STAFF REPORT (05-08-2026)**

*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:** 15091 PENROD

**MEETING DATE:** 05-13-2026

**APPLICATION NUMBER:** HDC2026-00035

**ADVISORY STAFF REPORT PREPARED BY:** E. THACKERY

**STAFF OBJECTIONS TO APPROVAL:**

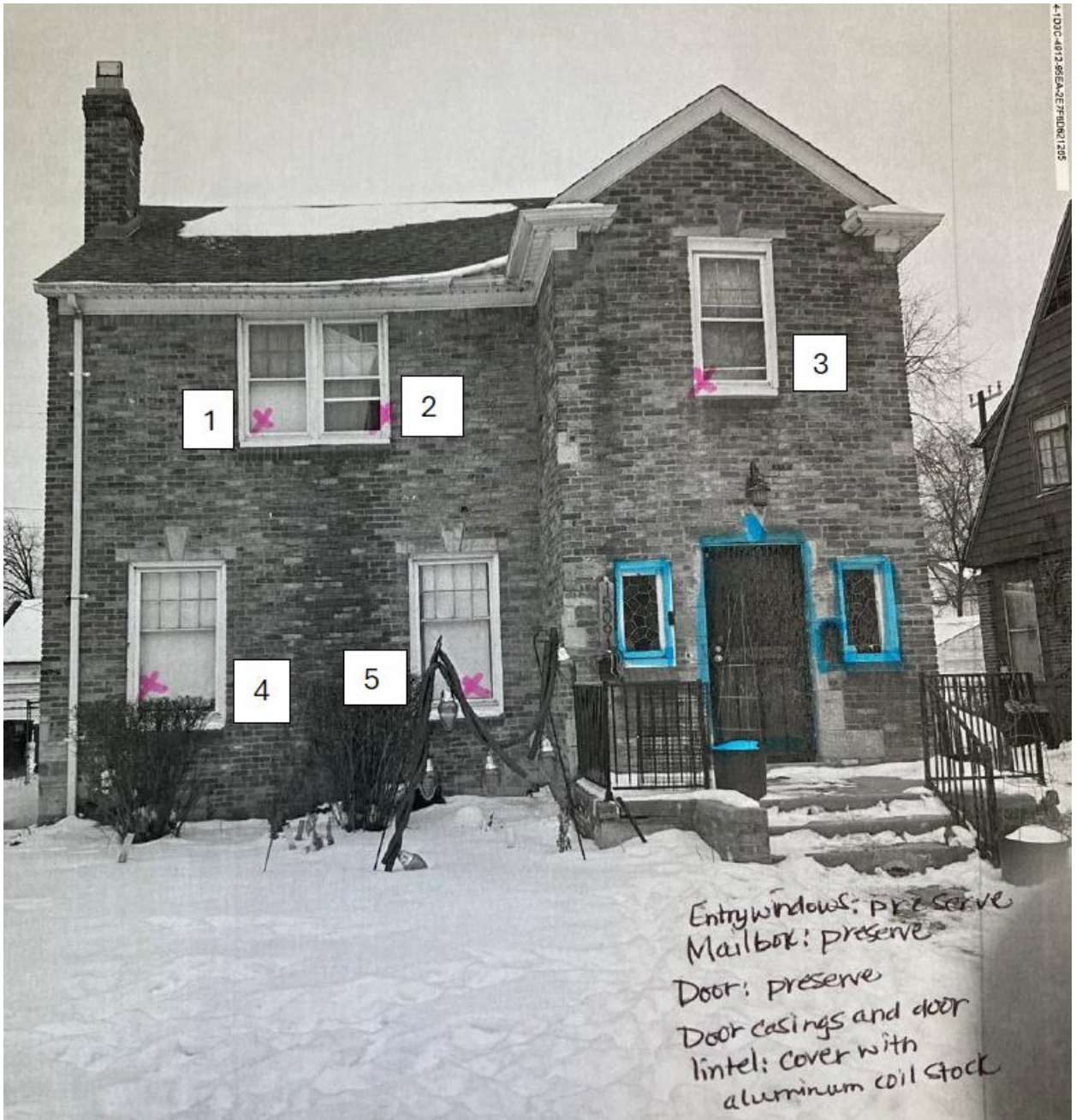
*This first section describes itemized conclusions/concerns, which, in staff's professional opinion, would prevent the issue of an unconditional Certificate of Appropriateness (COA). "None" means staff has no objections and believes a COA is warranted, with no conditions. The Historic District Commission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

1. The ten (10) wood windows with muntins and the rear balcony's wood entry door and storm door are distinctive and historic character-defining features of the house. The application does not adequately substantiate that these existing historic features are deteriorated beyond repair.
2. Removing or covering existing historic wood trim around doors and windows would alter the house's historic features and diminish its character.

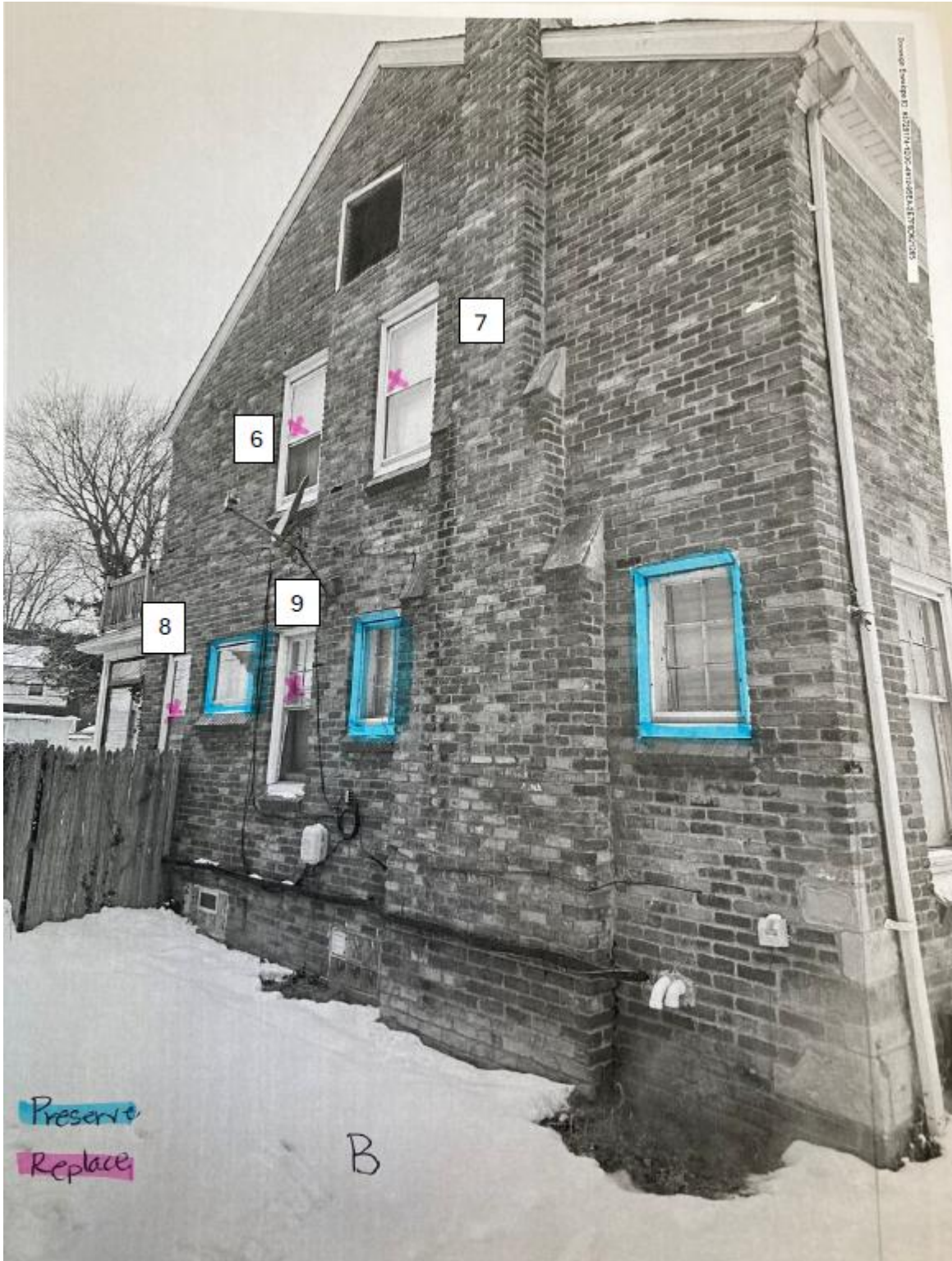
**STAFF ANALYSIS AND DISCUSSION:**

*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.*

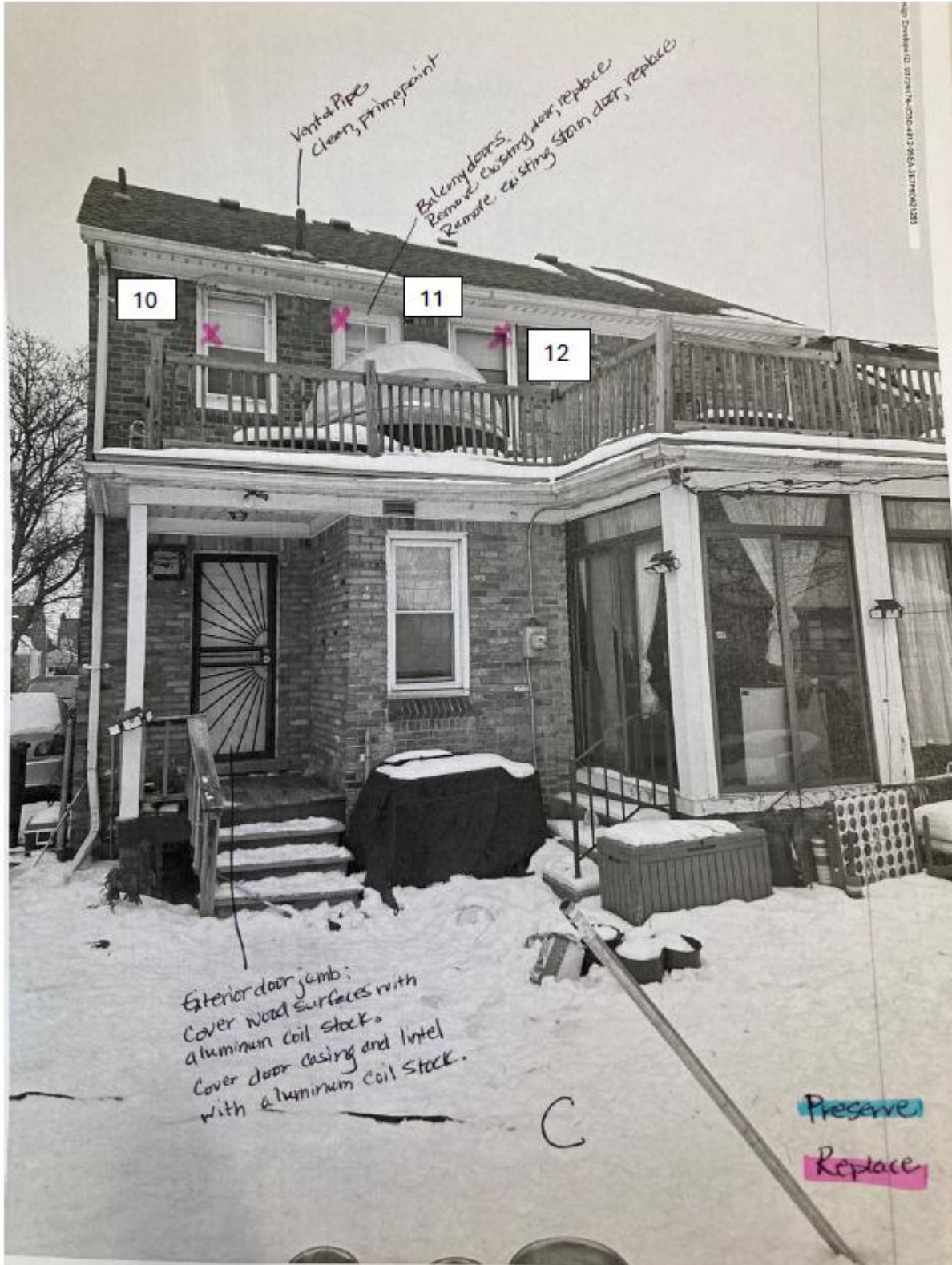
- Proposed is the replacement of 15 windows, a storm door, and an entry door. Also proposed is covering wood trim around doors with aluminum coil stock.
- The bid sheet included in the application states that this work is part of a grant-funded lead abatement project.
- See the below pictures of the house. These pictures were provided by the applicant and marked up by staff to help identify the windows proposed for replacement. The applicant confirmed that staff's understanding of the windows and doors proposed for replacement is correct. The windows and door marked with pink Xs are proposed for replacement. The features outlined in pale blue were identified in the scope of work as remaining in place. (There are several windows that are fixed in place and likely historic, and these fixed windows are not proposed for replacement in this application.) Staff then numbered the items proposed for replacement on these photos.



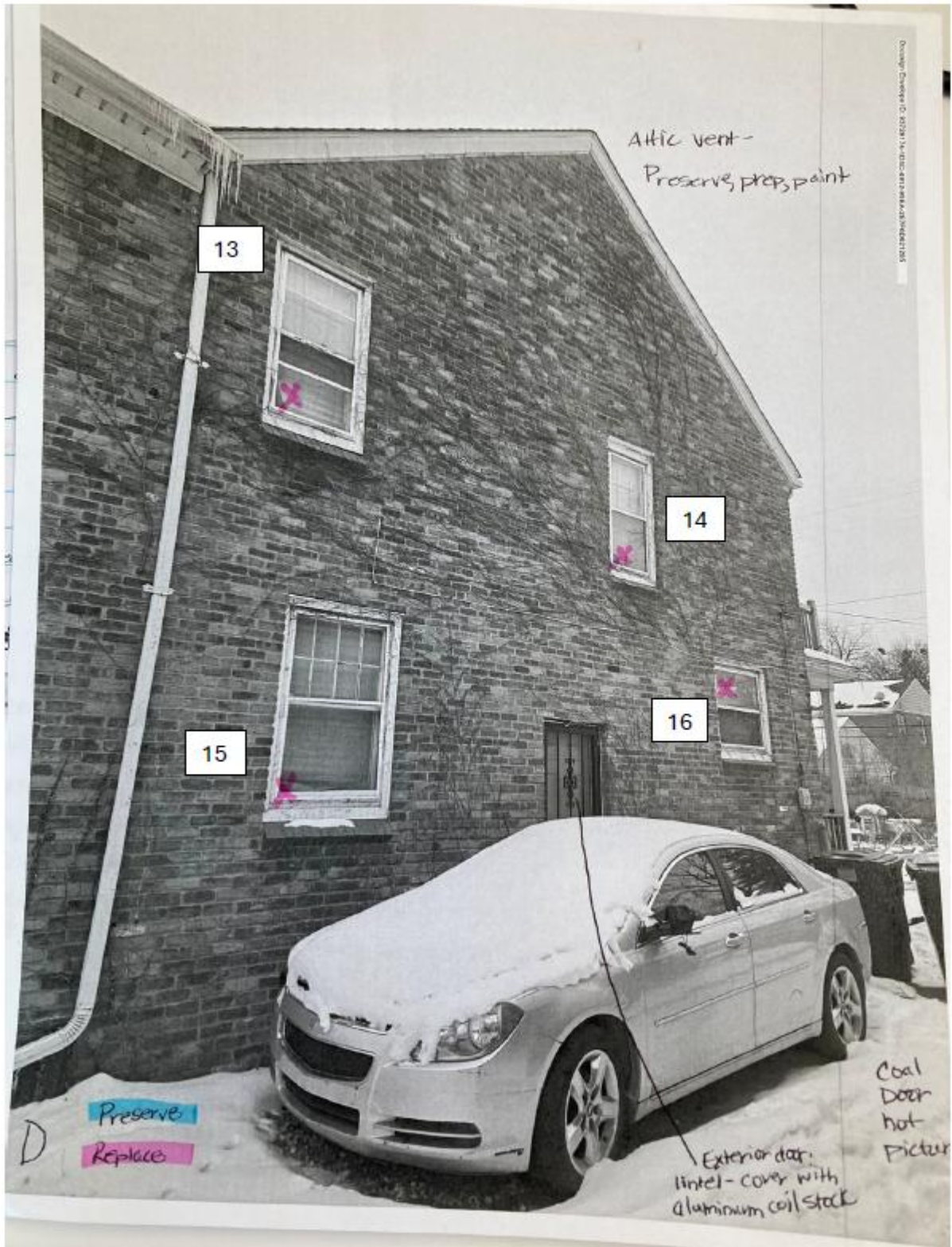
*Front of house, east side, Side A by the applicant's bid sheet.*



South side of house, Side B on the applicant's bid sheet.



Rear of house/ west side, or Side C on applicant's bid sheet.



North side of house, or Side D on the applicant's bid sheet.

- In addition to the above photos of all sides of the house, the applicant also provided several photos of individual windows—some exterior, some interior. They are included with the Cycle 2 and Cycle 3 application materials on the property’s webpage (two photos were included in Cycle 4 application materials) and staff appended the photos to the staff Summary Report-1, posted on the meeting webpage, for reference.
- Of the 15 windows proposed for replacement, 10 are wood with muntins and divided lights in the upper sashes. They all have storm windows installed.
- The other 5 windows to be replaced lack muntins. These windows are Windows 6, 7 (both on Side B), 10, 12, (both on the rear/ Side C), and 16 (on Side D). Staff is not able to discern these windows’ materials with certainty, but several appear to be wood. All 5 of these windows also have storm windows installed.
- The doors proposed for replacement are on the rear at the balcony, and both are wood.
- Rosedale Park’s Element of Design 10 (Relationship of architectural details) states: “*The architectural elements and details of each structure generally relate to its style.*” It is staff’s opinion that the wood doors proposed for replacement are historic, character-defining features.
- Rosedale Park’s Elements of Design 3, 7, 8, and 15 speak to the importance of wood windows in the district in helping to establish the historic character of the district:
  - *Element 3, Proportion of openings within the façade: “...Windows are often subdivided; buildings designed in English Revival styles frequently display leaded glass in casement windows and transoms. In buildings derived from classical precedents, double-hung sash windows are further subdivided by muntins. ...”*
  - *Element 7, Relationship of materials: “... Wood is almost universally used for window frames, half-timbering, and other functional trim. Windows are commonly either of the metal casement or wooden sash variety.”*
  - *Element 8, Relationship of textures: “Textured brick and brick laid in patterns creates considerable interest, as does half-timbering, leaded and subdivided windows, and wood-shingled or horizontally sided elements.”*
  - *Element 15, Scale of facades and façade elements: “...Window sash are usually subdivided by muntins and casement windows are leaded, affecting the apparent scale of the windows within the facades.”*
- It is staff’s opinion that the 10 windows with divided lights in the upper sashes that are proposed for replacement are historic, character-defining features of the house. Five of these historic windows are on the primary façade, including two cottage-style windows (the upper sashes are shorter than the lower sashes). It is staff’s opinion that the five windows without muntins proposed for replacement may be of historic age, but staff does not find them to be character-defining. Windows 6, 7, 10, and 12 (south side and rear) have proportions that would be typical of other (historic) windows but lack muntins; as a result, it is staff’s opinion that these windows are likely replacements. Window 16 is a kitchen window over a sink, and its proportions look wider and shorter than the typical taller-than-wide historic windows elsewhere on the house. As a result, staff believes this window opening was modified and staff believes this to be a replacement window as well.
- The Secretary of the Interior’s Standards for Rehabilitation require historic features to be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the Standards require that the new feature will match the old in design, color, texture, and other visual qualities and, where possible, materials. It is staff’s opinion that the applicant’s submitted materials do not support an assertion that the 10 historic wood windows with muntins and the two wood doors proposed for replacement are deteriorated

beyond the point of reasonable repair. Therefore, the removal and replacement of these 10 historic wood windows and two doors does not align with the Standards.

- Staff acknowledges concerns with the existence of lead paint. However, lead removal and abatement processes exist for treating historic wood windows, short of outright replacement, and should be pursued instead.
  - The National Park Service’s *Preservation Brief 37: Appropriate Methods for Reducing Lead-Paint Hazards in Historic Housing*, establishes strategies based on the premise that “historic housing can be made lead-safe for children without removing significant decorative features and finishes, or architectural trimwork that may contribute to the building’s historic character.”
  - The *Brief* states that removing surfaces that contain lead-based paint (like the windows themselves in this case) results in “extensive loss or modification of architectural features and finishes and is not appropriate for most historic properties.”
  - The *Brief* continues: “A preferred approach, consistent with The Secretary of the Interior’s Standards for the Treatment of Historic Properties, calls for removing, controlling, or managing the hazards rather than wholesale—or even partial—removal of the historic features and finishes. **This is generally achieved through careful cleaning and treatment of deteriorating paint, friction surfaces, surfaces accessible to young children, and lead in soil.**” (emphasis added)
  - Such an approach is illustrated in the grant-related Summary of Work document (included in this application) when it outlines the approach to the subject house’s front door. The grant-related Summary of Work calls to “Remove all paint from impact and friction surfaces. Perform substrate stabilization on all remaining door trim. Wet scrape and fully apply Eco-Bond Lead Defender (or equivalent) to doors, jamb, and interior/exterior casing. Chemically strip, neutralize, and repaint/refinish lead-identified door. Reinstall door.” This approach removes the lead-paint hazard without replacing the historic door.
  - Historic windows (and the rear balcony door in this case), like the front door, are also historic, character-defining features that should be preserved if at all possible.
  - *Preservation Brief 37* states, “From a preservation standpoint, selecting a hazard control method that removes *only* the deteriorating paint, or that involves some degree of repair, is always preferable to the total replacement of a historic feature.”
  - The *Brief* describes that hazard abatement removes the lead paint hazard and it describes that deteriorated paint can be removed on friction, chewable, or impact surfaces to the sound layer, and the surfaces can then be repainted. The *Brief* encourages wet sanding, low-level heat guns, chemical strippers, or HEPA sanding to remove the paint. The *Brief* also describes that component elements of a friction surface, like a window, (the parting bead or stops of windows, for example) could be replaced to eliminate the hazard, without replacing the entire window. The *Brief* describes that elements, such as windows, should be removed only when they are seriously deteriorated.
  - Regarding friction surfaces, the *Brief* states:
    - “Interior features with surfaces that—functionally—rub together such as windows and doors, or are subject to human wear and tear, such as floor and steps, are known as friction surfaces. It is unclear how much lead dust is created when friction surfaces that contain lead-based paint, but are top-coated with lead-free paint, rub together because much of the earlier paint may have worn away. For example, if lead dust levels around windows or on

Painted floors are consistently above acceptable levels, treating nearby friction surfaces should be considered. **If surfaces, such as operable windows, operable doors, painted porch decks, painted floors and painted steps appear to be generating lead dust, they should be controlled through isolating or removing the lead-based paint. Window and door edges can be stripped or planed, or the units stripped on or off site to remove paint prior to repainting. Simple wooden stops and parting beads for windows, which often split upon removal, can be replaced.**” (emphasis added)

- It continues: “If window sash are severely deteriorated, it is possible to replace them; and vinyl jamb liners can effectively isolate remaining painted window jambs. When windows are being treated within rehabilitation projects, their repair and upgrading are always recommended. In the event that part or all of a window needs to be replaced, the new work should match in size, configuration, detail, and, whenever possible, material.”
  - The *Brief* notes that encapsulant paints and coatings cannot be used on friction surfaces.
  - In conclusion, the Brief states: “Reducing and controlling lead hazards can be successfully accomplished without destroying the character-defining features and finishes of historic buildings. Federal and state laws generally support the reasonable control of lead-based paint hazards through a variety of treatments, ranging from modified maintenance to selective substrate removal. The key to protecting children, workers, and the environment is to be informed about the hazards of lead, to control exposure to lead dust and lead in soil, and to follow existing regulations. In all cases, methods that control lead hazards should be selected that minimize the impact to historic resources while ensuring that housing is lead-safe for children.”
- Because Windows 6, 7, 10, 12, and 16 are not considered by staff to be historic, character-defining windows, it is staff’s opinion that they could be replaced with compatible windows. As per the National Park Service guidance on compatible windows:
    - “Replacement windows for missing or non-historic windows must be compatible with the historic appearance and character of the building. Although replacement windows may be based on physical or pictorial documentation, if available, re-creation of the missing historic windows is not required to meet the Standards. Replacement of missing or non-historic windows must, however, always fill the original window openings and must be compatible with the overall historic character of the building. The general type of window – industrial steel, wood double-hung, etc. – that is appropriate can usually be determined from the proportions of the openings, and the period and historic function of the building. The appearance of the replacement windows must be consistent with the general characteristics of a historic window of the type and period, but need not replicate the missing historic window.”
  - By this guidance, for the five non-historic windows, staff finds the proposed replacement windows (wood, aluminum-clad, one-over-one windows without simulated divided lights) compatible with the historic appearance and character of the building. They fill the openings and operate as a wood double-hung would, but replicating the missing window with muntins is not required.
  - Staff notes that the proposed replacement windows are wood with black aluminum cladding and black screens. Staff further notes that the draft window order provided includes Location

information on each line, but it is not meaningful. For example, the first window shown on the window order states that its location is Window 1 but there are 3 of those windows shown in “Quantity.” The applicant would point to the floor plan they provided and that is posted to the meeting webpage for this property (“Window Layout”) that shows window locations based on the number of window lights in the upper sash.

- Staff notes that should the Commission determine that the replacement of the rear balcony doors is appropriate and issues a Certificate of Appropriateness for that scope item, staff would note that the proposed replacement door is not appropriate for this house’s architectural style and an approval should be conditioned upon the applicant submitting an appropriate door to staff for review and approval.

**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 2, Denial: Replace 10 existing wood windows with muntins with new aluminum-clad wood windows, replace a wood storm door and a wood entry door with a fiberglass entry door, and cover historic wood trim with aluminum coil stock**

Staff recommends that the proposed replacement of 10 wood windows with muntins, replacement of a wood entry door and a wood storm door, and covering historic wood trim with aluminum coil stock will be inappropriate according to the Secretary of the Interior’s Standards for Rehabilitation and the Rosedale Park Historic District’s Elements of Design, specifically:

- Standards 2, 5, and 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.*
- Elements of Design 3, 7, 8, 10, and 15

For the following reasons;

1. The 10 wood windows with muntins and the rear balcony’s wood entry door and storm door are distinctive and historic character-defining features of the house. The application does not adequately substantiate that these existing historic features are deteriorated beyond repair. The hazards represented by lead paint can be abated via historic preservation treatments rather than outright replacement.

2. Removing or covering existing historic wood trim around doors and windows would alter the house's historic features and diminish its character.

**Recommendation 2 of 2, Certificate of Appropriateness: Remaining work items**

Staff recommends that the replacement of five windows without muntins with wood windows with black aluminum cladding and no muntins will be appropriate according to the Secretary of the Interior's Standards for Rehabilitation and the Rosedale Park Historic District's Elements of Design, with the conditions that:

1. Any historic wood trim and brick mold that exists will be preserved, repaired, and reused. If any wood trim is beyond repair, trim that matches the historic in material, profile, and craftsmanship may be used.
2. Samples of the black screen proposed will be shared with staff for review and approval.