

**STAFF REPORT: JUNE 12, 2024 REGULAR MEETING**

**PREPARED BY: T. BOSCARINO**

**APPLICATION NUMBER: HDC2024-00223**

**ADDRESS: 2325 W. BOSTON**

**HISTORIC DISTRICT: BOSTON-EDISON**

**APPLICANT/OWNER: RILEY HALL**

**DATE OF PROVISIONALLY COMPLETE APPLICATION: MAY 7, 2024**

**DATE OF STAFF SITE VISIT: MAY 24, 2024**

**SCOPE: REPLACE SLATE ROOF WITH ASPHALT SHINGLE ROOF**



## **EXISTING CONDITIONS**

Built in 1923, the property at 2325 W. Boston is a two-and-one-half story residence facing north. The house displays Colonial Revival detailing to include red brick exterior cladding, deep overhanging eaves with brackets, and three dormers with clapboard siding peering out from the side-gabled, slate roof that is the subject of this application.

## **PROPOSAL**

The proposal is to replace the slate roof on the house. The proposed new material is GAF Timberline HDZ architectural asphalt shingles in “slate” color. The proposed work includes related items, such as fascia, drip edges, flashing, and ridge vents.



*GAF Timberline HDZ “slate” color. Image from submitted application materials.*

## **STAFF OBSERVATIONS AND RESEARCH**

- The Boston-Edison Historic District was established by resolution of the City Council in 1974. No Final Report was prepared for this district.
- The Elements of Design for Boston-Edison provide the following relevant observations:
  - “Roofing includes slate, tile, and asphalt shingles.”
  - “Tile, slate, or wood shingle roofs have particular textural values where they exist.”
  - “Roofs are in natural colors (tile and slate colors, natural and stained wood colors), and asphalt shingles are predominantly within this same dark color range.”
- A slate roof is almost invariably a character-defining feature of a building, as is the case on this house. The slate roof appears to be original to the house.
- The National Park Service provides guidance on determining whether repair of a slate roof is feasible or if replacement should be considered (*Preservation Briefs: The Repair, Replacement, and Maintenance of Slate Roofs*, page 16). Considerations include the “expected serviceable life” of the roofing, whether leaks are coming from slates or from flashing, and whether more than 20% of slates are damaged or missing.
- The Secretary of the Interior’s Standards for Rehabilitation (Standard #6) require that “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.” Slate should be replaced with slate unless it is infeasible to do so.
- The applicant has obtained the following estimates:
  - Replacement with slate: \$248,000 (Detroit Cornice and Slate)
  - Repairs to existing roof: \$72,950 (Detroit Cornice and Slate)
  - Replacement with asphalt: \$70,400 (Detroit Cornice and Slate)
  - Replacement with asphalt: \$66,000 (Michigan General Contractors)
- Despite providing a repair estimate, Detroit Cornice and Slate has advised against the repair, stating that “the slate is in poor condition and is reaching the end of its useable life” and that the underlayment, wood deck, “some” rafters, and “all” flashing are also in need of replacement.
- In a cover letter included with the application, the applicant states that the “supporting beams” are rotting due to water infiltration and that the leaking roof will lead to a loss of insurance coverage as of June 21, 2024.
- The applicant has submitted photos showing missing and cracked slates, damage to flashing, and interior water damage (see application materials for photos).

- From the ground, staff has observed numerous cracked and missing tiles. It is unclear if the number meets the 20% rule of thumb described above. Small spot repairs in sheet metal are also visible.



*Photos provided by Detroit Cornice and Slate. Please see the application materials for additional photos and higher resolution.*

- According to Realtor.com, the house sold in 2024 for \$525,000.
- According to the City Code,<sup>1</sup> “in reviewing plans for the issuance of a certificate of appropriateness, the Historic District Commission shall follow the U.S. Secretary of the Interior’s Standards for rehabilitation and guidelines for rehabilitating historic buildings as set forth in 36 CFR Part 67.” That regulation includes the direction “the Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.”<sup>2</sup>
- Although repair is technically feasible, the applicant is proposing replacement, based on the statement of an experienced contractor that the slate is reaching the end of its service life and repair is not recommended. The dollar amount quoted implies an economic feasibility argument.
- In determining feasibility, it is the role of the Commission to apply the Standards in the “reasonable manner” as cited above. Replacement of the roofing with new slate is technically feasible, as evidenced by the replacement estimate included with the application materials, and by the fact that slate roofs are occasionally replaced in the Indian Village Historic District and other historic districts. In assessing “reasonableness” concerning economic feasibility, staff has recommended in the past that the Commission compare the cost of the historically appropriate repair to the value of the property, among other factors. This is a subjective, case-specific assessment, and can vary from district to district, block to block, or house to house. In this instance, the cost of the slate replacement is nearly half the apparent market value of the house. Staff stipulates that the proposed replacement cost (\$248,000) is within expectations for a project of this type. If the Commission agrees that replacement if the slate is economically unfeasible, the use of asphalt shingles would qualify for a Certificate of Appropriateness under 36 CFR Part 67.7 and Section 21-2-73, et seq.

## **ISSUES**

None.

## **RECOMMENDATION**

### Section 21-2-78: Determinations of Historic District Commission

Staff recommends that the Commission issue a Certificate of Appropriateness for the proposed work as it meets the Secretary of the Interior's Standards for Rehabilitation.

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<sup>1</sup> Sec. 21-2-73

<sup>2</sup> 67.7 (b).