

**STAFF REPORT: AUGUST 14, 2024 MEETING**

**PREPARED BY: A. DYE**

**APPLICATION NUMBER: HDC2024-00381**

**ADDRESS: 3747 TYLER**

**HISTORIC DISTRICT: RUSSELL WOODS-SULLIVAN**

**APPLICANT: MICHAEL EISENBERG, EISENBERG EXCLUSIVES**

**PROPERTY OWNER: MICHAEL EISENBERG**

**DATE OF PROVISIONALLY COMPLETE APPLICATION: JULY 22, 2023**

**DATE OF STAFF SITE VISIT: JULY 26, 2023**

**SCOPE: INSTALL VINYL WINDOWS\* (WORK COMPLETED WITHOUT APPROVAL), ALTER PORCHES**

**EXISTING CONDITIONS**

Erected ca. 1927, the property at 3747 Tyler is a 2 ½ story two-family residence. The house and driveway (immediately east of the house) fill the width of the lot; the two car garage is at the rear lot line. The hipped, asphalt-shingled roof has a low shed dormer at the east elevation and a dominant hip roof dormer at the front elevation which features wood shingled sloping walls, bracketed eaves and three, square mullied window openings. The house is clad in dark brown brick and cast stone details, including the first story window hoods and sills, and decorative square and rectangular pieces set within the patterned brick walls. The side-by-side front doors are accessed through an arched masonry opening that is accentuated by alternating dark red and brown brick. A single door at the second floor opens to the porch above the main entrance where cross-shaped openings create a dimensional pattern between the corner masonry piers. An elevated open front porch extends across the first story's front wall and stepped brick wing walls enclose the front stairs. It appears one historic door is present at the front entrance, but the leaded glass window has been replaced with clear glass. Vinyl windows fill the openings at the first and second floor, and the windows within the dormer and the porch door are covered or missing.



*Staff photo, July 26, 2024.*

## **PROPOSAL**

### **Front Wall**

#### 3<sup>rd</sup> floor

Install aluminum-clad wood windows to fit existing openings.

#### 2<sup>nd</sup> floor

Replace the vinyl triple slider window with five aluminum-clad wood single-hung mulled windows.

Install solid panel door at second floor porch.

#### 1<sup>st</sup> floor

Retain the single-hung vinyl windows and install aluminum-clad frames in front of the vinyl windows to mimic-the transom and double-hung storm window pattern in place circa June 2019.

Install two solid panel doors at front entrance.

Rebuild entire masonry porch structure, wing walls and stairs.

### **Side Walls**

Install new vinyl windows with single-hung operation (smaller openings), and triple slider operation in the wider than tall openings. Install aluminum-clad wood frames in matching operation in front of each existing window opening.

At grade door near rear on west wall will be removed and bricked in.

### **Rear Wall**

The applicant offers three options to rectify the rear window and door openings, and previous porch removal:

#### Option One – retain existing conditions – #1 Back Façade - Actual

- Retain the single-hung vinyl windows in the door openings and install aluminum panels below each window to fill the remaining space.
- Retain the vinyl windows within the single window openings (no aluminum-clad frames suggested).

#### Option Two – four equal-sized window openings - #2 Back Façade – Prop Op 1

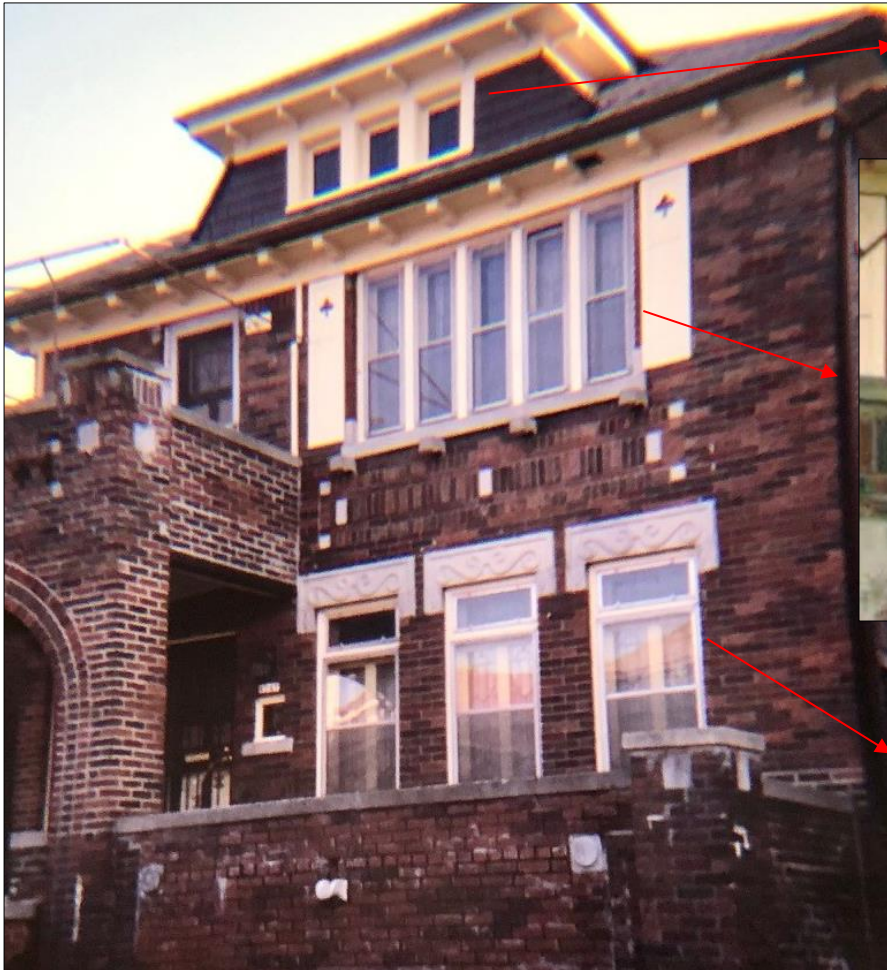
- The stone sills of the door opening will be raised to be used as sills for the new windows; the remaining space of doors to be infilled with brick.
- Install aluminum-clad window frames in front of each of the four windows.

#### Option Three – install doors to open to new two-story masonry porch - #3 Back Façade – Prop Op 2

- Install new panel doors in the door openings and erect a two-story enclosed brick porch.
- It is not clear if aluminum-clad frames are proposed to cover the two single windows.

## STAFF OBSERVATIONS AND RESEARCH

- The Russell Woods-Sullivan historic district was established in 1999.
- The designation photo shows leaded glass windows within each window opening on the front wall, as well as the three doors (two entrance and one upper porch). The first and second floor windows were vertically oriented casement units (casement design visually obscured by storm windows). The third floor had small square windows. The windows and doors were distinctive character-defining features and were replaced, without HDC approval, between 2013 and 2022.



1999 Designation photo, HDAB.

Bottom right: 3755 Tyler, Google street view, June 2022.

- The window shown at right is in the neighboring house (3755 Tyler) which has an identical leaded glass pattern to what had been in place at 3747 Tyler. This photo clearly shows the repeating leaded glass pattern in the transom window.
- The installation of storm windows in a double-hung operation obscured the casement windows, and once the windows were gone, gave erroneous and misleading information as to the original window operation and decoration.

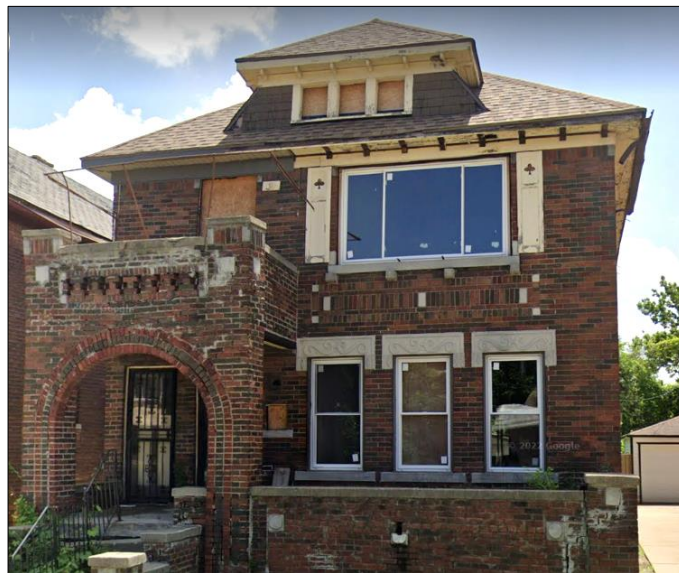


- According to Google street view, the leaded glass windows and doors were all still in place as of August 2013.
- The next available image is from August 2018 and shows the windows at the first floor and second floor had been removed but the double-hung storm windows remained in place. The leaded glass windows in the dormer remained, as did the leaded glass within the original doors at the front entrance and second floor door porch. The 2019 image below offers visual clarity of the aforementioned conditions.



*Google street view, August 2019.*

- Reviewing additional Google street view images, the remaining windows and doors were removed between June 2019 and June 2022 and the existing vinyl windows were installed.



*Google street view, June 2022.*

- The 2018 photos of 3747 Tyler show mulled units in the wider than tall window openings on the east side wall. The rear photo of 3747 Tyler shows three-over-one double-hung units, which also captures identical windows on the east side wall of 3755 Tyler. Therefore, it is staff's opinion the side and rear elevation windows at 3747 were consistently three-over-one double-hung units in single and mulled window openings.
- This double-hung window pattern emphasizes the verticality of the window opening, in a way similar to the casement windows that were in place on the front elevation.



*3747 Tyler, 2018 east elevation. Triple, equally proportioned mulled window frames are visible.*



*3747 Tyler, 2018 rear elevation. Vertical upper sash pattern is visible at both properties. (3755 Tyler partially shown.)*



*These two photographs were in a folder from a previous incomplete application and offer a clear before and after comparison of the rear elevation.*

*Left - January 2018.  
The window openings have wood double-hung windows with a three-over-one pattern. The first floor paneled/glass door may be original, while the second floor door design reflects a later replacement door.*



*Bottom left – November 2021 – existing conditions.*

*The window openings have one-over-one vinyl windows, the wood brick mould has been covered, and the door openings have been resized/infilled to accommodate one-over-one vinyl windows.*

*Staff doesn't know when the two-story porch was removed but found photographic confirmation that it was removed before 2006.*

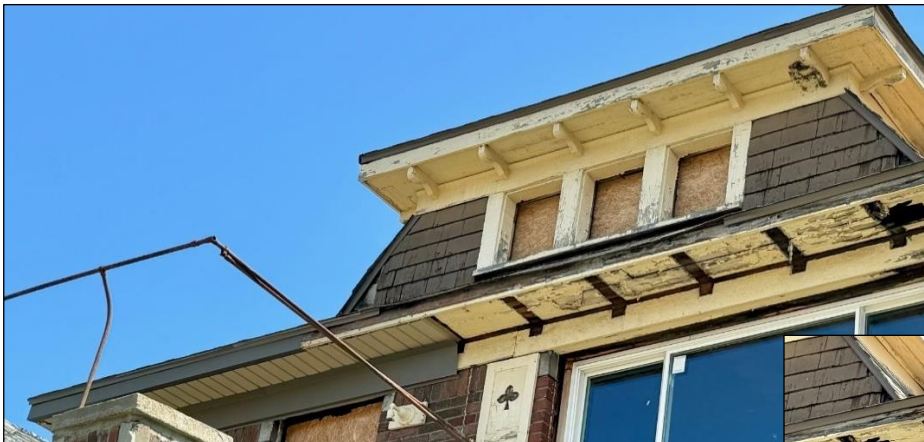
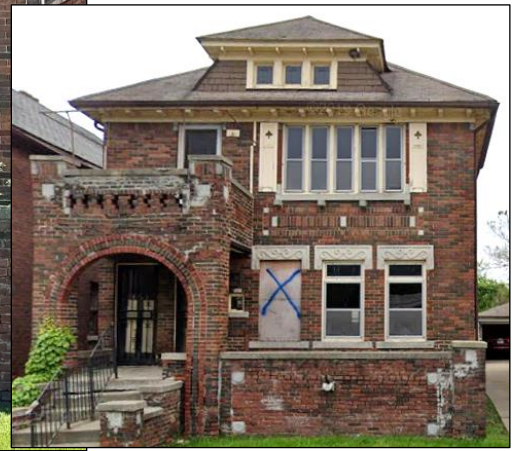
*The ghost images offer evidence that the porch was constructed of wood, due to the proportions of the porch railings.*

- This property is subject to the Detroit Land Bank Authority’s (DLBA) Nuisance Abatement Program (NAP), which required the property owner to rehabilitate the house. However, the rehab work was undertaken without HDC approval.
- Additional work identified which is NOT included in this application - the partial removal of the soffit brackets and covering of the wood soffit and fascia. This work occurred between June 2019 and September 2021.



*Left: Staff photo, July 26, 2024. This condition of the soffit and fascia has been in place since at least September 2021 when staff first photographed this property.*

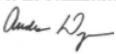
*Below: The 2019 Google street view image shows the wood bracketed soffit and wood fascia still intact.*



*Left and below: 2024 staff photos showing existing conditions at the second floor eaves and the intact historic design at the dormer eaves.*



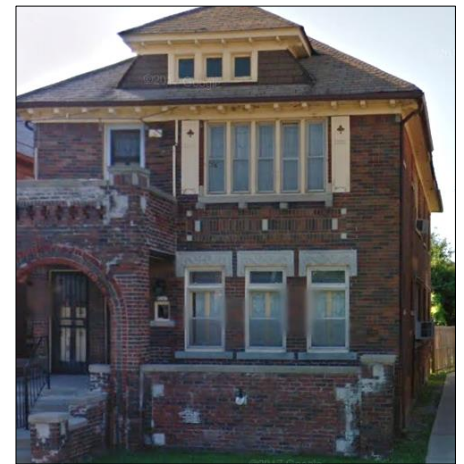
- At the October 11, 2023 meeting, the Commission reviewed an application to install aluminum-clad wood windows to match the existing window operations (HDC2023-00053). A copy of the Notice of Denial is below.

<p>CITY OF DETROIT HISTORIC DISTRICT COMMISSION</p>	<p>1 WOODWARD, SUITE 808 DETROIT, MICHIGAN 48226</p>
<p>October 18, 2023</p>	
<p><b><u>NOTICE OF DENIAL</u></b></p>	
<p>Michael Eisenberg 3747 Tyler Detroit MI 48238</p>	
<p><b>RE:</b> Application Number HDC2023-00053; 3747 Tyler; Russell Woods-Sullivan Historic District Project Scope: Remove original windows*, install wood windows *Work completed without approval</p>	
<p>Dear Applicant,</p>	
<p>At the Regular Meeting that was held on October 11, 2023, the Detroit Historic District Commission ("DHDC") reviewed the above-referenced application. Pursuant to Section 5(1) and 9(1) of the Michigan Local Historic District Act, as amended, being MCL 399.205 (1), MCL 399.209 (9) and Sections 21-2-78 and 21-2-80 of the 2019 Detroit City Code; the DHDC hereby issues a Denial for the following work, effective on October 17, 2023, as it will be inappropriate according to the Secretary of Interior's Standards for Rehabilitation and the district's Elements of Design:</p>	
<p><i>Installation of Jeld-Wen W-2500 aluminum-clad wood windows in the window openings of each elevation to replace previously installed vinyl windows; rear elevation door openings were filled with double-hung windows and wall panels, and a two-story open wood porch proposed at the rear elevation where a two-story porch had been removed, per the submitted documents, drawings, and photographs.</i></p>	
<p>The Commission's reason for the denial is that:</p>	
<ul style="list-style-type: none"> <li>▪ <i>The existing vinyl windows do not match the original windows in materiality, dimensionality, operation, decorative features, and color. The existing and proposed windows, in addition to the rear elevation door removal/window installation, destroyed distinctive character-defining features and substantially altered the appearance of the building. Therefore, this proposal to replace the existing vinyl units with aluminum-clad wood units that will match the operation, design and color of the existing windows does not improve the historic and architectural design of this property.</i></li> <li>▪ <i>All the windows were removed without Historic District Commission approval. Therefore, based on the Standards, new windows should match all the details of the historic windows that were removed.</i></li> <li>▪ <i>The uniformity and relationship between the window openings on each floor and each elevation is an important architectural component of the dwelling. Picture windows and sliding windows are contemporary window designs. The wide expanse of plate glass creates a negative void on an elevation, and sliding windows require horizontally placed uneven planes of glass. These window styles disrupt the traditional uniformity of this house's architectural design and features.</i></li> <li>▪ <i>The submitted drawings for the rear porch do not offer clarity of dimensions, design, and finish for this two-story element. Additionally, the applicant proposes to retain windows within the door openings leading to the porch. This is not an appropriate solution for these openings; doors should be reintroduced to the door openings as part of the porch design.</i></li> </ul>	
<p>Therefore, this work fails to meet the Secretary of the Interior's Standards, specifically Standards or Elements:</p> <p><i>Standard 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.</i></p> <p><i>Standard 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.</i></p> <p><i>Standard 5 Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.</i></p> <p><i>Standard 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.</i></p>	
<p>The application may be resubmitted for the Historic District Commission's review when suggested changes have been made that address the cited reasons for denial, if applicable.</p>	
<p>Please be advised that, in accordance with MCL 399. 211 and Section 21-2-81 of the 2019 Detroit City Code, an applicant aggrieved by a decision of the DHDC may file an appeal with the State Historic Preservation Review Board. Within sixty (60) days of your receipt of this notice, an appeal may be filed with:</p>	
<p>Jon Stuckey, Michigan Department of Attorney General 2<sup>nd</sup> Floor, G. Mennen Williams Building 525 West Ottawa Street P.O. Box 30754 Lansing, MI 48909</p> <p>Phone: 517-335-0665 E-mail: stuckeyj@michigan.gov</p>	
<p>If you have any questions regarding the foregoing, please contact staff at 313-224-1762 or hdc@detroitmi.gov.</p>	
<p>For the Commission:</p> <p></p> <p>Audra Dye Detroit Historic District Commission</p>	



- With the current scope of work, the applicant still doesn't offer to install replacement windows that match the operation, material and/or design of the original windows. The proposal for each elevation is discussed on the following pages.

### Front Wall



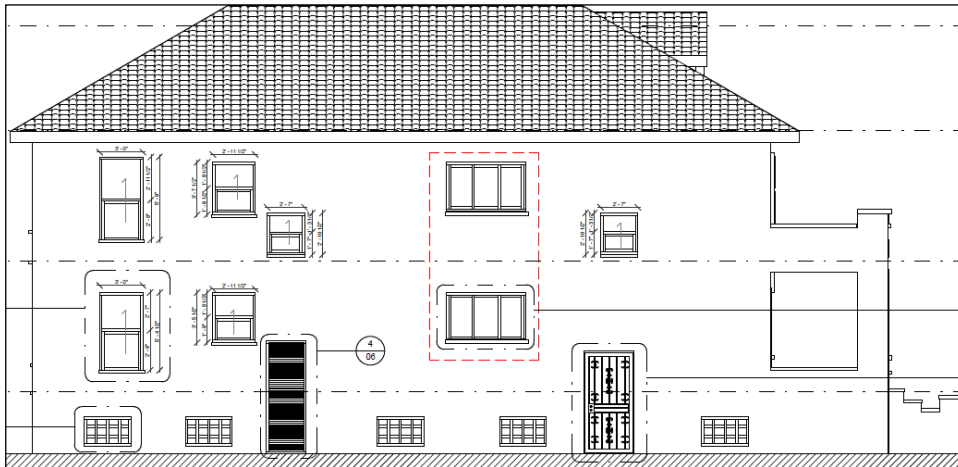
August 2011 Google street view photo.

### Applicant drawings

- Aluminum-clad wood single-hung windows, suggested at the second floor to replace the vinyl slider/fix window, do not match the operation (nor the glass details) of the historic leaded glass mulled casement windows. Additionally single-hung windows are not adequate replacement of double-hung windows due to the stationary upper sash being welded to the window frame.
- The installation of aluminum-clad window frames positioned in front of vinyl single-hung windows at the first floor will not replicate the removed windows (which were double casements with mulled transoms). As shown in older photographs, the first and second floor casement windows created a strong vertical pattern that emulated the vertical proportions of the 1-1/2 story masonry porch entry.
- If the Commission considers not requiring that new leaded glass windows be fabricated for the front elevation opening, it is staff's opinion that at a minimum, the window operations and details must be matched, which means the first and second floor would have casement units as well as the additional mulled transoms at the first floor.

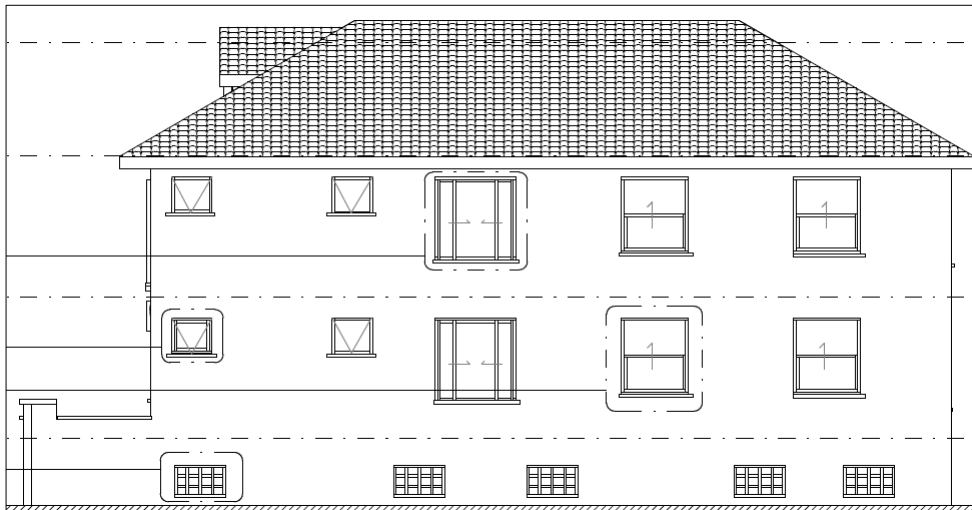
The applicant's drawings of each side wall show the proposed operation of the aluminum-clad framing for each window opening.

**Left- East Side Wall**



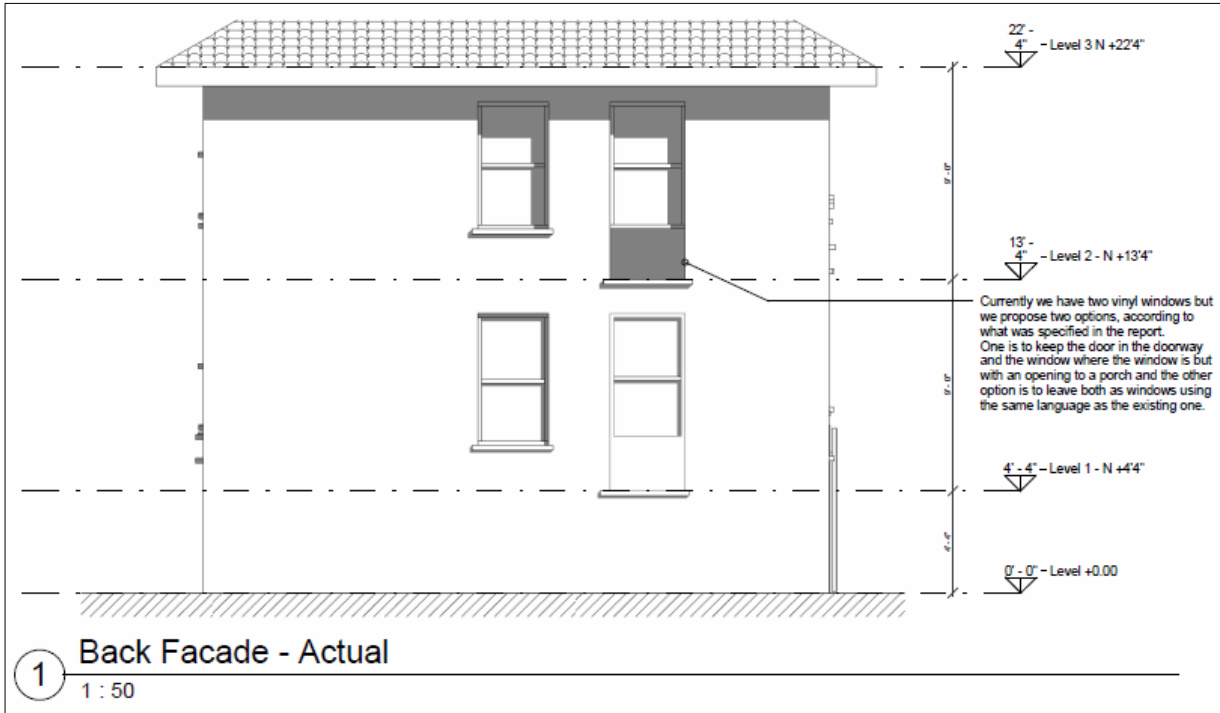
- The taller than wide windows on this wall currently have a sliding window within each individual opening. The applicant proposes to replace the small sliders with single-hung vinyl units covered aluminum-clad wood double-hung frames. The two wider than tall openings would receive new equally sized triple slider windows with matching operation aluminum-clad frames on the outer side. The dark rectangle shows the door opening that is currently covered with vinyl siding; the applicant proposes to fill the opening brick veneer.
- This dwelling is a two-family flat, so staff would like to note that the building code may require two entrances/exits per unit. As the rear porch door openings are proposed to be changed to windows (within two of the suggested options), the side doors may be required to remain operational. With regards to the design, the door is one component of a somewhat symmetrical design (based on the number and size of openings, rather than a fully symmetrical placement) which offers visual evidence to the two-family dwelling function.

**Right- West Side Wall**



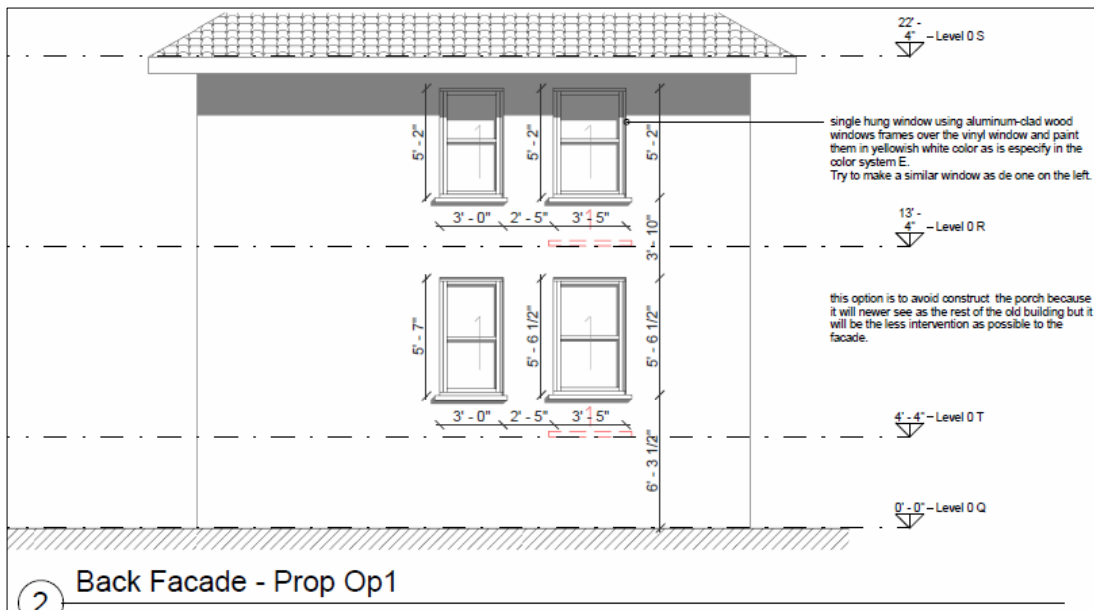
- Similar to the other side wall, the taller than wide openings will receive new single-hung vinyl windows covered with aluminum-clad wood frames as shown in this drawing. The four small windows will retain the existing wood window frames. The tall central openings will receive new vinyl sliding units covered with aluminum-clad wood frames.

- It is staff's opinion that the two-story rear porch was a functional feature of the house, but the likely wood construction (based on the ghost images) did not offer distinctive character-defining features. Staff did a photo survey of the rear walls of the houses on this block of Tyler; about 90% of the dwellings did not have any back porch in place in the earliest photo staff found (2006).
- If a porch is to be rebuilt, it is staff's opinion that it should be a wood porch with wood railings to be similar to the likely historic condition.
- If a porch isn't to be rebuilt at this time, the openings should remain intact offering a future owner the opportunity to build a porch. With this in mind, staff believes the only option presented that should be considered is option one. A double-hung window fills the width and about 2/3 the height of the door opening, and a panel fills the remaining area. The door's stone threshold remains in place.

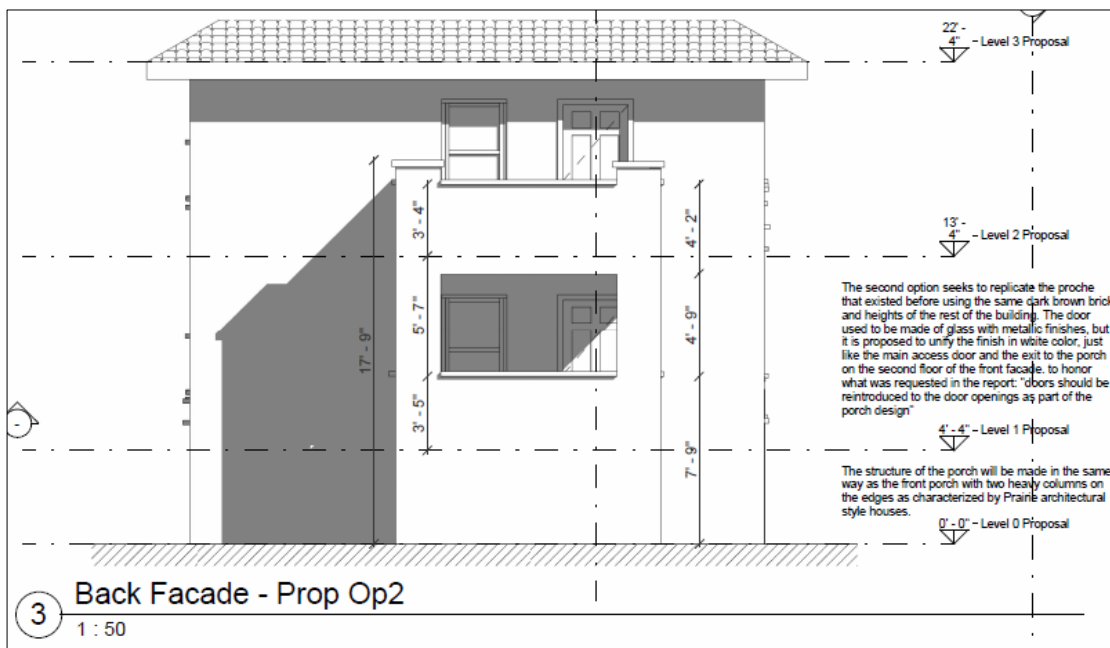


- Within this application, the applicant proposes to install an identical metal panel at the second floor door opening.
- As these openings are on the rear elevation, are not part of the public view, and don't remove distinctive features, it is staff's opinion this alteration to the door openings falls within Standard #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.*
- Staff's comments relate only to the generalized scope of work at this elevation – the existing windows and wrapped brick mould are not part of staff's supportive review of this option.





- This proposal offers a somewhat permanent change to the door opening, by its solid enclosure, relocated stone threshold/sill and installation of brick. This option doesn't offer any difference in the internal use of the four windows but is significantly more destructive to the exterior wall and historic openings.

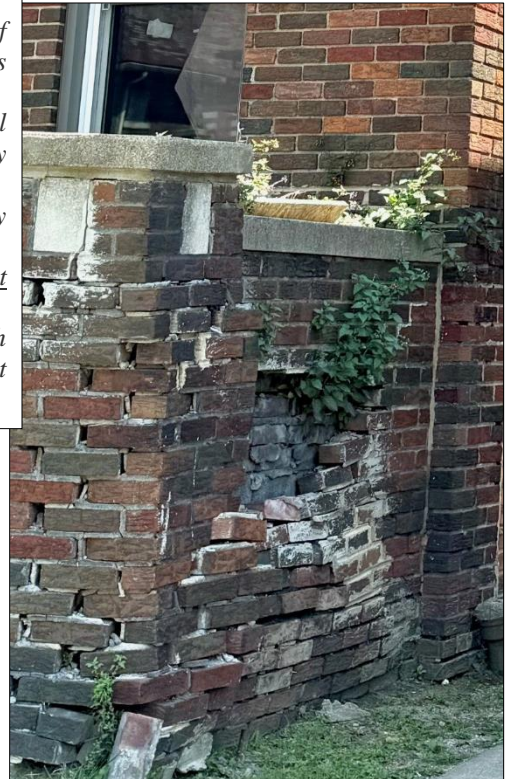


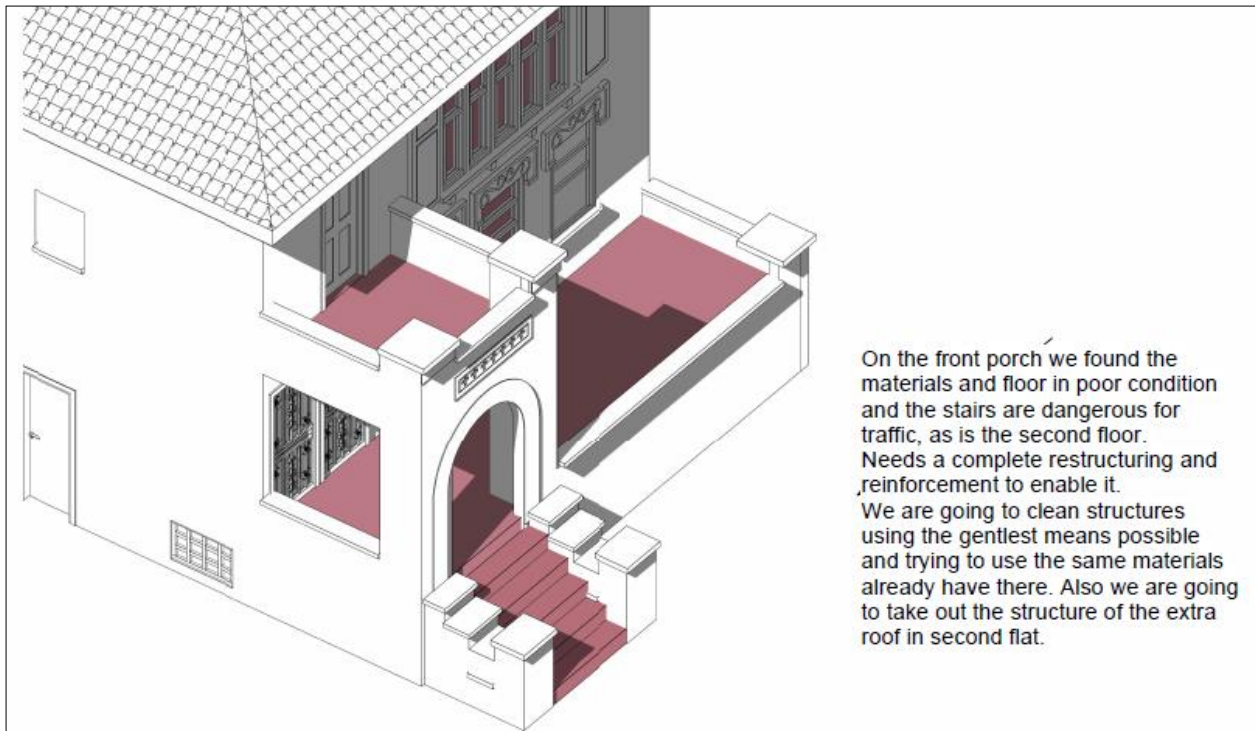
- This option retains the functional door openings but creates a non-historic element at the rear of the house. The ghost images of the wood railing shows that a masonry porch was not in this location. The opulence of the details that were designed for the front public-facing wall, including cast concrete window hoods, highly decorative leaded glass windows, larger dormer and full width front porch, is quite different than this relatively unadorned private, rear-yard facing elevation. The erection of two story masonry porch is akin to Standard 3 which says, "Changes that create a false sense of historical development...shall not be undertaken."

- The applicant proposed to rebuild portions of the front elevation's masonry porch. Based on the photos and staff's site visits, a high level of deterioration, some structural as well as masonry deterioration due to poorly executed tuckpointing, is evident.



Staff photos, July 2024.  
Left: Front entry.  
 Underside support of upper porch floor is missing and sagging.  
 Mortar and occasional brick missing and poorly done tuckpointing.  
 Porch steps significantly sinking at left/west side.  
Right and below: Front porch.  
 Structural problems with outer wall and right/east pier.





On the front porch we found the materials and floor in poor condition and the stairs are dangerous for traffic, as is the second floor. Needs a complete restructuring and reinforcement to enable it. We are going to clean structures using the gentlest means possible and trying to use the same materials already have there. Also we are going to take out the structure of the extra roof in second flat.

FRONT PORCH



- The applicant’s condition assessment is not fully documented, and the scope of work is not detailed to the level needed, in order to clearly understand the areas of concern as well as the construction methods that will be used to repair this porch.
  - Dimensioned drawings confirming the historic design and construction are needed, as is additional pictorial and written description of existing conditions.
  - Detailed processes to embark on, such as “clean structures using the gentlest means possible” need to be fully explained, including method, material and pressure of cleaning proposal.
  - If a section of the existing porch is to be deconstructed and rebuilt (like possibly the outer, east masonry pier which isn’t identified in the current scope of work), a dimensioned drawing confirming how it will be reconstructed is required.
  - Assuming that some new brick may be needed, on this porch or the house, brick samples that closely match the existing brick in dimension, color, pattern, finish and profile will be submitted to staff for review against the historic brick. Also, specification of the new mortar, including composition and installation dimension, profile, etc. must be submitted to staff for review.

## ISSUES

- While the current application is different than the October 2023 application that the Commission denied, it is still does not meet the Secretary of the Interior Standards. When windows (or any historic element) are removed without Historic District Commission approval, based on the Historic District Commission ordinance, features must be rebuilt or restored to their original condition. The Commission may, in applying the Secretary of the Interior's Standards, consider other options they believe to be consistent with the property's historic character and Elements of Design. When a distinctive character-defining feature is affected, the Standards dictate that they be repaired or, if irreplaceable, be replaced by an exact match in design, color, texture and other visual qualities.
- In staff's opinion, the historic windows and doors were distinctive, character-defining features of the house, and their removal substantially altered the appearance of the building. The proposal to install vinyl windows that will be covered by separately installed aluminum-clad wood frames will not improve the historic and architectural design of this property.
- The proposed vinyl windows (and aluminum frames) do not match the original windows in materiality, dimensionality, operation, decorative features, and color.
  - Single-hung windows are fabricated with a stationary upper sash that is welded to the frame and doesn't offer the dimensionality of a double-hung window.
  - Sliding windows proposed for side walls are contemporary window designs; they disrupt the traditional uniformity of mullied windows.
  - Vinyl windows and wrapped brickmould offer a plasticity and flat/thick appearance that does not adequately match the profile/dimensionality and appearance of historic windows, such as wood.
  - Consumer grade vinyl windows weather poorly, deteriorate rapidly, and exhibit poor detailing and detracting color/sheen.
  - The framing material, glazing, and seals (which keeps the argon gas intact between the insulated glass) of vinyl windows break down more quickly in ultraviolet light than wood or steel-framed windows.
  - Vinyl also lacks rigidity and can expand and contract more greatly than wood and steel. This can result in discoloration and warping of the vinyl frames, as well as condensation between the glass layers.
  - The installation of the proposed vinyl windows does not follow NPS guidelines for new replacement windows, as the proposed windows are not "consistent with the general characteristics of a historic window of the type and period", are not "compatible with the overall historic character of the building".
  - The proposed aluminum-clad wood framing system, akin to a storm window, will not adequately disguise the vinyl windows, and this outer framing can be easily removed.
- The uniformity and relationship between the window openings on each floor and each elevation is an important architectural component of the dwelling. The casement units on the front elevation and the three-over-one double-hung window pattern on the side and rear walls offered a verticality to each window opening. Adding additional framing to the openings will further disrupt the original uniformity of this house's architectural design and features.
- The two-story rear porch has been gone since at least 2006. It is staff's opinion, the option to permanently alter the rear door openings to smaller window openings significantly reduces the opportunity to re-establish a wood porch at this area at some time in the future. Erecting a two-story masonry porch would create a distinctive non-historic element at this location, and conflict with Standard 3 which says, "Changes that create a false sense of historical development...shall not be undertaken."
- The front porch requires a significant amount of attention, however the condition assessment and scope of work to address the physical and aesthetic problems are not detailed sufficiently for review.
- The west side entrance that is currently covered should be reopened, with a solid panel door installed.

## RECOMMENDATION

Staff finds that the proposal does not meet the Secretary of the Interior's Standards for the following reasons:

- The historic windows and doors were distinctive, character-defining features of the house, and their removal substantially altered the appearance of the building. When windows are removed without Historic District Commission approval, new windows should match all the details of the historic windows that were removed. The proposal to install vinyl windows that will be covered by separately installed aluminum-clad wood frames will not restore nor improve the historic and architectural design of this property.
- The uniformity and relationship between the window openings on each floor and each elevation is an important architectural component of the dwelling. The casement units on the front elevation and the three-over-one double-hung window pattern on the side and rear walls offered a verticality to each window opening. Adding additional framing to the openings will further disrupt the original uniformity of this house's architectural design and features.
- The proposed vinyl windows (and aluminum frames) do not match the original windows in materiality, dimensionality, operation, decorative features, and color.
  - Single-hung windows are fabricated with a stationary upper sash that is welded to the frame and doesn't offer the dimensionality of a double-hung window.
  - Sliding windows proposed for side walls are contemporary window designs; they disrupt the traditional uniformity of mullied windows.
  - Vinyl windows and wrapped brickmould offer a plasticity and flat/thick appearance that does not adequately match the profile/dimensionality and appearance of historic windows, such as wood.
  - Consumer grade vinyl windows weather poorly, deteriorate rapidly, and exhibit poor detailing and detracting color/sheen.
  - The framing material, glazing, and seals (which keeps the argon gas intact between the insulated glass) of vinyl windows break down more quickly in ultraviolet light than wood or steel-framed windows.
  - Vinyl also lacks rigidity and can expand and contract more greatly than wood and steel. This can result in discoloration and warping of the vinyl frames, as well as condensation between the glass layers.
  - The installation of the proposed vinyl windows does not follow NPS guidelines for new replacement windows, as the proposed windows are not "consistent with the general characteristics of a historic window of the type and period", are not "compatible with the overall historic character of the building".
  - The proposed aluminum-clad wood framing system, akin to a storm window, will not adequately disguise the vinyl windows, and this outer framing can be easily removed.
- At the rear wall, the proposal to install a double-hung window and panel below within the two door openings is the least intrusive of the three options provided by the applicant. However, the proposal as it is currently designed with vinyl single-hung windows, aluminum covered brick mould and panel, will not be approved.
  - The option to permanently alter the rear door openings to smaller window openings significantly reduces the opportunity to re-establish a wood porch at this area at some time in the future .
  - The option to erect a two-story masonry porch would create a distinctive non-historic element at this location, and conflict with Standard 3 which says, "Changes that create a false sense of historical development...shall not be undertaken."
- The applicant's condition assessment of the front porch is not fully documented, and the scope of work is not detailed to the level needed, to understand the areas of concern as well as the construction methods that will be used to repair the masonry porch.
  - Dimensioned drawings confirming the existing historic design and construction are needed, as are pictorial and written descriptions of existing conditions.
  - Detailed processes to embark on, such as "clean structures using the gentlest means possible" need to be fully explained, including method, material and pressure of cleaning proposal.
  - If a section of the existing porch is to be deconstructed and rebuilt (like possibly the outer, east masonry pier which isn't identified in the current scope of work), a dimensioned drawing confirming how it will be reconstructed is required.
  - Assuming that some new brick will be needed, on this porch or the house, brick samples that closely match the existing brick in dimension, color, pattern, finish and profile will be submitted to staff for



review against the historic brick. Also, specification of the new mortar, including composition and installation dimension, profile, etc. must be submitted to staff for review.

- The west side entrance that is currently covered will not be bricked in as this door opening is one component of a symmetrical design directly related to the dwelling's two-family function. Individual photos documenting the existing front and side doors will be submitted to staff prior to reviewing the door replacement product.

Staff therefore recommends that the Commission issue a Denial for the work as proposed, as it does not meet the Secretary of the Interior's Standards for Rehabilitation, specifically Standards 1, 2, 3, 5, and 6:

- 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.*
- 5) *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a 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.*