

Rehabilitation Tax Incentives Projects Problematic Issues

The following is a short list of issues and treatments that can be problematic and if not addressed appropriately may result in denial of a rehabilitation tax incentive project.

1. Demolition. The *Standards for Rehabilitation* require projects to avoid removal of historic materials. This guidance is applicable to exterior and interior materials of an individual building and for entire buildings in the case of multiple building properties. While limited and selective demolition may be permissible, approval by **SHPO/NPS** prior to demolition is necessary to determine if it is circumstantially acceptable.
2. Replacement of Existing Historic Features. The *Standards for Rehabilitation* require historic features to be repaired unless they are deteriorated beyond repair and if they must be replaced, the new feature must match the existing feature. As such, appropriate treatment involves a 2-step process: (1) evaluate the existing condition to determine if repair is possible and, if not, (2) replacement with a new feature that matches the design and visual qualities of the existing feature (in-kind replacement).
 - Windows: matching a historic window goes beyond matching configuration and type; it also includes matching dimensions and profiles. To achieve a matching window design typically requires replacement with custom built windows.
 - Siding: replacement of historic wood siding with modern cement board is not appropriate.
 - Architectural Ornamentation: ornamental features are one area where substitute materials are more commonly allowable because the original material or method of construction may no longer be available; even so, design details based on existing examples need to be closely followed.
3. Replacement of Missing Historic Features. The *Standards for Rehabilitation* generally do not require the replacement of missing historic features, but if they are to be replaced:
 - the feature must have actually existed on the building and documentation needs to exist to guide the design of its replacement. The existence of a feature on another building of similar age and design is not, in and of itself, evidence of the existence of the feature elsewhere.
 - Missing features necessary for the functional use of the building may be replaced with a new design that is compatible with the building's historic character if no documentation of the historic design is available.
 - Common missing historic features include windows, storefronts, porches, and architectural ornamentation.
4. Adding "Period" Ornamentation. The *Standards for Rehabilitation* require projects to avoid creating a false sense of historical development. Adding features of a conjectural nature to enhance or to create a different historic appearance is not appropriate.
5. Masonry Cleaning/Paint Removal Treatments. The *Standards for Rehabilitation* require projects to avoid treatments that cause physical damage to historic materials. Damaging treatments include sandblasting and high pressure water blasting. Other methods for addressing masonry cleaning/paint removal should be tested prior to wide-spread use on a project.

6. New Additions and New Construction. The *Standards for Rehabilitation* require new additions/new construction to:
 - not cause destruction of historic materials
 - be differentiated from, secondary to, and compatible with its associated historic building
 - be “reversible” in the context that if the new addition/construction is removed in the future, the associated historic building will still retain its form and integrity.

7. Major Floor Plan Changes. The *Standards for Rehabilitation* require retention of significant historic spaces. These include primary rooms and circulation patterns. Alterations that significantly change or eliminate historic floor plans are not appropriate.
 - Floor plan alterations should be restricted to secondary areas (generally rear and upper floors of buildings) to the extent possible.
 - Large volume spaces (commercial space, warehouse and mill buildings) may be partitioned, provided the sense of volume of the original space is adequately represented.
 - Atriums and other floor removal treatments are generally only acceptable for large floor plates.

8. Plaster Treatments. The *Standards for Rehabilitation* require retention of historic character and character-defining finishes to be preserved by repair or replacement when they are deteriorated beyond repair. Plaster as a finish treatment is a defining element of a finished, rather than utilitarian/industrial, space. Removal of plaster to create a “loft” or semi-ruined appearance for a space that is historically finished is not appropriate.

9. Fire-Rated Assemblies. The *Standards for Rehabilitation* require retention of historic character and avoiding removal of historic features and finishes. If a fire-rated assembly is necessary for a ceiling and the ceiling material is beadboard, pressed metal or other distinctive material, removal and reinstallation is an acceptable treatment.

10. Early Start/Completion of Project Work. The tax incentive programs require review and approval of projects by SHPO/NPS as consistent with the *Standards for Rehabilitation*. Owners of projects that proceed with work prior to approval do so at their own risk. Lack of review does not imply approval. Approval by other authorities for permitting or other reasons does not imply approval by SHPO/NPS for rehabilitation tax incentive purposes.