



Brandon M. Scott
Mayor

**COMMISSION FOR
HISTORICAL & ARCHITECTURAL
PRESERVATION**

Tom Liebel, Chairman

STAFF REPORT



Chris Ryer
Director

February 9, 2021

REQUEST: Revisions to Baltimore City Historic Preservation Design Guidelines

RECOMMENDATION: Approval

STAFF: Caitlin Audette

BACKGROUND

- The existing version of the guidelines was adopted by the Commission at the December 8, 2015 Commission hearing following several months of updates initiated in March 2015. This included major formatting updates, creating a separate document for procedures, and major updates to the procedures following the 2015 CHAP Ordinance Revision.
- At the February 11, 2019 CHAP Hearing the commission voted to approve the addition of Chapter 6: Artistic Expression to the guidelines as well as other minor changes.
- At the January 12, 2021 CHAP Hearing staff provided the proposed alterations under review today to the Commission and public during the briefing session. The draft document was shared via email on January 15, 2021.

PROPOSAL

The proposal is in keeping with the Rules and Regulations which states the following in Section 1.11, “Any amendments made to the Historic Preservation Design Guidelines require review at a minimum of two (2) hearings, unless there is a consensus among all Commissioners present to act on the item at the first hearing.” This is the first hearing.

The proposal includes the following revisions:

- General edits to address typos and grammatical errors,
- Updates to address inaccuracies and best practices,
- Addition of guidelines for decks in Section 1.9.1
- Addition to interior materials in Section 3.3.1,
- Addition of guidelines to address planting beds in Section 4.1.1,
- Addition of guidelines to provide further details on fences, walls, and gates in Section 4.2.4,
- Additions and clarification to Chapter 6: Design Guidelines for Artistic Expression, specifically the language surrounding the installation of murals.

Each revision is included below with a brief explanation behind the change. Most of these changes are one the below statements which are defined here:

Codifying Existing Practice – A practice CHAP staff and Commission already regularly complete that is being formally included in the document.

Clarifying Process or Language – Removal of confusing text for more easy-to-understand language.

Ease of use by property owners – A change to make the guidelines easier to practice.

Coordination throughout document regarding alternate materials – Making all references to alternative materials coordinate.

Review of Proposed Revisions (not including grammar or minor alterations)

- 1.2.3 Mortar - ~~*In some cases, H*~~*historic mortar testing by trained material conservators can be easily and inexpensively may be required ~~completed by trained material conservators.~~* - Codifying existing practice.
- 1.4.1 General - ~~*Do not leave*~~*Certain metal surfaces such as steel, iron, or tin that require ~~protection~~protective coatings~~from the elements exposed, such as steel, iron, or tin.~~* - Clarifying language.
- 1.5 Alternative Materials - *Where a historic feature is entirely missing or where replacement has been approved by the Commission, a visually and physically compatible alternative material may be used, ~~if approved by the Commission.~~* - Codifying existing practice.
- 1.5 Alternative Materials - *Where economic hardship-feasibility is a consideration, the cost of the alternative material will be compared ~~relative to the~~ cost of the original material. ~~Please refer to the Economic Hardship Procedures for more information.~~* - Clarifying process and codifying existing practice.
- 1.6.1 General - *Preserve, repair, and maintain historic doors, doorway and entryway features that contribute to the building's architectural character, such as hardware, fanlights, sidelights, pilasters, entablatures, columns, balustrades, and stairs. Historic doors should not be altered, such as replacing panels with glazing.* - Codifying existing practice.
- 1.6.1 General - *Installation of ~~new~~ storm doors is allowed; however, they must match the shape of the opening, have a narrow-frame design that enables the inner door to be seen, and have a finish that matches the inner door. Security bars should not be installed at doors, however, security glass within a storm door may be installed if appropriate for the door opening.* - Codifying existing practice.
- 1.6.1 General - *In most cases, new metal security doors or gates are discouraged on highly visible elevations.* - Codifying existing practice.
- 1.6.2 Door Replacement - *In most cases, ~~N~~ever do not replace ~~historic~~ doors if repair and maintenance can improve its performance; eliminate a lead-based paint hazard on an accessible, friction or impact surface; and preserve its physical and historical integrity.* - Codifying existing practice.
- 1.6.2 Door Replacement - *~~In most cases,~~ Do not replace historic double-leaf doors with a single door.* - Codifying existing practice.
- 1.7 Windows – ~~*Historic Windows are generally found to be better constructed than contemporary windows.*~~ - Not always true.
- 1.7 Windows - *This can be addressed through simple weatherization techniques, such as installing weather-stripping or exterior or interior storm windows, ~~which greatly~~*

~~increase energy efficiency at a substantially lower cost than wholesale window replacement.~~ – Not always true.

- 1.7.3 Window Replacement - ~~Window replacement~~ ~~Guidelines apply when~~ ~~staff~~ ~~the Commission~~ ~~has determined:~~ - Codifying existing practice.
- 1.7.3 Window Replacement - ~~Snap-on muntins, removable grilles, and grilles between the glass are~~ ~~generally not acceptable.~~ – Codifying existing practice.
- ~~1.7.3 Window Replacement -~~ ~~CHAP may apply these standards strictly or leniently based on site conditions.~~ – Redundant as this is at the beginning of the document and applies to all of the guidelines.
- 1.8 - ~~Roofing and~~ ~~Roof Drainage Systems~~ ~~Gutters~~ - Change title for clarity.
- 1.8 Roofing and Gutters - ~~As a result of water infiltration, wood members will rot (especially important~~ ~~damaging at bearing points), metal elements will rust and expand, and masonry will deteriorate and crack.~~ – Superfluous language.
- 1.8 Roofing and Gutters - ~~Climate patterns have changed, causing Baltimore to regularly experience significant amounts of rainfall in very short periods of time. This new climate pattern can overwhelm gutters (especially on rowhouses that have one gutter for an entire roof) and cause water to spill over the gutters or back up under flat roof membranes, both of which can cause serious damage to a building in both the short- and long-term.~~ – New content.
- 1.8.1 General - ~~Severely deteriorated roof features should be replaced to match existing features in size, form, shape, and color, and materials identical to the originals.~~ – Coordination throughout document regarding alternate materials.
- 1.8.2 Roof Replacement - ~~When in-kind replacement is not feasible, install alternative materials that are visually~~ ~~physically, and chemically~~ ~~compatible with the historic roof materials. New materials must match~~ ~~the~~ ~~historic materials in color, texture, size, shape, profile, and general appearance~~ ~~as closely as possible.~~ ~~The use of alternative roofing materials will be reviewed on a case-by-case basis, see Section 1.5, Alternative Materials.~~ – Coordination throughout document regarding alternate materials and ease of use by property owners.
- 1.8.2 Roof Replacement - ~~Flat or gently sloping roofs not visible from the ground may be replaced with appropriate contemporary roofing systems~~ ~~such as modified bitumen membranes or single-ply membranes (EPDM, TPO, etc.).~~ – Ease of use by property owners.
- 1.8.5 Chimneys - ~~If chimney replacement is required, document the chimney with measured drawings and photographs before dismantling it. D~~ ~~dismantle and salvage existing materials if possible. Reconstruct the chimney to match the original~~ ~~if the chimney is functional or visible from the public right of way.~~ – Codifying existing practice.
- 1.8.5 Chimneys - ~~Where chimney caps are a visible design detail, replace the historic materials to match existing~~ ~~whenever possible.~~ – Codifying existing practice.
- 1.8.6 Gutters and Downspouts - ~~Trim overhanging tree branches where they touch roofs and gutters.~~ – General advice not specific to gutters and downspouts, redundant with other guidelines.
- 1.8.6 Gutters and Downspouts - ~~In most cases, do not install new gutters and downspouts on buildings that have retained internal drainage systems. Repair and maintain~~ ~~the functional~~ ~~internal drainage systems. Where these are failing, replacement~~

- with new exterior gutters may be appropriate.* – Codifying existing practice.
- 1.8.6 Gutters and Downspouts – *Select gutter and downspout styles, materials, and layouts that are appropriate to the character of the roof edge, cornice, or trim and minimize the visual change. Half-round metal gutters and round downspouts are generally preferred for highly visible elevations. K-style gutters may be used in appropriate residential applications.* – Codifying existing practice.
- 1.8.6 Gutters and Downspouts - *Where needed, ~~install~~ underground drainage systems, grading, splash blocks, diverters, and/or French drains under downspouts to carry water away from the building foundation and limit soil erosion. Rain barrels and/or rain gardens are other ways to collect and divert rainwater from building foundations.* – Provide additional information.
- 1.8.7 Skylights - *~~Avoid locating~~ Do not install new skylights on primary roof elevations of pitched or visible roofs.* – Codifying existing practice.
- ~~1.8.9~~ Roof Decks - *~~Where permitted, ~~n~~~~ New roof decks must not be visible from the opposite side of the street street front grade along of any primary elevation. Locate roof decks at the rear of a building whenever possible to minimize visibility. Consider the shape, material, size, and pitch of the roof when locating rooftop decks. - Clarifying language and codifying exiting practice.*
- 1.8.9 Roof Decks - *Provide access to roof decks from the rear of the property whenever possible. Do not construct rooftop pop-ups or doghouses to access roof decks ~~on~~ historically residential properties.* – Codifying existing practice.
- 1.9 - *1.9 Porches, Steps, ~~and~~ Railings, and Decks* – Addition of decks to guidelines.
- 1.9 Porches, Steps, Railings, and Decks - *New decks may be constructed on the rear of properties, or where appropriate, on the sides of properties, provided that the deck does not replace a historic character-defining feature, such as an original porch, ~~or~~ and does not alters an historic landscape.* – Addition of decks to guidelines.
- 1.9 Porches, Steps, Railings, and Decks - *Construct new porches, decks and related stairs to be comparable in scale to the building. Decking and railings are traditionally wood, but composite or metal materials can also be considered. Railings shall not have internal illumination.* - Addition of decks to guidelines and coordination throughout document regarding alternate materials.
- 1.9.2 Exterior Steps and Railings - *When in-kind replacement is not possible, a visually ~~and physically~~ compatible synthetic material may be used that replicates the size, form, shape, texture, and appearance of the historic material. Provide samples and product literature for approval.* – Codifying existing practice.
- 1.10.2 Paint Removal and Cleaning - *Lead paint is a common hazard associated with historic buildings. Applicants must follow Maryland Department of Environment’s Lead Poisoning Prevention Program and all federal, state, and local laws pertaining to the safe removal of lead paint. Contractors must be certified by the Maryland Department of the Environment and accredited by the U.S. Environmental Protection Agency. Paint removal requires a building permit in Baltimore City.* – Providing important permit information.
- 1.10.2 Paint Removal and Cleaning - *Reapply an appropriate paint or other coating system to previously painted surfaces after cleaning. Failure to do so will result in deterioration of either the paint or the masonry. Confirm compatibility of paint to substrate.* – Clarifying language.

- 1.10.3 Masonry Painting - When painting masonry is approved, an appropriate vapor-permeable masonry paint must be used. Examples of appropriate paint include lime wash paint, silicate mineral paint, or acrylic latex paint. When undertaking a masonry painting project, use a paint that is specifically developed for masonry surfaces. This will help to ensure it will form a strong bond. Follow manufacturer's instructions for preparation and application. – Reference language used in Chapter 6 that is relevant to paint beyond murals.
- 1.10.4 Wood Painting - Coat all surfaces of wood repairs, including those that will be concealed, with primer. Painting non-visible surfaces, like the bottoms of doors, to be concealed is called "back-priming" and helps combat deterioration and warping caused by moisture absorption and warping over time. – Clarification.
- 1.10.5 Paint Colors - Building style, period of construction, materials, and setting contribute to the appropriate choice of paint colors. Select paint colors that are appropriate for the character of the building time period in which the building was constructed. Most major paint brands have historic color palettes. – Addition of useful information for property owners.
- 1.12 Signage and Awnings - Concealed, indirect lighting is preferred for signage in the historic areas. Internally lit signs are generally inappropriate in a historic context. Signs that flash, move, or have inappropriately scaled graphics are inappropriate should not be permitted. Digital or LED signs may be approved. – Clarification and codifying existing practice.
- 1.13 Mechanical, Electrical & Plumbing - In most cases, do not minimize cut through cutting through existing masonry walls to install when installing new systems or system upgrades. Utilize mortar joints for installations when possible. – Codifying existing practice.
- 1.13.2 Utility Meters and Mechanical Equipment - Modern rooftop elements, such as mechanical units, ducts, solar panels, antennae, satellite dishes, and vents should not be easily seen by the public from the street. – Clarification.
- 1.14.1 Solar Panels - CHAP encourages the use of sustainable technology, including the use of solar panels, where the installation is sensitive to the historic nature of the building and its setting. Install new solar panels where they are least obtrusive, do not damage historic fabric, and are not highly visible from the street. – Codifying existing practice.
- 1.15 Accessibility - CHAP fully supports making buildings and sites accessible to individuals with physical disabilities. is important and required by law for publicly accessible buildings. This, however, this can be a challenge in some historic contexts. Most building codes provide allowance for addressing accessibility in creative ways. – Codifying existing practice.
- 3.3.1 – General - Avoid the installation of trending and historically inappropriate materials or features such as tray ceilings, interior ship-lap siding, or barn doors. – Codifying existing practice.
- 3.4 Paint and Color - A professional paint analysis of historic interior finishes is encouraged prior to undertaking rehabilitation work, whenever possible, for Public Interior Landmarks and other ornate spaces. – Codifying existing practice.
- 3.4 Paint and Color - Repaint with colors and sheen levels that are appropriate to the historic interior. Paint colors must be submitted for approval for work on Public

Interior Landmarks and other ornate spaces. – Codifying existing practice.

- 3.4 Paint and Color - ~~Repainting with the same color as existing color is considered maintenance and does not require an Authorization to Proceed.~~ – Inaccurate information.
- 4.1.1 – Streetscapes - *Preserve all historic streetscape elements located within the cross-section between the buildings including the road width, grade, crown, swale, curb, tree lawn, sidewalk, and setbacks.* – Clarification.
- 4.1.1 Streetscapes - *Preserve historic site furnishings, ~~and such as benches and urns, accessories, including street signs, and historic paving such as granite curbs, Belgian block, and brick sidewalk and roadway paving.~~* – Clarification.
- 4.1.1 Streetscapes - *Preserve the materials and architectural features of historic building facades associated with the streetscape. ~~In most cases, do not construct planting beds adjacent to buildings, which can trap moisture. Make sure that plantings do not touch or grow on historic buildings. Place non-historic street furnishings, such as trash containers, benches, tables, flowerpots and raised planting beds in locations that enhance the streetscape and do not obscure historic architectural components of a building.~~* – Codifying existing practice.
- 4.1.1 Streetscapes - *Protect and encourage street tree plantings where their health can be sustained. ~~and where there is historic precedent.~~* – Codifying existing practice.
- 4.2.4 - 4.2.4 FENCES, WALLS, AND GATES – Addition of walls and gates explicitly in guidelines.
- 4.2.4 Fences, Walls, and Gates - *Repair historic fences and walls using matching materials. ~~pickets, posts, and rails.~~* – Codifying existing practice.
- 4.2.4 Fences, Walls, and Gates - *New fences and walls must be compatible with the character, height, scale, and design and material of comparable properties in the neighborhood.* – Codifying existing practice.
- 4.2.4 Fences, Walls, and Gates - *In front yards or side yards visible from the street, wood or metal picket-type fences found in a number of styles are often appropriate. Short brick, stone, or cast stone walls or retaining walls may be appropriate.* – Codifying existing practice.
- 4.2.4 Fences, Walls, and Gates - *In rear yards or side yards ~~not visible from the street, wood fences, and metal picket fences and brick or stone walls may be appropriate. vertical board, board on board and board and batten fences are appropriate. Vinyl and chain link fences not visible from the street may be approved. Brick or stone walls may be appropriate in some locations.~~* – Codifying existing practice.
- 4.2.4 Fences, Walls, and Gates - ~~Chain link, vinyl, sStockade and split rail fences are typically not appropriate for use in Baltimore City historic districts.~~ – Codifying existing practice
- 4.2.4 Fences, Walls, and Gates - Pedestrian and vehicular gates may be wood or metal. – Codifying existing practice
- 4.2.4 Fences, Walls, and Gates - *In most cases, do not install security wire or roman mesh to fences or gates, if it is visible from a public way, including alleys. There are other design solutions to ensure the security of fences or gates. Barbed wire is not allowed.* – Codifying existing practice
- 4.2.4 Fences, Walls, and Gates - *Fence or wall location and orientation must be consistent with the historic location and the character of the property. A site plan with*

the location of the proposed fence, wall, and gates and an elevation plan must be provided for approval. – Codifying existing practice

- 4.2.8 Trees and Other Plantings - Contact the Department of Forestry if you would like a street tree, or if you are concerned about the health or safety of an existing street tree. – Additional information for property owners.
- 4.2.8 Trees and Other Plantings - ~~Trees may be added to any streetscape where there is space to sustain healthy growth and where they would not be in conflict with significant historic precedents.~~ – Not necessary.
- 4.2.8 Trees and Other Plantings - When completing landscape restoration for park, yard or streetscape improvements, identify historic precedents for plantings and consult historic photographs and general historic plant lists to determine compatible plant materials. Select tree and plant locations, sizes and species in keeping with these precedents. – Clarifying language.
- 4.2.8 Trees and Other Plantings - Some vines, if allowed to grow directly on stone, brick and wooden walls, may trap moisture and accelerate deterioration of the wall through disruptive clinging roots. If vines are desired, train vines onto trellises or other climbing structures. To remove vines from buildings, it is best to cut the vines at the root and let the vines die prior to removing them from the building to prevent further damage. – Additional information for property owners.
- 6.2 – ~~Paint~~ Murals – Clarification between general paint application and artistic paint application.
- 6.2 Murals - CHAP encourages the painting of murals on previously painted surfaces to avoid damage to historic masonry and to maintain historic streetscapes where unpainted masonry is a character defining feature. – Clarification of intent to encourage the installation of murals only on previously painted surfaces.
- 6.2 Murals - In most cases, masonry elevations that were not historically painted should not be painted. If a mural is proposed on an unpainted surface, please contact CHAP staff to determine whether painting will cause damage to the masonry substrate. – Clarification on process for mural installations.
- 6.2 Murals - When murals are installed on unpainted surfaces, they must use paint that can be removed without using destructive methods such as sandblasting. – Clarifying language.
- 6.2 Murals - ~~In most cases masonry elevations that were not historically painted should not be painted. CHAP shall consider paint colors and schemes to be reversible. A broad range of colors and schemes may be permissible as long the paint scheme does not overwhelm the historic character of the immediate surrounding area.~~ – Removed and reworded using other bullet points.
- 6.2 Murals - CHAP review is limited to the location of murals. Content of proposed murals are is not within CHAP purview; however, CHAP strongly encourages community input. – Clarifying language.
- 6.3 Signs - CHAP will allow for painted signs on buildings if buildings; when the masonry has previously been painted; they are located on flat surfaces that historically have received painted signs, and when painting of unpainted surfaces will not cause damage. – Clarification and codifying existing practice.
- 6.3 Signs – CHAP discourages the installation of internally lit illuminated box signs, though the use of internally illuminated box lights for pieces of art may be approved.

Digital or LED signs may be reviewed on a case by case basis. – Codifying existing practice.

NEIGHBORHOOD COMMENTS

The proposed revisions were discussed at the January CHAP hearing and were emailed to the email list for CHAP on Friday, January 15th. CHAP staff members emailed the proposed updates to the Architectural Review Committees (ARCs) for CHAP historic districts to request comments. Additionally, a link was included with the email blast of the February 9th CHAP Hearing agenda. To date staff has received the following comments:

- Corrections from colleagues in the Sustainability Division:
 - 4.2.8 Landscape Features, Trees & Other Plantings- Change “Department of Forestry” to “Department of Recreation and Parks Division of Forestry”
 - 4.2.8 Landscape Features, Trees & Other Plantings – Recommend that invasive vines such as English Ivy be avoided and removed as they can spread beyond where they are planted and threaten the health of other plants and trees.
- Corrections and comments noted by CHAP Commissioners:
 - Introduction – Update reference to “five chapters” to “six chapters”;
 - 1.7 Windows – Last paragraph of introduction reference methods of risk reduction for lead paint in special windows, should these be provided?
 - 1.7.1 Windows, General – Typo at bullet 6, need to insert “in”;
 - 1.7.2 Windows, Window Repair – Cite section 1.7.3 at last sentence of first bullet;
 - 1.8 Roofing and Gutters – Consider adding language such as, “*Therefore special attention should be given to ensuring that adequate roof drainage exists and that gutters and downspouts are in good repair and are appropriately-sized for the roof area, slope and projected rainfall intensity.*”
 - 1.8.2 Roofs & Gutters, Roof Replacement – Remove “whenever possible” from the following sentence, “Replace historic roofing materials with materials that visually match the existing roofing whenever possible.
 - 1.8.5 Roofs & Gutters, Chimneys – At bullet five last sentence, “visible from the public right-of-way” – are we being consistent in the language we use? – in 1.8.1 Roof Decks – talks about “decks, terraces easily seen by the public at the front of the building” and in other places from the opposite side of the street.
 - 1.9.3 Carriage Houses, Garages, Sheds and Outbuildings – With recent legislation to allow accessory dwelling units as a means to promote more affordable housing do we need to address design issues specific to ADUs?
 - 1.10.3 Paint & Color, Masonry Painting – Add language regarding the permanent nature of silica mineral paint.
 - 1.12 Signage and Awnings – At eighth bullet delete “the” in first sentence – “...signage in the historic areas.” Second sentence consider new word, “...inappropriately-scaled graphics are ~~inappropriate~~ discouraged...”;
 - 4.2.7 Landscape Features, Monuments and Public Art – Emphasize the need for professional advice when removing graffiti.

- 6.2 Murals – Insert “only” into, “*CHAP encourages the painting of murals only on previously painted surfaces to avoid damage to historic masonry and to maintain historic streetscapes where unpainted masonry is a character defining feature.*”
- 6.2 Murals – Replace “will” with “may” in the following sentence, “*If a mural is proposed on an unpainted surface, please contact CHAP staff to determine whether painting will cause damage to the masonry substrate.*”
- 6.2 Murals – Suggest using projections instead of painted murals, particularly on stone/masonry surfaces.
- 6.3 Signs – At last sentence of bullet four, do we want to say “Digital and LED signs may be approved on a case-by-case basis”? Also, same section fifth bullet – “...artistic use of neon signs” instead consider “when used for artistic expression or to reflect historic precedent”.
- Further corrections noted by CHAP staff:
 - 1.8.6 Gutters and Downspouts – Error with bulleting.
 - Fix page numbering throughout document.
- Comments from Mount Vernon ARC:
 - 1.11 Lighting – Property owners need guidance for color temperature of light bulbs/LEDs. Suggest <3000°.
 - 1.5 Alternative Materials - “Where economic feasibility is a consideration, the cost of the alternative material will be compared to the cost of the original material.” Comment: Under what criteria will CHAP *decisions* be made after the comparison is made? Potential lifespan of the materials should also be a factor.
 - 1.7 Windows: “Historic windows are generally found to be better constructed than contemporary windows which have a limited lifespan.” & “...installing weather-stripping or exterior or interior storm windows, which greatly increase energy efficiency at a substantially lower cost than wholesale window replacement.” Comment: Both of the strike-through statements are true. Has the replacement window industrial complex asked for these statements to be removed?
 - 1.7.3 Window Replacement: “Replacement windows shall match the historic windows in size, type, configuration, form, detail, and overall appearance.”
 - Comment: “detail” should be defined: Rail and Stile profiles/dimensions and glass opening size should be the primary detail criteria (matching original).
 - Comment: Windows and doors are character-defining features. If the Commission wishes to delegate important window and/or door replacements to staff for review, there should be an appeal or public review process for community members if they disagree with staff decisions.
 - Comment: Criteria for visibility/appropriateness on corner houses and detached houses...all elevations visible from a named street should be considered primary elevations.
 - 1.8.1 General (Roofs): “Severely deteriorated roof features should be replaced to match existing features in size, form, shape, and color, and materials identical

- to the originals.” Comment: Encouragement should always be made to use original materials. Nonoriginal materials should be the rare exception, not the primary option.
- 1.8.2 Roof Replacement: “When in-kind replacement is not feasible, install alternative materials that are visually physically, and chemically compatible with the historic roof materials.” Comment: Physical and chemical compatibility are important—for example, incompatible rates of expansion may lead to premature failure as will incompatible metals, which will lead to galvanic corrosion and premature failure.
 - 1.8.9 Roof Decks: “New roof decks must not be visible from the opposite side of the street of any primary elevation.” Comment: For visibility of decks, definition of primary elevation for corner houses must include both primary elevations (not just the elevation containing the front door or legal street address).
 - 1.9.1 Porches: “Only replace porches or porch elements that are deteriorated beyond repair....”
 - Comment: How is deterioration “beyond repair” determined? Almost always, this is influenced by the cost to repair, not the infeasibility. Example: Decaying ornate cast/wrought iron porch behind 717 Washington Place (717 N Charles Street).
 - Comment: Need community input for new decks and porches, since these may directly affect neighbors.
 - 1.9.3 Carriage Houses, Garages, Sheds, Outbuildings: Comment: Need guidelines for garage doors for both historic garages/carriage houses and newer garages.
 - 4.2.4 Fences, Walls, and Gates
 - Comment: Add razor wire to list of not allowed materials (same as barbed wire?)
 - Comment: Disagree with allowing any chain link or vinyl fencing in historic districts, unless they are not visible from any street, including “alley” streets, which are often pedestrian walking areas that “are significant features of historic neighborhoods that contribute to their overall character as well as to the safety and enjoyment of residents and visitors.” (4.2.5)
 - Comment: Fences and walls on primary streets (vs “alley” streets) should be more monumental and/or compatible in design and materials with the visual language of the primary street and other historical walls in the neighborhood. Often, walls built on “alley” streets were monumental too, and new or replacement walls should be compatible with that visual language.
 - 6.2 Murals: “CHAP encourages the painting of murals on previously painted surfaces to avoid damage to historic masonry and to maintain historic streetscapes where unpainted masonry is a character defining feature.” Comment: This statement does not seem to make sense for two reasons. How does painting previously painted historic masonry avoid damage--does this imply that *not* painting or removing paint will (always) actively damage historic

masonry? Is painting the only way to “avoid damage”? Second question: How does painting of a mural maintain “historic streetscapes where unpainted masonry is a character defining feature”? These appear to be incompatible statements. If murals must be approved in an historic district, we suggest that they be painted on a separate fabric or other substrate, which is carefully attached to the masonry elevation.

- 6.2: “CHAP review is limited to the location of murals; Content of proposed murals is not within CHAP purview; however, CHAP strongly encourages community input.”
 - Comment: What entity is the final arbiter of content? What if a property owner wants to install an offensive mural? What if a property owner wants to install a mural that contains advertising (essentially a billboard)? In our opinion, murals are generally incompatible with historic districts. Neighbors must have a say in the content and location of a mural, which at the very least may affect their property values and rights.
 - Comment: For determining appropriateness of a mural, definition of primary elevation for corner houses must include both primary elevations (not just the elevation containing the front door or legal street address).
- Comments from Ten Hills ARC:
 - Intro and How To Use:
 - Comment: Although it should go without saying, it may be helpful to specifically reiterate the fact that while the guidelines should inform choices, even when the guidelines are followed closely, the work still requires ATP from CHAP. Or something about using to guidelines to guide the project plan as described it the ATP.
 - 1.5 Alternate Materials:
 - Comment: In item 6, recommend clarifying that the cost of alternate material will be compared to the cost of *replacement using* original material.
 - 1.6 Doors – Concerns about the requirements for replacement doors.
 - 1.8.5 Chimneys – Clarify that mortar should match when dry.
 - 1.8.6 Gutters and Downspouts – Would like more flexibility in the use of K-Style gutters.

RECOMMENDATION

Staff find that the revisions make the guidelines more consistent and easier to use and understand. Staff recommends the approval of the guidelines with the minor alterations proposed by the Sustainability Division of the Department of Planning, CHAP Commissioners and staff prior the public hearing.

Staff recommends approval of the proposed revisions.

E. S. MLG

Eric Holcomb
Director

DRAFT