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## HISTORIC TAX CREDIT TOOL BOX

# New Additions: Criteria for Designing Additions to Historic Buildings

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**M**any historic tax credit (HTC) developments involve the construction of an addition onto a historic building to accommodate a proposed programmatic use. Construction of additions is often possible in a HTC project, so long as there is demonstrated need for an addition and provided the addition is designed in a manner that preserves the character of the historic building and is appropriate in the overall context of the site. Of particular importance are the criteria that the National Park Service (NPS) uses in evaluating proposed designs to determine whether an addition is appropriate for a historic building.

### Making the Case for a New Addition

What is often a surprise to developers is the notion that while an addition is generally not considered a qualified rehabilitation expenditure (QRE), the NPS does in fact have design review jurisdiction over additions. For purposes of HTC review, the NPS reviews the entire project, including the historic building exterior and interior, as well as site work and additions. In presenting a proposed addition as part of HTC project, it is important that the applicant provide sufficient documentation to permit the NPS to evaluate three aspects: that an addition is needed, that the addition is appropriate for the site and that the design is compatible with the historic building. HTC projects are evaluated using the Secretary of the Interior's Standards for Rehabilitation. Standard 1 contemplates the potential for a new use that might require inappropriate changes to a historic building:

“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.”

NPS guidance on additions states that additions should be considered only after it is determined that the proposed purpose cannot be achieved within the existing footprint of the historic building. The burden is on the applicant to prove that the proposed programmatic use would require extensive or insensitive alterations to the existing buildings and that an addition would avoid otherwise necessary inappropriate alterations. Approval of an addition does not stop at conceptual design; the NPS requires the submission of drawings in order to evaluate the context and impact of the proposed design. In assessing whether an addition is appropriate, two of the standards are specifically relevant:

(9) “New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment.”

(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

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of the historic property and its environment would be unimpaired.”

In applying these two standards in evaluating proposed additions, the NPS assesses whether the addition is appropriate for the site as well as the building.

**How NPS Assesses Impact**

In assessing the impact of a new addition on the site, the NPS will evaluate the location, massing, size and scale of the addition. NPS guidance states that an addition should be subordinate to the historic building; that it should not compete in scale with the historic building. Additions that are located on secondary side or rear elevations, particularly on elevations that are less architecturally distinguished, are preferred. In planning an addition, the degree of existing material loss should be minimized so that if the addition were removed at a later date, the impact on the historic building would be minimal.

This notion of reversibility is an important aspect within the context of new additions. Where this is not possible, and an addition must be located along a primary elevation, the NPS prefers recessed connectors that clearly distinguish the new addition from the historic building. If the site contains important historic features or historic landscaping, alteration or removal of those

features could be problematic. A proposed addition that dominates the site, or requires the removal of important site features, is not likely to be approved. By contrast, an addition that is smaller in scale, located on a secondary elevation and respects the proportions and massing of the historic building, is more likely to be determined appropriate.

The NPS also evaluates the design of additions as part of the HTC review, thus it is important that the submission drawings are advanced to the point where the reviewers can understand the materials, colors and fenestration patterns proposed for an addition. NPS guidance on the design of new additions emphasizes compatible but differentiated design; the addition must respect the historic building, but not mimic the design. In designing an addition, the architect should take design cues from the historic building, repeating the historic forms, features and details but avoiding exact replication. Designs for new additions should avoid making a design statement with the new construction.

Central to the NPS view on additions is that the addition be distinguishable as modern and clearly differentiated from the historic building while achieving a harmonious composition. Using building materials in the same color palette as those of the historic building is recommended in NPS guidance. The fenestration pattern of the

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*Image: Courtesy of David R. Miller*

**Lace Mill in Kingston, N.Y., recently completed its rehabilitation, which included the construction of an addition.**



addition, the rhythm and alignment of window and door openings, should be based on the fenestration pattern of the historic building.

**Lace Mill, Kingston, N.Y.**

The recently completed rehabilitation of the Lace Mill in Kingston, N.Y., included the construction of an addition. Constructed around 1902, the United States Lace Curtain Mills was built for the manufacture of lace curtains and employed 250 to 300 people at its peak. Production stopped in the 1950s and the building became a multitenant warehouse and light manufacturing facility. In 2012, the Rural Ulster Preservation Company (RUPCO) initiated a rehabilitation financed using low-income housing tax credits (LIHTCs) as well as HTCs. Recognizing that Kingston has a thriving arts scene, RUPCO decided to convert the building into 55 apartment units with studio space preferenced for artist residents.

The Lace Mill is a three-story brick mill building that is organized in a U form with two wings connected by a center entrance section with boiler house to the rear within an open courtyard. The boiler house contained the original water tube boiler, which was a massive piece of original equipment sunken below grade. RUPCO’s vision was to retain the boiler as an artifact and expand this portion of the building to create community studio and shared gallery space for building residents. RUPCO’s unique concept was intended to foster a greater sense of community and collaboration among the artist residents. To achieve this vision, a portion of the boiler house, which was added on at a later date and was in collapsed condition, was proposed for demolition and an addition to the boiler house was proposed.

The design went through numerous design iterations to provide for the shared studio and gallery space in the boiler house. Options that were initially explored included demolition of the boiler house for the construction of an entirely new studio and gallery space and the construction of a rooftop addition for the studio and gallery. Eventually, the design submitted with the HTC application called for the removal of the boiler house roof and the installation of an aluminum framed glass enclosure over the entire boiler house, which would provide two additional floor levels. The

initial HTC application was denied by the NPS, with the primary issue being the boiler house enclosure.

Specifically, the NPS determined that the glass enclosure would significantly alter the historic character and would overwhelm the boiler house in terms of scale and massing. The project went to appeal, where the case was made that incorporation of the studio and gallery space was not feasible within the existing footprint and that the alternative solutions were less advantageous as they created visibility issues. Revised designs were presented in a succession of amendments wherein the glass enclosure was eliminated at the first floor and ultimately a rooftop expansion, limited to the least visible portion of the boiler house behind an existing smokestack, was proposed. Further, the addition was located on a secondary elevation. Metal siding in a matte gray finish was proposed as a material compatible for the industrial aesthetic. The NPS approved this revised design, determining that the revised proposal met the standards.

**Conclusion**

It is often possible to obtain approval for the construction of additions as part of a HTC project. In making their determination on whether the treatment meets the standards, the NPS will consider the overall context of the building and the visibility and impact of the new construction on the larger site. The NPS generally requires that additions be compatible but differentiated and should demonstrate restraint in making a new design statement. Materials should be harmonious, but exact replication is discouraged. The goal is to design an addition that preserves the building’s historic character. Early submission and resolution is critical as an applicant may need to revise and resubmit designs to obtain final approval. Seeking preliminary design guidance for massing and scale can save a project time and money. ❖

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