



HISTORIC TAX CREDIT TOOL BOX

Successful Incorporation of New Canopies in Historic Tax Credit Properties

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Certain building types, including hotels and residential buildings, often use canopies in the design of the main entrances. Canopies create a transitional space for users of the building between the public street and the private space of the building. The adaptive reuse of such buildings, particularly for hotels or apartments, may benefit from the introduction of a new canopy to an entrance.

As straightforward as this design change may seem, an owner cannot assume a canopy will be approved as part of a historic tax credit (HTC) project. Some buildings do not lend themselves to the introduction of a new canopy feature. Even if the notion of a new approved in concept, the National Park Service (NPS) may ultimately require significant modifications to the design, which is why this discussion examines the opportunities and challenges of incorporating exterior canopies into entrances and loading areas in HTC projects.

Assessing Options for Canopy Installation

Inclusion of a canopy at a main entrance is often a necessary feature for the reuse of buildings such

as hotels and residential buildings. In particular, canopies are ubiquitous on hotels, as they are essential for sheltering hotel guests and their luggage upon arrival and departure and during wait times for taxis. However, the installation of new canopies may alter the appearance of an ornamental primary entrance.

In their review of HTC projects, the NPS applies the Secretary of the Interior's Standards for Rehabilitation (SOI Standards), which is a framework intended to ensure that the distinctive features of a building are retained. To assist property owners in understanding how these Standards are applied, the NPS issues additional guidance in the form of briefs or bulletins offering technical assistance and recommendations that can assist the development team in their decision-making regarding specific changes to a historic property. While the NPS provides design guidance on the installation of window awnings in Preservation Brief 44: The Use of Awning on Historic Buildings, there is limited guidance on canopies. Canopies are generally



Image: Courtesy of Heritage Consulting Group
The Lofts at Clifford Brown Walk in Wilmington, Del., feature a canopy that the National Park Service determined was an appropriate addition.

continued from page 1

reviewed on a case-by-case basis, taking the specifics of the particular building into account.

The SOI Standards require that properties be reused in a manner that minimally changes the character defining features of a building, thereby retaining the overall historic character. Changes proposed to the exterior appearance of a building, including the addition of a canopy, are given a high priority in the review process. In assessing the significance of exterior entrances NPS examines the visibility of the entrance, hierarchy (whether the entrance is primary or secondary) and character-defining features of the entrance, such as configuration, materials or ornamentation.

Public entrances are typically recognized as more important than entrances that were not historically visible or used by the public. Public entrances are often architecturally distinguished and typically assigned

a higher level of significance than more utilitarian or private entrances. Most commonly, there will be greater opportunity for change in less significant and less architecturally distinguished entrances of the building than in primary public entrances, however, more commonly, canopies are desired at primary entrances. For example, a canopy at a secondary entrance would be preferable to a primary entrance. The proposed addition of a canopy which obscures character defining primary entrances or changes the configuration or use of an entrance may be less likely to meet the SOI Standards.

Design Considerations

In evaluating proposed new canopies, the NPS will take into consideration the size, form and design of the canopy. An experienced project team that understands these design considerations can save time in the review process by eliminating unnecessary back-and-forth with a succession of design iterations.

continued on page 3

continued from page 2

In assessing whether a new canopy is approvable, the NPS will evaluate the size and location of the canopy. Most commonly, the NPS approves canopies that are compatible with the scale and design of the entrance and that do not attempt to make a design statement. A proposed canopy that either visually obscures or physically impacts decorative features of an existing entrance may not be approved by the NPS. Where entrances are ornamental, the NPS will most likely require the submission of details showing the proposed method of attachment in order to assess whether the canopy will damage historic fabric. Effectively, the simpler the entrance, the more likely it is that the NPS will approve a new canopy.

Beyond the size and location, the NPS will also evaluate the design of the new canopy, including its material, shape, color and any signs. The NPS typically requires the new canopy to be compatible with the building's overall historic character. As the NPS generally discourages new features that intend to make a design statement, the material should be harmonious with the existing style of the building. Generally, the NPS requires that canopies be as minimal as possible. Should there be historic precedent for a canopy on the building, the NPS will likely require the new canopy to closely match the historic based on documentary evidence.

The design of a canopy that extends into the public right of way may require additional review from the local municipality in order to obtain a building permit. The municipality may also regulate their use, specify construction type, minimum height above the sidewalk, minimum distance between the projecting edge and the curb, and maximum projection from the building wall. These regulations are in place due to public safety concerns. Often lettering, color and the relationship to adjacent designs may also be subject to municipal review.

Case Study 1: New Canopy at the Continental and Commercial National Bank Building, Chicago

The Continental and Commercial National Bank Building, built in 1914, was one of Daniel Burnham's last works. The 21-story neo-classical former bank and office building is at the south end of the LaSalle Street financial district in Chicago. Using HTCs, the Chicago-based The Prime Group adapted the lower 13 floors of the building into a J. W. Marriott Hotel, which opened in 2013. One of the particular challenges of the tax credit project was the installation of a five-bay, 93-foot canopy on the Adams Street elevation. Initially, the NPS considered the canopy too large for the building and requested a reduction from five bays to three, as they felt the five-bay canopy was making a design statement.

Despite NPS's initial objection to the design, the development team was able to argue for the necessity of a larger canopy. The argument was threefold, based on targeting the convention market, transporting large numbers of guests at a time and weather and design considerations. The 661-room hotel targeted the convention market, which had been recently spurred by McCormick Place development. This market relied on moving hundreds of guests at one time—mostly via multiple motor coaches. Also factoring into the discussion was Chicago's notorious inclement weather. Finally, it was also noted that the canopy was not out-of-scale with the 21-story, 320-foot-long Adams Street elevation. As the functional requirements were explained, the NPS came to appreciate and understanding that this was not a design statement, but rather an element critical to the hotel's success. Ultimately, the five-bay canopy was approved by the NPS and constructed as part of the tax credit project.

Case Study 2: New Canopy at the Lofts at Clifford Brown Walk in Wilmington, Del.

Earlier this year, 1320 CBW LLC completed the rehabilitation of the historic New Castle Leather Raw Stock Warehouse into 80 affordable housing

continued on page 4



Image: Courtesy of Heritage Consulting Group

The J.W. Marriott Hotel in Chicago features a canopy that gained approval after the developers convinced the National Park Service it was critical to the hotel's success.

continued from page 3

units, known as the Lofts at Clifford Brown Walk, in Wilmington, Del.

Built in 1917, the three-story reinforced concrete warehouse building has an industrial aesthetic with limited ornamentation. A canopy was desired at the primary, west elevation to provide shelter at the main entrance for building residents. Historic research informed the design—historic photographs were uncovered, which illustrated that the primary elevation historically featured a long loading dock with canopy. The project team proposed a long metal canopy that evoked the historic loading canopy. The proposed streamlined, modern canopy with building identification sign, “The Lofts at Clifford Brown Walk,” lent itself to the industrial aesthetic of the warehouse.

In this case, the NPS determined that the canopy was an appropriate addition to the west elevation as it

evoked the former loading dock canopy in form and matched the historic location. The modern metal design was determined to be appropriate for the style of the building and, ultimately, the NPS approved the canopy.

Conclusion

Residential and hotel buildings often benefit from the addition of new entrance canopies, but an owner should not automatically assume that a canopy will be approved. The project team must be prepared to argue for the functional necessity of a new canopy as well as the appropriateness of the design. Early consultation with SHPO and the NPS is critical to obtaining approval while avoiding delays in the process. Completing thorough research may be important to provide precedent for the installation of entrance canopies.

Greater opportunities for new canopies can be realized at secondary elevations that are less significant, less

continued on page 5

continued from page 4

architecturally distinguished or previously altered. Visual and physical impacts on existing historic fabric will be carefully considered by the NPS. The design and materials should be reflective of the building's design. An informed design team that understands the parameters of the HTC review can often obtain approval for the installation of a new canopy.❖

state and federal historic tax incentives for the rehabilitation of historic properties. Since 1982 Heritage Consulting Group has represented historic projects totaling more than \$3 billion in rehabilitation construction. He can be reached at 503-228-0272 or jmtess@heritage-consulting.com.

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