Our Speakers

What's Happening at the National Park Service: Reviewing NPS Guidance and Its Impact on Project Design and Finance

Cindy Hamilton
Heritage Consulting Group

Moderator

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National Park Service

Julie Langan
Department of Historic Resources

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Ryan, LLC

IPED

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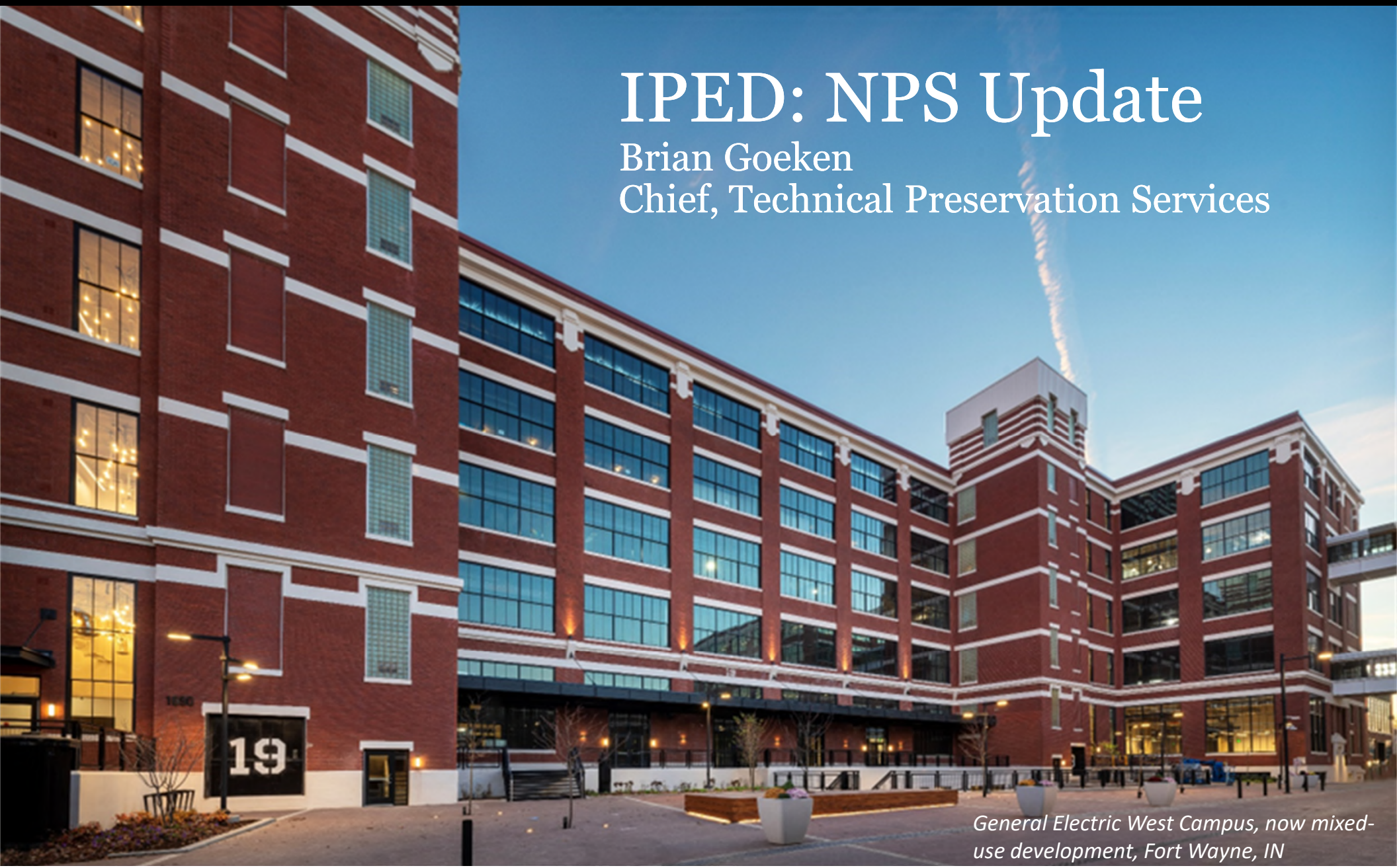
Cultural Resources, Partnerships and Science

Technical Preservation Services

IPED: NPS Update

Brian Goeken
Chief, Technical Preservation Services



General Electric West Campus, now mixed-use development, Fort Wayne, IN

- Program stats
- All-electronic HPCA application submission
- TPS hiring/staffing & HPCA review times
- NPS response to HTCC and industry stakeholders
- Training/outreach
- New guidance/publications

Old Grand Rapids Christian High School, now affordable housing and offices, Grand Rapids, MI
Credit: ICCF Community Homes

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Fiscal Year 2023 at a Glance

970 Certifications of completed work (Part 3)

Estimated rehabilitation costs	$8.81 billion
Median project QRE	$1.18 million
Average project QRE	$9.10 million
Rehabilitated housing units	6,162
New housing units	12,684
Low- and moderate-income housing units	6,824

FY 1977 – FY 2023 Program Accomplishments

$131.71 billion
Estimated Rehabilitation Investment

49,263
Historic Rehabilitation Projects Certified

314,201
Rehabilitated Housing Units

356,267
New Housing Units

199,138
Low- and Moderate-Income Housing Units

Fiscal Year 2022 Highlights

122,000
NEW JOBS created and billions of dollars in total **(direct and secondary) economic gains**

$7.3 billion
Total in rehabilitation investment

50% Projects in **low- and moderate-income census tracts***

78% Projects in **economically distressed areas***

29% Projects in **communities of less than 50,000 people***

Projects by Community Size (Population)*

19%	Less than 25,000
10%	25,000 to 49,999
13%	50,000 to 99,999
23%	100,000 to 249,999
23%	250,000 to 500,000
12%	Over 500,000

- All-electronic HPCA application submission
  - Transition August 15, 2023, to all-electronic HPCA application submission & review process
  - Remaining applications must be in electronic format
  - All decisions issued by email
  - Streamlined process for amendments

Warm Springs Bath Houses (1820s–1920), continued use as bathhouses, Warm Springs, VA
Photo: Gordon Gregory

- TPS hiring/staffing
  - Over past five years, filled 16 positions (25 FTEs, 1 PTE)
  - Hired new reviewer and new supervisory position
  - Approved to hire 5 additional positions
  - Have expanded TPS capacity and work program
- HPCA review times
  - As of June 2022, TPS office back to 30-day review times
  - 80% of Part 2 applications approved within 30 days as submitted or w/conditions without being placed on hold
  - As necessary, assisting SHPO offices with backlogs

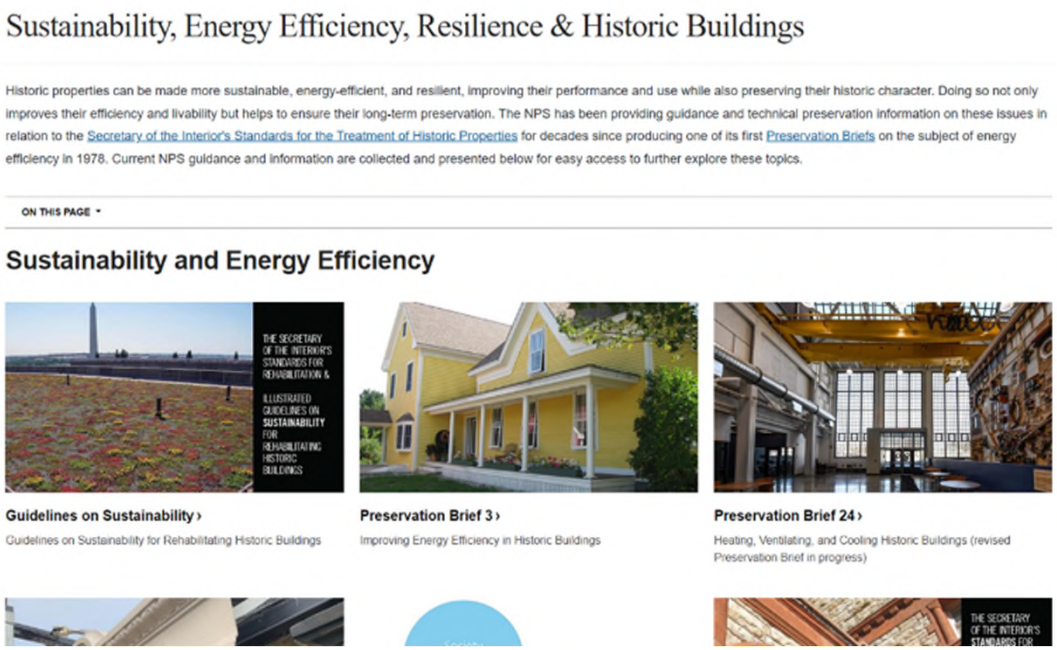
- Responding to HTCC and Industry Stakeholders
  - HTCC report and other reports on the SOI Standards
  - Listening sessions with program users and stakeholders
  - Addressing consistency and other concerns

- FY 2024 Work Plan
  - Coordination/consultation
    - Regular project coordination meetings w/SHPOs
    - In-person training w/SHPOs and regular coordination calls
    - Part 1/PDILs and NR documentation requirements
    - Increased use of preliminary reviews
    - Site visits (+/-25 trips/year)
  - Training/outreach
  - New guidance/publications
- FY 2025 Work Plan
  - TPS to solicit public comments on annual work plans

Training/Outreach

- Frequent program-users HPCA training
  - All-day in-person training (Sept 2023) in DC (280 attendees), repeated virtually spring 2024 (5 webinars, 175-200 registrants)
  - Advanced training for consultants, architects, developers, etc., already well familiar with the program
  - Training on complete applications, avoiding holds and conditions of approval, and problematic treatments
- Other trainings
  - Use of substitute materials (2,100 attendees), next step to record on-demand version
  - Flood adaptation (in-person)
  - AIA National Conference (+/-180 attendees, two half-day trainings on HPCAs and SOI Standards)
  - In development: New training on the SOI Standards

- Outreach
  - Regular calls with frequent program-users
  - New Sustainability & Resilience landing webpage consolidating all TPS guidance
  - Launching soon new email newsletter subscription app
  - Launching soon new regular case-study spotlight e-blast series and periodic guidance spotlight e-blast series



Sustainability, Energy Efficiency, Resilience & Historic Buildings

Historic properties can be made more sustainable, energy-efficient, and resilient, improving their performance and use while also preserving their historic character. Doing so not only improves their efficiency and livability but helps to ensure their long-term preservation. The NPS has been providing guidance and technical preservation information on these issues in relation to the Secretary of the Interior's Standards for the Treatment of Historic Properties for decades since producing one of its first Preservation Briefs on the subject of energy efficiency in 1978. Current NPS guidance and information are collected and presented below for easy access to further explore these topics.

ON THIS PAGE

Sustainability and Energy Efficiency

Guidelines on Sustainability ›
Guidelines on Sustainability for Rehabilitating Historic Buildings

Preservation Brief 3 ›
Improving Energy Efficiency in Historic Buildings

Preservation Brief 24 ›
Heating, Ventilating, and Cooling Historic Buildings (revised Preservation Brief in progress)

New guidance/publications

- (Oct 2023) Preservation Brief 16: Substitute Materials
- (April) Resilience to Natural Hazards

16 PRESERVATION BRIEFS

The Use of Substitute Materials on Historic Building Exteriors

John Sandor, David Trayte, and Amy Elizabeth Uebel

National Park Service
U.S. Department of the Interior
Technical Preservation Services

The *Secretary of the Interior's Standards for Rehabilitation* generally require that deteriorated distinctive architectural features of a historic property be repaired rather than replaced. Standard 6 of the *Standards for Rehabilitation* further states that when replacement of a distinctive feature is necessary, the new feature must "match the old in composition, design, color, texture, and other visual properties, and, *where possible*, materials" (emphasis added). While the use of matching materials to replace historic ones is always preferred under the *Standards for Rehabilitation*, the Standards also purposely recognize that flexibility may sometimes be needed when it comes to new and replacement materials as part of a historic rehabilitation project. Substitute materials that closely match the visual and physical properties of historic materials can be successfully used on many rehabilitation projects in ways that are consistent with the Standards.

The flexibility inherent in the *Standards for Rehabilitation* must always be balanced with the preservation of the historic character and the historic integrity of a building, of which historic materials are an important aspect. Any replacement work reduces the historic integrity of a building to some degree, which can undermine the historic character of the property over time. With limited exceptions, replacement should only be considered when damage or deterioration is too severe to make repair feasible. When needed replacement is made with a material that matches the historic material, the impact on integrity can be minimal, especially when only a small amount of new material is needed. When a substitute material is used for the replacement, the loss in integrity can sometimes, although not always, be greater than that of a matching material. Also, whether historic or substitute material, there is a point where the amount of replacement can become excessive and the building's historic integrity is diminished to an unacceptable degree, regardless of the material used—that is, a loss of authenticity and the physical features and characteristics closely associated with the property's historic significance.

The term substitute materials is used to describe building materials that have the potential to match the appearance, physical properties, and related attributes of historic materials well enough to make them alternatives for use in current preservation practice when historic materials require replacement.

Compelling reasons to use a substitute material instead of the historic material include the unavailability or poor performance of the historic material, or environmental pressures or code-driven requirements that necessitate a change in material. When using a substitute material for replacement it is critical that it match the historic material in all of its visual and physical properties to preserve the historic character of the building and minimize the impact on its integrity.

Substitute materials can be cost-effective, permit the accurate visual duplication of historic materials, and provide improved durability. While the behavior of traditional, historic materials is generally well understood, the behavior of newer materials can be less established and sometimes less predictable. Substitute materials are most successful when the properties of both the original material and the substitute are thoroughly understood by all those involved in the design and construction process. The architect must be adept at the selection of substitute materials and their incorporation into architectural plans and specifications. The contractor or tradesperson in the field must also be experienced with their use.

This Preservation Brief provides general guidance on the use of substitute materials as replacement materials for distinctive features on the exterior of historic buildings. Due to the ever-evolving product market for construction materials, this Brief does not provide specifications for substitute materials. This guidance should be used in conjunction with qualified professionals who are knowledgeable in current construction and historic preservation practices.

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Resilience to Natural Hazards and Historic Buildings

The following guidance is adapted from the "Resilience to Natural Hazards" section (p.24) in The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (2017) and from The Guidelines on Flood Adaptation for Rehabilitating Historic Buildings (2021).

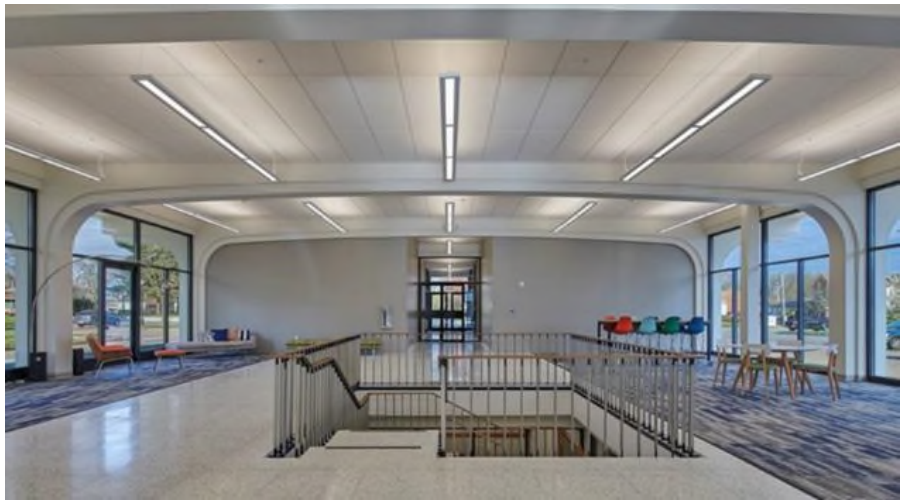
For more contextual and detailed information and discussion of this topic and the terminology used, please consult these two publications. The Treatment Guidelines also include a "Resilience to Natural Hazards" section with recommended and not recommended work in each of the four sets of treatment guidelines.

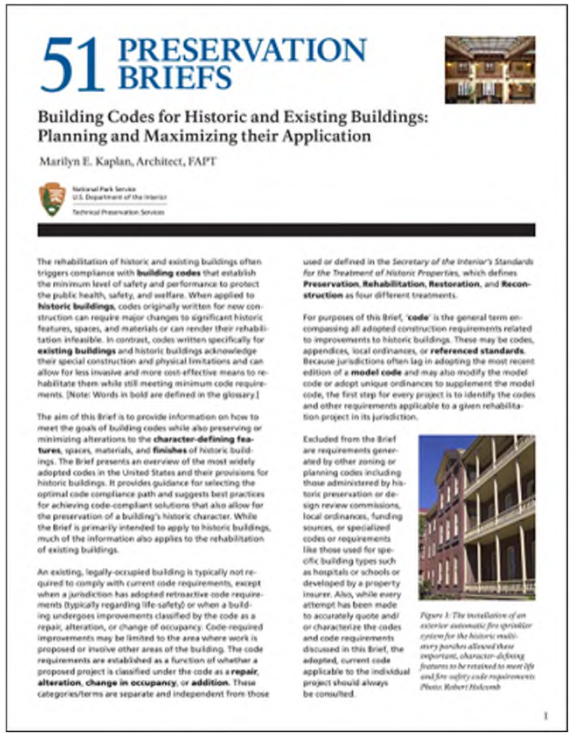
Resilience to Natural Hazards

The potential future impacts of natural hazards on a historic building should be carefully evaluated and considered. If foreseeable loss, damage, or destruction to the building or its features can be reasonably anticipated, treatments should be proactively undertaken to avoid or minimize the impacts and to ensure the continued preservation of the building and its historic character. In other instances, the effects may be minimal or more gradual and the impacts unknown or not anticipated to affect the property until some future time, but they should still be considered. In all instances, an historic building should be maintained in good condition

New guidance/publications

- (June) Acoustical Panel Ceilings and Residential/Hotel Conversions
- (June) *Preservation Brief 51: Building Codes for Historic and Existing Buildings: Planning and Maximizing their Application*





51 PRESERVATION BRIEFS

Building Codes for Historic and Existing Buildings: Planning and Maximizing their Application

Marilyn E. Kaplan, Architect, FAPT

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U.S. Department of the Interior
Technical Preservation Services

The rehabilitation of historic and existing buildings often triggers compliance with **building codes** that establish the minimum level of safety and performance to protect the public health, safety, and welfare. When applied to **historic buildings**, codes originally written for new construction can require major changes to significant historic features, spaces, and materials or can render their rehabilitation infeasible. In contrast, codes written specifically for **existing buildings** and historic buildings acknowledge their special construction and physical limitations and can allow for less invasive and more cost-effective means to rehabilitate them while still meeting minimum code requirements. [Note: Words in bold are defined in the glossary.]

The aim of this Brief is to provide information on how to meet the goals of building codes while also preserving or minimizing alterations to the **character-defining features**, spaces, materials, and **finishes** of historic buildings. The Brief presents an overview of the most widely adopted codes in the United States and their provisions for historic buildings. It provides guidance for selecting the optimal code compliance path and suggests best practices for achieving code-compliant solutions that also allow for the preservation of a building's historic character. While the Brief is primarily intended to apply to historic buildings, much of the information also applies to the rehabilitation of existing buildings.

An existing, legally-occupied building is typically not required to comply with current code requirements, except when a jurisdiction has adopted retroactive code requirements (typically regarding life safety) or when a building undergoes improvements classified by the code as a repair, alteration, or change of occupancy. Code-required improvements may be limited to the area where work is proposed or involve other areas of the building. The code requirements are established as a function of whether a proposed project is classified under the code as a **repair**, **alteration**, **change in occupancy**, or **addition**. These categories/terms are separate and independent from those used or defined in the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, which defines **Preservation**, **Rehabilitation**, **Restoration**, and **Reconstruction** as four different treatments.

For purposes of this Brief, '**code**' is the general term encompassing all adopted construction requirements related to improvements to historic buildings. These may be codes, appendices, local ordinances, or **referenced standards**. Because jurisdictions often lag in adopting the most recent edition of a **model code** and may also modify the model code or adopt unique ordinances to supplement the model code, the first step for every project is to identify the codes and other requirements applicable to a given rehabilitation project in its jurisdiction.

Excluded from the Brief are requirements generated by other zoning or planning codes including those administered by historic preservation or design review commissions, local ordinances, funding sources, or specialized codes or requirements like those used for specific building types such as hospitals or schools or developed by a property insurer. Also, while every attempt has been made to accurately quote and/or characterize the codes and code requirements discussed in this Brief, the adopted, current code applicable to the individual project should always be consulted.

Figure 1: The installation of an exterior automatic fire sprinkler system for the historic multi-story porches allowed these important, character-defining features to be retained to meet life and fire safety code requirements. Photo: Robert Holcomb

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New guidance/publications

- Upcoming guidance (summer/fall):
  LVT replacement flooring, phasing, preliminary reviews, white-box treatments, other topics
- Preservation Briefs in development on such topics as HVAC systems, adaptation to wildfire risks, accessibility, and other topics
- HTC program brochure (tent. Sept 2024)