

# Staff Report of Findings

## Application for Certificate of Appropriateness

**Property Name:** East Side Carnegie Library  
**Property Address:** 25 South Altamont Street, Spokane WA, 99202  
**Applicant:** Marsha Naegeli, owner  
**Hearing Date:** 11/20/2019  
**Type of Work:** Re-roofing project to replace historic clay tile roof with synthetic composite roofing material.

### FINDINGS OF FACT:

1.) The Spokane Historic Landmarks Commission has the authority to review this proposal for a Certificate of Appropriateness under SMC 17D.100.200 B (Certificates of Appropriateness – When Required).

- The commission has the authority to review proposals “to construct, change, alter, modify, remodel, move, demolish and significantly affect properties or districts on the register.”

2.) The East Side Carnegie Library building is listed on the Spokane Register of Historic Places and is protected by a Management Agreement.

- City Council listed the property on the Spokane Register on 10/21/1985.
- The Management Agreement covers the exterior of the building.

3.) The Management Standards for Spokane Register properties and districts are the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. Staff recommendation is based on the Standards as listed below.

4.) Additional to the Management Agreement, a Façade Easement on the East Side Carnegie Library was granted to the City of Spokane.

- The Façade Easement was signed by the owners of the building, the Grantor, and the City of Spokane, the Grantee, on August 24, 1981 and it is to run with the property and be in effect for perpetuity.
- The Façade Easement states that without prior approval of the Grantee, the property owner shall not “undertake or permit any construction, alteration, or remodeling, or do or permit any other thing which would materially affect the historic appearance” of the building as described in Exhibit B.
- Exhibit B of the Façade Easement document states that “the historic architectural character of the property will be retained through maintenance and preservation of the exterior brick and masonry and the **exterior roof tile.**”

## **PROPOSED WORK:**

The project proposal submitted by the applicant calls for the removal of all of the building's historic clay roof tiles, installation of new underlayment, and replacement of the historic clay tiles with a synthetic composite roofing material intended to simulate clay tile.

The applicant claims that full roof replacement is necessary because a large portion of the historic roof tiles are damaged as well as the underlayment causing leaking and interior water infiltration issues.

The Historic Preservation Office (HPO) suggested to the applicant that since the roof is a protected character defining feature of the building, it would be best to carefully remove and preserve the historic clay tiles, install new underlayment, then reinstall the historic tiles along with new color-matched clay tiles to replace the damaged tiles. The applicant is resistant to this strategy because they claim that the roof is no longer structurally sufficient to support the weight of a clay tile roof (applicant later withdrew the assertion that the building could not support a clay tile roof).

The HPO requested additional photographs of the roof that indicate the relative amounts of damaged and intact tiles, and an assessment of the building's capability to support the weight of a clay tile roof by a structural engineer. Photographs were provided to the HPO on November 7 showing some damage to existing tiles as well as what appears to be large areas of intact clay tiles forming the roof. As mentioned earlier, the applicant withdrew the concern about the weight of a clay tile roof.

The applicant has submitted two bids – one is for the wholesale replacement of the historic clay tile roof with synthetic tiles in a similar color/style. The second bid is for the removal and preservation of the existing roof tiles with a replacement of the underlayment and reapplying the existing tile to include the replacement of new clay tile where needed. The two bids are dramatically different in price and the roofing company states the loss of approximately 80% of the historic tile during the removal process. The HPO has requested a bid for a new clay tile roof for the building using traditional materials for an "in-kind" replacement *without* saving the historic tile but using a true clay tile roof.

## **RELEVANT STANDARDS:**

**Standard Number 2:** The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

- The East Side Carnegie Library building's clay roof tiles are a character defining feature of the building. In the Façade Easement, the roof tiles are specifically identified as a significant characteristic of the building.
- The photographs of the roof provided by the applicant show that the clay roof tiles appear to be largely intact and in good condition, however there are missing and

broken tiles as well as some areas of replacement materials that are not compatible.

**Standard Number 5:** Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

- The historic clay tile roof is a distinctive feature of the 1913 East Side Carnegie Library.
- Since the clay tile is located on a hipped roof, it is extremely visible from all elevations of the building.

**Standard Number 6:** Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

- The applicant has provided additional evidence to the HPO that demonstrates that a portion of the historic clay roof tiles are deteriorated to a point that require replacement.
- Following repair in the hierarchy, rehabilitation guidance is provided for replacing an entire character-defining feature with new material because the level of deterioration or damage of materials precludes repair. If the missing feature is character defining or if it is critical to the survival of the building (e.g., a roof), it should be replaced to match the historic feature based on physical or historic documentation of its form and detailing. As with repair, the preferred option is always replacement of the entire feature *in kind*.
- Clay roof tiles that would be considered a true "in-kind" replacement for the historic roofing material are commercially available from a number of manufactures.
- The proposed new material, Brava Barrel synthetic composite tile, has a thickness comparable to that of clay tile. It has some color variation as a clay tile would, but its smooth surface is that of a composite or plastic material. Brava Barrel synthetic composite tiles do not match the historic material sufficiently enough to consider it an "in-kind" replacement of a character defining feature that the Façade Easement specifically protects.
- A weathertight roof is essential to the longterm preservation of the entire structure. Historic roofing reflects availability of materials, levels of construction technology, weather, and cost.

**GUIDANCE BY THE NATIONAL PARK SERVICE'S TECHNICAL PRESERVATION SERVICES FOR ROOF TREATMENTS THAT ARE NOT RECOMMENDED:**

- Radically changing, damaging, or destroying roofs which are important in defining the overall historic character of the building so that, as a result, the character is diminished.
- Removing a major portion of the roof or roofing material that is repairable, then reconstructing it with new material in order to create a uniform, or "improved" appearance.
- Using a substitute material for the replacement part that does not convey the visual

appearance of the surviving parts of the roof or that is physically or chemically incompatible.

- Stripping the roof of sound historic material such as slate, clay tile, wood, and architectural metal.
- Failing to reuse intact slate or tile when only the roofing substrate needs replacement.

## **RECOMMENDATIONS:**

The clay tile roof on the East Side Carnegie Library building is a character-defining feature of the structure.

Beyond the Management Agreement governing changes to the property, the City of Spokane was granted a Façade Easement on the building in 1981 that specifically identifies the clay tile roof as a protected feature that should be retained through maintenance and preservation rather than replacement. The Brava Barrel synthetic composite tiles do not match the historic material sufficiently enough to consider it an "in-kind" replacement of a character defining feature that the Façade Easement specifically protects.

The clay roof tiles appear to be largely intact and in good condition – however, staff does understand that the main issue with the failing roof is the underlayment rather than the tiles themselves. In order to maintain the building, the roof must be repaired and the underlayment must be replaced. If the careful removal and preservation of the existing clay tile roof cannot be feasibly accomplished, staff recommends a wholesale replacement of the underlayment and historic clay tile with a traditional clay tile product.

Considering the findings of fact, the project as described by the applicant does not meet the Secretary of the Interior's Standards and the HPO recommends the application for Certificate of Appropriateness be denied.

Alternatives which would meet the Secretary's Standards and staff would recommend approval for a Certificate of Appropriateness are:

1. The careful removal and storage of the existing historic clay tile; replacement of the underlayment on the roof; and replacement of historic clay tile along with replacement tiles as needed to replace broken or missing tiles.

**OR**

2. The demolition of the existing historic clay tile roof and replacement of the underlayment with NEW clay tiles that match the material, color, pattern and size of the historic roof.

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HPO Report: Duvall/Camporeale

Design Review Committee Review: Bradley, Kittel, Dickey, Shockley

Landmarks Commission Review: Pending

Report: 11/15/19

Site Visit: 10/09/19

Hearing Date: 11/20/19