EDB Committee

From: Kauwila Hanchett <kauwila3@gmail.com>
Sent: Thursday, February 06, 2020 8:45 AM

To: EDB Committee

Subject: EDB-40 Informational Packet **Attachments:** EDB-40 Informational Packet.pdf

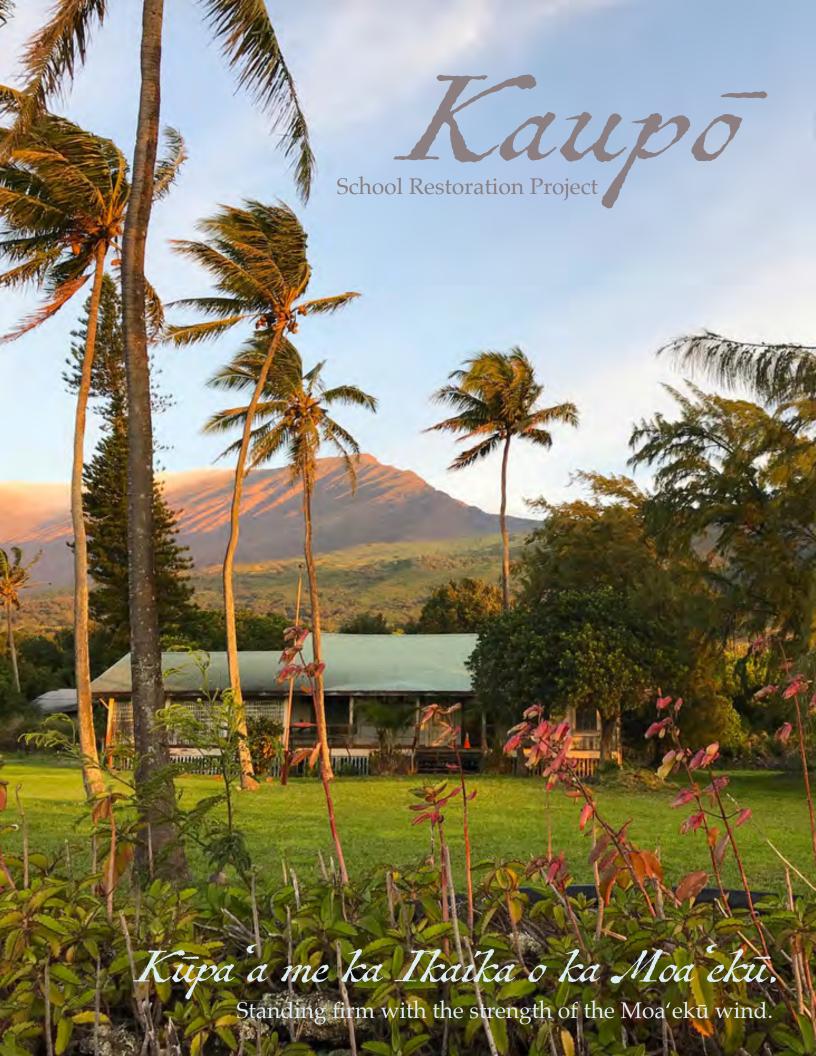
Welina me ke aloha,

Attached please find Kaupō Community Association's informational packet pertaining to EDB-40. Do not hesitate to contact us should you have any questions or concerns.

Mahalo nui, Kauwila

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Kauwila Hanchett kauwila3@gmail.com kauwila@hanabuild.org (808) 463-6259



Reimbursement Bu		G4996				
Approved Budget	OED FUNDS on Program Budget	Invoice #1	Invoice #2		Total Paid (to Date)	Remaining Balance
Construction/grant mgmt	\$10,000					,
Construct per LTE	\$85,000	\$41,405.99	\$43,593.99		\$84,999.98	\$0.02
Hub design drawing, permit, docs	\$15,000					
Pwr, water design, permits, docs	\$15,000			co e		
Archaeological monitoring	\$5,000		\$4,999.68		\$4,999.68	\$0.32
Hub structure concrete slab	\$16,000					
Water tank cemnt ring fndns	\$3,200					
Trenching for power, water runs	\$15,000					
Walkways, ramps, handicap stalls	\$56,000		\$2,812.16		\$2,812.16	\$53,187.84
Hub solar shed roof & framing	\$26,400					
Utility rooms for pwr & water	\$9,600					
Two lavatory & shower rooms	\$13,000				- 1	
Storage container, paint, trucking	\$6,800	\$6,070.57			\$6,070.57	\$729.43
Water tanks	\$40,000				500 170	
Plumbing	\$30,000				- 14 Carlon	
Solar hot water equipment	\$10,000					
Bathroom fixtures & install	\$20,000					
PV panels	\$9,000					
Panel racking, hardware	\$10,000					
Inverters, charge controllers	\$23,000			-6		
Install, wiring, matls, shipping	\$25,000					
Batteries & shipping	\$32,000					
TOTAL	\$475,000	\$47,476.56	\$51,405.83			\$376,117.61

KAUPO SCHOOL PROJECT MITIGATION REPORT

January 25, 2019

SUMMARY

This report is prepared to document the process leading to the reconstruction of Kaupo School. The project was originally conceived as a rehabilitation of the existing ninety-seven-year-old, single wall, wood structure located in Kaupo, Maui. However, during the initial phases of work a hidden condition, once revealed, exposed the fact that the critical joint between the siding and the floor was compromised by rot and termite damage to such an extent that any rehabilitation effort would not be adequate to insure a safe, structurally sound solution to the intended future use of the facility. Consequently, action was taken to remove and replace the building's siding and floor to adequately address these concerns.

CONDITION REPORT

Observed Conditions – Prior to preparing drawings a condition survey was preformed to assess the viability of rehabilitation of the structure. Extensive damage due to rot and termite activity was noted but since the structure above the floor appeared largely intact that rehabilitation efforts might still viable. However, drawings for permit and historic agency review were prepared to accommodate the worst-case scenario which would involve the reconstruction of the school building if undiscovered conditions so warranted.

Discovered Conditions – Upon commencement of the work, the contractor removed the roofing and support structure which were not original construction. Then carefully began to disassemble siding elements to repair or replace damaged wood. When the bottom trim boards were removed it became immediately apparent that 70 to 80 % of the siding was compromised at that hidden critical joint with the floor. See Figure 1 below. In single-wall construction the entire weight of the structure above the floor is carried by this joining of the siding to the floor and from there to the ground (the Load Path).

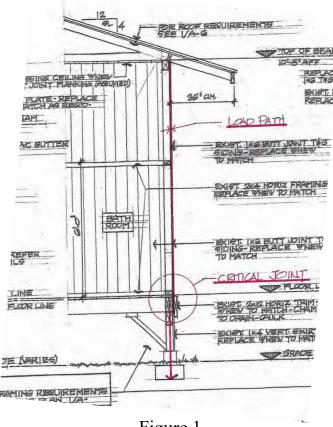


Figure 1

Determination – A determination was made to proceed by replacing the siding Once the siding was removed it became clear that the flooring system was significantly out of level. See pictures for the extent of damage. Upon closer examination it was very clear that the structural integrity of damaged posts, girder beams and joists was beyond repair and had to be replaced. This, coupled with the fact that foundation stones with no vertical hold downs, did not conform to current building code requirements for earthquake resistance prompted the action taken.

Mitigating Action – This determination was necessary and prudent considering the facts discovered during construction. However, this action did reduce the historic status of the original building and reclassified it as a 'reconstruction' of an historic property per the Secretary of Interior's Guidelines. Having to take this action obviously, justifiably upset some members of the Kaupo community. In retrospect there should have been more of an effort to keep the community informed of such a dramatic change of course. For this oversight I deeply apologize to the community and hope we can move forward together with the project since the reconstructed structure will recreate the 'character defining features' of the original building and conform to Item #6 in the Guidelines for 'Rehabilitation' of an historic property.

Conclusion – The goal to repurpose this structure as a Community Center and shelter for motorists trapped by road closures is well justified. This function places demand on a structure that the original building could simply not accommodate. The reconstructed building will be an accurate replica of the original building and provide a safe, accessible and serviceable structure for decades to come without compromise to the character defining features of its predecessor.

Respectfully Submitted,

James Niess
Project Architect

Appendices:

- A. Images of Damage
- B. Character Defining Features Matrix
- C. Secretary of Interior's Guidelines

Appendix A



SIDING TO FLOOR JOINT



POST



JOIST DAMAGE - FLOOR OUT OF LEVEL



GIRDER BEAM





POST

Appendix B: Character Defining Features

Character Defining Feature	Planned Retained	Replaced	Comment
Corrugated Roofing		X	Not Original
Ceilings		X	Missing
Panel Doors		X	Damaged
Windows	X	X	Damaged
Flooring	X	X	
Massing	Х		
Siding	X	X	Damaged
Railing	X		
Colors	X		

Appendix C: Secretary of Interior's Guidelines for Rehabilitation

The Standards will be applied taking into consideration the economic and technical feasibility of each project.

- 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
- 2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
- 3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- 4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

- 5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- 7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- 8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- 9. New additions, exterior alterations or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- 10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

MICHAEL P. VICTORINO Mayor MICHELE CHOUTEAU MCLEAN,

MICHELE CHOUTEAU MCLEAN, AICP Director

> JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

COUNTY OF MAUI ONE MAIN PLAZA 2200 MAIN STREET, SUITE 315 WAILUKU, MAUI, HAWAII 96793

January 14, 2020

KAUPO COMMUNITY ASSOCIATION, INC ATTN: JONATHAN STARR P.O. BOX 787 KULA, HAWAII 96790 KIPAHULU CONSTRUCTION LLC ATTN: PATRICK AND PATRICIA O'CONNELL HCI BOX 200 HANA, HAWAII 96713

KAUPO COMMUNITY ASSOCIATION, INC. ATTN: LINDA CLARK 34346 PI'ILANI HIGHWAY HANA, HAWAII 96713

RE: NOTICE OF WARNING AND REQUEST TO CORRECT APPARENT VIOLATION(S)

TMK: (2) 1-7-002:015-0000

RFS No.: 19-0001559

Description: For non-agricultural use located at 34793 Pillani Highway,

Hana, on the island of Maui

TO WHOM IT MAY CONCERN:

Based on information obtained, we have reason to believe that on your property, on or before **November 15, 2019**, there were one or more violations. The ongoing construction is not permitted within the County's Agricultural District, which is in violation of Section 19.30A.050, Maui County Code. The construction was permitted as part of "retention, restoration, rehabilitation, or improvement of buildings, sites, or cultural landscapes of historical or archaeological significance," which no longer applies since the original historic building was demolished.

The information obtained includes: inspection, research and photographs

You must stop all construction immediately, correct any further violations as directed by the Planning Department, and contact the inspector by **January 21, 2020.** We will investigate further, and if we find any non-compliance, you will be subject to civil and possible criminal enforcement action.

Civil Fines for the violation will be 1) an initial fine of ONE THOUSAND AND NO/100 DOLLARS (\$1,000.00) and 2) a daily fine of ONE THOUSAND AND NO/100 DOLLARS (\$1,000.00) for each day each violation continues.

This request is only for violations of regulations that are enforced by the Department of Planning. There may be additional violations of regulations that are enforced by other County, State, or Federal agencies. If you have any questions about this request or need further information, please contact me at merle.tashiro@co.maui.hi.us or (808) 270-7810; and please refer to RFS 19-0001559.

Sincerely,

Merle Tashiro Zoning Inspector

Jay Arakawa, Supervising Zoning Inspector (PDF) Merle Tashiro, Zoning Inspector (PDF) S:\Zoning\RFS\2019\1559. KAUPO 19-0001559 (KIVA; AX; RFS File)

XC:

CERTIFICATE OF SERVICE

I hereby certify that on the day of January 14, 2020, I served the following individual by placing the documents indicated via regular, U.S. Postal Service: Name of person served: Address:

KAUPO COMMUNITY ASSOCIATION, INC ATTN: JONATHAN STARR P.O. BOX 787 KULA, HAWAII 96790

KAUPO COMMUNITY ASSOCIATION, INC ATTN: LINDA CLARK 34346 PI'ILANI HIGHWAY HANA, HAWAII 96713

KIPAHULU CONSTRUCTION LLC ATTN: PATRICK AND PATRICIA O'CONNELL HCI BOX 200 HANA, HAWAII 96713

Documents served: Notice of Warning – (1) NON-AGRICULTURAL USE.

Permit was to repair, restore, retention etc. for historical or archaelolgical significance of the Kaupo School. It got demolished.

Dated: 1/14/2020

Signature of server

Merle Tashiro/ Zoning Inspector

Print name and title

Kaupo School

RFS 19-0001559

Aloha Merle,

Responding to the recently re-issued RFS there are several points to be made to contest and refute this action by the Department.

First, and you agreed with me on this, the building was structurally compromised due to accelerated rot and termite damage. The extensive deterioration of the siding at its joint with the floor, a crucial structural element in a single wall building, was simply beyond repair. Foundations were not code compliant and structural posts below the floor were equally compromised.

This project was conceived as an historic rehabilitation of the original building which is no longer possible. However, the Secretary of the Interior's Standards for the Treatment of Historic Properties does recognize Reconstruction of an historic property such as this. Granted it is the least desirable of the four categories of preservation, but it is in place for circumstances such as this. I have attached a few excerpts form the Standards to support this contention. The 'distinctive features, spaces, and functional relationships' of the Kaupo School building will be retained in the new structure and thus qualifies as an 'improvement' to this historically significant site. Consequently, the permission granted in the Deputy Director's letter of December 13, 2016 remains valid.

The Community Association is obviously upset by this unexpected and unwarranted action and respectfully requests that the RFS be terminated without delay.

I realize this issue may be out of your immediate control but please realize there will be further discussion with the Director and others since this effort cannot simply be left in this state of suspended confusion.

Jim Niess Project Architect DAVID Y. IGE





STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION KAKUHIHEWA BUILDING 601 KAMOKILA BLVD, STE 555 KAPOLEI, HAWAII 96707

October 30, 2017

County of Maui 250 South High Street Wailuku, HI 96707

SUZANNE D. CASE CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA FIRST DEPUTY

JEFFREY T. PEARSON DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND RESOURCE MANAGEMENT
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVATION
LAND
STATE PARKS

IN REPLY REFER TO:

LOG NO: 2017.02402 **DOC NO: 1710KN27**

Architecture

SUBJECT:

Chapter 6E-8 Historic Preservation Review

Kaupō School - School Building 34793 Pi'ilani Hwy. Maui, HI 96790 Owner Name: County of Maui

Kaupō Ahupua'a, Kīpahulu District, Island of Maui

TMK: (2) 1-7-002:015

Thank you for the opportunity to comment on this request from the County of Maui for Hawai'i Revised Statutes (HRS) Chapter 6E-8 review. The State Historic Preservation Division (SHPD) received this submittal on October 27, 2017. The submittal included the building permit application and the permit set.

Kaupō School is listed on the Hawai'i and National Registers of Historic Places (SIHP #50-04-1630, NR #00000662). The proposed scope of work includes the repair and rehabilitation of an existing structure that previously served as the school building, which is a contributing resource to the Kaupō School campus. The proposed work to the existing restrooms will comply with the American Disabilities Accessibilities Act Guidelines. The proposed improvements maintain the character defining features of the teacher's cottage and will not affect the building's historic integrity.

Based on this submittal, SHPD has determined "no historic properties affected". SHPD's part of the review process is complete.

Please contact Kaiwi Yoon, Architecture Branch Chief, at (808) 692-8032 or at Kaiwi.N.Yoon@hawaii.gov regarding architectural resources or this letter.

Aloha,

Alan Downer

Alan S. Downer, PhD Administrator, State Historic Preservation Division Deputy State Historic Preservation Officer

cc: jim@mauiarch.com

STANDARDS FOR RECONSTRUCTION & GUIDELINES FOR RECONSTRUCTING HISTORIC BUILDINGS

Reconstruction

Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.



Standards for Reconstruction

- Reconstruction will be used to depict vanished or non-surviving portions of a property
 when documentary and physical evidence is available to permit accurate reconstruction
 with minimal conjecture and such reconstruction is essential to the public understanding
 of the property.
- 2. Reconstruction of a landscape, building, structure or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
- 3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
- 4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.
- 5. A reconstruction will be clearly identified as a contemporary re-creation.
- 6. Designs that were never executed historically will not be constructed.

GUIDELINES FOR RECONSTRUCTING HISTORIC BUILDINGS

INTRODUCTION

Reconstruction is different from the other treatments in that it is undertaken when there are often no visible historic materials extant or only a foundation remains. Whereas the treatment Restoration provides guidance on restoring historic building features, the Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings should be followed when it is necessary to recreate a non-surviving building using new material. But, like restoration, reconstruction also involves recreating a historic building which appears as it did at a particular—and at its most significant—time in its history. Because of the potential for historical error in the absence of sound physical evidence, this treatment can be justified only rarely and, thus, is the least frequently undertaken of the four treatments. Reconstructing a historic building should only be considered when there is accurate documentation on which to base it. When only the appearance of the exterior of the building can be documented, it may be appropriate to reconstruct the exterior while designing a very simple, plain interior that does not attempt to appear historic or historically accurate. Signage and interpretative aids should make it clear to visitors that only the exterior of the building is a true reconstruction. Extant historic surface and subsurface materials should also be preserved. Finally, the reconstructed building must be clearly identified as a contemporary recreation.

Research and Document Historical Significance

The guidance for the treatment **Reconstruction** begins with *researching and documenting* the building's historical significance to determine whether its recreation is essential to the public understanding of the property. In some instances, reconstruction may not be necessary if there is a historic building still existing on the site or in a setting that can explain the history of the property. Justifying a reconstruction requires detailed physical and documentary evidence to minimize or eliminate conjecture and to ensure that the reconstruction is as accurate as possible. Only one period of significance is generally identified; a building—as it evolved—is rarely recreated. If research does not provide adequate documentation for an accurate reconstruction, other interpretive methods should be considered, such as an explanatory marker.

Investigate Archeological Resources

Investigating archeological resources is the next area of guidance in the treatment **Reconstruction**. The purpose of archeological research is to identify any remaining features of the building, site, and setting that are essential to an accurate recreation and must be reconstructed. Archeological resources that are not essential to the reconstruction should be left in place. The archeological findings, together with archival documentation, should be used to replicate the design, materials, and plan of the historic building.

Identify, Protect, and Preserve Extant Historic Features

Closely aligned with archeological research, recommendations are given for *identifying*, *protecting*, *and preserving* extant features of the historic building. It is never appropriate to base a **Reconstruction** upon conjectural designs or on features from other buildings. Any remaining historic materials and features should be retained and incorporated into the reconstruction when feasible. Both the historic and new materials should be documented to assist in interpretation.

Reconstruct Non-Surviving Building and Site

After the research and documentation phases, guidance is given for **Reconstruction** work itself. Exterior and interior features are addressed in general, always emphasizing the need for an accurate depiction (i.e., careful duplication of the appearance of historic materials and features for interpretative purposes). While the use of traditional materials and finishes is always preferred, in some instances substitute materials may be used if they are able to convey the same appearance. Where non-visible features of the building are concerned, such as interior structural systems, contemporary materials and technology may be used. Recreating the features of the building site or setting based on archeological findings should also be an integral part of project work.

Accessibility and Life Safety, Natural Hazards, and Sustainability

Whereas preservation, rehabilitation, and restoration treatments usually necessitate retrofitting to meet code requirements and to address other issues (including natural hazards and sustainability), in this treatment it is assumed that the **Reconstructed** building will be essentially new construction. Thus, code-required work, treatments to reduce the potential impact of natural hazards, and ensuring that the reconstructed building is as sustainable as possible should be considered during the design phase—when appropriate to the particular Reconstruction project—so as not to negatively impact or detract from the reconstructed appearance of the building, its site, and setting. The fact that the non-surviving building was located in a floodplain or another area especially vulnerable to the impact of natural hazards is crucial to consider when determining whether the building should be reconstructed.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings.* Although specifically developed for the treatment Rehabilitation, the Guidelines can be used to help guide the other treatments.

Reconstruction as a Treatment. When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, Reconstruction may be considered as a treatment. Prior to undertaking work, a documentation plan for Reconstruction should be developed.

STANDARDS FOR REHABILITATION & GUIDELINES FOR REHABILITATING HISTORIC BUILDINGS

Rehabilitation

Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.



Standards for Rehabilitation

- 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
- 2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
- 3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- 4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- 5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- 7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- 8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- 9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- 10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

GUIDELINES FOR REHABILITATING HISTORIC BUILDINGS

INTRODUCTION

In Rehabilitation, historic building materials and character-defining features are protected and maintained as they are in the treatment Preservation. However, greater latitude is given in the Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings to replace extensively deteriorated, damaged, or missing features using either the same material or compatible substitute materials. Of the four treatments, only Rehabilitation allows alterations and the construction of a new addition, if necessary for a continuing or new use for the historic building.

Identify, Retain, and Preserve Historic Materials and Features

The guidance for the treatment **Rehabilitation** begins with recommendations to identify the form and detailing of those architectural materials and features that are important in defining the building's historic character and which must be retained to preserve that character. Therefore, guidance on *identifying*, *retaining*, *and preserving* character-defining features is always given first.

Protect and Maintain Historic Materials and Features

After identifying those materials and features that are important and must be retained in the process of **Rehabilitation** work, then *protecting and maintaining* them are addressed. Protection generally involves the least degree of intervention and is preparatory to other work. Protection includes the maintenance of historic materials and features as well as ensuring that the property is protected before and

during rehabilitation work. A historic building undergoing rehabilitation will often require more extensive work. Thus, an overall evaluation of its physical condition should always begin at this level.

Repair Historic Materials and Features

Next, when the physical condition of character-defining materials and features warrants additional work, *repairing* is recommended. **Rehabilitation** guidance for the repair of historic materials, such as masonry, again begins with the least degree of intervention possible. In rehabilitation, repairing also includes the limited replacement in kind or with a compatible substitute material of extensively deteriorated or missing components of features when there are surviving prototypes features that can be substantiated by documentary and physical evidence. Although using the same kind of material is always the preferred option, a substitute material may be an acceptable alternative if the form, design, and scale, as well as the substitute material itself, can effectively replicate the appearance of the remaining features.

Replace Deteriorated Historic Materials and Features

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 his-

toric documentation of its form and detailing. As with repair, the preferred option is always replacement of the entire feature in kind (i.e., with the same material, such as wood for wood). However, when this is not feasible, a compatible substitute material that can reproduce the overall appearance of the historic material may be considered.

It should be noted that, while the National Park Service guidelines recommend the replacement of an entire character-defining feature that is extensively deteriorated, the guidelines never recommend removal and replacement with new material of a feature that could reasonably be repaired and, thus, preserved.

Design for the Replacement of Missing Historic Features

When an entire interior or exterior feature is missing, such as a porch, it no longer plays a role in physically defining the historic character of the building unless it can be accurately recovered in form and detailing through the process of carefully documenting the historic appearance. If the feature is not critical to the survival of the building, allowing the building to remain without the feature is one option. But if the missing feature is important to the historic character of the building, its replacement is always recommended in the **Rehabilitation** guidelines as the first, or preferred, course of action. If adequate documentary and physical evidence exists, the feature may be accurately reproduced. A second option in a rehabilitation treatment for replacing a missing feature, particularly when the available information about the feature is inadequate to permit an accurate reconstruction, is to design a new feature that is compatible with the overall historic character of the building. The new design should always take into account the size, scale, and material of the building itself and should be clearly differentiated from the authentic historic features. For properties that have changed over time, and where those changes have acquired

significance, reestablishing missing historic features generally should not be undertaken if the missing features did not coexist with the features currently on the building. Juxtaposing historic features that did not exist concurrently will result in a false sense of the building's history.

Alterations

Some exterior and interior alterations to a historic building are generally needed as part of a **Rehabilitation** project to ensure its continued use, but it is most important that such alterations do not radically change, obscure, or destroy character-defining spaces, materials, features, or finishes. Alterations may include changes to the site or setting, such as the selective removal of buildings or other features of the building site or setting that are intrusive, not character defining, or outside the building's period of significance.

Code-Required Work: Accessibility and Life Safety

Sensitive solutions to meeting code requirements in a **Rehabilitation** project are an important part of protecting the historic character of the building. Work that must be done to meet accessibility and life-safety requirements must also be assessed for its potential impact on the historic building, its site, and setting.

Resilience to Natural Hazards

Resilience to natural hazards should be addressed as part of a Rehabilitation project. A historic building may have existing characteristics or features that help to address or minimize the impacts of natural hazards. These should always be used to best advantage when considering new adaptive treatments so as to have the least impact on the historic character of the building, its site, and setting.

Sustainability

Sustainability should be addressed as part of a **Rehabilitation** project. Good preservation practice is often synonymous with sustainability. Existing energy-efficient features should be retained and repaired. Only sustainability treatments should be considered that will have the least impact on the historic character of the building.

The topic of sustainability is addressed in detail in *The Secretary* of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings.

New Exterior Additions and Related New Construction

Rehabilitation is the only treatment that allows expanding a historic building by enlarging it with an addition. However, the Rehabilitation guidelines emphasize that new additions should be considered only after it is determined that meeting specific new needs cannot be achieved by altering non-character-defining interior spaces. If the use cannot be accommodated in this way, then an attached exterior addition may be considered. New additions should be designed and constructed so that the character-defining features of the historic building, its site, and setting are not negatively impacted. Generally, a new addition should be subordinate to the historic building. A new addition should be compatible, but differentiated enough so that it is not confused as historic or original to the building. The same guidance applies to new construction so that it does not negatively impact the historic character of the building or its site.

Rehabilitation as a Treatment. When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular time is not appropriate, Rehabilitation may be considered as a treatment. Prior to undertaking work, a documentation plan for Rehabilitation should be developed.

