

Historic Preservation Requirements for Repairs and Alterations on the University of Oregon Campus

Campus Planning and Real Estate
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Available online at: <http://uplan.uoregon.edu/subjects/HistoricPreservation/histprescover.html>

The following describes how to implement UO *Campus Plan* policies and patterns as well as city, state, and federal regulations addressing historic preservation. For a full summary of applicable regulations, refer to the Summary of Regulations Governing Historic Properties on page 3.

Three Steps

Prior to performing any construction work on campus (repairs, alterations, etc.):

- 1. Determine if the proposed work might alter the landscape's or the building's (interior or exterior) historic character.**

Exterior Work (building or landscape):

Generally, **all** repairs and alterations visible from the exterior are subject to review. Some examples include:

1. Installation of A\C window units or systems.
2. Alteration or replacement of window trim and sashes.
3. Alteration or replacement of design features (trim, siding, decorative features, etc.).
4. Installation of exterior plumbing, vents, etc.
5. Installation of stair rails.
6. Changes to the configuration of the landscaped areas, sidewalks, and landscape features (e.g., light fixtures, retaining walls, plaques, etc.).

Examples of exterior work **not** subject to review include:

1. Reroofing with like materials.
2. Repainting (although it may be necessary to select a historically appropriate paint color).
3. Restoration work using historically appropriate materials (e.g., repairing a wooden stair tread with like materials).

Interior Work:

Changes to primary public spaces such as lobbies and gathering places are the primary focus. However, alteration to and/or replacement of any original materials may require review. Some examples include:

1. Alteration to or replacement of original plumbing fixtures, flooring, doors, light fixtures, or hardware.
2. Alteration to or removal of decorative features such as trim, murals, fireplaces, banisters, or built-in furniture.
3. Changing the configuration of significant interior spaces (e.g., new walls, lowering ceilings, removing doorways, etc.).

Examples of interior work **not** subject to review include:

1. Standard plumbing and hardware repairs that do not involve replacement.
2. Restoration work using historically appropriate materials (e.g., repairing trim with like materials).
3. Repair or replacement of non-original materials. However, restoring the original character is encouraged when possible (e.g., replacing a non-compatible light fixture with a historically compatible fixture).
4. Repainting.

Will the change be visible? If the work might alter the resource's historic character, historic review is necessary; proceed to step two. If not, proceed with the project in coordination with Facilities Services.

2. Determine the historic status of the affected building or landscape.

Refer to the "UO Summary Table of Historic Rankings and Designations for Landscapes, Structures, and Buildings" online at:
<http://uplan.uoregon.edu/subjects/HistoricPreservation/histprescover.html>.

Or, check with Campus Planning and Real Estate staff (Christine Thompson 346-5572 or cthoms@uoregon.edu).

If the building or landscape has some level of historic status, proceed to step three. If not, proceed with the project in coordination with Campus Planning and Real Estate and Facilities Services. Exterior alterations to **all** buildings are subject to Campus Planning Committee review.

3. Determine what level of historic review is required.

For most work, historic review is minimal, if required at all, and can be addressed by Campus Planning and Real Estate staff. Every effort is made to handle reviews in-house (to the degree allowed by applicable regulations).

Contact Campus Planning and Real Estate staff for assistance with the review process (Christine Thompson, 346-5572 or cthoms@uoregon.edu).

The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (see page 6) are a good tool to use when working on historic or potentially historic buildings and sites.

The historic status of campus buildings and landscapes (based upon step 2 findings) determines the type of review required:

Listed in or Eligible for the National Register of Historic Places, National Park Service: All alterations (interior and exterior) to resources listed or eligible to be listed in the National Register of Historic Places are subject to state (SHPO) review. If federal funds are used, a federal review process (Section 106) is required. Exterior alterations to resources listed in the National Register require submittal of a City Alteration application prior to obtaining a building permit. In addition, proposed work may be subject to Campus Planning Committee Review.

Listed as a City Landmark, City of Eugene: Exterior alterations to City Landmarks require submittal of a City Alteration application prior to obtaining a building permit. In addition, proposed work may be subject to Campus Planning Committee review.

Listed in a Cultural Resources Survey (2008 Campus Heritage Landscape Plan Building and Landscape Resource Surveys or South University/Fairmount Neighborhood Cultural Resources Inventory): Primary-ranked (and sometimes secondary-ranked) resources are likely to be eligible for National Register listing. Refer to National Register discussion above. In addition, proposed work may be subject to Campus Planning Committee review.

Listed in the Oregon State Board of Higher Education (OSBHE) Report: Prime- and secondary-ranked resources are considered eligible for National Register listing (if they are not already listed). Refer to National Register discussion above. In addition, the proposed work may be subject to Campus Planning Committee review.

Summary of Regulations Governing Historic Properties

University of Oregon:

The university's *Campus Plan* states that all development projects must meet applicable policies and patterns including:

***Campus Plan* Policy 7: Architectural Style and Historic Preservation**

The continuity and quality of the university's campus environment are materially affected by the character and architectural style of the buildings. Furthermore, the university's historic buildings and landscapes, which are important defining features of the campus, are artifacts of the cultural heritage of the community, the state, and the nation.

To preserve the overall visual continuity and quality of the campus and as a commitment to the preservation and rehabilitation of identified historic resources, all construction projects shall follow the policy refinements below.

Policy Refinements:

Historic Preservation

- (a) When altering buildings and landscapes listed on the National Register of Historic Places or as a City Landmark, projects must follow the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*. (Refer to the attachments for a list of historic resources and a copy of the standards.)
- (b) When altering interior or exterior resources that are listed or eligible to be listed in the National Register of Historic Places, the university, through Campus Planning and Real Estate, will consult with the State Historic Preservation Office as appropriate.
- (c) When federal funds are used, projects must comply with the federal historic review process (Code of Federal Regulations, Section 106).

Historic Landscapes

- (a) These policy refinements address processes for identifying and documenting historic landscapes and provide a framework for making decisions about preferred preservation actions and future development. Refer to the Campus Heritage Landscape Plan, section "1.0 Landscape Preservation Guidelines and Description of Historic Resources" for further definition and a description of treatment approaches.
 - 1. Protect and steward the campus's historic landscapes in the context of an evolving university.
 - 2. Identify, evaluate, and consider preservation treatment for all potential historic landscapes—designated open spaces and others.
 - 3. Develop preservation treatment plans for open spaces determined to be historic.
 - 4. Select treatment approaches based upon significance, integrity, and contemporary goals for the space.
 - 5. Manage and maintain historic landscapes.
 - 6. Balance preservation and other contemporary needs of the university and region.
 - 7. Integrate historic landscape characteristics into new elements and areas.
 - 8. Document cultural landscape design interventions to leave a clear record of preservation and new design actions that will assist future preservation planning.
 - 9. Communicate and educate about the historic qualities of the campus landscape so they become part of the values, culture and intellectual resource of the university.

10. Integrate historic preservation goals into other related *Campus Plan* policies and subject-specific campus planning and maintenance documents.

Campus Plan Patterns (refer to the *Campus Plan* for pattern text)

The *Campus Plan* contains a number of patterns related to historic preservation including:

- Architectural Style
- Building Character and Campus Context
- Campus Quad and Historic Core
- Historic Landscapes

Also, the *Campus Plan* states that the Campus Planning Committee shall review projects that "... involve new construction or modifications of outdoor spaces, or interior spaces with significant public exposure." Typically, the Design Review Subcommittee of the Campus Planning Committee reviews small alterations.

The *Campus Plan* is available on line at:

<http://uplan.uoregon.edu/plandoc/CampusPlan/CampusPlan.html>

City of Eugene:

The City of Eugene has the strongest historic preservation regulations, but they apply to a limited selection of resources.

The city reviews proposed exterior alterations (as well as moving and demolition) to "Historic Properties." Historic properties are defined as resources listed in the National Register of Historic Places or designated by the city as a City Historic Landmark. The city's Historic Alteration application process must be completed prior to issuance of a building permit.

Other city land-use applications required as part of a project (e.g., Conditional Use and Site Review) also may address preservation of historic properties. Although the city's conditional-use and site-review criteria do not specify the need to preserve historic properties, the city may choose to address it in the criteria that requires compatibility of the proposed development's location, size, and design with surrounding properties.

State:

All state entities, including the UO, have an established responsibility to partake in historic preservation implementation measures. ORS 358.653 states:

Any state agency or political subdivision responsible for real property of historic significance¹ in consultation with the State Historic Preservation Officer (SHPO) shall institute a program to conserve the property and assure that such property shall not be inadvertently transferred, sold, demolished, substantially altered or allowed to deteriorate.

This state regulation requires all state entities to consult with the SHPO if proposed work might impact resources that are listed or eligible to be listed in the National Register of Historic Places.

"Consultation" is not clearly defined, but it usually includes SHPO review of the proposed development and recommendations to mitigate negative impacts on historic resources.² The UO must consider SHPO's recommendations but is not required to follow all of them. The process is designed to assist the UO in meeting its historic preservation responsibilities as a state agency.

SHPO typically includes primary- and secondary-ranked resources in the consultation requirements because they are usually considered eligible to be listed on the National Register of Historic Places. In 1974 the Oregon State Board of Higher Education approved the Report of the Ad Hoc Committee on

Properties of Historical and/or Architectural Value. The report identifies and ranks historic resources on each campus and specifies their preservation. Subsequent cultural resource surveys (2006 UO Cultural Resource Survey, the Ellis Lawrence Inventory, and the South University/Fairmount Neighborhood Cultural Resources Inventory) identify additional properties as having primary or secondary significance. Typically, the surveys are acknowledged by SHPO as part of the statewide inventory³.

Federal:

Federal regulations generally defer to state and local governments for implementation of historic preservation measures. The National Register of Historic Places determines a resource's significance but does not provide protection unless federal funds are being used. If a project uses any federal funds, a comprehensive review and mitigation process (Section 106) is required.

¹ A "real property of historic significance" includes but is not limited to "buildings listed or eligible to be listed on the National Register of Historic Places under section 101 of the National Historic Preservation Act of October 15, 1966 (16 U.S.C. 470a)." (ORS 276.093 (5)).

² The SHPO uses the Secretary of the Interior's Standards for the Treatment of Historic Properties to determine if proposed alterations are appropriate. See page 6.

³ The State Historic Preservation Officer (SHPO) "acknowledges" cultural resource surveys as part of the statewide inventory if they meet the SHPO's specified survey standards. Note: The 2006 UO Cultural Resource Survey was acknowledged by the City of Eugene but it has not been reviewed by SHPO.

Secretary of the Interior's Standards for Rehabilitation
(Department of Interior regulations, 36 CFR 67)

1. 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.
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.
3. Each property shall 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 architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
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.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
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 of the historic property and its environment would be unimpaired.

Note: The associated Guidelines for Rehabilitating Historic Buildings are available on the National Park Service web site <http://www2.cr.nps.gov/tps/tax/rhb/stand.htm>. The Guidelines describe how to apply the Standards.