

Tempe Historic Preservation Office

Using the Secretary of the Interior's Standards for Rehabilitation for Evaluating

CHANGES TO CRITERION C PROPERTIES

Adopted by the Tempe Historic Preservation Commission 01/14/2010

HPO update 12/12/2011 4:37 PM

BACKGROUND

Owners Karyn Gitlis and Philip C. Douglass have nominated their property at 1206 South Ash Avenue in the historic Park Tract subdivision for listing in the Tempe Historic Property Register. At a neighborhood meeting held by the Tempe Historic Preservation Commission on December 10, 2009, the commission requested additional information regarding change to the Douglass/Gitlis Residence beyond its 1935 period of significance. Change at this property has been made sensitively in ways that exemplify how an historic property can accommodate a contemporary lifestyle while preserving portions and features significant to its historic, architectural, and cultural values.¹

Tempe Preservation assists owners with managing change to their historic properties in ways that balance preservation objectives with continued viability and enhancement of value. The Douglass/Gitlis Residence is a case study of this balanced change. The property provides a model for determining impact of proposed additions to historic buildings and establishes important precedent for evaluating effects of change on properties nominated for historic designation and listing in the Tempe Historic Property Register.²



The Early Ranch Style Douglass/Gitlis Residence is significant as a rare example of a once common type: the pre-1941, wood-frame Early Ranch style house. Significance for the subject property is based on National Park Service (NPS) Criterion C – as it embodies distinctive characteristics of a type (early ranch), period (pre-1941), and method of construction (wood-frame residential). A property important for illustrating a particular architectural style or construction method must retain most of the physical features characteristic of the style or technique. Aspects of integrity which must be present for such property to remain eligible for historic designation under National Register Criterion C are; design, workmanship, materials, and feeling. Change to historic properties may be necessary to provide for efficient contemporary use. The way in which repairs and alterations are conceived and executed may determine if materials, features, or finishes that are important in defining historic character will be damaged or destroyed. The ability of a property to convey its significance is referred to as integrity. Integrity exists if critical character defining features of a property remain intact.^{3 4}

The Secretary of the Interior's Standards for Rehabilitation prescribe a method for long term maintenance of a property's historic significance through the preservation of characteristic materials and features. Rehabilitation is defined in the Standards as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values. Although the Standards were not created for evaluation purposes, they provide terminology, identify best practices, and offer a useful framework for assessing effects of change on the integrity of an historic property."^{5 6}

Standard 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. The historic Douglass/Gitlis Residence meets this standard through continued residential use of the property. Over time, rental units have been added at the rear of the property. Landscape screening in conjunction with strategic placement of whimsical landscape elements in the foreground of the rear yard act as focal points which, in combination with the lot depth and separation distance, leaves the historic residential feeling intact.

Standard 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 historic Douglass/Gitlis Residence meets this standard through conservation of character-defining features of the wood-frame Early Ranch style including the L-shaped plan, the low pitched gable end roof, the covered front porch without carport, the rectangular window openings, the steel casement windows divided to emphasize the horizontal dimension, and the wood siding on walls and gable ends. Ornamental detailing remains limited to scalloped gable end siding and vents and grouped porch posts. Change has minimized removal of historic materials and avoided alteration of character defining features.

Standard 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. The historic Douglass/Gitlis Residence meets this standard by respecting the historic design. Design is the combination of elements that create the form, plan, space, structure, and style of a property and results from conscious decisions made during the original conception and planning of a property or its significant alteration. Property alterations have added and subtracted spaces. Additions were made for a master bath and library, and an early garage was moved to the rear of the property. However, the critical front yard setback remains unaltered, and the front façade looks essentially as it did originally. As a final test of integrity, the original owners could return to find this property at once familiar and easily recognizable.⁷

Standard 4 – Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved. This standard does not currently apply to the historic Douglass/Gitlis Residence. Extant change dates from before 1984 to 2000, while the period of significance of the property is 1935, the year of original construction.⁸

Standard 5 – Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved. The historic Douglass/Gitlis Residence meets this standard through conspicuous conservation of workmanship. The Early Ranch style was a final manifestation of the craftsmen builders who would soon be replaced by a process of production home building and its often substandard fabrication. By 1945, prefabrication and assembly line techniques would increasingly remove skilled tradesmen from the job site. Although Early Ranch style properties downplay evidence of craftsmanship more than elaborately detailed styles from earlier periods, skill on the construction site was still very much in evidence in individual site-built components and in the property as a whole. Change has not altered the integrity of workmanship manifest in critical character defining features and the cumulative effect heightens the sense of craftsmanship which is a hallmark of this property.

Standard 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 historic Douglass/Gitlis Residence meets this standard by maintaining a preponderance of physical features that, taken together, convey the property's historic character. Adequate and timely maintenance has largely eliminated the need for replacement of major features. In one case, when insect damage made it necessary to replace porch posts, new members matched existing. Retention of design, workmanship, and materials combine at this location to provide the feeling that this property is clearly expressive of the Early Ranch style aesthetic and offers a sense of what life was like in Tempe in 1935.

Standard 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. This standard does not currently apply to the historic Douglass/Gitlis Residence.

Standard 8 – Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken. This standard does not currently apply to the historic Douglass/Gitlis Residence.

Standard 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. Determining an appropriate balance between differentiation and compatibility is subjective and has caused inconsistency, frustration, and concern throughout the preservation community. NPS guidance for design of new additions, exterior alterations, or related new construction emphasizes the relationship of new work to the historic building as well as to the historic district or neighborhood. NPS states new work may be contemporary or may reference motifs from the historic building, but it should always be clearly differentiated from the original design yet be compatible in terms of mass, materials, solids to voids ratios, and color.

New additions, exterior alterations, or related new construction are conceived along a continuum of design alternatives ranging from concepts so modern as to offer only token compatibility to solutions so similar to the original work that a false sense of historical development would be practically unavoidable. Between these extremes lies a middle range of appropriate architectural alternatives. Standard 9 does not suggest where the balance between differentiation and compatibility should be placed, however, which leaves broad latitude for individual tastes in interpretation. Although direction on design sensibility is (and perhaps should be) somewhat ambiguous, standard nine does offer some specific advice.⁹

New additions, exterior alterations, or related new construction are not required to be contrasting in character or period style; Standard 9 merely requires differentiation and compatibility in order to protect the historic integrity of the property and its environment. Implicit in consideration of the property in its setting is the concern in Standard 9, as across all standards together, for maintaining a harmonious relationship between the altered historic property and its overall physical context. The small houses in the historic Park Tract subdivision derive their beauty to some degree from their setting, and it is this unique sense of place created by distinguishable neighborhood character that brings broad-based community recognition of the historic significance to the subdivision. Uniform front yard setbacks along with consistent spacing between the homes and similar lot area coverage apparent from the public right of way maintains integrity of the historic setting and enhances feeling and association of the individual properties. *"The small house must depend on its grouping with other houses for its beauty, and for the preservation of light, air, and open space."* – Clarence Stein¹⁰

NPS guidance for interpreting Standard 9 states that new work should not overwhelm or dominate the historic character of the property as a whole or alter the property's character-defining features, including significant open space. That a uniform front yard setback was initiated without a zoning development standard and voluntarily maintained throughout the 35 year period of significance of the Park Tract subdivision testifies to the importance this has for tying a wide range of architectural styles and property types together. Change at the historic Douglass/Gitlis Residence has added and subtracted space from the historic house, and rental units have been created at the rear of the property; however, the critical front yard setback remains unaltered.

The historic Douglass/Gitlis Residence has had two principal additions: a Library rebuild on the back of the house circa 1990 added less than 100 square feet, and a Master Bath extension on the south side of the house circa 2000 added less than 200 square feet. NPS guidance cautions that out-of-scale additions, rooftop additions, and additions that obscure principal elevations are particularly problematic unless they are stepped back and appear small in scale. Certainly, these modest additions could not be considered out of scale with the original Early Ranch style house. Consistent with NPS direction, these additions do not obscure principal elevations and have been offset from the planes and surfaces of the original construction to provide additional differentiation. The roof of the master bath addition steps down and, along with the exterior walls, back from the historic house. In contrast, the roof of the library addition steps up and, along with the walls, projects out from the rear of the house. The additions do not hide the principal façade from the public right of way and other significant viewpoints, or change the perceived orientation of entrances consistent with NPS guidance. Design aspects typifying the Early Ranch style are present in abundance and continue to maintain this aspect of integrity. Finally, the additions utilize materials and workmanship to further reinforce design decisions that balance differentiation and compatibility and realize appropriate architectural expression.¹¹

Standard 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. Reversibility in attaching an addition or installing adjacent or related new construction means that if the new work were to be removed in the future, the essential form and material integrity of the historic property would remain intact. Of course work cannot be determined to meet the intent of Standard 10 simply because, although it is unacceptable, it can be undone. The historic Douglass/Gitlis Residence meets this standard through touching the historic fabric gently. Rather than removing walls, additions made connections to the historic building by enlarging existing window or door openings. Removal of the master bath addition would leave the historic roof unaffected, whereas removal of the library addition would require replacement of sheeting and shingles, but would leave only minor physical record of the change.

In Arizona we are fortunate to have policy available from the State Historic Preservation Office that addresses the continued eligibility of a property in consideration of change to integrity over time. This guidance was prepared by the Arizona SHPO and adopted by the Arizona Historic Sites Review Committee to aid in evaluating integrity and determining eligibility for buildings being nominated to the Arizona or National Registers of Historic Places under Criterion C (our case study). The SHPO keeps the focus on the primary facade and evaluation of exterior integrity is considered to be primary. The SHPO states either the historic wall materials and details must be intact and visible, or the historic massing and openings (doors and windows) must be intact and visible. If both are absent or hidden behind non-historic materials the building will be ineligible for lack of integrity. This requirement has caused the policy to be recognized as the “two-strikes-you’re-out rule” by the local preservation community. Finally the SHPO provides that as part of a comprehensive evaluation the age and rarity of the resource will be addressed within an historical context, and a comparison with other similar properties will consider that the older or rarer the property, the less integrity will be required for eligibility.¹²

Eligibility for historic designation and listing in the Tempe Historic Property Register of the historic Douglass/Gitlis Residence has been determined based on HPO finding that change made outside the 1935 period of significance has been appropriately conceived and skillfully executed so as to leave the integrity of the property intact. Additions have been sensitively designed and achieve comfortable balance of differentiation from, and compatibility with, the original form and fabric of the historic Early Ranch style house. Scarcity of the property type coupled with the extreme relative age of the property allowed some latitude in evaluating integrity in accordance with NPS guidance. Scarcity, age, and comparison with the only known contemporaneous example of the type were factors in the determination of eligibility.^{13 14 15}

As a side bar to this report, HPO has adapted ten general principles for evaluating the impact of a proposed addition on an historic building or for determining the significance of an existing addition to a property proposed for designation and listing in the Tempe Historic Property Register. This adaptation is based very closely on a working draft prepared by NPS historian Linda McClelland titled “Evaluating the Significance of Additions and Accretions: A National Register White Paper.” HPO offers these standards for consideration by the commission as an aid to their review of the historic Douglass/Gitlis Residence. Adoption of review standards by the commission is recommended as a future agenda item.¹⁶

ENDNOTES – [reader note that the online document provides functional hyperlinks](#)

¹ Tempe HPO 12/10/09 Research Report to the Historic Preservation Commission HPC Neighborhood Meeting online at: <http://www.tempe.gov/historicpres/Designations/DouglasGitlisResidence/DGR-HPO-Research.pdf> “Tests for integrity are documented in this report which provides the HPO preliminary determination of eligibility. At this time, no comprehensive inventory exists to identify whether the subject property represents the single best example of the type and neither is that determination necessary to reach a finding of eligibility based on National Park Service guidance.”

² Tempe City Code Chapter 14A Historic Preservation Ordinance Section 14A-1 - Purpose and Intent: online at <http://www.tempe.gov/citycode/14aHistoricPreservation.htm> “The intent of historic property designation is to provide protection for significant properties and archeological sites which represent important aspects of Tempe's heritage; to enhance the character of the community by taking such properties and sites into account during development, and to assist owners in the preservation and restoration of their properties.”

³ Arizona State Historic Preservation Office - Garrison Integrity Matrix online at: http://www.tempe.gov/historicpres/GLOSSARY_PAGES/GarrisonIntegrityMatrix.pdf Arizona State Historic Preservation Officer Jim Garrison developed a matrix to quickly identify aspects of integrity which must exist in a generalized application based on property type and eligibility criteria. This chart indicates which of the seven aspects of integrity (location, design, setting, materials, workmanship, feeling, association) must be present for different property types to be eligible under various criteria. For the case at hand enter the chart at criteria “C – Design/Construction” and move across to the column for the property type “Building.” The matrix indicates four of the seven aspects of integrity must be present to maintain the integrity of a building that has significance under Criteria C: Design, Workmanship, Materials, and Feeling.

⁴ National Park Service Technical Preservation Services (TPS) Incentives! online at: <http://www.nps.gov/history/HPS/TPS/tax/incentives/index.htm> “Rehabilitation, by definition, involves change. The more important a feature or area is to the historic character of a property, the less it can be changed without damaging character as a whole. On the other hand, aspects less critical to historic character may sometimes be altered substantially with little overall effect. But historic character is far more than simply visual effect. Historic character is dependent upon the property's material integrity, that is, its surviving historic material. If too much historic material is replaced with new material during rehabilitation, the historic character of a building is inevitably lost along with its material integrity. While new material can exactly copy significant features, material integrity itself can never be re-created. The precise replication of features with new materials may produce a building that looks like a historic building, but without retention of historic materials, the project will not meet the Secretary of the Interior's Standards for Rehabilitation.”

⁵ National Park Service Secretary of the Interior Standards for Rehabilitation online at: <http://www.nps.gov/history/hps/TPS/tax/rhb/stand.htm> “The intent of the Standards is to assist in the long-term preservation of a property's significance through the preservation of historic materials and features. As stated in the definition, the treatment “rehabilitation” assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features or finishes that are important in defining the building's historic character.”

⁶ National Park Service Guide to Federal Historic Preservation Tax incentives online at: http://www.nps.gov/history/HPS/TPS/tax/incentives/standards_4.htm# “The Secretary of the Interior's Standards for Rehabilitation are ten principles to follow when planning rehabilitation work on a historic building. By emphasizing repair over replacement and accommodating reasonable change for new uses, they seek to ensure the preservation of those qualities which are important to the building's historic

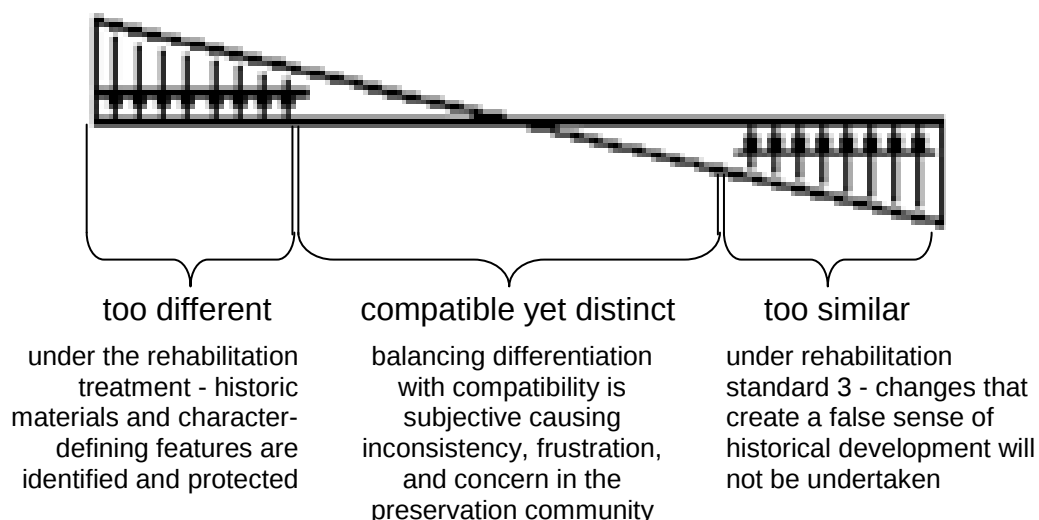
character. Because rehabilitation focuses on successfully adapting historic buildings for contemporary uses, it may be considered somewhat more flexible than more traditional treatments, such as preservation and restoration. But even though rehabilitation allows for more change, a historic building's distinctive materials, features, and spaces still must be preserved.”

⁷ Karyn Gitlis email sent: Fri 12/18/2009 11:08 am to: Joe Nucci, subject: Re: Discussion of Changes at the 1935 Douglass / Gitlis Residence (on file at Tempe HPO). “Property purchased in 1985, current owners have done maintenance, made repairs, and constructed alterations to the property over 25 years. Throughout the process of designation and listing, owners have graciously accommodated staff on their property and shared their experiences as stewards of this important community cultural resource. Documentation of change provided by the owners identified the following range of dates – garage relocated to rear of property by previous owners (date unknown), back door porch cover was replaced by current owners circa 1984, library addition circa 1990 replaced work done by previous owners (date unknown), insect-damaged front porch posts replaced circa 1993, addition on south side of house from drawings dated 1990 by Michael Wilson Kelly, Architect, project completion circa 2000.”

⁸ Ibid

⁹ Tempe HPO adapted from Arizona State Historic Preservation Officer Jim Garrison 2009, *Secretary Standard For Rehabilitation Number Nine Differentiation Vs. Compatibility* online at: <http://www.tempe.gov/historicpres/Designations/NPS-SOFI-STD-9.pdf> Arizona SHPO Garrison diagrammed the range of interpretations possible under a standard which is insufficiently specific to produce a uniform and predictable outcome. He suggested that within the extremes of interpretations lies a range of design solutions representing appropriate balance between differentiated and compatible change. Garrison indicated these mid-range alternatives are most capable of producing the harmonious relationship between old and new which the standards as a whole prescribe.

[Secretary of the Interior's Standards for Rehabilitation \(Standard 9\)](#)



¹⁰ Clarence S. Stein, FAIA http://www.aia150.org/aw_gm_1956.php Quote: “A small house must depend on its grouping with other houses for its beauty, and for the preservation of light, air and the maximum of surrounding open space. The house itself is of minor importance. Its relation to the community is the thing that really counts.” Clarence Stein to Alfred K. Stern, September 15, 1930 (quoted in “The Rise of the Community Builders: The American Real Estate Industry and Urban Land Planning” By Marc A. Weiss. New York: Columbia University Press, 1987).

¹¹ Tempe HPO 01/14/2010 Staff Summary Report to Historic Preservation Commission at Public Hearing <http://www.tempe.gov/historicpres/Designations/DouglassGitlisResidence/SSR-DGR->

[PublicHearingHPC.pdf](#) “The 1935 Early Ranch Style Douglass/Gitlis Residence is significant as one of the earliest examples of frame Early Ranch style houses in Tempe. A rare example of the early use of wood frame construction in this style, where masonry construction was far more typical, the property survives as a solid example of its type and makes a positive contribution to the character of the streetscape in the historic Park Tract subdivision. Two rental units located at the rear of the property are non-contributing features of the property because they were constructed after the period of significance (1935) and therefore are recommended to not be subject to future design review by Tempe Preservation.”

¹² Arizona State Historic Preservation Office - Policy Statement For Recommendations Of Eligibility May, 1992 http://www.tempe.gov/historicpres/Designations/SHPO_Policy_Eligibility_Integrity.pdf “Because the Arizona Heritage Fund initiative allows funds to be awarded to properties listed or determined eligible for listing in the National Register, the question arises as to how and by whom can these determinations be made, and under what conditions can these determinations be applied to properties with questionable integrity but demonstrable restorability? This question becomes more complex as one evaluates the wide range of integrity of listed properties, the evolution of the sheathing issue, and variations in viewpoint between National Register policy, Tax Act review policy, and Certified Local Government (CLG) Design Review Ordinance policy. The recent final edition of NPS Bulletin 15 gives us the clearest picture of the current Federal position on these issues (See Chapter VIII). Under the heading ASSESSING INTEGRITY IN PROPERTIES it states integrity is based on significance which is established in the nomination. The steps in assessing integrity are: Define the essential physical features that must be present for a property to represent its significance. Determine whether the essential physical features are visible enough to convey their significance. Determine whether the property needs to be compared with similar properties. Determine based on the significance and essential physical features, which aspects of integrity are particularly vital to the property being nominated and if they are present.”

¹³ National Park Service, Bulletin (15): How To Evaluate The Integrity Of A Property online at: http://www.nps.gov/history/NR/publications/bulletins/nrb15/nrb15_8.htm “Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.” Integrity of design is a condition precedent to the proposed nomination.

¹⁴ Tempe HPO Research Report to Historic Preservation Commission 12/10/09 online at: <http://www.tempe.gov/historicpres/Designations/DouglassGitlisResidence/DGR-HPO-Research.pdf> “The 1935 Early Ranch Style Douglass/Gitlis Residence is in the ninety-ninth percentile ($n = 149/53,665 = 99.9972$) of Tempe properties in terms of age. Accordingly, this property is considered to survive as a significant representative – or a “rare example” of a once common type – Early Residential Architecture in Tempe, Arizona; 1871-1941. Of further significance, the historic 1935 Douglass/Gitlis Residence is one of the first examples of frame Early Ranch style houses in Tempe. An uncommon example of the use of wood frame construction in the Early Ranch style, where houses were typically constructed of masonry materials, this property survives as a best example of its type and provides a positive contribution to the historic Park Tract streetscape. Research in this report develops the significance of the property in the context of Residential Architecture in Tempe, Arizona 1935, and other relevant historic contexts.”

¹⁵ Tempe HPO Interview with Philip C. Douglass (owner) 11/18/2009: Michael Wilson Kelly - Architects, Ltd. an award winning small firm specializing in projects of all types: historical, cultural, recreational, and residential designed the addition to the master bath. Kelly served on the Tempe Historic Preservation Commission as a volunteer member and is well versed in the Secretary of the Interior's Standards for Rehabilitation. Kelly received the Governor's Award for Historic Preservation in 1994 and a Certificate of Appreciation from the Tempe Historic Preservation Commission in 1998. Kelly's

philosophy is “modernist to historical – the beauty of architecture is in its honesty, stability, and harmony.” see also MWK online at <http://mwkarch.com/>

STANDARDS FOR EVALUATING ADDITIONS TO HISTORIC PROPERTIES

¹⁶ McClelland, Linda 4-20-08, Evaluating the Significance of Additions and Accretions: A National Register White Paper online at: http://www.nps.gov/history/nR/publications/guidance/NR_workshop_3-11-09/White_paper_on_additions_4-09.doc “This paper is intended to supplement not replace information in the National Register Bulletins and other NPS publications. If discrepancies are found between this paper and other NPS publications, the guidance in existing publications should be considered correct.” HPO offers the following adaptation of standards for evaluating additions proposed for historic properties or for determining the effect of existing additions on historic integrity for consideration by the Tempe Historic Preservation Commission:

1. An addition should fall within the period of significance, and, in some cases, its date of construction may be used as the closing date of an extended period of significance.
2. New additions, exterior alterations, or related new construction should be sympathetic to the original design (i.e. stylistically appropriate, sensitively rendered, compatible in size and scale, similar or compatible materials).
3. New additions, exterior alterations, or related new construction should consider the cumulative effect of the change along with other changes that have been made or are proposed (window replacement, siding, etc.).
4. New additions, exterior alterations, or related new construction that is not sympathetic in design must not substantially damage the historic property unless it has historic importance in its own right.
5. New additions, exterior alterations, or related new construction should not mimic the historic design to the extent that it becomes indistinguishable from the original building and thereby conveys a false sense of history. (*Exceptions are some additions to the 1920s to 1940s period revival style properties which represent recognized patterns of period design called for by thematic styles*).
6. New additions, exterior alterations, or related new construction should not overwhelm or dominate the historic character of the property as a whole or alter the property's character-defining features including significant open space.
7. New additions, exterior alterations, or related new construction should not be out-of-scale; rooftop additions and additions that obscure principal elevations are particularly problematic unless they are stepped back and appear small in scale.
8. New additions, exterior alterations, or related new construction should not hide a building's principal façade from the public right of way and other significant viewpoints, or change the perceived orientation of entrances.
9. New additions, exterior alterations, or related new construction should not impair significant or character-defining features of the historic resource.
10. New additions, exterior alterations, or related new construction should not impact the front-yard setback to protect the historic integrity of the property and its environment.