



**HISTORIC PRESERVATION COMMISSION - REGULAR SESSION
COMMUNITY ROOM 2, 2ND FLOOR, BLOOMINGTON PUBLIC LIBRARY
205 E. OLIVE ST., BLOOMINGTON, IL 61701
THURSDAY, MARCH 20, 2025, 5:00 PM**

1. Call to Order

2. Roll Call

3. Public Comment

Individuals wishing to provide emailed public comment must email comments to publiccomment@cityblm.org at least 15 minutes before the start of the meeting. Individuals wishing to speak in-person may register at cityblm.org/register at least 5 minutes before the start of the meeting.

4. Consent Agenda

Items listed on the Consent Agenda are approved with one motion; Items pulled from the Consent Agenda for discussion are listed and voted on separately.

- A. Review and approval of the minutes of the November 21, 2024, regular meeting of the Bloomington Historic Preservation Commission. (Recommended Motion: Motion to accept the minutes, as presented.)

5. Regular Agenda

- A. **BHP-02-25** - Consideration, review and action on a request submitted by Jim Neeley, for a **Certificate of Appropriateness** for planter box replacement on the property located at 33 Sunset Road, PIN 14-34-402-016. (Recommended Motion: Motion to approve or deny the scope of work and request for a Certificate of Appropriateness, with or without conditions.)

6. Old Business

- A. Update on downtown fire suppression status research (Downtown Streetscape Phase 1+) (Recommended Motion: None; presentation and discussion only.)

7. New Business

- A. Discussion and planning for Heritage Awards 2025. (Recommended Motion: Motion to form a two-member Awards Subcommittee. Motion to elect or appoint two (2) Commission members to the Awards Subcommittee.)
- B. Presentation and discussion on Lead Based Paint Abatement rules, recommendations, costs, and barriers. (Recommended Motion: None; discussion only.)

8. Adjournment

Individuals with disabilities planning to attend the meeting who require reasonable accommodations to observe and/or participate, or who have questions about the accessibility of the meeting, should contact the City's ADA Coordinator at 309-434-2468 or mhurt@cityblm.org.



REGULAR AGENDA ITEM NO. 4.A.

FOR HISTORIC PRESERVATION COMMISSION: March 20, 2025

WARD IMPACTED: City-Wide Impact

SUBJECT: Review and approval of the minutes of the November 21, 2024, regular meeting of the Bloomington Historic Preservation Commission.

RECOMMENDED MOTION: Motion to accept the minutes, as presented.

STRATEGIC PLAN LINK:

Goal 1. Financially Sound City Providing Quality Basic Services

STRATEGIC PLAN SIGNIFICANCE:

Objective 1c. Engaged residents that are well informed and involved in an open governance process

BACKGROUND: In compliance with the Open Meetings Act, Commission Proceedings must be approved thirty (30) days after the meeting or at the second subsequent regular meeting whichever is later.

COMMUNITY GROUPS/INTERESTED PERSONS CONTACTED: N/A

FINANCIAL IMPACT: N/A

Respectfully submitted for consideration.

Prepared by: Alissa Pemberton, City Planner

ATTACHMENTS:

[Draft HPC Minutes 2024-11-21](#)

[HPC Minutes 2024-11-21 Exhibit A](#)

[HPC Minutes 2024-11-21 Exhibit B](#)

[HPC Presentation 2024-11-21](#)



DRAFT MINUTES
HISTORIC PRESERVATION COMMISSION - REGULAR SESSION
THURSDAY, NOVEMBER 21, 2024, 5:00 PM

The Historic Preservation Commission was called to order by Vice Chair Scharnett and convened in regular session at 5:00 PM, November 21, 2024.

Roll Call

Attendee Name	Title	Status
Greg Koos	Commissioner	Present
Paul Scharnett	Commission Vice Chair	Present
Sarah Lindenbaum	Commission Chair	Absent
Dawn Peters	Commissioner	Absent (Arrived at 5:05 PM)
Mark Adams	Commissioner	Present (Left at 6:05 PM)
Emma Meyer	Commissioner	Present
John Elterich	Commissioner	Present

City Staff present included Kelly Pfiefer, Director of Development Services; Jon Branham, City Planner; Alissa Pemberton, City Planner; John Myers, Assistant City Planner; Laura Keeran, Stevenson Fellow; Samantah Mlot, Economic Development Advocate.

Public Comment

No public comment was provided.

Consent Agenda

Items listed on the Consent Agenda are approved with one motion; Items pulled from the Consent Agenda for discussion are listed and voted on separately.

Item 4.A. Review and approval of the minutes of the September 19, 2024, regular meeting of the Bloomington Historic Preservation Commission.

Commissioner Koos stated that he will abstain from the vote, because he was not present at the October Historic Preservation Commission meeting.

Commissioner Elterich stated his name was misspelled in multiple times throughout the draft minutes. Ms. Pemberton responded Staff will correct the mistakes.

Commissioner Elterich made a motion, seconded by Commission Vice Chair Scharnett, to approve the consent agenda as amended.

AYES: Scharnett; Elterich; Meyer; Adams

ABSTAIN: Koos

Motion passed (viva voce).

Commissioner Peters arrived at 5:05 PM.

Regular Agenda

The following item was presented:

Item 5.A. **BHP-36-24** - Consideration, review, and action on a request submitted by the Bloomington Historic Preservation Commission for **Demolition Review**, as required by § 44-1711 of the Bloomington City Code, for a structure located on the property commonly known as 604 IAA Drive, PIN 14-35-377-022.

Ms. Pemberton presented the staff report. She stated the A-Frame structure was built in the 1960s and designed for restaurant use. The structure saw a variety of uses throughout its history, most recently being used as a title loan establishment, which closed several years ago. She noted the current property owner attempted to use the structure for a restaurant use, however the structure type is very restrictive and makes reuse costly and difficult. Ms. Pemberton stated Chair Lindenbaum's preliminary review found the structure is potentially significant, because of its period architecture and cultural significance. Staff found that the structure is locally unique but does not rise to a level of specialty that merits designation.

Vice Chair Scharnett asked when the building was constructed. Ms. Pemberton responded 1968.

Vice Chair Scharnett opened the public hearing.

Nicolas Canchola (property owner) stated he believes it is best to tear down and start with a new building. He noted the surrounding area would benefit with a new commercial building.

Vice Chair Scharnett asked about other potential uses to occupy the building. Mr. Canchola responded that the building is very old and cannot support their goals. He stated he discussed with different contractors, and they concluded the structure is not able to support the heavy equipment needed for their proposed use.

Ms. Pemberton clarified they purchased the property to move their existing restaurant from the nearby location on Empire.

Commissioner Koos inquired about the occupancy of the restaurant. Mr. Canchola responded that they anticipate under 100 people. He noted the business model has shifted with the increase in DoorDash and to go orders.

Commissioner Meyer inquired about an addition to allow reuse. Ms. Pemberton stated staff can discuss after the public hearing. Mr. Canchola had no additional testimony to provide.

Vice Chair Scharnett closed the public hearing.

Ms. Pemberton stated that there is really no room on the site for an addition. Almost any decent sized addition would trigger stormwater detention requirements, which would take

up more space, then make meeting off-street parking requirements difficult, or would require it to be buried which would result in a level of expense that would kill the project.

Vice Chair Scharnett inquired about the maximum lot coverage for the site. Mr. Branham responded there is not a maximum lot coverage, but given setbacks, landscaping, and other requirements, using the site to its highest and best use is difficult with the current building.

Vice Chair Scharnett explained restaurant planning can be difficult and elaborated on some of the Building Coder requirements. Mr. Canchola provided a high-level overview of the new proposed site design.

Commissioner Meyer inquired about structural issues with the building. Mr. Canchola stated he does not think it is safe for use and definitely can't handle the increased weight of the roof-mounted equipment needs to be upgraded.

Vice Chair Scharnett asked the Commission to review each of the criteria for designation.

The Commission found that the structure has some merit based on the following: Its character, interest, or value as part of the development, heritage, or cultural characteristics of the City, County of McLean, State of Illinois, or the United States of America (the Nation); Its embodiment of elements of design, detailing, materials, or craftsmanship that render it architecturally significant; Its embodiment of design elements that make it structurally or architecturally innovative; and Its unique location or singular physical characteristics that make it an established or familiar visual feature.

During the Commission discussion they discussed the structure as moderately significant but not fitting the Route 66 esthetic, and its branded design as common. In terms of suitability for restoration, the building is not in great shape and would be difficult to restore. The Commission discussed how to commemorate the local uniqueness of the red roof that the community is used to seeing. At minimum the building should be documented, and copies of photographs and documents should be provided to the History Museum.

Commissioner Peters made a motion, seconded by Commissioner Elterich, to find that the building is moderately significant, based on criteria its historical and cultural significance for the City, the design, its architectural significance, structural design, and unique location, but is not suitable for preservation or restoration.

Roll call.

AYES: Scharnett; Koos; Peters; Elterich; Meyer; Adams

Motion passed.

Commissioner Peters made a motion, seconded by Commissioner Adams, to not oppose the Demolition required for the structure located on the property at 604 IAA Drive, with the condition that the structure is documented, as discussed.

Roll call.

AYES: Scharnett; Koos; Peters; Elterich; Meyer; Adams

Motion passed.

The following item was presented:

Item 5.B. Discussion of grant and incentive possibilities for Downtown Bloomington, including asbestos remediation and fire suppression sprinkler systems, as requested by Vice-Chair Scharnett.

Ms. Pemberton stated she expanded this discussion topic, because there are several items that need to be discussed together. She noted vacancy issues and accessibility issues. She noted the streetscape phasing plan and described the work that they will be doing.

Mr. Myers described the “Downtown Dashboard” that Planning Staff and Building Safety have been working on. He stated that this dashboard looks at the water service lines, existing fire suppression systems, and existing uses to identify potential opportunities for upsizing water supply lines to support redevelopment that may require sprinkling. He noted the dashboard only looks at Phase 1 of the Streetscape Plan so far, but Staff is working on including all of downtown. Some of the key takeaways from this first analysis are that 81% of building with residential units do not have fire suppression and many of the service line sizes do not have the capacity to support fire suppression systems.

Vice Chair Scharnett provided background on why he brought this up as a discussion item. He stated other communities have been providing grants for property owners to revitalize downtown. He noted that Building Code will require fire suppression systems. Mr. Myers noted that there is Federal Fire Sprinkler Tax Incentive program that Ms. Pemberton forwarded to the Commission members.

Commissioner Koos asked if there are any buildings with up-to-date fire suppression systems. Mr. Myers he was not aware, specifically, but that they are cataloged in the GIS viewer. He added that likely less than 25% of buildings have fire suppression systems.

Vice Chair Scharnett stated that he brought this conversation to the Commission because past projects have stated that the Historic Preservation Commission does not provide enough of an incentive. He added, in his professional experience, many downtown business owners cannot find the funding for retrofitting and reuse of their buildings due to new codes and requirements. He noted that this particularly affects smaller developments and projects.

Vice Chair Scharnett shared emails and comments from downtown business owners, which reiterated the difficulty to redevelop downtown due to funding issues (Exhibits A & B).

Ms. Pemberton explained the vacancy information on the map, noting the partially vacant properties are typically vacant above the first floor.

Ms. Pemberton stated the biggest hurdle will likely be identifying funding sources for incentives. Noting the Rust Grant, as written, could be used to funding asbestos, fire suppression, and other similar projects, but demand is already above funding availability.

Commissioner Peters asked if there are any non-city grants that would be available for business owners. Ms. Pemberton responded that the City could administer any grants acquired, however, the Commission would need to identify and draft these opportunities.

Commissioner Koos stated there are similar issues with historic residential structures and we need to include our S-4 properties in the discussion.

Vice Chair Scharnett noted there are many ways to make a building compliant, but the addition of sprinkler systems is one of the fastest ways to compliance. He stated, overall, fire suppression is the number one priority, with asbestos being a close second because, in order to address internal infrastructure for water/sewer/sprinklers, you frequently encounter asbestos you have to address rather than compartmentalize.

Commissioner Koos inquired about the possibility of trading streetscape funds for the improvements of life safety aspects in structures. Ms. Pemberton responded that a large part of the Streetscape Plan is addressing existing infrastructure systems, including vault removal and the potential increase in water supply line capacity, that will result in improvements to building condition and life safety. Ms. Pfiefer added that the project is focused on work in public right-of-way and the funds could not be used for private property.

Vice Chair Scharnett inquired about the process to request additional funds. Ms. Pfiefer stated the City is projecting a large deficit and it is unlikely additional funds will be allocated.

Commissioner Koos asked why the responsibility to review and fund this work falls onto the Historic Preservation Commission, because a healthy downtown has a significant impact on the tax base and property values. Vice Chair Scharnett responded that if buildings are unoccupied, they are unable to work on preservation and restoration work on those building. Commissioner Koos noted that if we want more funding, we need to provide a larger context and help administration understand the implications of building condition to the tax base.

Ms. Pemberton inquired about changes that need occur to address the issues being discussed. Vice Chair Scharnett stated new residences inside historic buildings just can't be built without sprinklers; other modifications that would be required to meet the points-based compliance pathway would be more costly and complex. Life safety aspects of the Building Code are there for a reason and changing wouldn't be possible or recommended, but the Commission and the City need to be thinking about how to fund and address improvements long-term, because many of the downtown structures that are not formally vacant are significantly underutilized and will require improvements to life safety codes to remain usable and financially viable in the future.

Ms. Pemberton made an appeal to the Commission for assistance in identifying and applying for funding, from external sources, for the work they have identified as necessary. The Commission discussed alternate sources of funding and cost reduction that may be available. Commissioner Koos stated there may be an opportunity to gain a small grant from Landmarks Illinois to conduct a study to identify additional funding sources and evaluate the larger issue. He stated he will contact Landmark Illinois.

Ms. Pemberton provided information for the Developer-focused training on historic property processes, begin planned in collaboration with Normal. She stated she hopes the training can take place in the spring.

Commissioner Koos inquired about the Rust Grant Guidelines. He asked if they need to be changed to accommodate the recent discussion. Ms. Pemberton responded the guidelines do not need to change and the projects discussed could already be interpreted as allowed.

Commissioner Adams left at 6:05 PM.

The following item was presented:

Item 5.C. Discussion of process and priorities for identifying and surveying City-Owned Historic Structures, as requested by Chair Lindenbaum.

Vice Chair Scharnett requested a motion to table this discussion item until the next regularly scheduled meeting.

Commissioner Elterich made a motion, seconded by Commissioner Koos, to table Item 5.C. Discussion of process and priorities for identifying and surveying City-Owned Historic Structures, as requested by Chair Lindenbaum, until the next regular meeting.

Roll call.

AYES: Scharnett; Koos; Peters; Elterich; Meyer

Motion passed.

New Business

Commissioner Koos recommended the Commission members become members of Landmarks Illinois. He requested staff include the information in the next meeting packet.

Adjournment

Commissioner Peters made a motion, seconded by Commissioner Elterich, to adjourn the meeting.

AYES: Scharnett; Koos; Peters; Elterich; Meyer

Motion passed (viva voce).

The Meeting Adjourned at 6:19 PM.

CITY OF BLOOMINGTON

Paul Scharnett, Vice Chair

Alissa Pemberton, Staff Liaison

HPC Minutes 2024-11-21 Exhibit A

Alissa Pemberton

From: Paul Scharnett <[REDACTED]>
Sent: Wednesday, March 12, 2025 10:25 AM
To: Alissa Pemberton
Subject: FW: Downtown

From: Mike [REDACTED] >
Sent: Thursday, November 21, 2024 10:11 AM
To: Paul Scharnett <[REDACTED]>
Subject: Downtown

Paul

[REDACTED]

Following up on our conversation yesterday, similar to exterior façade grants, having some incentives to assist with asbestos abatement and fire protection upgrades could be very beneficial in developing old facilities in downtown. These improvements are required for the health, safety, and long-term viability of our downtown area. However, they can have significant financial burdens for property owners, often times being too costly to justify pursuing, therefore halting the development. A proactive partnership between municipalities and property owners could help resolve these burdens.

Every project is different and some of the larger re-developments have been able to absorb these costs, but not always. To me, the biggest hurdle is for the small business owners with smaller properties as they face a large challenge. For a small business to invest in downtown, they need a manageable point of entry and unfortunately the condition of a lot of the structures requires a financial investment that they can't afford. Asbestos abatement is extremely expensive. Adding fire protection isn't always simple. When adding these systems to old buildings, there are a lot of factors that increase costs, such as brick walls are not insulated enough causing concerns of frozen pipes, not being able to access all areas that are required by code to be covered that require additional structure to achieve, etc..

Making these types of improvements help to increase the marketability and long-term value of downtown properties and can help preserve the character and historical significance of downtown. [REDACTED] has made a commitment to be a Community Builder and have been a part of developing/managing several downtown properties. We want our community to thrive and believe that improving these properties will help ensure that downtown remains attractive to prospective tenants, businesses, and investors.

It is expensive to re-develop these properties and too many times, the costs outweigh the vision. Helping to solve this hinderance could go a long way in helping our downtown be a more vibrant and thriving area that attracts businesses, residents and visitors.

Mike [REDACTED]

HPC Minutes 2024-11-21 Exhibit B

Alissa Pemberton

From: Paul Scharnett <[REDACTED]>
Sent: Wednesday, March 12, 2025 10:25 AM
To: Alissa Pemberton
Subject: FW: HPC?

From: Paul Scharnett
Sent: Wednesday, November 20, 2024 3:42 PM
To: [REDACTED] >
Subject: RE: HPC?

Perfect. Thanks!

From: [REDACTED]
Sent: Wednesday, November 20, 2024 3:41 PM
To: Paul Scharnett <[REDACTED]>
Subject: Re: HPC?

Yes. [REDACTED] and myself are trying to get the [REDACTED] building ([REDACTED]) to work but we cannot at the current time. We are exploring options for incentives right now

On Wed, Nov 20, 2024 at 3:38 PM Paul Scharnett <[REDACTED]> wrote:

[REDACTED] Any examples of projects that we could point to that are not really viable without incentives?

From: [REDACTED] >
Sent: Wednesday, November 20, 2024 3:37 PM
To: Paul Scharnett <[REDACTED]>
Subject: Re: HPC?

Paul, based on our phone conversation, this would be my feedback for the asbestos abatement and sprinkler incentive money for development.

Developing the buildings in downtown Bloomington and other downtown are getting to be very difficult to cash flow due to the expense and materials and labor. Doing projects currently with no incentives is almost impossible to make a positive cash flow/return. Incentives are a must if future development is going to happen. Sprinkler systems and asbestos abatement is very costly and adds. Tremendous amount of expense on projects that are already over budget. I would definitely recommend incentive packages for these items. If you would like to continue the conversation, please give me a call and we can set up a meeting.



City of Bloomington

Historic Preservation Commission

November 21, 2024



CITY OF BLOOMINGTON
HISTORIC PRESERVATION COMMISSION
NOVEMBER 21, 2024

Agenda

Item	Case Number	
4A	N/A	Review and approval of the minutes of the September 19, 2024, regular meeting of the Bloomington Historic Preservation Commission.
5A	BHP-36-24	Consideration, review, and action on a request submitted by the Bloomington Historic Preservation Commission for Demolition Review, as required by § 44-1711 of the Bloomington City Code, for a structure located on the property commonly known as 604 IAA Drive.
5B	N/A	Discussion of grant and incentive possibilities for Downtown Bloomington, including asbestos remediation and fire suppression sprinkler systems, as requested by Vice-Chair Scharnett.
5C	N/A	Discussion of process and priorities for identifying and surveying City-Owned Historic Structures, as requested by Chair Lindenbaum.
6	N/A	New Business
7	N/A	Adjourn

BHP-36-24 604 IAA Drive

Consideration, review, and action on a request submitted by the

Bloomington Historic

Preservation Commission for

Demolition Review, as

required by § 44-1711 of the

Bloomington City Code, for a

structure located on the

property commonly known as

604 IAA Drive.



BHP-36-24 604 IAA Dr.

Due to size and cost restrictions that prevent adaptive reuse in pursuit of their concept the property owner proposes to demolish most of the structure, reusing portions of the existing foundation.



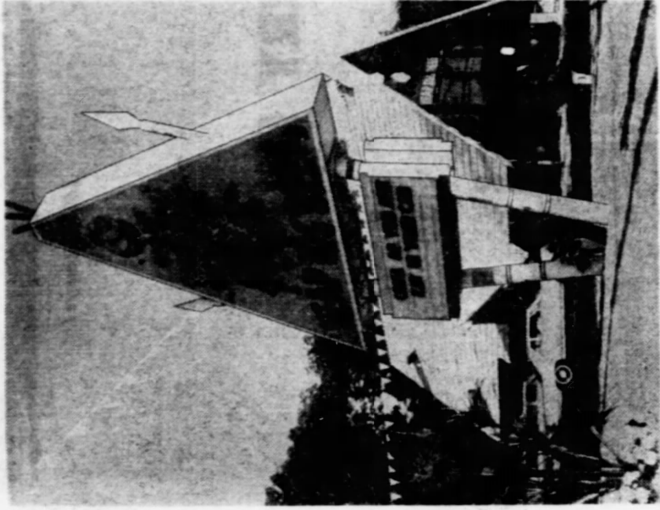
BHP-36-24 604 IAA Dr.

HISTORICAL INFORMATION

- Year Built: 1968
- Architectural Style: A-frame, Alpine-style
- Architect: Unknown
- Significant Name: The Beef Place / Title Loan
- Historic District: None

NEW PROFIT OPPORTUNITY!
See Wednesday, March 22 Wall St. Journal for 1/2 page ad with details on all new profit proven business opportunity in the booming fast food industry. **HEAP BIG BEEF** features giant roast beef sandwiches at 59c and 99c.
Read our WALL ST. JOURNAL ad. Then call us for further information.
best fit
HEAP E
Your Are
FR/
INTEI
Franchi

2310 E
Bloom
Phone:
or 31



New Restaurant
Opening on IAA Drive.



Dabney's
STEAKBURGERS

The Pantagraph/STEVE SMEDLEY

Jerry Harmon, right, gave the Beef Place, 604 IAA Drive, Bloomington, a new name and remodeled it. Now known as Dabney's, it's being managed by Perry Tracy, Lexington, left. Sandwiches, chili and a breakfast menu are featured. A grand opening is planned later this month.

STANDARDS FOR REVIEW LANDMARK NOMINATION CRITERIA

The Preservation Commission shall, upon such investigation as it deems necessary, make a determination as to whether a nominated property, structure, or area possesses sufficient integrity of location, design, materials, and workmanship to make it worthy of preservation or restoration and meets one or more of the following criteria.

At the conclusion of the hearing, the Commission shall make findings and issue a determination as to the significance of the building.

- (a) Its character, interest, or value as part of the development, heritage, or cultural characteristics of the City, County of McLean, State of Illinois, or the United States of America (the Nation);
- (b) Its location as a site of a significant local, county, state, or national event;
- (c) Its identification with a person or persons who significantly contributed to the development of the City, County of McLean, State of Illinois, or the Nation;
- (d) Its embodiment of distinguishing characteristics of an architectural style valuable for the study of a period, type, method of construction, or use of indigenous materials;
- (e) Its identification as the work of a master builder, designer, architect, or landscape architect whose individual work has influenced the development of the City, County of McLean, State of Illinois, or the Nation;
- (f) Its embodiment of elements of design, detailing, materials, or craftsmanship that render it architecturally significant;
- (g) Its embodiment of design elements that make it structurally or architecturally innovative;
- (h) Its unique location or singular physical characteristics that make it an established or familiar visual feature;
- (i) Its character as a particularly fine or unique example of a utilitarian structure, including, but not limited to farmhouses, gas stations, or other commercial structures, with a high level of integrity or architectural significance; and/or
- (j) Its suitability for preservation or restoration.

Recommendation
CASE BHP-36-24

Demolition Review

Staff finds that the structure *does not meet the Standards of Review for Landmark Nomination Criteria*.

Sample motions for the Commission are below:

Motion to find that the building is not significant (specify how).

- OR -

Motion to find that the building is significant, (specify how), and/is not suitable for preservation or restoration.

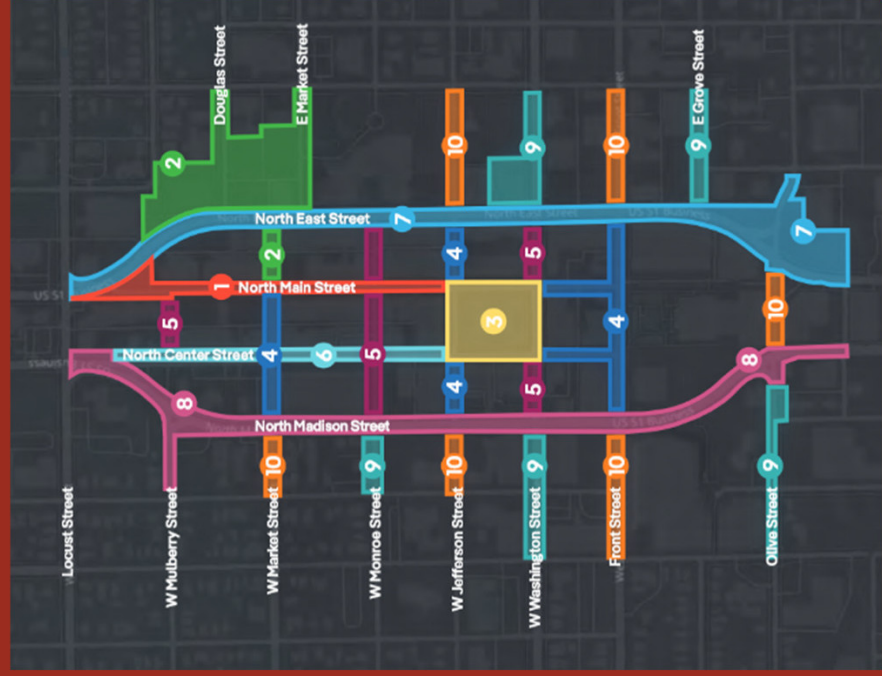
- AND -

Motion to not oppose the Demolition request for the structure located on the property at 604 IAA Drive, with or without conditions.

- OR -

Motion to oppose the Demolition request for the structure located on the property at 604 IAA Drive, and request a meeting per § 44-171D(2) of the City Code.

New Business



Discussion of grant and incentive possibilities for Downtown Bloomington, including asbestos remediation and fire suppression sprinkler systems.

Fire suppression

- Triggers
- Status of Information
- Incentives

Vacancy

- Triggers
- Status of Information

Asbestos

- Triggers
- Status of Information
- Incentives

Accessibility

- Triggers
- Status of Information

AKA - “build a healthy Downtown that offers a range of employment, retail, housing, cultural and entertainment opportunities for all” (D-1)

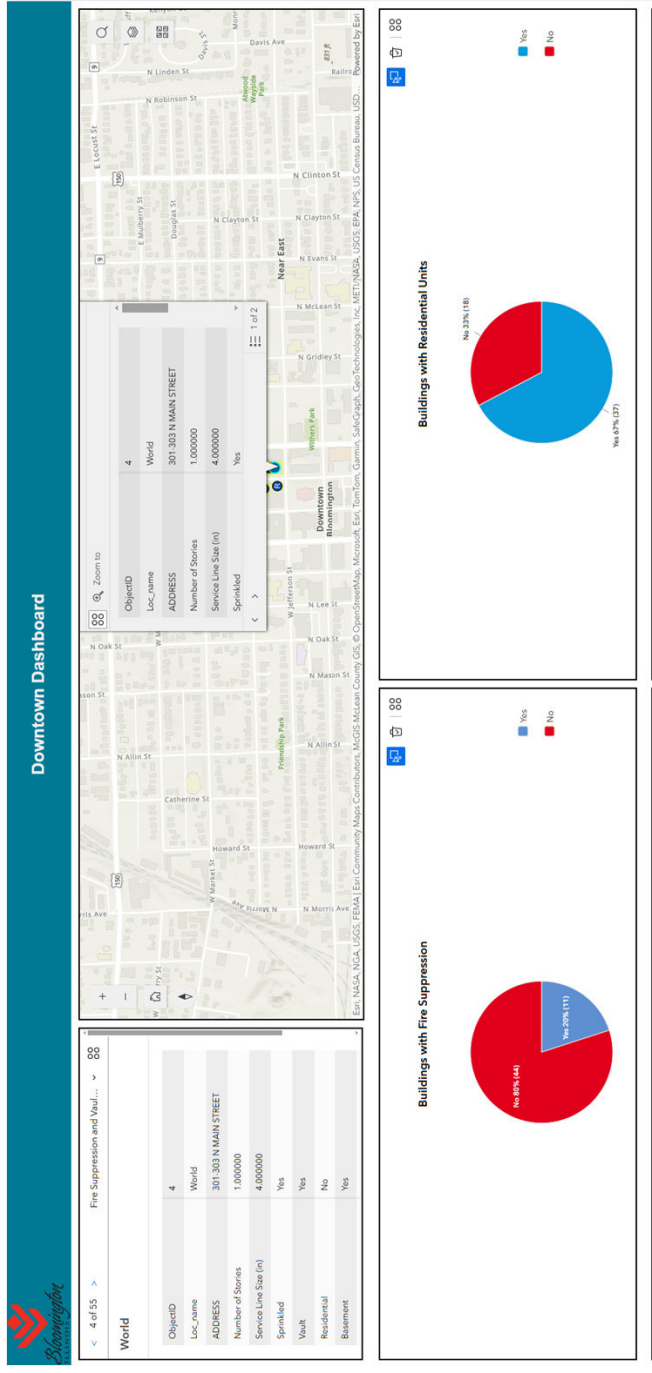
Fire Suppression

Downtown Viewer:

<https://experience.arcgis.com/experience/f27365ef37b84fdc8cb4ad4eefbb1861>

Status:

- Completed Downtown Streetscape Phase 1 (N Main Corridor, Jefferson to Locust)
- Residential Uses, Vaults, Fire Suppression, Size of Service Lines, Vacant Buildings

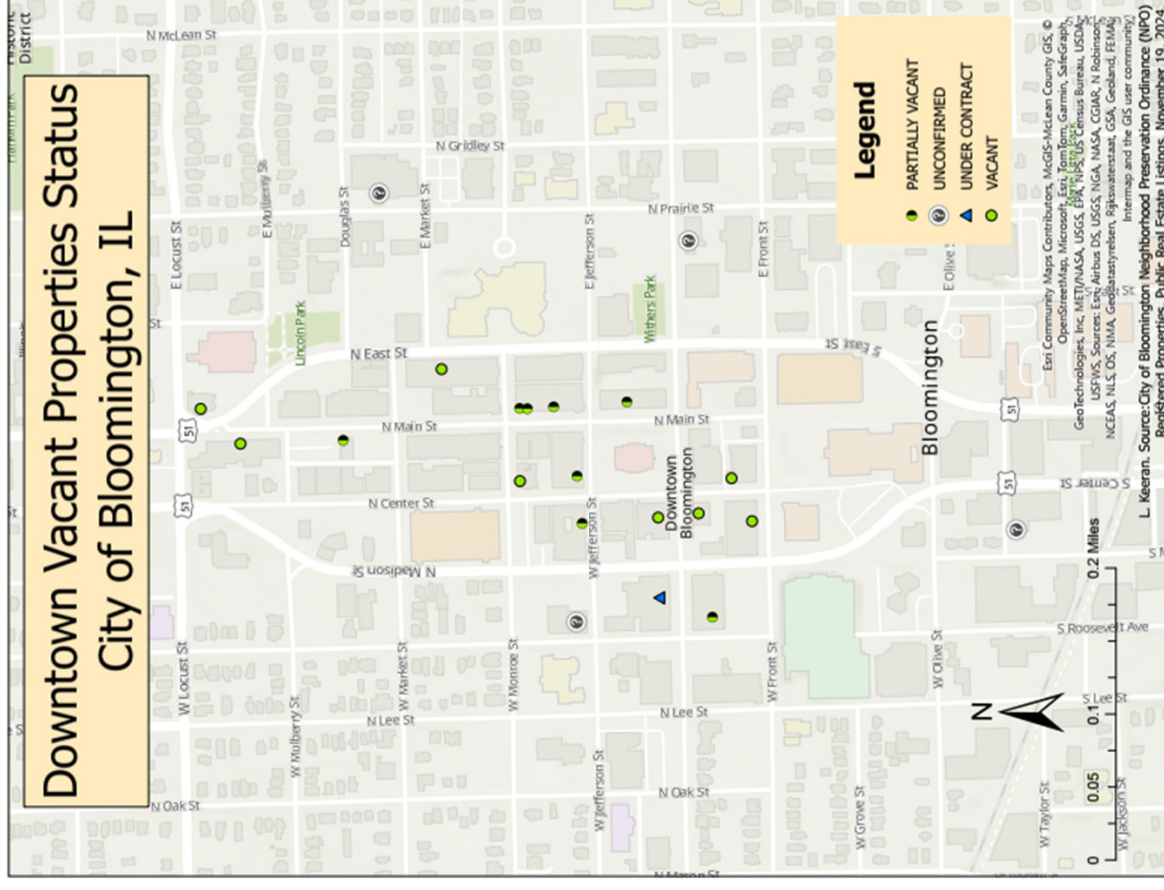


Downtown Dashboard Updates (Fire Suppression)

- Key takeaways (Phase 1)
 - 80% of buildings do not have fire suppression
 - 67% of buildings have residential units
 - 81% of buildings with residential units do not have fire suppression
 - Service line sizes
 - 13% (7) - 6 inch
 - 15% (8) - 4 inch
 - 62% (34) - 2 inch
 - 10% (6) - 1.5 inches or less

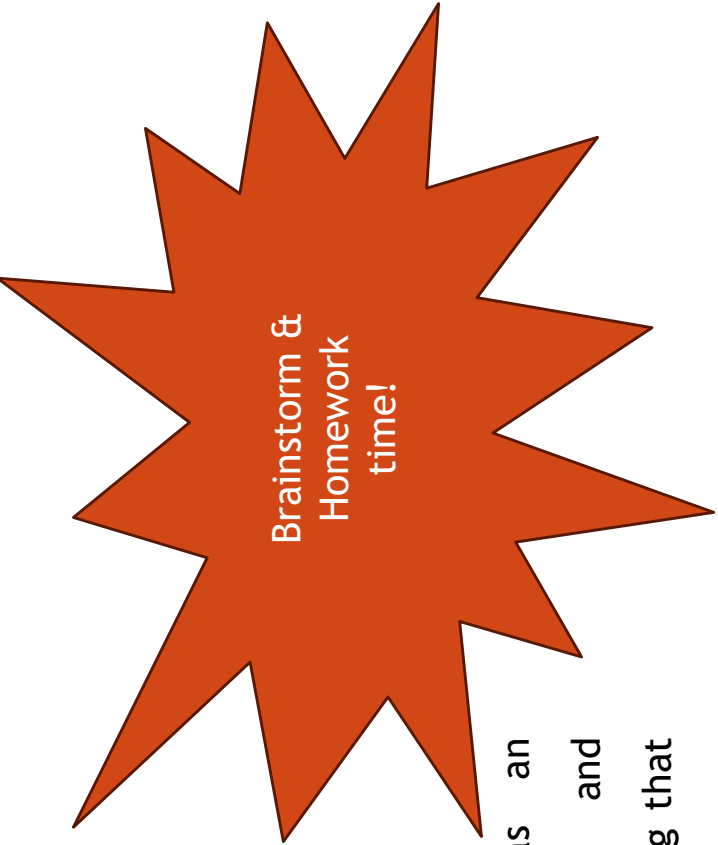
Vacancy

- Preliminary vacancy review (complete)
- Space use and condition assessment
- Identification of barriers to reuse or occupancy
- Specific property incentive or agreements



Incentives & Ideas

- Fire Suppression
 - Section 179 of the U.S. Internal Revenue Code allows small businesses to write off the full cost of commercial fire sprinkler systems as an expense up to \$1.04 million (including interest expense).
- Vacancy
- Asbestos
- Accessibility



Brainstorm &
Homework
time!

The City CAN act as an applicant or awardee, and manage any grant funding that is acquired for these purposes.

New Business

- Aligns with the five themes: 1. Protecting and Preserving the Next Generation of Bloomington Historic Landmarks and Places 2. Promoting Community Sustainability, Livability and Vitality through Historic Preservation 3. Enhancing the Local Historic Preservation Program 4. Telling the Bloomington Heritage Narrative 5. Building Local Awareness and Capacity.
- The second goal of the Community Preservation Plan is to “Prioritize significant historic resources for designation and preservation”
- Identified as Opportunity 3.5 (p. 188): “Explore Landmarks Designation for Eligible Municipal-Owned Buildings”
- Related to the following Opportunities:
 - Opportunity 1.8 (p. 173), “Designate New Local Landmarks and Historic Districts” and Opportunity 1.9 (p. 173), “Create a Significant Property Inventory”
 - Opportunity 2.2 (p. 177), “Explore the Development of a Formal Bloomington Adaptive Reuse Program”
 - Opportunity 3.6 (p. 188), “Maintain an Ongoing Training and Orientation Program for Municipal Staff and the Historic Preservation Commission”

Discussion of process and priorities for identifying and surveying City-Owned Historic Structures

- Purpose:** To ensure timely intervention for vulnerable City-owned historic structures to prevent their deterioration and demolition.
- How do we identify City-owned structures?
 - Do we conduct a reconnaissance-level or intensive-level survey of historic structures?
 - Will the survey include special features of historic places (e.g. streets, parks, etc.)?
 - Who will be responsible for the survey of structures?
 - What is the time frame for identifying structures?
 - What characteristics will determine the structures that are at the greatest risk? (Suggestion: Use Rust Grant scoring sheet)
 - What interventions will be taken with structures identified to be at greatest risk?
 - What interventions will be taken with structures identified to be less at risk to prevent future deterioration?
 - What partners will need to be included in any action plans (e.g. Planning Commission, Parks & Recreation Department, et al.)? [Note: There is a list of potential partners on p. 201 of the Community Preservation Plan]
 - What surveys and initiatives have other cities taken to protect municipal-owned historic structures?
 - What are the budgetary constraints in preserving / rehabilitating these structures?



NEXT MEETING

Historic Preservation Commission

December 19, 2024



REGULAR AGENDA ITEM NO. 5.A.

FOR HISTORIC PRESERVATION COMMISSION: March 20, 2025

WARD IMPACTED: Ward 4

SUBJECT: **BHP-02-25** - Consideration, review and action on a request submitted by Jim Neeley, for a **Certificate of Appropriateness** for planter box replacement on the property located at 33 Sunset Road, PIN 14-34-402-016.

RECOMMENDED MOTION: Motion to approve or deny the scope of work and request for a Certificate of Appropriateness, with or without conditions.

STRATEGIC PLAN LINK:

Goal 1. Financially Sound City Providing Quality Basic Services
Goal 5. Great Place - Livable, Sustainable City

STRATEGIC PLAN SIGNIFICANCE:

Objective 1d. City services delivered in the most cost-effective, efficient manner
Objective 5b. City decisions consistent with plans and policies

BACKGROUND:

The Applicant is requesting a Certificate of Appropriateness for the replacement of a non-original pressure-treated wood planter box, with a stone wall/box of the same height, but in material closely matching the existing chimney and entryway wall. The existing box is not an item called out for protection and review under the designating ordinance. The installation of the new box will not hide or visually detract from any of the specifically protected items identified by the designating ordinance, and it is easily changeable/removable in the future.

COMMUNITY GROUPS/INTERESTED PERSONS CONTACTED: N/A

FINANCIAL IMPACT: N/A

Respectfully submitted for consideration.

Prepared by: Alissa Pemberton, City Planner

ATTACHMENTS:

[BHP-02-25 - Staff Report - 33 Sunset Rd](#)

TO: City of Bloomington Historic Preservation Commission

FROM: Development Services Department

DATE: March 20, 2025

CASE NO: BHP-02-25, Certificate of Appropriateness (COA)

REQUEST: Consideration, review and action on a request submitted by Jim Neeley, for a Certificate of Appropriateness for planter box replacement, on the property located at 33 Sunset Rd, PIN 14-34-402-016.



Above: Subject property, current day

PROPERTY INFORMATION

Subject property: 33 Sunset Rd

Existing Zoning: R-1A (Single-Family Residence) District with S-4 (Historic Preservation Overlay)

Existing Land Use: Single-Family Dwelling

Property Size: 150' x 350' (52,500 square feet)

HISTORIC INFORMATION

Year Built: 1948
Architectural Style: Mid-Century Modern
Architect: Richard Williams
Historic District: N/A
Alternate Name: Otto and Lucille Beich House

PROJECT DESCRIPTION

Background

According to the Local Designation nomination report, the residence was constructed in 1948 by Richard A. Williams, for Otto and Lucille Beich, and the surrounding property reflects the work of landscape architect Jens Jensen. The property was designated and zoned S-4 in 2023 (Ord. No. 2023-020). The Applicant previously received Certificates of Appropriateness for garage replacement with minor expansion in April, 2024 (BHP-06-24) and fence installation in June, 2024 (BHP-20-24).

Request

The Applicant is requesting a Certificate of Appropriateness to replace an existing low planter box on the eastern portion of the front (north) façade. The existing box is not original, constructed of pressure-treated wood; it is not an item called out for protection and review under the designating ordinance. The proposal is to replace it with a low stone wall, using material consistent with original stone details on the front façade. The new box will not hide, damage, or visually detract from any of the specifically protected items identified by the designating ordinance, and it is easily changeable/removable in the future.

STANDARDS FOR REVIEW

For each Certificate of Appropriateness awarded, the Historic Preservation Commission shall be guided by the following general standards in addition to any design guidelines in the ordinance designating the landmark or historic district:

- 1. Every reasonable effort shall be made to provide a compatible use for a property that requires minimal alteration of the building, structure, or site and its environment, or to use a property for its originally intended purpose.**

No change is being made to the property's current use.

- 2. The distinguishing original qualities or character of a building, structure, or site and its environment shall not be destroyed. The removal or alteration of any historic material or distinctive architectural feature should be avoided when possible.**

The planer box is not called out as one of the significant exterior architectural features that should be reviewed for appropriateness. It is on the north façade of east-west oriented wing, that calls out "broad expanse of dark stained redwood board and batten siding," but is located at or below the lower edge of the protected feature. None of the protected features or landscaping would be damaged by installation of the proposed feature.

- 3. All buildings, structures, and sites shall be recognized as products of their own times. Alterations that have no historical basis and that seek to create an earlier appearance shall be discouraged.**

The proposed work would not alter the appearance of the building to an earlier period.

4. **Changes that may have taken place in the course of time are evidence of the history and development of a building, structure or site and its environment. These changes may have acquired significance in their own right, and this significance shall be recognized and respected.**

N/A. The existing construction is a utilitarian installation of low/no visual interest.

5. **Distinctive stylistic features or examples of skilled craftsmanship that characterize a building, structure, or site shall be treated with sensitivity.**

N/A.

6. **Deteriorated architectural features shall be repaired rather than replaced, wherever possible. In the event replacement is necessary, the new material should match the material being replaced in composition, design, color, texture and other visual qualities. Repair or replacement of missing architectural features should be based on accurate duplication of features, substantiated by historic, physical or pictorial evidence, rather than on conjectural designs or the availability of different architectural elements from other buildings or structures.**

The existing planter box is not original to the structure, nor a noted architectural feature.

7. **The surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning methods that will damage the historic building materials shall not be undertaken.**

N/A.

8. **Every reasonable effort shall be made to protect and preserve archeological resources affected by, or adjacent to, any project.**

N/A.

9. **Contemporary design for alteration and additions to existing properties shall not be discouraged when such alterations and additions do not destroy significant historical, architectural, or cultural material, and such design is compatible with the size, scale, color, material and character of the property, neighborhood, or environment.**

While the addition of a more visible planter box is new design, it is consistent with the materials and use of hardscaping to define the front of the home. It appears to be compatible with the size, scale, color, and material of the existing structure.

ARCHITECTURAL REVIEW GUIDELINES

The final standard for review requires that, for landmarks, the Commission shall ensure consistency with the Secretary of Interior's Guidelines for the Treatment of Historic Properties and the Bloomington Architectural Review Guidelines. The Guidelines primarily stipulate that any replacement materials be typical to those built in the style of the historic building, retaining as much existing material as possible, and repairing where feasible.

The scope of work proposed by the applicant ***complies with the subject policies*** as outlined in the Architectural Review Guidelines, which stresses repair over replacement when feasible.

Under the Architectural Review Guidelines, the following criteria is provided:

New hardscaping shall be either similar to historic hardscaping used at the site, or shall be characteristic of the period of significance.

The purpose for architectural review is to protect the unique visual qualities of a building and its site...Siting, Massing, Scale, Materials, Street rhythm

STAFF RECOMMENDATION

Staff finds that the scope of work ***meets the relevant standards and policies*** as presented in the Bloomington Architectural Review Guidelines and recommends that the Commission take the following actions:

Motion to ***approve or deny*** the scope of work and request for a Certificate of Appropriateness, as submitted by Jim Neeley, for replacement on the property located at 33 Sunset Road, with or without conditions.

Respectfully submitted,
Alissa Pemberton
City Planner

Attachments:

1. Image of the location for proposed work
2. Proposed visual, after requested change

Attachment 1: Image of the location for proposed work



Attachment 2: Proposed visual, after requested change





REGULAR AGENDA ITEM NO. 6.A.

FOR HISTORIC PRESERVATION COMMISSION: March 20, 2025

WARD IMPACTED: Ward 6

SUBJECT: Update on downtown fire suppression status research (Downtown Streetscape Phase 1+)

RECOMMENDED MOTION: None; presentation and discussion only.

STRATEGIC PLAN LINK:

STRATEGIC PLAN SIGNIFICANCE:

BACKGROUND: Additional information working past Phase 1 and/or finishing out completion of Phase 1 data.

COMMUNITY GROUPS/INTERESTED PERSONS CONTACTED: N/A

FINANCIAL IMPACT: N/A

Respectfully submitted for consideration.

Prepared by: John Myers, Assistant City Planner



REGULAR AGENDA ITEM NO. 7.A.

FOR HISTORIC PRESERVATION COMMISSION: March 20, 2025

WARD IMPACTED: City-Wide Impact

SUBJECT: Discussion and planning for Heritage Awards 2025.

RECOMMENDED MOTION: Motion to form a two-member Awards Subcommittee. Motion to elect or appoint two (2) Commission members to the Awards Subcommittee.

STRATEGIC PLAN LINK:

STRATEGIC PLAN SIGNIFICANCE:

BACKGROUND: The City's Heritage Awards have not been issued since 2020 and staff would like to review, possibly revamp, and restart the program in this calendar year. The last available nomination form, with information on qualifying criteria, is attached. Staff proposes the creation of an Awards Subcommittee--consisting of two (2) Commission members, ideally one who was present for prior award reviews--to review the program, propose any changes, and lead the solicitation and nomination review for 2025.

COMMUNITY GROUPS/INTERESTED PERSONS CONTACTED: N/A

FINANCIAL IMPACT: N/A

Respectfully submitted for consideration.

Prepared by: John Myers, Assistant City Planner

ATTACHMENTS:

[2020 Heritage Awards Nomination Form.pdf](#)

****SEEKING NOMINATIONS****

City of Bloomington Heritage Awards

For Notable Achievement in:

**RESTORATION
REHABILITATION
ADAPTIVE RE-USE
LANDSCAPE RESTORATION
LEGACY/MULTI-GENERATIONAL
INDIVIDUAL COMMITTED TO PRESERVATION**

Sponsored by:

Bloomington Historic Preservation Commission

Nominations are now being accepted for the City of Bloomington Heritage Awards. Public and privately owned properties are eligible for an award for exterior improvements. The Bloomington Historic Preservation Commission will select award winners.

To nominate a property, please complete the reverse side of this form. For further information, please contact the City of Bloomington Planning Division at (309) 434-2226 or planning@cityblm.org

Deadline for Submission: March 26, 2020

Application will be reviewed at the Historic Preservation Commission Meeting on Thursday, April 16, 2020 at 5:00 p.m.



Send or E-mail Entries to:

Planning Division, City of Bloomington
115 E. Washington Street, Suite 201. Bloomington IL, 61702
Phone: (309) 434-2226 – E-mail: planning@cityblm.org

City of Bloomington Heritage Awards

Deadline for Submission: March 26, 2020

Application will be reviewed at the Historic Preservation Commission Meeting on
Thursday, April 16, 2020 at 5:00 p.m.

Award Categories (check those that best represent the project being nominated):

- ☐ **RESTORATION** – Returning a structure or a significant part of it to the original design/condition through repair or by matching the original architectural detailing with replacement materials.
- ☐ **REHABILITATION** – Renovating and/or “greening” a structure through alterations or additions that are compatible in materials, scale, and character with the original design.
- ☐ **ADAPTIVE RE-USE** – Changing the use of a structure to meet contemporary needs in a manner that retains or restores its viability while respecting the original design character.
- ☐ **LANDSCAPE RESTORATION** – Preserving or recreating a historic landscape plan through the use of appropriate plantings and design elements.
- ☐ **LEGACY/MULTI-GENERATIONAL** – Maintaining a restored, renovated, or adapted structure that has been owned by the same family for 20 years or longer.
- ☐ **INDIVIDUAL COMMITTED TO PRESERVATION** – An individual who has shown dedication to Historic Preservation in the Bloomington Community.

Address of Property: _____ Year Built: _____ Year Purchased: _____
Owner(s): _____

Address: _____ Contact info: _____

Nomination by: _____ Contact info: _____

PROJECT DESCRIPTION and REASONS FOR NOMINATIONS (attach additional pages if needed):

Date Started: _____ Date Completed: _____

****PLEASE INCLUDE ANY BEFORE AND AFTER PICTURES/PHOTOS & DRAWINGS****

Name/Address of Architect (if applicable): _____

Name/Address of Contractor (if applicable): _____



Send or E-mail Entries to:

Planning Division, City of Bloomington
115 E. Washington Street, Suite 201. Bloomington IL, 61702
Phone: (309) 434-2226 – E-mail: planning@cityblm.org



REGULAR AGENDA ITEM NO. 7.B.

FOR HISTORIC PRESERVATION COMMISSION: March 20, 2025

WARD IMPACTED: City-Wide Impact

SUBJECT: Presentation and discussion on Lead Based Paint Abatement rules, recommendations, costs, and barriers.

RECOMMENDED MOTION: None; discussion only.

STRATEGIC PLAN LINK:

Goal 4. Strong Neighborhoods

STRATEGIC PLAN SIGNIFICANCE:

Objective 4c. Preservation of property/home valuations

Objective 4b. Upgraded quality of older housing stock

BACKGROUND: The City administers a *Lead-Based Paint Hazard Reduction Program (LBPHRP)* that has provided staff an opportunity to review project scopes, costs, options, and application to historic and/or potentially properties. Relevant definitions: [Abatement](#), [Hazard Abatement](#), [Interim Controls](#).

A number of considerations and potential barriers exist to rectifying LBP management with the priorities of historic preservation, including:

- The cost of lead removal and material restoration, versus replacement, particularly of detailed architectural features
- Understanding and balancing the benefits of replacing items with friction surfaces (ex: windows/doors/sills/jams) versus the use of interim controls (ex: jam liners) versus full abatement (remove, strip, refinish, replace)
- Balancing historic materials preservation and patina with long-term maintenance costs and moisture issues

Regulations, opportunities, and resources exist to guide discussion and project planning/negotiation, including:

- Historic Properties and The Lead Safe Housing Rule - 24 CFR Part 35, Subparts B-R overview from HUD (attached)
- HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing - [Chapter 18 "Lead-Based Paint and Historic Preservation"](#)
- Preservation Brief 37 Reducing Lead-Based Paint in Historic Housing (attached)
- [A brief overview of encapsulants](#) from the NY Health Dept

COMMUNITY GROUPS/INTERESTED PERSONS CONTACTED: N/A

FINANCIAL IMPACT: No financial impact of this discussion. Potential financial impacts

associated with Lead-Based Paint or Lead-Based Paint Abatement are: the significant potential expense for property owners required to complete abatement, by law for rental properties or by necessity of life safety for owner occupied structures; potential loss of rental income for unabated properties; potential decrease in sale value for unabated properties; and potential decrease in real property value with the removal of features with visual appeal and/or replacement of high quality materials with lower quality modern materials.

Respectfully submitted for consideration.

Prepared by: Alissa Pemberton, City Planner

ATTACHMENTS:

[Historic Properties and the Lead Safe Housing Rule.doc](#)

[Preservation Brief 37 Reducing Lead-Based Paint in Historic Housing](#)

Attachment 24-2:
Historic Properties and the Lead Safe Housing Rule
(24 CFR Part 35, Subparts B-R)

A. Introduction. This attachment explains the Lead Safe Housing Rule’s allowance for interim controls instead of abatement on historic properties. Some HUD grantees and subrecipients may be confused over the application of the Lead Safe Housing Rule (24 CFR Part 35, subparts B-R) to historic properties covered by the Rule because they are federally-assisted or being disposed of by a federal agency. The confusion focuses primarily on the level of treatment (lead abatement or lead interim controls [defined below]) required on properties receiving rehabilitation assistance from various HUD programs.

B. When Abatement Is Usually Required. As summarized by Table One of the Rule [in 24 CFR 35.100(c)]: “Full abatement of lead-based paint” (LBP) is required for:

- Subpart G, §35.630, Multifamily mortgage insurance for conversions and major rehabilitations.”
- Subpart L, Public Housing programs.

[Note that these programs covered by Subparts G and L are not CPD programs.)

“Abatement of lead-based paint hazards,” is required for:

- Subpart J, §35.930(d)(3), Properties receiving more than \$25,000 per unit in rehabilitation assistance, except that interim controls are allowed on exterior surfaces that are not disturbed by the rehabilitation.”

C. When Interim Controls Are Usually Required. As summarized by Table One of the Rule [in 24 CFR 35.100(c)], interim controls are required for:

- Subpart G, §35.620, Multifamily mortgage insurance for properties constructed before 1960, other than conversions and major rehabilitations;
- Subpart H, §35.715, Project-based assistance for multifamily properties receiving more than \$5,000 per unit;
- Subpart I, HUD-owned multifamily property;
- Subpart J, §35.930(c), Properties receiving more than \$5,000 and up to \$25,000 per unit in rehabilitation assistance.”

[Note that the programs covered by Subparts G, H and I are not CPD programs.)

Paint stabilization alone, a lesser level of protection, is required for other programs.

D. Exemption of Historic Properties from the Lead Abatement Requirement. While abatement must usually be conducted on LBP hazards in properties receiving over \$25,000 in Federal Rehabilitation Assistance, or on LBP itself under the multifamily insurance and public housing programs identified above, the Rule also provides an exemption for historic properties. The exemption [at 24 CFR 35.115(a)(13)] says that:

- Where abatement of lead-based paint hazards or lead-based paint is required by this part and the property is listed or has been determined to be eligible for listing in the National Register of Historic Places or contributing to a National Register Historic District, the designated party may, if requested by the State Historic Preservation Office, conduct interim controls in accordance with 24 CFR 35.1330 instead of abatement. If interim controls are conducted, ongoing lead-based paint maintenance and reevaluation shall be conducted as required by the applicable subpart of this part in accordance with 24 CFR 35.1355.

[Note that, for this Rule, the "designated party" is the entity responsible for complying with applicable requirements, of the Rule, whether it be a Federal agency, grantee, subrecipient, participating jurisdiction, housing agency, Indian tribe, tribally designated housing entity, sponsor, or property owner [24 CFR 35.110)].

E. Technical Considerations of Abatement and Interim Controls Strategies. The Rule defines abatement (at §35.110) as:

- any set of measures designed to permanently eliminate lead-based paint or lead-based paint hazards (see definition of "permanent"). Abatement includes: (1) The removal of lead-based paint and dust-lead hazards, the permanent enclosure or encapsulation of lead-based paint, the replacement of components or fixtures painted with lead-based paint, and the removal or permanent covering of soil-lead hazards; and, (2) All preparation, cleanup, disposal, and post-abatement clearance testing activities associated with such measures.

Abatement strategies include on- and off-site paint stripping, component replacement, enclosure and encapsulation. For the Lead Safe Housing Rule, "permanent" enclosure or encapsulation means that the activity must have "an expected design life of at least 20 years" to be considered to be abatement (24 CFR 35.110). These various abatement methods present a range of options. Thoughtful consideration should be given to the selection of an abatement method for each hazard identified.

In a historic property, preservation of the component is preferred so the anticipated impact of each lead hazard control method on the hazardous building component should be assessed before an approach is selected. The type and relative amount of damage caused by the different abatement methods depends on several factors. These factors include: the type of building component affected, number and thickness of paint layers, physical condition of the component, interior or exterior location on the property, skill level of abatement personnel, environmental conditions, etc.

The Rule defines **interim controls** (at 24 CFR 35.110) as:

- a set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards. Interim controls include, but are not limited to, repairs, painting, temporary containment, specialized cleaning, clearance, ongoing lead-based paint maintenance activities, and the establishment and operation of management and resident education programs.

(Note that the historic preservation exemption from abatement also requires ongoing LBP maintenance and reevaluation as specified in the Rule. Information on interim controls, ongoing LBP maintenance and reevaluation are available on the HUD web site: <http://www.hud.gov/offices/lead.>)

Interim control strategies are generally less aggressive than abatement techniques. They include paint stabilization with correction of substrate defects, specialized cleaning, temporary repairs, management and resident education programs, and ongoing LBP maintenance.

Because of its finality, some program participants consider component replacement (abatement) as the only acceptable approach to lead hazard reduction. Others view the cost-effectiveness of component replacement as justification for this approach. However, reviewers should note that, at the State Historic Preservation Office's (SHPO's) request, but not at the program participant's discretion, a program participant is allowed to use interim controls instead of abatement on interior and exterior surfaces. In these cases, the use of interim controls with ongoing lead-based paint maintenance rather than abatement should be given serious consideration, but it should be remembered that abatement is always allowed.

- F. **Monitoring.** During monitoring, reviewers should assess whether program participants are inappropriately insisting that abatement of lead hazards is the only acceptable approach for lead hazard control in historic properties. For historic properties, interim controls are preferred because they preserve the original structure and are usually less costly. In some cases, however, interim controls are not technically feasible or the condition of the affected building components is poor, making interim controls impractical. Program participants should justify and be able to document their position.

Reviewers should assess a program participant's position (failure to consult with the SHPO or the inappropriate insistence on abatement as a lead hazard control strategy) in light of two factors:

- 1) the generally higher costs of abatement relative to interim controls; and,
- 2) the irreparable damage to a historical property caused by building component removal or encapsulation.

- G. **National Park Service Guidance.** In addition to the Rule's requirements and the guidance about the Rule listed above, the National Park Service has published specific guidance on historic housing and LBP. *Preservation Brief* #37, "Appropriate Methods for Reducing Lead-Paint Hazards in Historic Housing" contains recommended historic preservation approaches for lead hazard reduction planning, appropriate methods for controlling lead hazards, and accepted maintenance techniques after hazard control treatment. The brief is available at www.nps.gov/tps/how-to-preserve/briefs/37-lead-paint-hazards.htm.

Reviewers and program participants are encouraged to consult this Preservation Brief prior to monitoring any projects involving LBP in historic properties.

H. HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing.

The HUD *Guidelines* provide detailed, comprehensive, technical information on how to identify lead-based paint hazards in housing and how to control such hazards safely and efficiently. They can be downloaded from the Office of Healthy Homes and Lead Hazard Control website (see address above). The Environmental Protection Agency cites them as a source of “documented methodologies” for performing lead hazard evaluation and control activities by LBP inspectors, risk assessors and abatement contractors, and HUD cites them as a source of guidance for interim control work for work under its Lead Safe Housing Rule.

Chapter 18 of the HUD *Guidelines*, on Lead Hazard Control and Historic Preservation, describes, step-by-step, approaches for evaluating and controlling lead hazards in historic properties with the intent of retaining historic building materials and their historic appearance to the greatest extent possible. These steps include:

- Identifying the historic preservation issues that may be faced when conducting LBP hazard control work;
- Establishing priorities for intervention;
- Performing a combination risk assessment and paint inspection;
- Assessing the danger of lead exposure for each significant architectural item;
- Negotiating the hazard control strategy with the SHPO;
- Avoiding removal of significant historic materials, the use of harsh abrasive cleaners or chemicals that are too strong on historic materials, and covering over historic siding, whenever possible and financially feasible;
- Using technically preferred treatments if paint is to be removed; and
- Upon completion of the project, providing educational materials to the residents describing the health hazards of LBP and information on appropriate housekeeping methods to keep the property in a lead-safe condition once lead hazard control work is completed.

I. Contacts. For any questions or comments on LBP and historic properties, please contact the following HUD officials:

- your Regional or Field Environmental Officer;
- the Program Environmental Clearance Officer, Office of Lead Hazard Control and Healthy Homes; or
- the Historic Preservation Officer, Office of Environment and Energy, Office of Community Planning and Development.



[Home](#) > [How to Preserve](#) > [Preservation Briefs](#) > 37 Lead-Paint Hazards

Some of the web versions of the Preservation Briefs differ somewhat from the printed versions. Many illustrations are new and in color; Captions are simplified and some complex charts are omitted. To order hard copies of the Briefs, see [Printed Publications](#).

PRESERVATION BRIEFS

37

Appropriate Methods for Reducing Lead-Paint Hazards in Historic Housing

Sharon C. Park, FAIA, and Douglas C. Hicks

[Lead in Historic Paints](#)

[Planning for Lead Hazard Reduction](#)

[Identify the Historical Significance](#)

[Risk Assessment to Determine Lead Hazards](#)

[Hazard Control Options](#)

[Summary and References](#)

This Preservation Brief is under revision to reflect current Federal laws and regulations concerning lead-based paint. This excerpt from the 2006 revision of the Brief provides general background and evaluation information. For additional information on current laws and regulations, contact or visit the websites of the Environmental Protection Agency and your state's environmental and housing agencies.



Most residences painted prior to 1978 will contain some lead-based paint. It was widely used on exterior woodwork, siding, and windows as well as interior finishes. This apartment stairhall retains its historic character after a successful rehabilitation project that included work to control lead-based paint hazards. Photo: Crispus Attucks Community Development Corporation.

Lead-based paint, a toxic material, was widely used in North America on both the exteriors and interiors of buildings until well into the second half of the twentieth century. If a "historic" place is broadly defined in terms of time as having attained an age of fifty years, this means that almost every historic house contains some lead-based paint. In its deteriorated form, it produces paint chips and lead-laden dust particles that are a known health hazard to both children and adults. Children are particularly at risk when they ingest lead paint dust through direct hand-to-mouth contact and from toys or pacifiers. They are also at risk when they chew lead-painted surfaces in accessible locations. In addition to its presence in houses, leaded paint chips, lead dust, or lead-contaminated soil in play areas can elevate a child's blood lead level to a degree that measures to reduce and control the hazard should be undertake.

The premise of this Preservation Brief is that historic housing can be made lead-safe for children without removing significant decorative features and finishes, or architectural trimwork that may contribute to the building's historic character. *Historic housing*—encompassing private dwellings and all types of rental units—is necessarily the focus of this Brief because federal and state laws primarily address the hazards of lead and lead-based paint in housing and day-care centers to

protect the health of children under six years of age. Rarely are there mandated requirements for the removal of lead-based paint from non-residential buildings.

Lead in Historic Paints

Lead compounds were an important component of many historic paints. Lead, in the forms of lead carbonate and lead oxides, had excellent adhesion, drying, and covering abilities. White lead, linseed oil, and inorganic pigments were the basic components for paint in the 18th, 19th, and early 20th centuries. Lead-based paint was used extensively on wooden exteriors and interior trimwork, window sash, window frames, baseboards, wainscoting, doors, frames, and high gloss wall surfaces such as those found in kitchens and bathrooms. Almost all painted metals were primed with red lead or painted with lead based paints. Even milk (casein) and water-based paints (distemper and calcimines) could contain some lead, usually in the form of hiding agents or pigments. Varnishes sometimes contained lead. Lead compounds were also used as driers in paint and window glazing putty.

In 1978, the use of lead-based paint in residential housing was banned by the federal government. Because the hazards have been known for some time, many lead components of paint were replaced by titanium and other less toxic elements earlier in the 20th century. Since houses are periodically repainted, the most recent layer of paint will most likely not contain lead, but the older layers underneath probably will. Therefore, the only way to accurately determine the amount of lead present in older paint is to have it analyzed.

It is important that owners of historic properties be aware that layers of older paint can reveal a great deal about the history of a building and that paint chronology is often used to date alterations or to document decorative period colors. Highly significant decorative finishes, such as graining, marbledizing, stenciling, polychrome decoration, and murals should be evaluated by a painting conservator to develop the appropriate preservation treatment that will stabilize the paint and eliminate the need to remove it. If such finishes must be removed in the process of controlling lead hazards, then research, paint analysis, and documentation are advisable as a record for future research and treatment.



A large-scale historic rehabilitation project incorporated sensitive lead-hazard reduction measures. Interior walls and woodwork were cleaned, repaired, and repainted and compatible new floor coverings added. The total project was economically sound and undertaken in a careful manner that preserved the building's historic character. Before:left, after:right. Photos: Landmarks Design Associates.

stabilize the paint and eliminate the need to remove it. If such finishes must be removed in the process of controlling lead hazards, then research, paint analysis, and documentation are advisable as a record for future research and treatment.

Planning for Lead Hazard Reduction in Historic Housing

Typical health department guidelines call for removing as much of the surfaces that contain lead-based paint as possible. This results in extensive loss or modification of architectural features and finishes and is not appropriate for most historic properties. A great number of federally assisted housing programs are moving away from this approach as too expensive and too dangerous to the immediate work environment. A preferred approach, consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, calls for removing, controlling, or managing the hazards rather than wholesale-or even partial-removal of the historic features and finishes. This is generally achieved through careful cleaning and treatment of deteriorating paint, friction surfaces, surfaces accessible to young children, and lead in soil. Lead-based paint that it not causing a hazard is thus permitted to remain, and, in consequence, the amount of historic finishes, features, and trimwork removed from a property is minimized.

Because the hazard of lead poisoning is tied to the risk of ingesting lead, careful planning can help to determine how much risk is present and how best to allocate available financial resources. An owner, with professional assistance, can protect a historic resource and make it lead-safe using this three-step planning process:

1. Identify the historical significance of the building and architectural character of its features and finishes;
2. Undertake a risk assessment of interior and exterior surfaces to determine the hazards from lead and lead based paint; and,
3. Evaluate the options for lead hazard control in the context of historic preservation standards.

1. Identify the historical significance of the building and architectural character of its features and finishes

The historical significance, integrity, and architectural character of the building always need to be assessed before work is undertaken that might adversely affect them. An owner may need to enlist the help of a preservation architect, building conservator or historian. The State Historic Preservation Office (SHPO) may be able to provide a list of knowledgeable preservation professionals who could assist with this evaluation.

Features and finishes of a historic building that exhibit distinctive characteristics of an architectural style; represent work by specialized craftsmen; or possess high artistic value should be identified so they can be protected and preserved during treatment. When it is absolutely necessary to remove a significant architectural feature or finish-as noted in the first two priorities listed below-it should be replaced with a new feature and finish that matches in design, detail, color, texture, and, in most cases, material.

Finally, features and finishes that characterize simple, vernacular buildings should be retained and preserved; in the process of removing hazards, there are usually reasonable options for their protection. Wholesale removal of historic trim and other seemingly less important historic material, undermines a building's overall character and integrity and, thus, is never recommended.

For each historic property, features will vary in significance. As part of a survey of each historic property, a list of priorities should be made, in this order:

- Highly significant features and finishes that should always be protected and preserved;
- Significant features and finishes that should be carefully repaired or, if necessary, replaced in-kind or to match all visual qualities; and
- Non-significant or altered areas where removal, rigid enclosure, or replacement could occur.

This hierarchy gives an owner a working guide for making decisions about appropriate methods of removing lead paint.

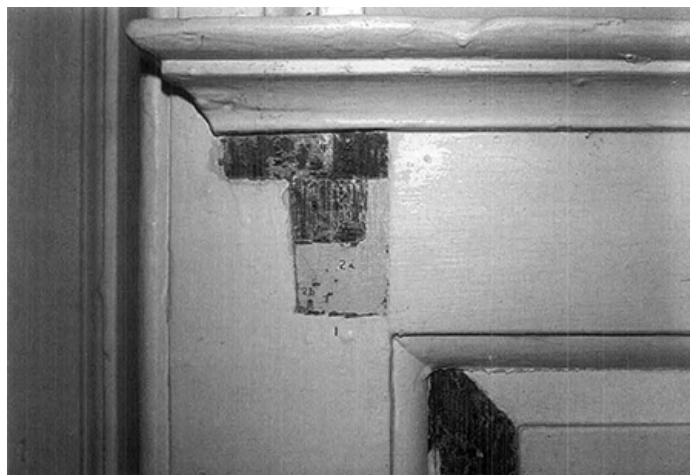
2. Undertake a risk assessment of interior and exterior surfaces to determine hazards from lead and lead-based paint.

While it can be assumed that most historic housing contains lead-based paint, it cannot be assumed that it is causing a health risk and should be removed. The purpose of a risk assessment is to determine, through testing and evaluation, where hazards from lead warrant remedial action. Testing by a specialist can be done on paint, soil, or lead dust either on-site or in a laboratory using methods such as x-ray fluorescence (XRF) analyzers, chemicals, dust wipe tests, and atomic absorption spectroscopy. Risk assessments can be fairly low cost investigations of the location, condition, and severity of lead hazards found in house dust, soil, water, and deteriorating paint. Risk assessments will also address other sources of lead from hobbies, crockery, water, and the parents' work environment. A public health office should be able to provide names of certified risk assessors, paint inspectors, and testing laboratories. These services are critical when owners are seeking to implement measures to reduce suspected lead hazards in housing, day-care centers, or when extensive rehabilitations are planned.

The risk assessment should record:

- the paint's location
- the paint's condition lead content of paint and soil
- the type of surface (friction; accessible to children for chewing; impact)
- how much lead dust is actively present
- how the family uses and cares for the house
- the age of the occupants who might come into contact with lead paint.

It is important from a health standpoint that future tenants, painters, and construction workers know that lead-based paint is present, even under treated surfaces, in order to take precautions when work is undertaken in areas that will generate lead dust. Whenever mitigation work is completed, it is important to have a clearance test using the dust wipe method to



The paint chronology of this mantel, seen in the exposed paint layers in the left corner, proved it had been relocated from another room of the house. To remove a significant feature's paint history and the evidence of its original sequence of color by stripping off all the paint is inappropriate - and unnecessary - as part of a lead

ensure that lead-laden dust generated during the work does not remain at levels above those established by

hazard reduction project. Careful surface preparation and repainting with lead-free top coats is recommended. Photo: NPS Files.

the Environmental Protection Agency (EPA) and the Department of Housing and Urban Development (HUD). A building file should be maintained and updated whenever any additional lead hazard control work is completed.

Hazards should be removed, mitigated, or managed in the order of their health threat, as identified in a risk assessment (with 1. the greatest risk and 8. the least dangerous):

1. Peeling, chipping, flaking, and chewed interior lead based paint and surfaces
2. Lead dust on interior surfaces
3. High lead in soil levels around the house and in play areas (check state requirements)
4. Deteriorated exterior painted surfaces and features
5. Friction surfaces subject to abrasion (windows, doors, painted floors)
6. Accessible, chewable surfaces (sills, rails) if small children are present
7. Impact surfaces (baseboards and door jambs)
8. Other interior surfaces showing age or deterioration (walls and ceilings)

3. Evaluate options for hazard control in the context of historic preservation standards.

The Secretary of the Interior's Standards for the Treatment of Historic Properties -established principles used to evaluate work that may impact the integrity and significance of National Register properties--can help guide suitable health control methods. The *preservation standards* call for the protection of historic materials and historic character of buildings through stabilization, conservation, maintenance, and repair. The *rehabilitation standards* call for the repair of historic materials with replacement of a character-defining feature appropriate only when its deterioration or damage is so extensive that repair is infeasible. From a preservation standpoint, selecting a hazard control method that removes *only* the deteriorating paint, or that involves some degree of repair, is always preferable to the total replacement of a historic feature.

By tying the remedial work to the areas of risk, it is possible to limit the amount of intrusive work on delicate or aging features of a building without jeopardizing the health and safety of the occupants. To make historic housing lead-safe, the gentlest method possible should be used to remove the offending substance-lead-laden dust, visible paint chips, lead in soil, or extensively deteriorated paint. Overly aggressive abatement may damage or destroy much more historic material than is necessary to remove lead paint, such as abrading historic surfaces. Another reason for targeting paint removal is to limit the amount of lead dust on the work site. This, in turn, helps avoid expensive worker protection, cleanup, and disposal of larger amounts of hazardous waste.

Whenever extensive amounts of lead must be removed from a property, or when methods of removing toxic substances will impact the environment, it is extremely important that the owner be aware of the issues surrounding worker safety, environmental controls, and proper disposal. Appropriate architectural, engineering and environmental professionals should be consulted when lead hazard projects are complex. Within the context of the historic preservation standards, the most appropriate method will always be the least invasive.

Summary and References

Reducing and controlling lead hazards can be successfully accomplished without destroying the character-defining features and finishes of historic buildings. Federal and state laws generally support the reasonable control of lead-based paint hazards through a variety of treatments. The key to protecting children, workers, and the environment is to be informed about the hazards of lead, to control exposure to lead dust and lead in soil, and to follow existing regulations. In all cases, methods that control lead hazards should be selected that minimize the impact to historic resources while ensuring that housing is lead-safe for children.

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