

**Response to Comments Matrices – Long Beach Historic District Design Guidelines  
Group 4: Bluff Park, Bluff Heights**

**BLUFF PARK/BLUFF HEIGHTS**

**Project:** Long Beach Historic District Design Guidelines      **Document/Draft:** Bluff Park/Bluff Heights Historic District Design Guidelines

**Commenter:** No contact information provided      **Response Codes:** A = Accept Comment (correct, add, clarify)  
B = Will Not Incorporate  
C = No Change Needed

**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

<b>Response to Comments (Public Meeting Comment &amp; Feedback Worksheet)</b>				
<b>Comment No.</b>	<b>Page or Section No.</b>	<b>Comment</b>	<b>Response Code</b>	<b>Response</b>
1	N/A	[What changes should be made to the design guidelines?]  Request an exception be made for front yard additions when the front yard makes up the majority of the lot (> 50%). A priority should be that the setback for an addition or new construction be best aligned with the neighboring houses for visual continuity.	C	Thank you for your feedback; these are design guidelines are for historic districts. They do not replace or supersede any portion of the existing zoning code, and City regulations will still apply.  Unique situations like this are considered on a case-by-case basis with Planning staff and the CHC.
2	N/A	[If you have any other thoughts or suggestions regarding the draft guidelines or draft style guides, please include them here:]  For new construction, vinyl windows should be allowed since vinyl is the standard in construction today. Or at least only require the front facing windows to be wooden.	C	Thank you for your feedback; the requirement for wood windows on new construction within historic districts is an existing regulation that will still apply. The design guidelines will not replace or supersede any regulation.

## BLUFF PARK

**Project:** Long Beach Historic District Design Guidelines

**Document/Draft:** Bluff Park Historic District Design Guidelines

**Commenter:** Wally Downing

**Response Codes:**  
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**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

Response to Comments (Public Meeting Comment & Feedback Worksheet)				
Comment No.	Page or Section No.	Comment	Response Code	Response
1	N/A	[What do you like about the design guidelines?] Nice coverage of potential issues.	C	Thank you.
2	N/A	[What changes should be made to the design guidelines?] The “compatible with, yet distinguishable from” language regarding additions should be eliminated or further toned down. It should be stated that the difference should be extremely subtle or if not, the rules requiring compatibility eliminate themselves.	C	The language included in the draft guidelines emphasizing that additions should be distinguishable from the original construction is derived from the Secretary of the Interior’s Standards for Rehabilitation, which is the set most applicable to the types of changes being made to buildings in historic districts. These standards are the established best-practices for the treatment of historic buildings and have been in use since they were introduced in the 1970s.  Standard 9 reads: <i>New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.</i> <a href="https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm">https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm</a> .

## BLUFF HEIGHTS

**Project:** Long Beach Historic District Design Guidelines

**Document/Draft:** Bluff Heights Historic District Design Guidelines

**Commenter:** Glenda Gabel

**Response Codes:**  
 A = Accept Comment (correct, add, clarify).  
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**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

Response to Comments (Public Meeting Comment & Feedback Worksheet)				
Comment No.	Page or Section No.	Comment	Response Code	Response
1	N/A	[What do you like about the draft design guidelines?]  -Meeting with like-minded owners and others; -Receiving copy of draft guidelines for Bluff Heights HD; -Receiving copy of craftspeople resources who work on historic homes; -info re: possibility of funds to help w/ home rehab projects	C	We are glad you found the April 14, 2018 public workshop helpful; thank you for attending.
2	N/A	[What changes should be made to the design guidelines?]  Haven't read them, don't know. Will submit comments later.	C	This comment was received at the 4/14/18 public workshop for the Bluff Heights and Bluff Park Historic Districts; public comments were gathered for several more weeks until 5/25.
3	N/A	[If you have any other thoughts or suggestions regarding the draft guidelines or draft style guides, please include them here:]  Have continuing problem re: replacing some windows on my home. Story continues...	C	Planning staff are always available to answer questions.  City of Long Beach Historic Preservation Staff: (562) 570-6194

## BLUFF HEIGHTS

**Project:** Long Beach Historic District Design Guidelines

**Document/Draft:** Bluff Heights District Design Guidelines

**Commenter:** Emily Rader

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**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

Response to Comments (Public Meeting Comment & Feedback Worksheet)				
Comment No.	Page or Section No.	Comment	Response Code	Response
1	N/A	[What do you like about the draft design guidelines?] <ol style="list-style-type: none"> <li>1. Very clear, thorough.</li> <li>2. List of local businesses that have experience with repairing renovating older homes</li> <li>3. Good descriptions and photos for specific features.</li> </ol>	C	Thank you.
2	N/A	[What changes should be made to the design guidelines?] <ol style="list-style-type: none"> <li>1. Landscaping – I have some specific revisions in mind for this section, to encourage plantings that are drought tolerant rather than stating that they “may be acceptable.”</li> <li>2. Include a section on railings for steps, since this might be important for safety. Since railings were not typical in the early 1900s, the commission should make recommendations for placement, etc.</li> </ol>	C	<ol style="list-style-type: none"> <li>1. The guidelines are intended to address treatments that are (or are not) historically compatible. There are a number of other city programs that encourage the use of drought tolerant landscaping, and its use is acceptable from a historic compatibility standpoint. Neighborhood groups are also encouraged to support drought-tolerant landscaping.</li> <li>2. The architectural style guides include additional information about railings (e.g., baluster profiles, materials, etc.) Appropriate placement would vary based on the project goals/needs, the style of the porch/house, and the location of the stairs on the house, and therefore would likely need to be addressed on a case-by-case basis with Planning Staff and Commissioners.</li> </ol>

Response to Comments (Public Meeting Comment & Feedback Worksheet)				
Comment No.	Page or Section No.	Comment	Response Code	Response
3	N/A	<p>[If you have any other thoughts or suggestions regarding the draft guidelines or draft style guides, please include them here:]</p> <p>Put page numbers on pages!</p>	A	<p>Once all public comments have been addressed and the content has been finalized, the guidelines will be placed in a more polished layout format with page numbers, stylized headings, illustrations, etc.</p> <p>Please see the adopted examples on the City's website:</p> <p><a href="http://www.lbds.info/planning/historic_preservation/historic_district_guidelines.asp">http://www.lbds.info/planning/historic_preservation/historic_district_guidelines.asp</a></p>

## BLUFF HEIGHTS

**Project:** Long Beach Historic District Design Guidelines

**Document/Draft:** Bluff Heights District Design Guidelines

**Commenter:** Donna Atwood

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**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

Response to Comments (Public Meeting Comment & Feedback Worksheet)				
Comment No.	Page or Section No.	Comment	Response Code	Response
1	N/A	[What do you like about the draft design guidelines?] Haven't looked yet.	C	This comment was received at the 4/14/18 public workshop for the Bluff Heights and Bluff Park Historic Districts; public comments were gathered for several more weeks until 5/25.
2	N/A	[What changes should be made to the design guidelines?] Haven't looked yet.	C	This comment was received at the 4/14/18 public workshop for the Bluff Heights and Bluff Park Historic Districts; public comments were gathered for several more weeks until 5/25.
3	N/A	[If you have any other thoughts or suggestions regarding the draft guidelines or draft style guides, please include them here:] None. It was a pleasure meeting/talking to you.	C	This comment was received at the 4/14/18 public workshop for the Bluff Heights and Bluff Park Historic Districts; public comments were gathered for several more weeks until 5/25.

## BLUFF PARK

**Project:** Long Beach Historic District Design Guidelines

**Document/Draft:** Bluff Park District Design Guidelines

**Commenter:** Niraj Sharma

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**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

Response to Comments (Email from Niraj Sharma)				
Comment No.	Page or Section No.	Comment	Response Code	Response
1	Additions	The guideline discourage an addition to the front of a building. This makes sense for most of the properties that have the dwelling near the front of the lot. It doesn't make sense for properties where the house is set back significantly such as mine. I recommend that an exception be allowed for properties that the majority of the yard is in front of the house (say >50% of open space is allocated to the front of the structure). And we would still have to comply with the front yard set back to achieve visual continuity. AT LEAST IT SHOULD BE CLARIFIED THAT THIS APPLIES TO CONTRIBUTING BUILDINGS ONLY	C	In unique situations like these, projects are considered on a case-by-case basis with Planning staff and the CHC. While the intent of the guidelines is to be flexible and capture a wide variety of situations, not all unique configurations can be captured in a concise way.
2		My lot is zoned for 2 units but doesnt meet the minimal 8k sq ft requirement so I would be required to demo or alter the existing structure when we newly construct. Historically speaking, we would like to preserve the existing dwelling as is, with no alterations. To do so, an exception should be allowed for 2 units on properties under 8k sq ft when so much of the lot is still available to build (maybe say when an existing structure exists and yet >50% of open space is available to build). It will allow us to keep the existing structure as is.	C	Thank you for your feedback; these are design guidelines are for historic districts. They do not replace or supersede any portion of the existing zoning code, and City regulations will still apply.  Unique situations like this are considered on a case-by-case basis with Planning staff and the CHC.

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**Response to Comments (Email from Niraj Sharma)**

<b>Comment No.</b>	<b>Page or Section No.</b>	<b>Comment</b>	<b>Response Code</b>	<b>Response</b>
3		For new construction, vinyl windows should be allowed since vinyl is the standard in development today. Or if that is too much to ask, then only require it for the front facing windows to be wooden.	C	Thank you for your feedback; the requirement for wood windows on new construction within historic districts is an existing regulation that will still apply. The design guidelines will not replace or supersede any regulation.



## BLUFF PARK

**Project:** Long Beach Historic District Design Guidelines

**Document/Draft:** Bluff Park District Design Guidelines

**Commenter:** Doug Shiels

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**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

Response to Comments (Email from Doug Shiels)				
Comment No.	Page or Section No.	Comment	Response Code	Response
1	Walkways and Porches	For Section 3.18 (Bluff Park Design Guidelines) I feel the rules concerning paint vs. materials used in front walkways and porches is inconsistent. One is given much freedom on paint color, but highly constrained on the walkway and porch appearances. I feel these should be treated consistently...either restrictive on both or more permissive on both. Personally I think color is a pretty major part of appearance and so don't feel we should be free to change it. Currently I believe we are required to keep our houses the same color and see no reason to change that rule.	C	These guidelines are not introducing any new regulations regarding the process of approval for repainting a home or making any changes to walkways or porches; rather, it is providing additional guidance in making compatible changes.  Changes in paint color or a change in walkway width or location or any modification to a porch would require a Certificate of Appropriateness; these guidelines do not change this requirement.
2	Mechanical Equipment	Based on my recent experience, I don't think the HVAC rule is well constructed. Many houses here share my problem of having no suitable place in the yard to place equipment, and also share my ability to screen the equipment from street view on a portion of the rear roof. I feel these guidelines should acknowledge that issue and make some accommodations for it.	C	Thank you for your feedback; whenever possible, this equipment should be installed at ground level to avoid damage to the structure itself as well as visual obtrusiveness. Extenuating circumstances may be considered on a case-by-case basis as these are general guidelines.

**Response to Comments (Email from Doug Sheils)**

<b>Comment No.</b>	<b>Page or Section No.</b>	<b>Comment</b>	<b>Response Code</b>	<b>Response</b>
3	Window Screens	I think the rules on window screens are excessively intrusive for no meaningful purpose. Standard window screens (which are aluminum and not wood frame) have a negligible visible impact but are much more practible for the homeowner than wood (which probably would be a very expensive custom job). Many houses down here don't have air conditioning and rely on open windows and breezes to keep cool in summer. Making the window screen such a challenge to the homeowner just encourages the install of more air conditioning systems instead, and is that really a desired tradeoff? Allowing practical screens in the rear but not front will not enable sufficient air flow and again just force homeowners into air conditioning use. Further, why are aluminum screens banned but aluminum screen doors just "not recommended". This is a logical inconsistency.	A	We have revisited this point and have revised the language to read that aluminum window screens and screen doors are discouraged to address the inconsistency indicated in this comment. Wood frames for door and window screens are encouraged. .
4	Security Bars	I think the restriction on security bars is inappropriate. My neighbors had a front facing window broken a few months ago and a thief entered through there and stole jewelry from the house. The police are stating an inability to stop this growing problem. Taking the security bars option away from the resident along with a police force that states it cannot protect us from such crime seems very wrong. So far I don't see anybody pursuing this option (and hope none of us ever feel the need to do so), but they should have it available if our police protection continues to deteriorate. Perhaps the guidelines could be helpful and suggest bars that would be visually acceptable.	C	Security bars would be very visually obtrusive on the homes in Bluff Park and detract from its historic character.  Subtler methods of providing home security when it is deemed necessary include electronic security systems, interior swing-away bars, or as another commenter pointed out, metal mesh screens that alert the homeowner when they are cut.

**Response to Comments (Email from Doug Sheils)**

<b>Comment No.</b>	<b>Page or Section No.</b>	<b>Comment</b>	<b>Response Code</b>	<b>Response</b>
5	Additions	I find all the discussion on additions to be far too permissive. I'd like to see our building shapes locked into place and don't see a need to seeming allow substantial additional building structure in the backs (and on the tops) of the houses. If people want to redo backyard landscaping, fine, and some allowance can be made for a covered patio (though the extreme of a cover over the whole backyard would be far too much), but when actual buildings get above the fence line then it is a problem in my mind. It changes our backyard views (and some no doubt can be seen from the front) in potentially significant ways. And the idea of allowing additions to the tops of houses, clearly altering the front view substantially, seems egregiously inconsistent with all the nitpicking on issues like wood screens.	C	<p>Thank you for your comment; these are general guidelines for historic compatibility and are intended to address a wide variety of situations and resident needs.</p> <p>Any addition to a residence would still require a Certificate of Appropriateness as well as public noticing for anything over 250 square feet.</p>

## BLUFF PARK

**Project:** Long Beach Historic District Design Guidelines

**Document/Draft:** Bluff Park District Design Guidelines

**Commenter:** Laura Gleed

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**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

Response to Comments (Email from Laura Gleed)				
Comment No.	Page or Section No.	Comment	Response Code	Response
1.		Could homeowners that do not have a side driveway ADD the two cement strip driveway to the side of their property leading to their side gate and pay to change the curb, etc. to add either one or two off street parking spaces to alleviate the parking congestion in our neighborhood? It may not be original to a homeowner’s specific property but it would be consistent to the look of the historic district and make a huge difference for the quality of life for the residents who could benefit from this option.	C	Thank you for your comment; this suggested change regarding a side-driveway that does not lead to a garage is not allowed per the citywide zoning code, therefore it is not within the scope of these historic district guidelines to allow such a change.
2.		Could we be issued Resident Permits for overnight parking per block or per street to ensure parking for residents near their homes? And/or, could a two hour or four hour time limit for parking be put into place with exemption for resident passes/guest passes issued for all Bluff Park residents? We get people parking vehicles for days at a time in front of our house who do not live anywhere near us. We have also had many stolen cars abandoned on our street. They often sit until after being ticketed for street cleaning. Then we call for them being parked for too many days. Having resident passes and 2 hour or 4 hour parking limits would alleviate this problem.	C	Issues such as parking permits and or time limits are not within the purview of historic district design guidelines, which are meant only to provide clarity regarding compatible changes to historic properties. This issue should be directed to another City department, such as Parking Services or Public Works.

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## BLUFF PARK

**Project:** Long Beach Historic District Design Guidelines

**Document/Draft:** Bluff Park District Design Guidelines

**Commenter:** Jeffrey Mallin

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**Addressed By:** Alejandro Plascencia, Alison Spindler (Long Beach Development Services), Amanda Yoder Duane (GPA Consulting)

**Response to Comments (Email from Jeffrey Mallin)**

<b>Comment No.</b>	<b>Page or Section No.</b>	<b>Comment</b>	<b>Response Code</b>	<b>Response</b>
1.		<p>Shouldn't the guidelines conform to the Bluff Park Historic District Ordinance (attached)? Can the ordinance's stipulations be referenced and respected within the new guidelines document, especially, in terms of the emphasis on fitting in within the block on which alterations and new construction is erected. To quote from the attached Ordinance on pages 4-5:</p> <ol style="list-style-type: none"> <li>1. <i>Construction...shall conform to the bulk mass, scale and height of the majority of existing structures on both sides of the street on the block on which the new structure is to erected</i></li> <li>2. <i>The style...materials ... and landscape shall not be uncharacteristically different from the predominant style of the immediate surroundings.</i></li> <li>3. <i>Driveways and garage entrances shall conform to the existing standard on the block on which the new building is to be erected. For example, if the standard is alley access to garage, then new structures shall not have street access.</i></li> </ol>		<p>Although the exact phrases from the Ordinance are not included in the Guidelines, the same policies and practices have been applied within the new and expanded guidelines, and are intended to further the original Ordinance's objectives.</p> <p>For example,</p> <ul style="list-style-type: none"> <li>○ "The contributing residences within the Bluff Park Historic District are varied in style, but they are primarily two stories in height. Property owners planning new construction should consider including features like a gabled, pitched or flat roof with a parapet, wood or stucco cladding, traditional decorative features, prominent porches, rectangular window and door openings in their design, and anticipate conforming to the prevailing height and setback in the district, especially that of contributing properties immediately adjacent to the proposed new construction."</li> <li>○ "The width, location, and configuration of existing driveways should be retained, as this will preserve the building's historic relationship to its site, and maintain the visual continuity of the district."</li> </ul>
2.	5	On Page 5: District Description. The boundaries mentioned in the 2nd paragraph fail to mention the small portion that is east of Loma. The historic lampposts are an iconic feature of the district and seem worthy of mention here.	A	This can be added.
3.	9-10	Should the restrictions on garages include a limit on approaching the lot line and how wide the expansion can be? Can the document include language on 2nd stories, decks, living spaces and game rooms, or are there restrictions/guidelines on these topics elsewhere in other documents?	C	<p>The zoning code provides the regulations for uses and development standards including setbacks from the property line(s) for accessory buildings, including garages.</p> <p>The design guidelines provide general guidance on implementing changes in a historically compatible manner.</p>

**Response to Comments (Email from Jeffrey Mallin)**


<b>Comment No.</b>	<b>Page or Section No.</b>	<b>Comment</b>	<b>Response Code</b>	<b>Response</b>
4.	10	It says, "... unless the owner is able to demonstrate that there is no other feasible option to increase usable space." This language seems to give the owner the option to expand the garage without much question as to what s/he defines as "usable space".	C	<p>The goal of these guidelines is to maintain the spatial relationship between the accessory building and primary dwelling where possible.</p> <p>The placement and location of accessory buildings and primary dwellings are regulated by the zoning ordinance; therefore, any addition must meet the requirements of those regulations.</p> <p>This exception would have to be truly an exception, and the owner would have to demonstrate that it is a last resort for this unusual circumstance to be approved. Some lots within the city are very small, and the guidelines need to be flexible enough to accommodate a number of situations.</p>
5.	18	Roof Decks. Can the bulleted, bolded points specify that they must be in the rear only?	C	The guidance states that they should not be visible. The rear elevation may not always be the least visible, say, for a corner property.
6.	32	Window Screens. Appropriately colored painted aluminum framed screens can sometimes look discrete and appropriate, at least in my opinion. How important is it that be wood-framed screens?	A	We have revisited this point and have revised the guidance such that wood frames for door and window screens are encouraged, while aluminum and metal-framed screens are discouraged.
7.	37	Security Doors. I agree with the prohibition against security doors and security bars. In describing alternate security measures, I understand that screens can incorporate security features (wires) that set off an alarm when the mesh material is cut. This might be something to consider adding here.	C	Thank you for feedback, this would be a great thing to share with neighbors and friends who are seeking compatible ways to incorporate security measures in a discrete and high-tech manner.
8.	38	Storm and Screen Doors. Why would anyone need a storm door? Suggest removal of that being permissible.	C	The design guidelines are intended to be inclusive and as flexible as possible in order to reasonably accommodate the wide array of property types, needs, and situations that may arise while also maintaining historic compatibility.

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Response to Comments (Email from Jeffrey Mallin)				
Comment No.	Page or Section No.	Comment	Response Code	Response
9.	42	Upper Story Additions. Would it be appropriate to add language that, for historic reasons, upper story additions should be discouraged?	C	<p>The guidance encourages property owners to first consider single-story additions to the rear. However, this document provides a balance between what is allowed per the zoning ordinance with historic compatibility and meeting the needs of residents.</p> <p>Any second-story addition has to go before the CHC and be publicly noticed, adding a further level of public review.</p>



**Response to Comments (Email from Jeffrey Mallin)**

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10.	49	<p>Alterations to Non-Contributing Buildings. In reference to the 1st sentence of the last paragraph of text, saying, "Owners of properties that no longer contribute to the district solely due to major alterations...." What kinds of alterations would deem a building no longer contributing when it was built in the contributing time period? I don't think it is in the best interests of the historic district to have structures removed from being significant just because of unfortunate alterations that were allowed in the past.</p>	C	 <p>Cumulative alterations to a property, like those on a 1912 bungalow pictured here (non-original windows and doors in non-original openings, porch enclosure, stucco over/replacing original wood cladding) have diminished the historic character of the home such that it no longer resembles a 1912 bungalow.</p> <p>This property would not be considered a contributor even if it was built during the period of significance. However, for a building to be considered a non-contributor due to alterations, the alterations would have to be fairly substantial and cumulative, along the lines of those pictured above. Alterations like new door and window openings, non-original windows in materials like vinyl and aluminum, porch infill, highly visible and/or incompatible additions—especially to the front or side elevations—and wholesale replacement of cladding with an incompatible material are alterations that could cause a building to no longer be considered a contributing element. Including a heavily altered building as a contributor to a district would not be a benefit, as it would not accurately convey the historic character of the district and would dilute the overall integrity.</p>

**Response to Comments (Email from Jeffrey Mallin)**

<b>Comment No.</b>	<b>Page or Section No.</b>	<b>Comment</b>	<b>Response Code</b>	<b>Response</b>
11.	50	For the photo of "least compatible", wouldn't the Versailles (2601 E. Ocean) be a better choice than the Galaxy (2999 E. Ocean)? For the photo of "more compatible", wouldn't 3228 E. 1st St be a better choice than the photo here, since the photo here shows a prominent front-facing garage and gate that are not at compatible with our district.	C	<p>The plan, height, and orientation of the Galaxy is less compatible with the district than the Versailles.</p> <p>Per information available from the LA County Tax Assessor, 3228 E. 1<sup>st</sup> Street was constructed in 1939 and was therefore constructed within the established period of significance for Bluff Park (1903-1949).</p> <p>The intent of the photographs on these pages is not to show the most compatible or best examples within the district, but rather a sampling of properties constructed after the period of significance ended (1949) to illustrate ways that new construction can disrupt the continuity of the district, as well as ways that it can be reasonably compatible while still appearing new, which is more desirable from a preservation standpoint to avoid creating a false sense of history.</p>
12.	51	For the photo of "most compatible", isn't there a better home to show? Why is it important that it have a "landscaped front yard"? The setback of the upper and lower stories and the tall metal railing on the 2nd story do not seem to make it an ideal selection. Makes me wonder if the photo shown here is more of an example of what <u>not</u> to build. Might there be a better photo to put in its place here?	C	<p>The intent of the photographs on these pages is not to show the most compatible or best examples within the district, but rather a sampling of properties constructed after the period of significance ended (1949) to illustrate ways that new construction can disrupt the continuity of the district, as well as ways that it can be reasonably compatible while still appearing new, which is more desirable from a preservation standpoint to avoid creating a false sense of history.</p>

		<p>Some of the word choices seem to open up the possibility for owners to challenge the ambiguity and inconsistency. Has this document been reviewed by the city attorney? If not, should/can it be? The verbiage seems to vary from place to place in the document, for example:</p> <ol style="list-style-type: none"> <li>1. "visible" versus "highly visible" from the street. Do you mean to make a distinction here between something that is visible, as opposed to something that is highly visible? What is the difference?</li> <li>2. "discouraged" versus "not permitted" versus "not recommended" versus "should never". Do you mean to make a distinction in the degree of prohibition specific and distinct in each instance? If something is "discouraged" but another thing is "not permitted", does that mean the former is permissible but the latter is definitely not.</li> <li>3. "may be" versus "should be" versus "encouraged" versus "should always". Do you mean to make a distinction in the degree of permissiveness specific and distinct in each instance?</li> <li>4. "historic" or "existed historically" versus "original". And then sometimes you put them together with an "or". Is there a reason that you chose "historic" for some places in this document and "original" in other places? Does each instance of the word choice have a specific and distinct meaning? Or, are the terms meant to be synonymous or equivalent? Would a feature that existed in the 1970's or 1980's be considered "historic" (but not "original") because it existed at some point in the past?</li> </ol>	<p>A/C</p>	<p>As these are guidelines and not regulations, they are not legally binding and are only intended to provide consistency in the decision-making process between the public, CHC, and planning staff.</p> <p>They provide flexibility in order to reasonably accommodate the wide array of property types, project needs, and situations that may arise while maintaining historic compatibility. They do not replace or supersede any existing zoning code or regulations.</p> <p>To briefly address your questions -</p> <ol style="list-style-type: none"> <li>1. Visible vs Highly visible = where highly visible is used, it is to provide reasonable concession for design topics such as additions. If compatibly added, these features should not be <i>highly</i> visible from the street, but there is an understanding that some portion of the added compatible feature may be partially visible from certain vantage points. If it were highly visible, this would suggest that it was not subordinate to the historic property and therefore not compatible.</li> <li>2. There is an intended distinction in the language, but we appreciate the comments and careful review, and have gone back through the document to ensure the language used was consistent with our intent.</li> <li>3. In reviewing instances of the terms pointed out, "may be" typically describes proposed changes that are permissible provided certain conditions are met (e.g., a rear addition may be added, provided it is compatible). "Should be" is typically used to describe the application of best preservation practices (e.g., historic fabric should be retained and repaired or replaced in kind). Encouraged is typically used when referring to a change that is desirable but not mandatory, such as reversing a prior incompatible alteration.</li> <li>4. Original and historic may be one and the same but they are not necessarily synonymous. An original feature is a feature that was part of the property since its date of construction and has always been. A historic feature is a feature that has been part of the property since its period of significance. It may or may not be original, but still</li> </ol>
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				<p>contributes to the property's historic character. (For example, a light fixture that was added in the 1920s to a 1912 cottage).</p> <p>In instances where "or" is used, it is intended to address a range of existing conditions. Original wood siding should be retained; however, if your wood siding has been replaced in the past but is historically compatible, this should also be retained rather than replaced.</p> <p>A non-original feature from the 1970s or 1980s is unlikely to be historic unless the property dates from that time period. It may be historically compatible if it was sensitively added.</p>
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