PLANNING SUCCESSFUL TAX CREDIT REHABILITATIONS

Application and Application Process

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Washington State Dept. of Archaeology and Historic Preservation (SHPO)
BECOMING A CERTIFIED PROJECT
Complete a 3-part application

Part 1 – Evaluation of Significance

Part 2 – Description of Rehabilitation

Part 3 – Request for Certification of Completed Work
PART 1: Statement of Significance

Owner requests determination by NPS that a property contains a “CERTIFIED HISTORIC STRUCTURE”

• **Contributes** to the significance of a National Register or certified local historic district

• Listed **individually** in the National Register (If only one building exists on property, then Part 1 is omitted.)

• **Preliminary** determination of eligibility
PART 1: Evaluation of Significance

Non-historic coverings must be removed
Properties with multiple, functionally related buildings are considered a single property for review purposes.
PART 1: Evaluation of Significance

A historic property can receive only one certification; portions of buildings – such as condos – cannot be certified.
PART 1: Submission

Applicant must submit:

- Description of physical appearance
- Statement of significance
- Photographs of property (exterior & interior)
- Historic district map and site plan

Example of a Part 1 application
PART 2: Description of Rehabilitation

- Pre-rehabilitation **CONDITION** of property is described on a feature-by-feature basis; corresponding proposed work on these features is described.

- **EXTERIOR AND INTERIOR PHOTOGRAPHS** documenting ALL areas of property – even where no work is planned – are included (for interiors, overall views of spaces are essential).

- Floor plans and elevation **DRAWINGS** that reflect the existing condition and proposed work are important components.

- Proposed work is evaluated against the Secretary of the Interior’s **STANDARDS** for Rehabilitation.
### SAMPLE

**Property Name:**

206 Old Farm Road, City, State

**Property Address:**

5. DETAILED DESCRIPTION OF REHABILITATION / PRESERVATION WORK – Includes site work, new construction, alterations, etc. Complete blocks below.

<table>
<thead>
<tr>
<th>Number</th>
<th>Architectural feature</th>
<th>Approximate Date of feature</th>
<th>Describe existing feature and its condition:</th>
<th>Describe work and impact on existing feature:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Barn siding</td>
<td>ca. 1920, 1972</td>
<td>The north, east, and west facades have painted board and batten siding. Most of the siding is in good condition. The south side has modern corrugated metal siding which is deteriorated.</td>
<td>The rusted and weathered corrugated metal siding on the south side will be replaced with board and batten wood siding to match the other facades. Any deteriorated portions of wood siding will be replaced to match the existing.</td>
</tr>
<tr>
<td>2</td>
<td>Roof</td>
<td>1981</td>
<td>The roof has two layers of asphalt shingles over deteriorated wood shingles. There are several portions which are damaged and need replacement.</td>
<td>All shingles will be removed. New asphalt shingles will be installed that recall the appearance of wood shingles.</td>
</tr>
<tr>
<td>3</td>
<td>Limestone foundation</td>
<td>1909</td>
<td>The limestone foundation is in relatively good condition. Several places have deteriorated mortar joints and damaged stone. There is a large crack at the SE corner.</td>
<td>The foundation will be repointed where damaged. Mortar will match the existing in color and composition. The joint profile will match the existing as well. Where the limestone is damaged, matching pieces will be used to replace deteriorated sections. New stone will match the existing in color and shape. All work will be done in accordance with NPS Preservation Brief 2.</td>
</tr>
<tr>
<td>4</td>
<td>Main house, cattle barn, implement shed, grain silo, spring house, and a garage</td>
<td>varies.</td>
<td>No work is planned for these features.</td>
<td></td>
</tr>
</tbody>
</table>

**Photo no.** 1-7, 10  
**Drawing no.**

**Photo no.** 1-7, 12  
**Drawing no.**

**Photo no.** 1, 8-9, 11  
**Drawing no.**

**Photo no.**

**Drawing no.**
PART 2: Minimum Recommended Descriptions

- Site work
- Exterior façades (single item for simple projects, each façade for complex projects)
- Exterior openings
- Each floor interior (typical floors can be single item)
- Building systems
  - Plumbing
  - HVAC
  - Electrical

- Special rehabilitation concerns:
  - Storefront alterations
  - New HVAC systems
  - New windows
  - Interior partitions, trim and finishes
  - Exterior masonry cleaning
  - Exterior masonry repair
  - New additions and new construction
PART 2: Describe Existing FEATURE and its CONDITION

EX: • Architectural style (ex: Gothic revival, Italianate, Queen Anne, etc)

• Character-defining features (ex: original or historic double hung wood windows with 6 over 6 sashes in with brick molds and granite sills in poor condition, common bond brick coursing with failing mortar joints, etc)

• Features: double hung windows, brick molds, granite sills, gypsum interior wall partitions, etc

• Conditions: poor, deteriorating, well maintained, moisture damage, etc
PART 2:
Things that are neither features nor conditions
PART 2:
Describe work and impact on existing feature

No. 33. 2012. Original wood windows—center pivot lower unit with transom hopper. Typical for stories two through five. Source: Historic Seattle
PART 2:
Describe work and impact on existing feature

No. 34. 2012. Detail of heavy timber beam, column and connection. Car deck ceiling visible. Sheetrock wall is non-historic. Source: Historic Seattle
PART 3: Request for Certification of Completed Work

- Owner submits completed Part 3 form along with photographs of completed work (project must be completed at this point)

- Approval issued by NPS for a “certified historic structure” where completed work meets the Standards for Rehabilitation; project is then a “certified rehabilitation”
HOW DOES THE PROCESS WORK

Who Initiates Consultation?

Historic Property Owner

Completed Application (in duplicate)

SHPO

Completed Application with SHPO recommendation

NATIONAL PARK SERVICE
KEYS TO A SUCCESSFUL PROJECT
Risk Management

• Contact the SHPO **EARLY** in the planning process for advice on rehabilitation treatments

• Submit **COMPLETE** application to SHPO well **BEFORE** beginning work

• Take **GOOD, CLEAR** photos of entire building and site **BEFORE** work begins

• Submit Part 2 describing **FULL** scope of work

• **DO NOT** begin work until NPS approves Part 2 application
KEYS TO A SUCCESSFUL PROJECT
Risk Management

- Identify the **CHARACTER-DEFINING FEATURES** of the building
- Complete work as previously **APPROVED** or submit project amendments for any changes
- Keep the **STANDARDS** in mind whenever changes are made after Part 2 approval, and refer to NPS online and printed guidance materials
- For large or complicated projects assemble an **EXPERIENCED TEAM** – architect, preservation consultant, contractors, accountant/tax attorney – and ensure good team communication
- Pay the NPS **REVIEW FEE** before NPS receives Part 2 application; the 30 day (non-statutory) clock begins upon payment
POTENTIAL PITFALLS

Common Fails

- Proceeding with work before Part 2 approved
- Refusing to negotiate project changes in response to SHPO and NPS guidance and conditions
- Assuming local review / approval = certification of rehabilitation for tax credits
LEADING CAUSES OF DENIAL

Step One is Admitting You Have a Problem

- Insufficient pre-rehab photographic documentation
- Completing work that does not meet the Standards before contacting the SHPO or beginning the application process
- Program that is too intense for building and site
- Substantial interior demolition

Project denied for incompatible work completed prior to Part 2 review.