

# **MEMO**

To: Nick Sugar, City Planner and Amanda Krickovich, Community Development, City of Hudson

From: Olivia Hopkins, AIA | Historic Architecture, Perspectus

Date: April 18, 2024

Re: 172 Aurora Street

CC: Lauren Pinney Burge, AIA, Principal & Alice Sloan, Assoc. AIA, APT-RP | Historic Architecture, Perspectus

### SUBJECT PROPERTY: 172 Aurora Street

At the request of the City of Hudson, Ohio and per their Codified Ordinances Section 1202.04(b)(3), Perspectus is providing this advisory report to assist the Architectural and Historic Board of Review (AHBR) in their review of the Owner Application requesting alterations to the designated historic property. The following were applied as it pertains to this application under the Codified Ordinances Appendix D. - Architectural Design Standards Section III-2.b.(1):

- 1. Codified Ordinances Appendix D. Architectural Design Standards Section III-2 (attached as EXHIBIT A)
- 2. The Secretary of the Interior's Standards for Rehabilitation (attached as **EXHIBIT B**)
- 3. National Park Service Preservation Briefs #14 Exterior Additions to Historic Buildings: Preservation Concerns & #16 The Use of Substitute Materials on Historic Building Exteriors.

Perspectus performed the following:

- 1. Reviewed the submitted documentation for the appropriateness of the proposal, compliance with above referenced documents, and general insights on the submittal.
- 2. Conducted a site visit on April 16, 2024.

#### **QUALIFICATIONS**

**Lauren Pinney Burge**, Principal, Historic Architecture, is a registered Architect in the state of Ohio, meets Federal Qualifications (36 CFR 61) for Architectural History, Architecture, Historic Architecture and Historic Preservation Planning, and is Section 106 Trained.

Olivia Hopkins is a registered Architect in the state of Ohio, meets Federal Qualifications (36 CFR 61) for Architecture, Historic Architecture.

**Alice Sloan** meets Federal Qualifications (36 CFR 61) for History and Architectural History and is an Association for Preservation Technology Recognized Professional (APT-RP).

#### PROPOSED CHANGES

The owner proposes to make the following changes to the existing structure:

# **House Massing and Materials & Trim**

Note that historic brick chimneys were removed before the site visit occurred.

- 1. Removing, at the rear (south), the one-story 1913 rear addition.
- 2. Removing, at the rear (south), the rear one-story addition (date unknown) which connects to the rear of the 1913 addition.
- 3. Constructing, at the rear (south), a one-story addition. The addition is roughly in the same location as the existing previous additions, a proposed chimney will be the only portion visible when viewing the house straight on from the street. The overall project will be adding roughly 430 SF to the property. The roof ridge line of the addition is held below the historic house. The proposed materials are, brick veneer at the foundation to match existing, cedar horizontal siding, Andersen 400 series (vinyl clad wood) architectural style windows with full divided lights with a white exterior, GAF Timberline HD architectural roof shingles color charcoal, and Boral trim at windows, doors, fascias, friezes, and pilasters. Boral trim is a poly-ash trim product, consisting of a blend of proprietary polymers and coal combustion products (ash).
  - a. The main mass of the proposed addition has a footprint of a long thin rectangle which rises one story high. There is a north/south facing gable. The left side (east) elevation is set back from the side (east) wall of the historic house. The proposed addition's elevation is broken up into 4 bays. The right, northern most bay closest to the historic house, has a set of wood steps up to a wood side entry door. Dividing this bay from the remaining three is a simplified pilaster from the historic house column with a square base and small rectangular column capital. The next bay has a pair of 6 over 6 double hung windows. The next bay has a tripartite of 6 over 6 double hung windows and another simplified column at the end of the massing. These three window bays are separated by vertical trim board. The rear

south elevation has Boral (polymer-coal ash) shiplap smooth siding in the roof gable end. On either side of the screened in porch is a pair of 6 over 6 double hung windows. The corners have simplified pilasters. The side (west) elevation is broken up into 4 bays. The left, northern most bay closest to the historic house, retains the existing wall, flush with the historic house. The paired fixed windows are being replaced with a 6 over 6 double hung window with shutters. Dividing this bay from the remaining three is a simplified pilaster. The next bay has a 6 over 6 double hung window with shutters. The next bay has a brick chimney. Note the chimney cap is above the proposed addition's roof ridge line but is still held below the historic house roof. The last bay has a 6 over 6 double hung window with shutters and a simplified pilaster at the corner.

- b. Centered on the rear (south) of the proposed living space addition is a square screened in front porch. Note the screened porch's north/south gable roof steps down from the first addition's roof. The screened front porch on the sides (east and west) and rear (south) elevations has screens with Boral (polymer-coal ash) trim details. At the corners there are simplified pilasters. The rear (south) elevation has a wood staircase leading to a pair of screened doors.
- 4. Replacing, on all sides of the historic house, the historic painted wood siding with Cedar horizontal siding painted white.
- 5. Replacing, on all sides of the historic house, the historic shutters with new shutters matching the existing design and will be black.
- 6. Replacing, on all sides of the historic house, the historic wood window and door trim with Boral (polymer-coal ash) trim to match existing profiles.
- 7. Replacing, on all sides of the historic house, the historic wood trim at fascias friezes, and pilasters with new Boral (polymer-coal ash) trim to match existing profiles.
- 8. Removing, on the front (north) elevation the historic wood trim between the first and second floor windows.
- 9. Removing, on the rear (south) elevation the non-historic wood stairs and non-historic fiberglass French doors.
- 10. Replacing, on the roof, the non-historic shingles.

#### **Historic Wood Windows:**

- 11. The historic wood windows of all configurations are being replaced with 6 over 6 double hung windows Andersen 400 series (vinyl clad wood) architectural style windows with full divided lights with a white exterior.
  - a. Note these windows are being moved from their original location.
    - i. The front (north) window above the front door is being adjusted to be aligned with the center of the door.
    - ii. The two front (north) first floor windows to the left of the front door are being adjusted to be aligned with the second floor windows.
    - iii. The front (north) second floor window on the left is being lowered to match the head height of the other second floor windows.
    - iv. The two short windows on the side (west) elevation are being replaced with taller windows to match the head and sill height of the other window.
- 12. Removing, on the rear (south) elevation at the second floor, historic windows including: a pair of 6 lite wood fixed windows, a 6 lite wood fixed window, and a 6 over 6 double hung window.

## **Replacement Vinyl Windows:**

13. Replacing on the side (west) elevation at the first floor, the two non-historic replacement vinyl 6 over 6 double hung windows and one historic wood 6 over 6 double hung window with three short 6 over 6 double hung windows. The proposed window is Andersen 400 series (vinyl clad wood) architectural style windows with full divided lights with a white exterior.

## **New Window Openings:**

- 14. Adding, on the side (east) elevation at the first floor, two 6 over 6 double hung Andersen 400 series (vinyl clad wood) architectural style windows with full divided lights with a white exterior in the two side bays.
- 15. Adding, on the rear (south) elevation at the first floor, a 6 over 6 double hung window where the French door was located.
- 16. Adding, on the rear (south) side of the roof, a skylight.

## Garage

- 17. Removing the existing 1920 garage. Note the garage is called out in the 1989 National Register Nomination Boundary Increase as being a contributing structure to the district.
- 18. Constructing, closer to the street, roughly in line with the rear of the proposed addition to the house a two car garage with a hipped roof. The garage is roughly square in plan and is wider than the existing. The materials are, brick veneer foundation, Boral (polymer-coal ash) trim at the doors, windows, fascias, friezes, and pilasters to match existing profiles, Cedar horizontal siding, GAF timberline HD architectural roof shingles color charcoal, and

Andersen 400 series (vinyl clad wood) architectural style windows with full divided lights with a white exterior. It is presumed the existing profiles to be matched are the profiles on the main historic house. The front (north) elevation has a double car garage door with a top row is four 8 lite windows, the bottom 3 rows are vertical paneling. The side (east) has one 6 over 6 double hung window centered on the elevation. The rear (south) elevation has two 6 over 6 double hung windows roughly equally spaced on the elevation. The side (west) elevation has a 6 over 6 double hung window centered on the elevation and a door to the north end. Note the door material is not specified.

### **Pool House**

19. Constructing, at the rear (south) end of the property, a one-story pool house with a hipped roof and cupola with a standing seam roof and 4 lite windows on each side. Note the pool house will not be visible when viewing the property from the street as the structure will be hidden by the garage and the house. The materials are, brick veneer foundation, natural limestone columns and bases at the front, Cedar horizontal siding, Boral (polymer-coal ash) trim at the doors, windows, fascias, friezes, and pilasters to match existing profiles, GAF Timberline HD architectural roof shingles color charcoal, and Andersen 400 series (vinyl clad wood) architectural style windows with full divided lights with a white exterior. The front (north) elevation will have sliding doors, material not specified, and a covered porch with HB&G (fiberglass Permacast columns) structural Tuscan columns and simplified pilasters at the building face. The side (east) elevation has a 10 lite door with 3 lite transom above, two 6 over 6 double hung windows, and a 6 paneled door. The materials for the doors are not specified. The rear (south) elevation has a 6 over 6 double hung window centered on the elevation. The side (west) elevation has a 6 paneled door, material not specified, and three 6 over 6 double hung windows.

#### APPROPRIATENESS OF PROPOSED CHANGES

## **House Massing and Materials & Trim:**

- 1. Proposed Changes #1-3 are not appropriate because of the proposed removal of what appears to be historic materials from the site. The Secretary of the Interior Standards (SIS), #4, states that "changes to a property that have acquired historic significance in their own right will be retained and preserved." The period of significance for the District ends in 1963, any modifications which have happened up to c1963 have acquired historical significance. Note the construction date of the rear-most addition, which attaches to the 1913 addition, is unknown, but appears to date to within the period of significance based upon cursory observations of the condition of the wood materials.
- Proposed Change #4 is <u>not appropriate</u> because of the proposed removal of the historic wood siding. SIS #6
  which states that "deteriorated historic features shall be repaired rather than replaced." It is our qualified
  professional opinion that the wood siding is not in a state of deterioration requiring full replacement throughout the
  entire structure.
- 3. **Proposed Change #5** is <u>not appropriate</u> because, upon cursory review, the shutters appear not to be in a state of deterioration requiring full replacement. If in fact they are deteriorated beyond the state of repair documentation should be provided showing evidence of the deterioration. To comply with SIS #6, "Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials."
- 4. Proposed Change #6-7 are not appropriate because of the proposed removal of the historic wood elements. It is our qualified professional opinion that the wood trim at the windows, doors, fascias, friezes, and pilasters were not in a state of deterioration requiring full replacement throughout the entire structure. To comply with SIS #6, limit removal and replacement to areas of wood trim in advanced state of deterioration. Boral is an appropriate substitute material if finished smooth.
- 5. **Proposed Change #8** is <u>not appropriate</u> because of the proposed removal of historic wood trim, which does not comply with SIS #2, "The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided."
- 6. **Proposed Change #9** is <u>appropriate</u> as the stairs and French doors appear to be outside the period of significance.
- 7. **Proposed Change #10** is <u>appropriate</u> because based upon cursory review (from the ground) of the existing roofing, it was determined that the existing roofing appears to be black asphalt shingles (non-historic).

## **Historic Wood Windows:**

8. **Proposed Changes #11-12** are <u>not appropriate</u> because of the proposed removal of the historic wood windows, which does not comply with SIS #6 as it will remove what appears to be historic materials from the site. The SIS #4 also applies to the removal of historic wood windows because while the windows may not be original to the house they appear to date within the period of significance (before1963). The exception is the two side (west) windows which are non-historic vinyl replacements.

## **Replacement Vinyl Windows:**

9. **Proposed Change #13** is <u>can become appropriate</u> because the proposed replacement window is a vinyl-clad wood. Detail drawings should be provided to see how accurately a vinyl-clad wood window can match historic profiles. It is also in our qualified professional opinion that the historic wood windows are in serviceable condition.

## **New Window Openings:**

10. **Proposed Changes # 14-16** <u>can become appropriate</u> with the following alterations to the design. The proposed windows would comply with SIS #9 "new work shall be differentiated from the old, but compatible with the massing, size, scale" if the configuration is changed to a 1 over 1 double hung window to allow these windows to be distinct and simplified from the existing historic 6 over 6 double hungs. The proposed windows are a vinyl-clad wood window and detail drawings should be provided to see how accurately a vinyl-clad wood window can match historic profiles.

#### Garage:

11. **Proposed changes #17-18** are <u>not appropriate</u> as the garage is listed as a contributing building to the Historic District. Removal of the garage will be removing a historically significant structure.

#### **Pool House:**

12. **Proposed Changes #19** can become appropriate with the following alterations to the design. Typical design elements of Greek Revival buildings are, gable or low pitched roofs, round Doric columns, doors with 1, 2 or 4 panels, and 6 pane glazing for windows (McAlester pages 247-250). Changes to the pool house should be a lower roof pitch and use 1, 2, or 4 paneled doors.

#### **SOURCES CONSULTED**

- 1. AHBR Agenda Packet with OHI Form and proposed drawings by J Kapela design & construction with material specifications and garage information.
- 2. AHBR Meeting Agenda Minutes, 172 Aurora Street, 4/10/2024.
- 3. House Report for HHA Historic Marker: 172 Aurora Street/I.T. Frary House, 1877. Hudson Heritage Association (HHA).
- 4. Grimmer, Anne and Weeks, Kay. *Preservation Briefs 14 New Exterior Additions to Historic Buildings: Preservation Concerns*. National Parks Service US Department of the Interior Technical Preservation Services. August 2021.
- Sandor, John, Trayte, David and Uebel, Amy. Preservation Briefs 16 The Use of Substitute Materials on Historic Building Exteriors. National Parks Service US Department of the Interior Technical Preservation Services. September 2023.
- 6. Ohio Historic Inventory (OHI) form by L Newkirk and F Barlow
- 7. McAlester, Virginia. A Field Guide to American Houses. Fifth printing, Alfred A. Knopf, 2020.
- 8. National Register of Historic Place Form by Thirza M. Cady, Asst. to Janet Sprague. *Hudson Historic District Reference Number 73001542*. April 7, 1973.
- 9. National Register of Historic Place Form by Lois Newkirk. *Hudson Historic District (Boundary Increase) Reference Number* 89001452. August 19, 1989.
- 10. National Register of Historic Place Form by Wendy Naylor and Diana Wellman. *Hudson Historic District (Boundary Increase) Reference Number 100007849*. April 15, 2021.

#### **FINDINGS**

- The structure is located in and contributing to the Hudson National Register Historic District, reference numbers 73001542, 89001452, and 100007849. The Period of Significance for the district is 1806-1963. The district is significant under Criteria A and Criteria C.
  - a. The significance under Criteria A as stated in the 1973 National Register Nomination (NRN): "Hudson is a fine example of the early development of the Connecticut Western Reserve both in architecture and town planning." As stated in the 1989 Boundary Increase, "...Boundary Increase is significant under Criteria A, in that the development of the railroad-based economy, with its consequent land development schemes...the community planning and historic restoration movement in the early 20<sup>th</sup> century are associated with and make a significant contribution to the broad patterns of history." As stated in the 2021 NRN the collection of structures included within the expanded boundary, "demonstrates the pattern of development in Hudson extending from the late nineteenth century post-railroad era decline...continues through the 1950s with the Ellsworth legacy of planning and resulting exurban pattern of growth..."
  - b. The significance under Criteria C as stated in the 1989 NRN; "...Boundary Increase...is significant under Criteria C in that it contains distinctive architectural styles and property types which reflect the history of the area, in its progression in style from Federal to Transitional, Greek Revival, Gothic Revival, Italianate, Queen

- Anne and twentieth century period revivals." As stated in the 2021 NRN, the collection of structures included within the expanded boundary is "...representative of building styles and types built in the late nineteenth century and dominated by the Colonial Revival style influences..."
- c. The house at 172 Aurora Street, was part of the 1989 National Register Historic District Boundary Increase. The 1989 NRN states, "The styling and construction details indicate a much earlier house. It was moved to this site in 1878 and its earlier site has not been determined. Greek Revival, sandstone block foundation, hipped roof, one story rear addition, front façade extended by enclosure of two-story porch at east end. Home in the early 1900s of I.T. Frary ([1873-1965] who was a significant historian in Ohio, who lived in the house from 1908 until 1918), author of <a href="Early Home of Ohio">Early Home of Ohio</a> (1936); most of the alterations were made under his supervision. 1920 contributing garage."
- 2. The property is located on the east side of the street, the second structure from the corner of Aurora Street and Franklin Street in the Historic Residential Neighborhood Hudson Zoning District. The terrain is flat.
- 3. The structure is approximately rectangular in plan and two stories tall. The structure has wood lap siding. The windows are mostly wood with a few vinyl replacements. The foundation exhibits concrete parging, and isolated areas of brick and exposed sandstone. The structure has influences from the Greek Revival style. The garage has stucco walls, wood windows, and wood roof brackets
- 4. According to the Ohio Historic Inventory, the house was built 1878.



Image 1: Date 1918. Courtesy of the Hudson Historical Society. Note the paired windows on the right side of the front (north) elevation.



Image 2: Photograph included in the 1989 National Register Historic District Boundary Increase. Caption on the back of the photo states, "1920 Garage, 172 Aurora Street."

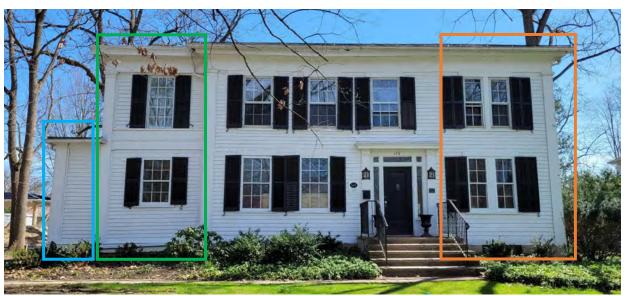


Image 3: Front (north) elevation. The orange box indicates the 1913 addition. The green box indicates the 1925 addition. The blue box indicates an addition with an unknown date.



Image 4: Side (east) elevation. The orange block indicates the 1913 addition. The green box indicates the 1925 addition. The blue boxes indicate an addition with an unknown date.



Image 5: Side (east) elevation. The orange block indicates the 1913 addition. The green box indicates the 1925 addition. The blue boxes indicate an addition with an unknown date.



Image 6: Rear (south) elevation. The orange block indicates the 1913 addition. The green box indicates the 1925 addition. The blue boxes indicate an addition with an unknown date.



Image 7: Side (west) elevation. The orange block indicates the 1913 addition. The green box indicates the 1925 addition. The blue boxes indicates an addition with an unknown date. The red boxes indicate the vinyl replacement windows.



Image 8: Detail of a typical wood window and shutters to be replaced.



Image 9: Detail of front (north) historic wood paired window to be replaced.



Image 10: Detail of typical vinyl replacement window to be replaced.



Image 11: Detail of wood staircase and replacement French doors to be removed.



Image 12: Front (north) of garage.



Image 13: Side (west) elevation of garage.



Image 14: Rear (south) of garage.



Image 15: Houses across the street from 172 Aurora Street.



Image 16: Houses to the west of 172 Aurora St.



Image 17: House to the east of 172 Aurora St.

# **END OF REPORT**



# EXHIBIT A: City of Hudson, Codified Ordinances Appendix D. - Architectural Design Standards

To Nick Sugar, City Planner and Amanda Krickovich, Community Development, City of Hudson

From Olivia Hopkins, AIA | Historic Architecture, Perspectus

CC: Lauren Pinney Burge, AIA, Principal & Alice Sloan, Assoc. AIA, APT-RP | Historic Architecture, Perspectus

# Section III-2. - Alterations to existing properties - all types.

The character of Hudson is preserved by maintaining the integrity of buildings as they are altered.

- a. *Alterations to non-historic buildings.* The following shall apply to all buildings which are not historic properties, as defined in Section III-2(b).
  - (1) In the case of an alteration to an existing property, an applicant must comply with the type design Standards in Part IV to the extent that they apply to the alteration itself.
  - (2) Applicants will be permitted to repair or replace existing non-conforming elements without bringing the element into conformance with the Standards, for example, shutters or windows may be replaced with essentially the same elements.
  - (3) If applicants propose to replace any element with another that is not the same (for example, aluminum windows for wood windows), the applicant will be required to conform fully with the Standards for those elements.
  - (4) Applicants may not be compelled to alter any part of the existing property which would otherwise not be affected by the proposed alteration.
  - (5) For existing buildings which do not conform to the type catalogue in Part IV, alterations will be allowed as long as they conform to the general principles enumerated in Section I-2, and they are compatible with the existing architectural style, materials, and massing of the building.
- b. Standards for historic properties, all districts. Historic properties include those buildings which are contributing to historic districts and buildings which are designated as historic landmarks by the City Council. Other buildings which have historic or architectural significance may also be reviewed as historic properties with the mutual agreement of the AHBR and the applicant.
  - (1) Historic landmarks or buildings within historic districts which are greater than fifty years old will not be reviewed according to the type Standards in Part IV. Such buildings will be reviewed according to the Secretary of the Interior's Standards for Historic Rehabilitation (see Appendix I) and National Park Service Preservation Briefs #14 and #16.
  - (2) In altering historic properties, the applicant is advised to refer to historic surveys and style guides which have been prepared specifically for Hudson, including the Uniform Architectural Criteria by Chambers & Chambers, 1977; Hudson: A Survey of History Buildings in an Ohio Town by Lois Newkirk, 1989; and Square Dealers, by Eldredge and Graham.
  - (3) Hudson's Historic District and Historic Landmarks contain a wealth of properties with well preserved and maintained high quality historic building materials. The preservation of these materials is essential to the distinguishing character of individual properties and of the district. Deteriorated materials shall be repaired where feasible rather than replaced. In the event that replacement is appropriate, the new material should be compatible in composition, design, color, and texture.
    - (i). Use of Substitute materials for Historic Properties (as defined in Section III-2. b.).
      - (a.) The AHBR shall review detailed documentation of the existing site conditions.
      - (b.) The AHBR shall request the patching and repair of existing materials.
      - (c.) If the repair or replacement of existing non-historic materials is requested, AHBR shall request removal of the non-historic material to expose the historic material so that it may be assessed.
      - (d.) If the AHBR concurs that the condition of the material requires replacement in some or all portions of the structure, like materials should be used. Substitute materials may be considered when the proposed materials do not alter the historic appearance of the structure, and the proposed materials are compatible in proportion, size, style, composition, design, color, and texture with the existing historic materials.
    - (ii). Use of Substitute materials for proposed additions to existing historic properties.
      - (a.) The placement of the addition shall be reviewed to determine its visibility from the public realm.
      - (b.) Substitute materials are acceptable provided they are compatible in proportion, size, style, composition, design, color, and texture with the existing historic materials.
    - (iii). New freestanding structures and non-historic properties: The use of substitute materials is acceptable provided they are compatible in proportion, size, style, composition, design, color, and texture of historic materials.
    - (iv). All applications are subject to Section II-1(c).



# **MEMO**

## EXHIBIT B: Secretary of the Interior's Standards for Rehabilitation

To Nick Sugar, City Planner and Amanda Krickovich, Community Development, City of Hudson

From Olivia Hopkins, AIA | Historic Architecture, Perspectus

CC: Lauren Pinney Burge, AIA, Principal & Alice Sloan, Assoc. AIA, APT-RP | Historic Architecture, Perspectus

The Standards (Department of Interior regulations, 36 CFR 67) pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and the interior, related landscape features and the building's site and environment as well as attached, adjacent, or related new construction. The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

- 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
- 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
- Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
- 4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
- 5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
- 6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
- 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- 8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
- 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.