

**The Secretary of the Interior's Standards:
Challenges for Employing Traditional Design for Infill and Additions**

*Excerpts from a presentation given at the meeting of the Council on Architecture and Urbanism, Charleston, South Carolina, March 11, 2005 by
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I'm speaking not as an architect but as an architectural historian. I work in the Virginia Department of Historic Resources, the state historic preservation office. I'm paid to apply the Secretary of the Interior's Standards to many of the projects my office reviews. The Standards were developed by the National Park Service in response to the Tax Reform Act of 1976. The Park Service has separate sets of standards for different treatments to historic resources. We will deal here with the Standards for Rehabilitation since they are the ones most pertinent to this discussion. The intent of the Standards for rehabilitation is to ensure that historic buildings undergoing rehabilitation projects receiving Federal tax credits will be treated appropriately and consistently.

I have no problem with the Standards themselves. Basically, they encourage repair rather than replacement and discourage remodeling. They give offices such as mine the authority to say you cannot remove original sashes and replace them with modern plastic windows with snap-in muntins. They give us the authority to say that if you sandblast your brickwork, your project will be denied. They give us the authority to say you can't cut through the original floor systems to create a multi-level atrium

I need to add, however, that a private property owner *can* do all of these things. Neither the state nor the federal government can exercise direct control over private property. However, if you want the government to subsidize your project with generous tax credits, you have to play by the rules. The Standards are meant to encourage a gentle reuse of historic buildings, not their transformation into something they never were.

This is big business. The Virginia state historic preservation office has certified over one billion dollars of rehabilitation work on historic buildings since 1976. All of this work has followed the Standards. The federal rehabilitation tax credits are the only urban renewal program that has really brought about genuine urban renewal.

So we might ask what do the Standards have to do with architects specializing in traditional design. The Standards permeate the American architecture scene. Google has 41,000 references for them. The Standards affect not just rehabilitation work, but *additions* and *infill* associated with historic buildings. Moreover, many local architectural review boards and historical commissions have adopted the Standards as the basis for approving projects, including additions and infill. For the most part that's good, but things can get complicated and contentious when it comes to determining the

appropriateness of additions and infill. We recall the debate over the addition to New York's Harvard Club.

So what exactly do the Standards have to say about additions and infill?

Standard 2 says: *“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.”*

I agree that we should not add pieces from other buildings to historic buildings. As for additions that create a false sense of historic development, I read that to mean that we shouldn't add a Romanesque-style arcade to a Greek Revival courthouse. That would be creating a false sense of historic development. Discouraging such additions is entirely appropriate.

Standard 9 states: *“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.”*

I think most of us also agree that additions should be compatible with the historic building in terms of massing, size, and so on, What about differentiating the addition from the old? This gets into interpretation, and interpretation can be very subjective. But note: it does not say that additions should be *of our time*, or rendered in *modernist style*. It just says differentiated.

Standard 10 says: *“New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form of and integrity of the historic property and its environment would be unimpaired.”*

I don't believe that any architect or preservationist would argue with Standard 10.

Mind you, these quotes from these three standards are all that the Secretary of the Interior's Standards for Rehabilitation have to say about additions and infill.

So what is the problem? The problem seems to grow out the language of the *Guidelines*—the explanations of what's recommended and what's not recommended when determining whether a project meets the Standards.

In the Guidelines for new additions, we read: *“Recommended: designing new additions in a manner that makes clear what is historic and what is new.”*

And we also read:

“Not Recommended: duplicating the exact form, material, style, and detailing of the historic building in the new addition so that the new work appears to be part of the historic building.”

I agree that differentiation is desirable, and that there should be a subtle shift between the old and the new. Talented architects can accomplish that. Moreover, I defy any contractor to make the craftsmanship, patina, and detailing of new additions such perfect copies that you or I can't tell the difference. What about the ability of the general public to tell the difference? To what degree must we compromise the visual quality of a historic structure in the character of its additions in order to pander to a generally uninformed public? I know that sounds snobby, but what should be our priority: the visual quality of a historic resource, or a public that is generally architecturally illiterate?

Interestingly, under the recommended column for additions it says: *“Design for the new work may be contemporary or may reference design motifs from the historic building.”*

It goes on to say: *“In either case, it should always be clearly differentiated from the historic building and be compatible in terms of mass material, relationship of solids to voids, and color.”*

Do we know what these statements really mean or how they should be interpreted? The bottom line is that these statements of what is recommended and what is not recommended are ambiguous and create a quagmire for interpretation. But note, nothing here says an addition must be *of our time*, or must be rendered in *modernist style*. It only says that new work *may* be contemporary, or it *may* reference design motifs from the historic building. We should remember that for many interpreters of the Standards “contemporary” is synonymous with modernist or International style, whereas “contemporary” can mean anything. (Actually, we could interpret these recommendations to declare that the recent addition to the Museum of Modern Art (MOMA) utterly fails to meet the Standards. It's very difficult, even for me, to distinguish the new from the historic section at MOMA.)

Now note too that the Standards are silent on the subject of infill, meaning new buildings in historic contexts. Nonetheless, the Guidelines for applying the Standards do have a couple of statements on this subject. One guideline says simply: *“Not recommended: introducing a new building, streetscape or landscape feature that is out of scale, or otherwise inappropriate to the setting's historic character.”* Nothing is said about style or historicism; it just says it must not be inappropriate, whatever that means.

The Guidelines also recommend against: *“introducing new construction into a historic district that is visually incompatible or that destroys historic relationships within the district of neighborhood.”* While the statement is imprecise, we can live with that recommendation. But to confuse us, the Guidelines also say: *“new work should be*

*compatible with the historic character of the district or neighborhood in terms of size, scale, **design**, material, color, and texture.*” So if the *design* must be compatible, by what criterion does one judge compatible design?

Adding further confusion we find this recommendation in the section on building site: *“Recommended: Designing new additions to historic buildings or adjacent new construction which is compatible with the historic character of the site and which preserve the historic relationship between a building or buildings, landscape features and open space.”* Does compatible mean that traditional or historic-style infill is acceptable? We aren’t sure.

Now adding to the mix, we find this line in the Guidelines concerning new additions: *“Not Recommended: Imitating a historic style or period of architecture in new additions, especially for contemporary uses such as drive-in banks or garages.”*

I believe this proscription against historic styles grew out of a 1970s reaction against the cheap, uninformed “colonial-style” work that sprang up in the 1960s and ‘70s. I’m all for avoiding that as well. But it does say clearly that imitating a historic style of architecture is not recommended. And that statement, I believe, has provided the basis for so much narrow interpretation of the Standards. It gives pedantic bureaucrats and architectural review boards the authority to veto any addition that smacks of traditionalism, and to cry the meaningless mantra: “False Historicism!” More ominously, it gives authority to bureaucrats and review boards to carry this where it was never intended to be carried, and that is determining the style or character of infill architecture in historic areas. It gives such people the backing to scream the equally meaningless mantra that *new* buildings in historic precincts must be *or our time!*

Again, all the Guidelines really say about infill architecture is that it should be visually compatible. The recommendation against imitating a historic style or period of architecture applies only to *additions*, not new buildings. And this recommendation is inconsistent with the recommendation that additions may reference design motifs from the historic building. So we ask, how far are you allowed to reference design motifs before it becomes imitation or even worse, a fake? Confusing, isn’t it?

I’m the first to admit that many traditional or historic-style buildings of the 60s and 70s have little to recommend them. Most were so uninformed or dumbed-down that many of us said anything else is better—stop insulting the historic; give us some new ideas! But, as we know, we now have a renewed interest and informed training in traditional architecture. Many architects know what they are doing, and are doing it well.

Architects associated with this new movement of classical and traditional design are perfectly capable of designing respectful additions to historic buildings. These same architects are perfectly capable of designing respectful and, may I say beautiful, infill

buildings in historic precincts-- buildings that sustain local traditions. The problem is that many bureaucrats and review boards don't acknowledge or unable to judge the quality of much new traditional work. Worse, they continue to lump it with the cheap stuff-- haughtily declaiming that any retro work can't be serious. Real architecture, they yell, reflects the present, not the past—it must be *of our time*.

The Secretary of the Interior's Standards were instituted to protect architectural and historic integrity amid change, but the conscious rebuff of history has made many additions and infill buildings insipid if not alien intrusions. The more pertinent question to ask is not whether an infill building or addition is of our time, but rather *of its place*.

So how do we deal with the fact that the Standards and their guidelines are used to stifle informed traditional architecture? If we were to amend the Standards, how would we make them more sympathetic to quality traditional infill and additions? We really don't need to tinker with the Standards, but we do need to clarify the Guidelines. First, I would suggest deleting the guideline that recommends against "*Imitating a historic style or period of architecture in new additions.*" And I would ask that consideration be given to revising the following guideline on additions:

Recall it says: "*Design for the new work may be contemporary or may reference design motifs from the historic building. In either case, it should always be clearly differentiated from the historic building and be compatible in terms of mass, materials, relationship of solids to voids and color.*"

A revision might read: "*Design for the new work may be contemporary, or may reference design motifs from the historic building, or may be an **informed interpretation of the architectural styles of the historic building or district.** In either case, the addition should incorporate a visually respectful differentiation from the historic building, and be compatible in terms of mass and materials.*"

As for infill, remember that Guideline regarding building sites. It states: "*Recommended: designing new exterior additions to historic buildings or adjacent new construction which is compatible with the historic character of the site and which preserve the historic relationship between a building or buildings, landscape features, and open space.*"

To that I would add the following sentence: "*The new construction may reference design motifs from adjacent historic buildings and structures, or be **an informed interpretation of the architectural style** of adjacent historic buildings and structures.*"

In summary, the works of the new traditional architects demonstrate that it is possible to design informed and literate traditional-style additions and infill. The Secretary of the Interior's Standards need to acknowledge this and make clear that this approach is

legitimate and of our time. The challenge is developing a strategy for making amendments. The question is: how do we start?