



**PARK CITY HISTORIC PRESERVATION BOARD MEETING
SUMMIT COUNTY, UTAH
June 3, 2026**

The Historic Preservation Board of Park City, Utah, will hold its regular meeting in person at the Marsac Municipal Building, City Council Chambers, at 445 Marsac Avenue, Park City, Utah 84060. Meetings will also be available online and may have options to listen, watch, or participate virtually. Zoom Link: <https://us02web.zoom.us/j/82086188552>

1. MEETING CALLED TO ORDER AT 5:00PM

2. ROLL CALL

3. MINUTES APPROVAL

- 3.A. Consideration to Approve the Historic Preservation Board Meeting Minutes from April 1, 2026

4. STAFF AND BOARD COMMUNICATIONS AND DISCLOSURES

- 4.A. **Historic Preservation Board Chair Election** – The Historic Preservation Board Will Elect One of Its Members to Serve as Chair for a Term of One Year

5. PUBLIC COMMUNICATIONS

6. REGULAR AGENDA

- 6.A. **Utah Main Street Program** – The Historic Preservation Board will Consider Forwarding a Recommendation to the Utah State Historic Preservation Office for the Tier 1 Utah Main Street Program that Connects Historic Commercial Districts with Technical Assistance, Peer Community Networks, and Grant Opportunities that Support Preservation-Based Economic Development.
(A) Public Hearing; (B) Possible Action
- 6.B. **External Siding Materials in Historic Districts** – The Historic Preservation Board Will Review and Consider Adopting the Materials Evaluation Framework for Alternative Siding Materials for Use on Additions to Historic Structures and New Residential Infill in the Historic Districts. PL-25-06407 (30 mins.)
(A) Public Hearing; (B) Action
- 6.C. **Land Management Code Amendments** – The Historic Preservation Board Will Review Proposed Amendments to the Land Management Code for Regulations of Fences in Historic Residential Zoning Districts. PL-25-06769 (30 mins.)
(A) Public Hearing; (B) Possible Recommendation for Planning Commission Review on June 24, 2026
- 6.D. **844 Empire Avenue – Modification** – The Applicant Proposes Modifying the Historic Preservation Board's February 7, 2024, Material Deconstruction Approval to Remove Approximately 255 Square Feet of Historic Material to Accommodate an Addition to the Significant Historic Structure in the Historic Residential - 1 Zoning District. PL-26-06801 (20 mins.)

(A) Public Hearing; (B) Action

7. WORK SESSION

7.A. **Historic District Grant Program** – The Historic Preservation Board Will Conduct a Work Session on Updates to the Historic District Grant Program.

8. ADJOURNMENT

Pursuant to the Americans with Disabilities Act, individuals needing special accommodations during the meeting should notify the Planning Department at 435-615-5060 or planning@parkcity.gov at least 24 hours prior to the meeting.

***Parking is available at no charge for meeting attendees who park in the China Bridge parking structure.**



**PARK CITY MUNICIPAL CORPORATION
HISTORIC PRESERVATION BOARD MEETING
MARSAC MUNICIPAL BUILDING
COUNCIL CHAMBERS
445 MARSAC AVENUE
PARK CITY, SUMMIT COUNTY, UTAH
MINUTES OF APRIL 1, 2026**

BOARD MEMBERS IN ATTENDANCE: Lola Beatlebrox, John Hutchings, Katie Noble, Puggy Holmgren

EX OFFICIO MEMBERS: Rebecca Ward, Planning Director; Elissa Martin, Project Planning Manager; Jacob Klopfenstein, Planner II; Lillian Zollinger, Planner III; Dave Thacker, Chief Building Official; Mark Harrington, Senior City Attorney

1. CALL TO ORDER

In the absence of Chair Douglas Stephens, Board Member Lola Beatlebrox called the Historic Preservation Board Meeting to order at approximately 5:00 p.m. Planning Director, Rebecca Ward, asked Board Members to vote on a Chair Pro Tem for the meeting.

MOTION: Board Member Holmgren moved that Lola Beatlebrox serve as Chair Pro Tem for the duration of the meeting. Board Member Hutchings seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

2. ROLL CALL

A roll call was conducted and the Board Members present were identified. Chair Stephens, Board Member Dalton Gackle, and Board Member Randy Scott were all absent.

3. MINUTES APPROVAL

A. Consideration to Approve the Historic Preservation Board Meeting Minutes from March 4, 2026.

MOTION: Board Member Holmgren moved to APPROVE the Historic Preservation Board Meeting Minutes from March 4, 2026. Board Member Noble seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

4. STAFF AND BOARD COMMUNICATIONS AND DISCLOSURES

A. External Siding Materials in Historic Districts – Staff Update on the Materials Evaluation Framework Being Developed by the Materials Advisory Committee.

Project Planning Manager, Elissa Martin, reported that the Historic Preservation Board conducted a Work Session in March 2026 to review progress the Materials Advisory Committee had made. During the Work Session, Staff shared information about a Materials Evaluation Framework, which establishes performance-based metrics and minimum thresholds materials must meet in order to be added to the materials list. The Historic Preservation Board provided positive feedback and encouraged the Committee to continue development of the performance-based framework. The Committee has met once since the last Historic Preservation Board discussion, but the framework has not been adopted.

Additional time is needed to reach consensus on some of the performance measures, metrics, and minimum thresholds. The Committee has requested that agenda item 6A be continued to a date uncertain to allow for additional discussion. Planner Martin explained that it is anticipated the framework will be brought back to the Board for adoption in June.

5. PUBLIC COMMUNICATIONS

There were no public communications.

6. CONTINUATIONS

A. External Siding Materials in Historic Districts – The Historic Preservation Board will Review and Consider Adopting the Materials and Finishes for Additions to Historic Structures and New Residential infill in the Historic Districts.

Chair Pro Tem Beatlebrox noted that the External Siding Materials in Historic Districts item was discussed during Staff Communications. A request has been made for continuation.

Chair Pro Tem Beatlebrox opened the public hearing. There were no comments. The public hearing was closed.

MOTION: Board Member Holmgren moved to CONTINUE the External Siding Materials in Historic Districts item to a date uncertain. Board Member Hutchings seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

7. WORK SESSION

A. Historic District Grant Program – The Historic Preservation Board will Consider Potential Improvements to the Historic District Grant Program.

Planner II, Jacob Klopfenstein, presented the Staff Report and explained that this Work Session item relates to the Historic District Grant Program. During the previous Work Session, Board Members expressed support to increase the amount of funding available for the Historic District Grant Program. There was also support to potentially expand the eligibility of the program to include Ski Era Resources, such as A-Frames. In addition, there was a discussion about updates to the eligible work and evaluation criteria.

Staff researched similar historic preservation grants in other jurisdictions. There are not a lot of similarities to the other programs. Most historic preservation grant programs are reserved for non-profit organizations rather than private property owners. However, there were programs in Colorado, Oregon, and Washington that were somewhat similar to the Historic District Grant Program. Some of the goals of those programs include:

- Rehabilitating historic elements and restoring building integrity of historic buildings;
- Replacing non-historic elements with historic materials;
- Funding projects that increase the historic value of the structure.

Planner Klopfenstein reported that additional details about these programs are included in the Staff Report. He next discussed the eligible work for the Historic District Grant Program. Based on some of the feedback received at the last Work Session and the research done in other jurisdictions, Staff recommends adding the following to the list of eligible work:

- Landscaping in front yards (not associated with non-historic rear additions);
- Foundation work (not associated with garage additions);
- Environmental work (lead/asbestos abatement, radon mitigation, etc.)

Planner Klopfenstein asked if there are any other items that should be added. Chair Pro Tem Beatlebrox suggested that the Board return to this question after the presentation. Manager Martin reported that there was a discussion about the application form during the last Work Session. There was Historic Preservation Board consensus on an update. Currently, the application form requires certain information to be included, such as:

- Project description;
- Cost estimate;
- Breakdown of proposed work and cost estimates;
- Proposed project timeline;

- Historic District Design Review (“HDDR”) approval letter;
- Drawings of the proposed project (if applicable);
- Color photographs of the existing site conditions.

Based on Board Member feedback, the Staff recommendation is to update the Historic District Grant Program form. The additional requirements include the following:

- At least one professional bid for projects over \$10,000;
- Narrative explaining how the proposed work will meet/address each of the Historic District Grant Program evaluation criteria;
- Information on the intended use. (Example: if the property will be owner-occupied, a long-term rental, or a nightly rental).

Manager Martin asked if there are other items that should be required on the application form. As for the evaluation criteria, Staff recommends updating Criteria #2 and Criteria #4:

- Proposed improvements to the site will positively impact the vitality of the historic context of the neighborhood;
- The historic features and elements of the structure and/or site will be enhanced by the proposed work.

Manager Martin asked if there are other criteria that should be revised as well. During the next Work Session, there is a desire to discuss Ski Era Resources and additional outreach methods to increase program awareness. It is also possible to discuss the lien requirements and determine whether that is prohibitive. The cost share structure can also be evaluated at a future Work Session. Board Members were asked to address the current items.

The Historic Preservation Board first discussed the application form. Board Member Puggy Holmgren noted that some people have submitted lined sheets of paper with handwritten information. She asked if there could be requirements related to the format and presentation. Chair Pro Tem Beatlebrox felt there should be specific line items included when a grant application is submitted. She asked that bids for projects over \$10,000 also include an itemized list. Board Member Katie Noble expressed support for two bids.

Chair Pro Tem Beatlebrox mentioned the suggestion for a “narrative explaining how the proposed work will meet/address each of the Historic District Grant Program evaluation criteria.” She feels there needs to be an overhaul done of the evaluation criteria and scoring method to ensure the criteria matches the applications received. Manager Martin agreed that the eligible work items need to tie back to the evaluation criteria, which then needs to tie back to the application form. Chair Pro Tem Beatlebrox asked why the information about intended use is considered important and why the lien is important. She feels the focus should be on improving what is historic. Board Member Noble

disagreed with the comment about the lien. She feels it is necessary for that to be in place for at least three years. However, there could be a lien requirement for projects over \$10,000 or projects that meet a certain financial threshold. Board Member Noble agreed with the comments about the use.

Board Member Holmgren does not have an issue with the lien. Many years ago, she needed a grant after the roof on her home slid off. She had a five-year lien in place at that time, which did not bother her. Chair Pro Tem Beatlebrox pointed out that situations can change, and people might need to sell their houses for many different reasons. She does not know that a lien needs to be in place for five years. Board Member Holmgren was open to adjusting the amount of time. Planner Klopfenstein reported that there can be additional research conducted to determine where the five-year timeline originally came from. As for the reason, the intended use was suggested, and previous Board Members considered that as part of their evaluation. It sounds like the intended use is not as important as preservation. Board Member John Hutchings believes the use is important. He does not like the idea of taxpayer money being used to improve an asset that someone will then turn around and profit off of.

Board Member Hutchings suggested that if someone has a nightly rental business license, the property will not qualify for the Historic District Grant Program. Additional discussions were had about the intended use. Chair Pro Tem Beatlebrox does not see a reason to ask about the use. Planner Klopfenstein stated that Staff can look into this further. He reported that the lien requirement will be considered as part of a future Work Session.

Planner Klopfenstein asked about the \$10,000 threshold for professional bids. He wanted to know if that is an appropriate threshold. Board Member Hutchings agreed with the earlier comment from Board Member Noble that two bids should be required. Chair Pro Tem Beatlebrox also liked the idea of requesting that there be two bids for projects over \$10,000.

The Historic Preservation Board next discussed eligible work and items that could be added to the list. Planner Klopfenstein reminded Board Members that Staff suggested adding landscaping in front yards, foundation work, and environmental work. Board Member Noble expressed concerns about the landscaping suggestion. She likes the idea of beautifying properties, but does not believe that it necessarily relates to historic work. As for radon mitigation, she does not think that is something the grant program should be focused on. Chair Pro Tem Beatlebrox and Board Member Hutchings agreed. Board Member Holmgren stated that if the landscaping is included, there would need to be some clear guidelines.

Chair Pro Tem Beatlebrox does not feel that landscaping is within the purview of the Historic Preservation Board. She believes the focus of the grant program should be the actual built environment. Planner Klopfenstein noted that landscaping can be a broad category. There was a recent request for a grant that involved a retaining wall. He

explained that there could be an argument made that a retaining wall is associated with landscaping. Chair Pro Tem Beatlebrox reported that it was a historic retaining wall in that example. Manager Martin reported that the retaining wall fell under a different category, so it would be possible to expand that category slightly so there is clarity that historic retaining walls are included.

Planner Klopfenstein summarized the Board Member comments. There does not appear to be support for the inclusion of landscaping in the eligible work. In addition, there is no support to include radon mitigation systems, because that impacts the physical appearance of the historic structure. There was Board Member support to include foundation work.

The evaluation criteria was considered. Planner Klopfenstein believed the Board would like a more substantial review of the evaluation criteria rather than only the two mentioned. The current evaluation criteria was shared with the Board. Board Member Hutchings acknowledged that there could be additional specificity included, but noted that having broader criteria can be beneficial as well. Board Member Noble agreed with those comments. Chair Pro Tem Beatlebrox explained that she has concerns about the following:

- Priority is given to restoration and treatment of historic materials, rather than replacing historic materials and features in-kind.

Manager Martin noted that the language could be revised slightly to consider whether a project is restoring existing materials or replacing lost materials. There could potentially be points provided if something is improving the overall safety of the structure. Planner Klopfenstein reported that it is possible to draw from some of the criteria seen in the other jurisdictions. He explained that some of those involved were protecting the integrity of the structure or increasing the value of the structure. It is also possible to explore adding to the last criterion. There could be something added to state: "If restoring the element is not possible, please explain why restoration cannot be done, and replacement is necessary." Board Members further discussed the evaluation criteria and historic materials. Board Member Hutchings suggested that there be language criteria specifically related to replacement.

Planner Klopfenstein reviewed additional discussion topics for future Work Sessions:

- Inclusion of Ski Era Resources, such as A-Frames;
- Additional outreach to increase awareness of the grant program;
- Revising lien requirements;
- Evaluating cost share structure.

Board Member Noble would like to understand how many houses in the Historic District would be included if the Ski Era Resources were added. She also asked for some examples of what those houses look like in the next Meeting Materials Packet. Board

Member Holmgren asked if the A-Frames are considered historic since those are over 50 years old. Director Ward clarified that those are not considered. Expanding the Historic District Grant Program to include some non-designated sites would not automatically designate them as historic. She added that the 50-year timeframe does not automatically designate a site.

Planner Klopfenstein thanked the Board for providing feedback on the Historic District Grant Program. There will be more discussions at the next Historic Preservation Board Meeting.

8. REGULAR AGENDA

A. 615 Woodside Avenue – Modification to Material Deconstruction – The Applicant Requests Panelization of the Significant Historic Structure’s Roof, a Partial Panelization of the Northeastern Portion of the Structure, Removal and Replacement of the Front Porch, and Removal and Replacement of a Structural Beam and Shed Roof Beneath the Sunroom to Construct the Approved Basement Addition and Garage. PL-26-06841.

Planner III, Lillian Zollinger, presented the Staff Report and explained that this is a Modification to Material Deconstruction at 615 Woodside Avenue. She reported that 615 Woodside Avenue is a Significant Historic Structure with a non-historic addition that was built prior to 1889. It is an existing non-complying structure in the Historic Residential – 1 Zoning District. In 2024, the Historic Preservation Board approved lifting the Historic Structure to construct a basement. Since then, the applicant has been issued a Building Permit and has started work on the Historic Structure. However, there were some concerns about stability and the ability to lift the entire structure. Based on that, the applicant submitted a Structural Engineer Report, which is attached as an exhibit to the Staff Report.

Based on the recommendations in the report, the applicant is requesting a modification for:

- Full roof disassembly and reassembly;
- Partial panelization of the Historic Structure;
- Material Deconstruction of the sunroom shed roof, supporting beam, and porch.

Planner Zollinger shared an image that was submitted by the applicant. The red color indicates areas where there are no proposed changes. She explained that the non-historic addition is shown in red toward the rear. The applicant is still proposing to lift the blue portion shown, but the proposal is to remove and reassemble the green section. The proposal is also to remove and reassemble the wraparound porch, remove the shed roof, and a structural beam. Planner Zollinger reviewed several proposed Conditions of Approval.

Chair Pro Tem Beatlebrox commented that the proposal makes sense. There is some familiarity with this property, and a lot of previous Board Member concerns have been addressed. The applicant representative, Cole Knight, explained that work has been done to follow the spirit of the code. He feels that what is proposed is the best solution to preserve the historic structure and ensure the job site is safe and manageable. Board Member Noble believed the shed roof in the front will be removed and not replaced. Mr. Knight reported that it will be removed, and whatever materials are serviceable will be salvaged. It will be put back on the building to formally represent the current iteration. The section highlighted in orange has moisture damage and is tied structurally to the beam that sits beneath it. The beam itself is warping and buckling and cannot be salvaged in order to function structurally.

Chief Building Official, Dave Thacker, reported that there have been on-site visits and work done with the contractor, designer, and engineer. There is a phenomenal job being done attempting to preserve all that is possible. The project is moving in the right direction.

Chair Pro Tem Beatlebrox opened the public hearing. There were no comments. The public hearing was closed.

MOTION: Board Member Hutchings moved to APPROVE the Modification to Material Deconstruction at 615 Woodside Avenue, according to the following:

Findings of Fact:

1. 615 Woodside is a Significant Historic Structure and was constructed sometime before 1889.
2. 615 Woodside Avenue is in the Historic Residential – 1 Zoning District and is Lot 1 of the Walter-Daniels Amended Lot 2 Subdivision.
3. The Applicant proposes to disassemble and reassemble the historic roof structure, disassemble and reassemble the northeastern portion of the structure, remove and replace the wrap-around porch, and remove and replace the shed roof and the support beam of the sunroom.
4. On February 15, 2026, Courtney Fleming from Mission Structural completed a Structural Approach for Lifting and Preservation Report that evaluated the Historic Structure.
5. The Applicant has shown that no windows on the Historic Structure are historic or wood, therefore aluminum-clad wood windows are allowed to be installed on the Historic Structure pursuant to LMC § 15-13-2(B)(2)(d).

6. The HPB reviews panelization requests for compliance with LMC § 15-11-14, Disassembly And Reassembly Of A Historic Building Or Historic Structure, and LMC § 15-13-4(B)(1), Disassembly & Reassembly of All or Part of a Historic Structure.
 - a. LMC § 15-11-14(A)(1) requires that a licensed structural engineer has certified that the Historic Structure cannot be reasonably moved intact.
 - i. The Applicant provided an engineer's report from Mission Structural that stated, "Due to the combined mass, it is not feasible to lift both historic structures simultaneously."
 - b. LMC § 15-11-14(A)(2) requires the Historic Preservation Board to determine, with input from the Planning Director and the Chief Building Official, that unique conditions and the quality of the Historic Preservation Plan warrant the proposed disassembly and reassembly.
 - i. On March 11, 2026, the Planning Director and Chief Building Official determined that unique conditions and the quality of the Historic Preservation Plan warrant the proposed disassembly and reassembly.
 - c. LMC § 15-13-4(B)(1) requires the Applicant thoroughly document the disassembly of the Historic Structure.
7. The HPB reviews Material Deconstruction requests for compliance with LMC § 15-11-12.5 and LMC § 15-13-2.
 - a. The proposed deconstruction of the deck and roof requires compliance with LMC § 15-13-3, wherein, the existing porch material and details shall be preserved. Where historic materials cannot be kept or repaired, replacement elements shall match the historic elements exactly.
8. Pursuant to LMC § 15-11-9, a Financial Guarantee is required prior to the issuance of a Building Permit.
 - a. On October 6, 2025, the Applicant recorded a Financial Guarantee and on October 14, 2025, a Building Permit was issued.

Conclusions of Law:

1. The proposal complies with the Land Management Code requirements pursuant to LMC § 15-11-9, *Preservation Policy*.
2. The proposal, as conditioned, complies with the Land Management Code requirements pursuant to LMC § 15-11.12-5, *Historic Preservation Board Review for Material Deconstruction*.

3. The proposal, as conditioned, complies with the Land Management Code requirements pursuant to LMC § 15-11-14, *Disassembly And Reassembly Of A Historic Building Or Historic Structure*.

Conditions of Approval:

1. Final building plans and construction details shall reflect substantial compliance with the modified Historic Preservation Board approval dated April 1, 2026, for the partial Panelization of the northeastern side, Panelization of the roof, and Material Deconstruction of 615 Woodside Avenue. Any changes, modifications, or deviations from the approved plans that have not been approved in advance by the Planning and Building Departments may result in a stop-work order.
2. The applicant is responsible for notifying the Planning and Building Departments prior to making any changes to approved plans.
3. Any changes, modifications, or deviations from the approved scope of work shall be submitted in writing for review and approval/denial in accordance with the applicable standards by the Planning Director or their Designee prior to construction.
4. The basement addition shall not raise or lower the Significant Historic Structure more than two feet from its original floor elevation.
5. The Historic Site shall be returned to original grade following the construction of a foundation. When the original grade cannot be achieved, generally no more than six inches of the new foundation shall be visible above Final Grade on the primary and secondary facades.
6. This approval requires stabilization and protection for the lifting of the historic structure. The Applicant under this approval is required to stabilize the structure for the lift. Any material deconstruction beyond the scope of this final action letter is prohibited without obtaining Chief Building Official, Planning Director, and Historic Preservation Board Review.
7. Historic materials removed from the Structure that are salvageable or in otherwise good condition shall be used to repair/replace irreparable materials on the Site.
8. The Significant Historic Structure must be reassembled using the original materials that are found to be safe and/or in serviceable condition in combination with new materials.

9. The Significant Historic Structure shall be reassembled in its original form, location, placement, and orientation.
10. The disassembly of the Historic Structure shall be documented and comply with LMC § 15-13-4(B)(1) requirements

Board Member Holmgren seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

B. 525 Park Avenue – Historic District Grant Application Modification – The Applicant Requests an Amendment to the Historic District Grant Awarded on February 4, 2026, to Change the Scope of Work from Exterior Paint and Siding Repair to Replacing Mechanical Equipment and Historic Windows. PL-26-06804.

Manager Martin presented the Staff Report and explained that this is a Historic District Grant Application Modification request for 525 Park Avenue. She reported that 525 Park Avenue is also known as St. Luke's Episcopal Church. It is a Landmark Historic Site in the Historic Residential – 1 Zoning District, and the structure was built circa 1901, within the Mature Mining Era. The small, one-story, frame, rectangular chapel in a simplified Gothic style is sided in painted horizontal shiplap. Background information was shared with the Board.

On February 4, 2026, the Historic Preservation Board awarded a \$10,000 grant for the repair and painting of the exterior siding. The original funding request was \$24,500, which was approximately 50% of the estimated total cost for the siding repair and paint. The Board awarded substantially less than the grant funding request due to a second grant request being considered on the same evening. This site was competing for the same Main Street RDA funds, which had a balance of \$30,000 at the time. The applicant explained in the narrative that the funding gap has made the painting project costs prohibitive at this time.

The applicant is requesting to amend the scope of work to cover other needed restoration work and upgrades. If the Historic Preservation Board approves the amended scope of work, the applicant intends to return to the Board with a second grant request in Fiscal Year 2027 to support the exterior painting work. The amended scope of work includes replacing the original stained-glass windows and upgrading outdated mechanical systems. Manager Martin shared images of the stained glass. The proposal is to replace the stained glass in the front façade window, as well as the original west façade-stained glass behind the altar. The window restoration work would fall under the following eligible work items:

- Restoring Historic Features; and
- Replacing Historic Windows.

The second part of the scope of work relates to mechanical systems. Manager Martin reported that the furnace is from 1987. Additionally, the water heater from 2006 is beyond the service life of 15 years. The total estimated cost of the amended scope of work is \$22,458. The funding request is \$10,000. Manager Martin explained that the request is to apply the February 4, 2026, grant award of \$10,000 to the amended scope of work.

Staff recommends the Historic Preservation Board review the amended scope of work for the Historic District Grant Program award at 525 Park Avenue and open a public hearing. The Board is asked to determine whether the amended scope of work is eligible for the grant award and if the February 4, 2026, grant award should be applied to the amended scope.

There was discussion about the historic stained glass. The applicant, Dan Moak, reported that the previous owner removed the stained glass prior to selling the building. The historic chapel has lost a lot of character without those pieces of stained glass, so the proposal is to replace them. Chair Pro Tem Beatlebrox gave this a score of 15 and expressed support for the work that has been proposed. Other Board Members also expressed their support.

Board Member Hutchings asked if this is the appropriate process. He wondered whether there should be a new Historic District Grant Program request submitted and a new award. He does not want to set a precedent. Senior City Attorney, Mark Harrington, explained that the Historic Preservation Board has discretion to approve an amendment to a Historic District Grant Program award. He is not concerned about setting a precedent with this.

Chair Pro Tem Beatlebrox opened the public hearing. There were no comments. The public hearing was closed.

MOTION: Board Member Holmgren moved to APPROVE the Historic District Grant Application Modification at 525 Park Avenue, according to the following:

Procedural History:

1. The City initiated the Historic District Grant Program (HDGP) in 1987 with the goal to financially incentivize the preservation, rehabilitation, restoration, and reconstruction of Historic Structures and Sites to create a community that honors its past and encourages historic preservation.
2. On February 4, 2026, the Historic Preservation Board (HPB) awarded a \$10,000 Historic District Grant for repair and exterior paint of the façade of the Historic Structure at 525 Park Avenue, known as St. Luke's Episcopal Church, a Landmark Historic Site in the Historic Residential-1 (HR-1) Zoning District.

3. The Applicant submitted a modification application on March 27, 2026, to amend the scope of work from the February 4, 2026, Historic District Grant in the amount of \$10,000 and apply the award to upgrade the old mechanical systems and restore the stained-glass windows.
4. 525 Park Avenue is in the Main Street Redevelopment Area (RDA) which had an initial balance of \$30,000 in FY26.
 - a. In FY26, the HPB awarded \$10,000 to 525 Park Ave and \$20,000 for a separate property, both sourced from the Main Street RDA, maximizing the available funds.
 - b. The current request is to amend the scope of work for the \$10,000 grant award for 525 Park Avenue.

Findings of Fact:

1. The Historic Sites from includes images of the pointed-arch windows with stained glass on the front façade and describes the west façade (rear) alter window as “edged in Cathedral glass”; both original stained-glass windows were removed by the previous owner and temporary window treatments are currently in place.
2. The Applicant submitted a property inspection report that indicates the existing mechanical systems, including the old furnace and water heater, are beyond their service life.
3. The proposed stained-glass window replacements and mechanical system upgrades fall under the following eligible work item categories: restoring Historic features, repairing/restoring/replacing windows, and upgrading mechanical systems and are eligible for a 50% matching grant through the HDGP includes; the work.
4. HDGP recipients must agree to a five-year lien with the City that is recorded against the property.
 - a. If the property is sold before the five-year period has passed, the Applicant is responsible for repaying the City a pro-rated amount of the awarded HDGP funds.
 - b. The Applicant for the HDGP request for 525 Park Avenue was made aware of and acknowledged the lien requirements through the HDGP application process.

Conclusions of Law:

1. The Historic Preservation Board determined the Applicant's amended scope of work to upgrade the mechanical systems and restore the stained-glass windows at 525 Park Avenue, a Landmark Historic Site, qualifies for a Historic District Grant.
2. The Historic Preservation Board finds the February 4, 2026, Historic District Grant award for \$10,000 should be applied to the amended scope of work.

Conditions of Approval:

1. The grantee shall maintain the architectural significance of the structure, retain and/or restore the historic character of the structure, preserve the structural integrity of the structure, and perform normal maintenance and repairs.
2. The grantee shall complete the work funded by the Historic District Grant within one year of approval of the grant application.
3. The Applicant shall submit a photograph of completed work to Planning Staff.
4. The grantee shall submit proof of payment to the Planning Department for disbursement of funds within 30 days of completion of the work.
5. Prior grant funds reimbursement, the grantee shall agree to and execute a five-year lien with the City in a form approved by the City Attorney's Office and record such lien with the Summit County Recorder's Office. Should the property be sold within the five-year period, the grantee is responsible for repaying the City a pro-rated amount of the grant disbursement. If the property is sold within one year, 100% of the awarded funds shall be paid back to the City.
6. Any changes, modifications, or deviations from the approved scope of work shall be submitted in writing for review and approval/denial in accordance with the applicable standards by the Planning Director prior to construction

Board Member Noble seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

9. ADJOURNMENT

MOTION: Board Member Holmgren moved to ADJOURN the Historic Preservation Board Meeting. Board Member Hutchings seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

The Historic Preservation Board Meeting adjourned at approximately 6:08 p.m.

Approved by _____
Douglas Stephens, Chair
Historic Preservation Board

PENDING APPROVAL

Historic Preservation Board Staff Report



Subject: Chair Election
Author: Rebecca Ward, Planning Director
Date: June 3, 2026

Recommendation

Nominate and elect a Historic Preservation Board Chair to serve a one-year term.

Background

The Historic Preservation Board elects one of its members to serve as Chair for a term of one year.¹ The Chair may be elected to serve for one consecutive additional term, but not for more than two successive terms.²

If the Chair is absent, the members may appoint a Chair Pro Tem to act as Chair solely for that meeting.³

Four Historic Preservation Board members, including the Chair or Chair Pro Tem, are needed to for a quorum.⁴ The Chair is a voting Board member.⁵

¹ LMC § 15-11-13(A)

² *Id.*

³ *Id.*

⁴ LMC § 15-11-3(B)

⁵ *Id.*

Historic Preservation Board Staff Report



Subject: Utah Main Street Program
Author: Ian Joyce, Senior Analyst
Date: June 3, 2025
Type of Item: Informational

Recommendation

- (I) Review the Utah Main Street Program and Park City's potential fit within the program,
- (II) review a supplementary letter of support for Park City's Utah Main Street Application

Background

The [Utah Main Street](#) (UMS) program initially ran from 1992 to 2007, making Utah an early adopter of the national Main Street America model before the program lapsed for over a decade. Interest in revival was strong, a 2019 study showed 70% of respondents supported restoring the program, with 71 Utah cities expressing interest. This led to a two-community pilot upgrading buildings within Brigham City and Price's historic areas from 2019 to 2021. In February 2021, the Utah Legislature passed S.B. 94 establishing a statewide Main Street Program within the [Governor's Office of Economic Development](#) (now Economic Opportunity) with 16 communities enrolled at launch. In July 2022, the Utah Main Street program moved to the [Department of Cultural and Community Engagement](#), landing within the [State Historic Preservation Office](#).

Early grants followed quickly after program reinstatement, with funds distributed to communities in matching grants used for beautification, facade improvements, historic preservation, planning, and staffing. In 2023 alone, participating communities created 666 new jobs, 73 new businesses, 46 new housing units, and more than \$7 million in public and private investment. As of 2025, 22 Utah communities participate in the program, with Logan being the only community in Utah to have reached a Tier 3 National Accreditation.

Summary

UMS is a coordinating program of [Main Street America](#) (MSA), a national nonprofit supporting 2,000+ communities for 35+ years. Park City Municipal Corporation submitted a Tier 1 Promising Communities application to UMS on May 14, 2026. Tier 1 is the program entry level with no paid staff required, the Tier 1 application is straightforward, the largest requirements include creating a proposed district boundary, three letters of support from area stakeholders and a letter of interest from the applicant. An application determination with accompanying feedback is expected from early to mid-June.

The program utilizes the [Four Point Approach](#)® to preservation based economic development, the four points include Economic Vitality, Design, Promotion and Organization. Economic Vitality focuses on growing the economic base, supporting small businesses, and creating wealth-building opportunities in the historic corridor. Design focuses on preserving and enhancing established architecture and guiding new development to compliment established community character. Promotion markets

districts unique heritage, culture and local character to attract visitors and residents. Organization is built on a shared vision, framing a board and staffing structure to help develop community partnerships. Together the four points create a focused and deliberate path to strengthening the commercial districts economy.

UMS operates on a three-tier structure, Tier 1 Promising, Tier 2 Affiliate, and Tier 3 Accredited. Tier 1 Promising Communities is the entry level Tier and ideal for communities strengthening their Main Street structure. This tier provides a low barrier to entry; no paid staff are required and there are limited reporting requirements. Communities initiate the program in Tier 1 and usually will remain in the tier for 1-3 years. Within Tier 1, communities have access to technical support, educational workshops, and training to assist in strengthening the historic main street district and progressing to Tier 2. Tier 2 Affiliate Communities holds deeper requirements such as a part-time director at 20hrs/week, increased reporting requirements, and volunteer board. Within Tier 2 communities can access MSA grants, historic district specific technical consultations, and training. Tier 3 Accredited Communities must have a full-time paid program director, a fully active board, and sustained operating budget. Tier 3 Accredited Communities are nationally recognized and have access to all prior listed resources.

The table below outlines the requirements for each phase of Tier 1 of the UMS program:

Phase	Requirement
Phase 1	Appointing Main Street Executive Director
	Executive Director attendance of trainings and workshops
Phase 2	Board Member Recruitment
	Board Member attendance of training and workshops
	Refine Main Street District Boundary
Phase 3	Begin drafting Transformation Strategy
	Begin forming committees aligned with the Four Point Approach
General Requirement	Annual agreement with UMS
	Bi-annual economic impact update
	Annual MSA Community Self-Assessment

Program Opportunity:

Park City's Historic Main Street District is a strong candidate for the Tier 1 designation and well-positioned to efficiently advance through the program tiers. The district's rich historic fabric that consists of an intact corridor of 19th- and early 20th-century commercial buildings meets the program's preservation criteria. The district reflects the architectural character that UMS is designed to protect. Culturally, Park City's Historic Main Street District serves as the heart of Park City and the surrounding region, anchoring ski season visitation, year-round community life, and a robust calendar of events that few comparable districts can match. Park City's existing Historic Preservation Board and adopted design standards signal an institutional preservation ethic already well-aligned with UMS's foundational values. This existing organization

alignment can reduce the ramp-up time typically required of new UMS program entrants.

The case for joining is further strengthened by the economic pressures the district faces. Despite its vibrancy, the district confronts challenges common to historic downtowns including seasonal fluctuations in visitation and economic activity, and growing pressure from regional development. This pressure stems from commercial and resort expansion at Deer Valley East and Canyons Village which threatens to shift visitation, investment, and economic activity away from the historic downtown core. Sustaining the Main Street Historic District's cultural and economic relevance will require a deliberate, ongoing focus. The UMS program provides exactly that, offering a platform and resources to keep the district competitive as the region continues to grow.

Critically, the Historic Park City Alliance (HPCA) provides a ready organizational anchor to drive Tier 1 progress from day one, rather than requiring the community to build capacity from scratch. HPCA is a primary business organization representing merchants, property owners, and stakeholders in the Main Street Historic District. They function as both a business advocacy group and a key operational partner to the City, with significant influence on economic activity and day-to-day conditions in the district. With the core functions of business communication and coordination, economic vitality and marketing, event and district activation and public relations and brand management HPCA is an integral stakeholder in the district. HPCA's current position and responsibilities within the district closely align with the requirements of the UMS program and provides a valuable organizational backbone to accelerate Park City's progression through the program.

Being accepted into and progressing through the UMS program would provide grant eligibility, and technical resources and consultations. Grant eligibility opens in Tier 2 of the program ranging from state level matching grants for façade improvements, beautification, planning, and staffing, to national competitive grants. Grant opportunities facilitated through UMS can be found in the [Utah Funding Opportunities Portal](#) and the [Main Street Funding Opportunities and Tools Dashboard](#). Communities will have access to dedicated UMS staff support and training and will be integrated into a state and national peer network. Additional technical resources are provided through hands-on workshops, architectural consultations, urban planning partnerships and transportation coordination. UMS provides a platform of funding and resources to provide valuable impact to Park City's Main Street Historic District during a pivotal period of the district's evolution.

Exhibits

A: Utah Main Street Letter of Support Template

B: Utah Main Street Application Map

[Organization/Agency Name]

[Street Address] | [City, State, ZIP] | [Phone] | [Email]

[Date]

To the Utah Main Street Program Review Committee,

On behalf of [Organization Name], I am pleased to offer this letter of support for the Park City Historic Main Street District's application to join Tier 1 of the Utah Main Street Program.

[Organization Name] is [brief description — e.g., a nonprofit, city department, business association] serving [constituency/area], and we have been engaged with Park City's historic district through [describe involvement].

Park City's Historic Main Street:

Park City's Main Street is one of Utah's most significant historic commercial corridors. Originally developed during the silver mining boom of the 1870s, the district retains a remarkable concentration of late-19th and early-20th century architecture, making it ideally suited for the preservation-based revitalization model at the heart of the Utah Main Street Program. The district today serves as the cultural and economic core of the community, home to a diverse mix of locally owned businesses that draw visitors and residents year-round.

Despite its vibrancy, the district faces challenges common to historic downtowns, including significant seasonal fluctuations in visitation and economic activity and increasing pressure from evolving regional development patterns. This regional pressure stems from increased commercial and resort growth at Deer Valley East and Canyons Village which may begin to shift visitation, investment and economic activity away from the historic downtown core. Membership in the Utah Main Street network would bring Park City access to peer communities, grant opportunities, and proven technical assistance to strengthen the historic downtown.

We urge the review committee to look favorably upon this application and are grateful for the Utah State Historic Preservation Office's investment in Utah's historic commercial districts.

Sincerely,

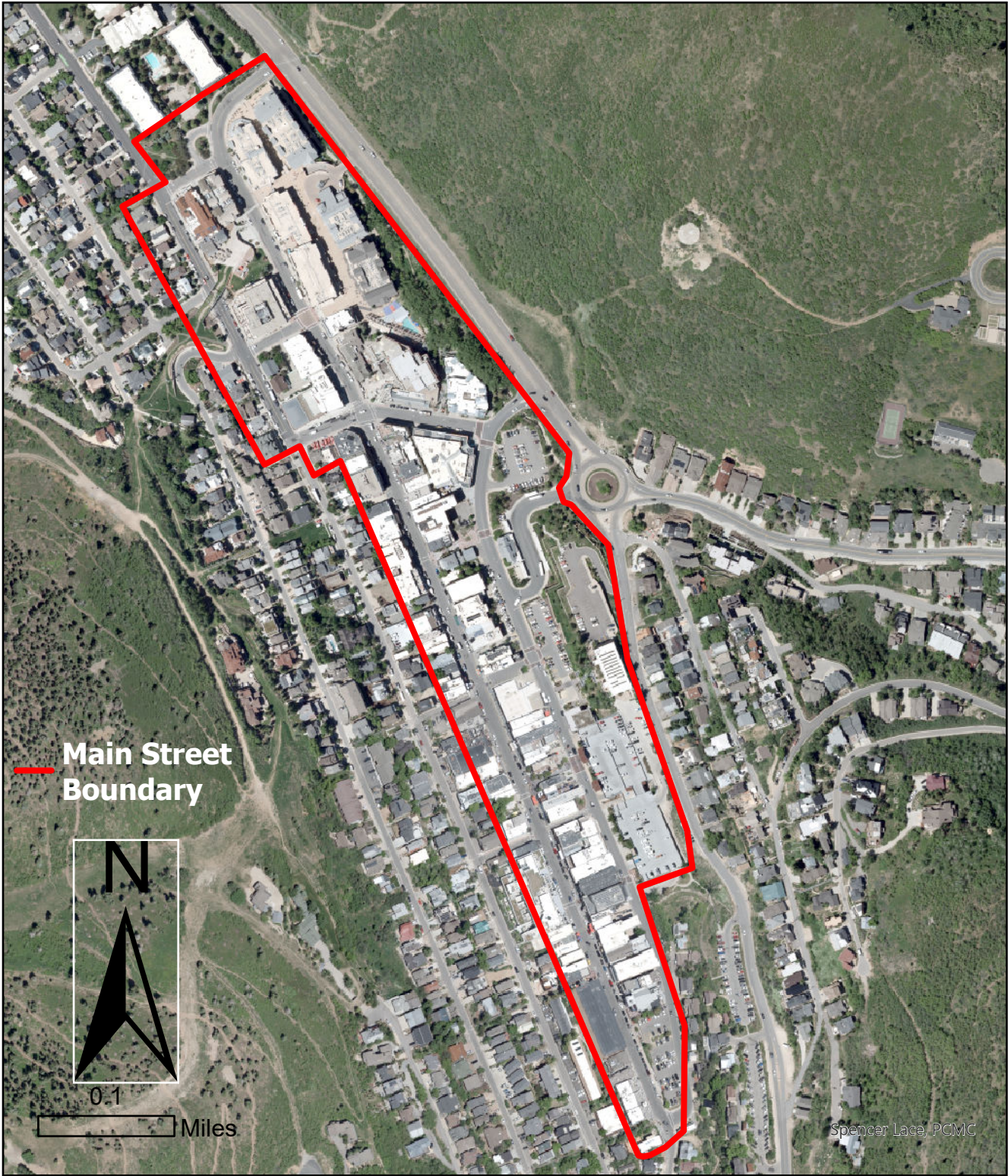
[Signatory Name]

[Title]

[Organization Name]

[Phone] | [Email]

Park City Main Street Historic District Boundary



Historic Preservation Board Staff Report



Subject: External Siding Materials for Buildings
in Residential Historic Districts
Author: Elissa Martin, Planning Project Manager
Date: June 3, 2026
Type of Item: Implementation of LMC Amendment

Recommendation

- (I) Review the Materials Evaluation Framework for vetting alternative siding Materials for inclusion on the Master List of Materials,
- (II) Open a public hearing and consider adopting the Framework;
- (III) Review staff's analysis regarding Land Management Code regulations pertaining to stone and the traditional application of new materials and provide feedback.

Summary

This Materials Evaluation Framework establishes performance-based criteria for evaluating non-traditional exterior cladding materials proposed for new residential construction within Park City's two National Register Historic Districts. The Framework was developed by the Materials Advisory Committee and is intended for use by Planning staff, in their review of new residential buildings in the Historic Districts, pursuant to Land Management Code (LMC) [§ 15-13-2\(A\)\(12\) Regulations for Historic Sites, Universal Regulations](#) and LMC [§ 15-13-8\(A\)\(11\), Regulations for New Residential Infill Construction \(and Non-Historic Residential Sites\) in Historic Districts](#), which state:

New alternative materials and non-historic materials may be used on additions (and new residential infill), pursuant to the Master List of Non-Historic Materials and Finishes on file with the Planning Department. New, alternative or non-historic materials are evaluated by the following characteristics:

- *Longevity (50-year lifespan),*
- *Energy performance,*
- *Durability in this climate,*
- *Fire Resistance,*
- *Environmental benefit and impact (high recycled content, locally sourced, life cycle impact, or cradle to grave impact),*
- *Compatibility with the character of the Historic District.*

The Committee developed the Materials Evaluation Framework to vet new and alternative siding products for inclusion on an internal Master List of Materials that will be kept on file with the Planning Department. Once the Materials Evaluation Framework is formally

adopted, it will be tested for at least six months and minor adjustments may be made. Applicants proposing new residential projects or replacing siding on non-Historic Structures in the Historic Districts can use the framework to help guide them in selecting acceptable siding materials for new residential projects in the Historic Districts. As external siding products are vetted and approved or rejected, they will be added to the internal list for future reference by Planning staff.

Background

The Materials Advisory Committee was tasked with selecting siding materials and wood finishes that meet specific performance measures for the above characteristics, which can be grouped into three overarching categories: durability, sustainability, and compatibility. The Materials Advisory Committee met on December 16, 2025, January 14, 2026, February 10, 2026, March 20, 2026, and April 24, 2026 to develop the Materials Evaluation Framework.

The Historic Preservation Board (HPB) conducted a work session on March 4, 2026, to review progress that the Advisory Committee made on developing the framework. Planning staff presented the draft framework to the HPB and received positive feedback on the direction the Committee was going ([Packet](#), Item 6.B; [Media](#)). During the work session, the HPB also discussed two topics regarding compatibility of siding materials, which the Advisory Committee lacks consensus on:

- 1) Interpretation of the LMC regarding the use of stone masonry as a siding material for new residential infill and addition to Historic Structures.
- 2) Interpretation of LMC regarding the application of new and alternative materials on Historic Residential buildings.

The Advisory Committee recommends the HPB formally adopt the draft Materials Evaluation Framework, with the understanding that the framework will be tested over the next six months and updated accordingly to ensure alternative siding materials are compatible, durable, and sustainable (Exhibit A).

Work Session

(I) The Materials Evaluation Framework uses performance-based criteria for vetting alternative external siding materials for new residential infill projects in Park City's Historic Districts, to ensure materials are Compatible, Durable in Park City's climate, and Sustainable.

This framework establishes minimum thresholds for exterior cladding materials, and is intended to be used applicants when submitting building plans and by Planning staff, when reviewing plans for new residential infill projects, either at the Historic District Design Review phase or building permit phase.

Materials that can be considered for inclusion on the Master List of Materials are limited by LMC [§ 15-5-5](#) *Architectural Design Guidelines*, which prohibits the following siding materials:

1. Thick shake shingles;
2. Ceramic tiles;
3. Slump bloc, weeping mortar;
4. Plastic or vinyl siding;
5. Used brick;
6. Synthetic stone products such as simulated stone or brick, cultured stone or brick, pre-cast stone or concrete imbedded with stone fragments;
7. Lava rock, clinkers;
8. Asphalt siding;
9. Plywood siding;
10. Aluminum siding;
11. Vinyl, or other similar material derived from petroleum;

An exception to Vinyl and Aluminum siding is provided in LMC [§ 15-13-8\(B\)\(4\) Materials](#):

Vinyl and aluminum siding are prohibited in the Historic District, unless otherwise specified in the Master List of Non-Historic Materials and Finishes

LMC [Chapter 15-13 Regulations for Historic Districts and Historic Sites](#), requires that “New materials should reflect the character of the Historic District”, and more specifically, alternative siding materials must have similar profiles and dimensions of Historic residential Structures.

The Materials Evaluation Framework organizes alternative siding materials based on the following overarching material classes:

- Composites
- Laminate Panels (MCM or ACM panels; wood veneer panels)
- Fiber Cement
- Glass Fiber Reinforced Concrete
- Extruded Aluminum
- Gaged Metal panels

The Advisory Committee developed performance metrics and minimum thresholds considering each of these different Material Classes, as they have a range of characteristics that in some cases need to be evaluated separately; some metrics are universal, such as the “Lifetime Durability” criteria, which is based on a product’s stated warranty period.

Step 1 in the framework qualifies alternative siding products based on specific durability metrics, which are critical to a product’s inclusion on the Master List -- if a material is compatible and sustainable, but it lacks durability in Park City’s climate it should not be an approved material. The following performance metrics are used to evaluate a material’s durability in Park City’s climate:

- Warranty period (25 years) / lifespan (50 years)
- Surface Failure (UV exposure/image fade/chalking)
- Substrate Failure (freeze/thaw resistance or moisture absorption)

- Fire resistance rating

Step 2: Sustainability metrics judge a siding product on its recycled content as well as its impact on the environment during the manufacturing process and impact at end-of-life (cradle to grave). The sustainability characteristics are weighed differently for different product types. For example: a product that rates high for lifetime durability and has a low cradle to grave impact may not contain recycled materials – the Advisory Committee concurs that a product with these characteristics shouldn't be disqualified.

Step 3: Compatibility metrics are related to the material's profile and dimensional characteristics as well as the quality aesthetic of a material. If a product imitates wood either in image or texture or both it must meet minimum thresholds for image and/or texture quality that ensure compatibility with the texture, finish, and color of traditional wood siding. The performance measures used to evaluate a material that imitates wood are:

- Image or texture pattern repeat
- Image resolution
- Sheen (must be low lustre or matte)

Because the quality of “wood-like” products can vary greatly, the Committee has decided that a sample of the proposed siding product will need to be submitted to be evaluated on a case-by-case basis; previously approved “wood-like” products will be added to the Master List of Materials and no sample is required to be submitted.

All other materials must meet minimum standards for compatibility in terms of profile and dimensions, as well as sheen.

See Exhibit A Materials Evaluation Framework.

See Exhibit B Examples of alternative siding products

(II) The Advisory Committee has discussed whether alternative applications of stone masonry is a compatible siding material, and whether the LMC could be interpreted, as currently written, to allow stone as a primary siding material for new residential infill.

The LMC describes stone as appropriate for use on retaining walls and foundation, but not as a primary siding material on residential buildings.

Specifically, LMC [§ 15-13-8](#) *Regulations for New Residential Infill Construction* states:

(B)(1)(d). Retaining Walls

*New retaining walls shall be consistent with historic retaining walls in terms of mass, scale, design, materials, and scale of materials. Simple board-formed concrete, **stacked stone** and other traditional materials are recommended over*

concrete block, asphalt, or other modern concrete treatments.

(B)(2)(b). Foundation

*Acceptable foundation materials may include **stone** and concrete, wood lattice and vertical boards. Distinction between foundation and wall material shall be clearly defined.*

(B)(4). Materials

- a. Building materials shall be compatible in scale, proportion, texture, finish and color to materials used on Historic Structures in the Historic District. The dimensions of **masonry units, wood siding, and other building materials shall be similar to those used historically.***

The “Materials” section of code is not limited to primary siding materials; it encompasses materials used on the entire Site, including masonry units, which were Historically used for foundations and retaining walls. The Materials section goes on to describe materials that are appropriate for “primary siding” for new structures:

- b. The primary siding material for new structures shall appear similar to those on historic structures in the Streetscape or character area. **Historically, the most common material on primary structures was painted horizontal lap siding with a reveal between 6 to 8 inches.** Secondary structures such as barns and sheds typically had siding of unpainted wood (horizontal lap or vertical board and batten) or corrugated metal panels.*
- c. Building materials shall be applied in the manner similar to that used historically. Typically, a ‘hierarchy’ of building materials should be used, with heavier, **more durable materials for foundations and more refined materials above foundations. Building materials, especially masonry, shall be used in the manner they were used historically.***

This section of code specifically calls for “more durable materials for foundations”, referring to masonry, and explicitly states that **masonry shall be used in the manner used historically**. Research has shown that brick and stone masonry were common siding materials used on public buildings and commercial buildings in Park City, but masonry was not used as a primary siding material for residential buildings; stone masonry was limited to foundations and retaining walls for residential buildings.

In order for stone masonry to be considered as a primary siding material for inclusion on the Master List of Materials, the LMC would need to be amended. Planning staff recommends maintaining restrictions in the LMC that prohibit adhered stone, stone veneer and masonry applied with mortar. If the HPB would like additional research on this topic, the Historic Preservation on-call consultant could be tasked.

(III) LMC Chapter 15-13 specifies that alternative siding materials must be applied as traditional materials were historically; it is not appropriate to introduce artificial patterns.

Pursuant to LMC Chapter 15-13, “Historically, the most common material on primary structures was painted horizontal lap siding with a reveal between 6 to 8 inches. Secondary structures such as barns and sheds typically had siding of unpainted wood (horizontal lap or vertical board and batten) or corrugated metal panels”. An example of historic siding profile and dimension is 7-inch wide by 12-foot long horizontal lap boards. Many composite materials that the Advisory Committee has identified as durable and sustainable are manufactured as panel rainscreen systems that come in a variety of sizes and dimensions that may not reflect historic profiles.



Figure 1: historic profile - lap siding



Figure 2: Rainscreen cladding with narrow vertical slats





Figure 3: Example of Aluminum Composite Panels (ACM) in various dimensions

The intent of the 2025 LMC amendments to establish more flexibility for alternative siding materials was to broaden the architectural palette of new residential buildings to provide contrast with Historic Structures, while not diminishing compatibility with Historic Structures. The amendments to the Historic District Design Regulations did not include updates to the requirement for synthetic materials to be applied as traditional materials were historically:

LMC § 15-13-8(B)(4), *Materials*, states:

Non-historic materials (approved on the Master List of Materials and Finishes) shall have a similar appearance and profile to historic siding and trim materials. Synthetic materials shall be applied as traditional materials were historically; it is not appropriate to introduce artificial patterns.

The Materials Evaluation Framework currently proposes that alternative siding products must reflect a rectilinear profile, and larger format panels may be allowed but limited as 'ornamental' and up to 25% of a façade.

If the HPB would like to consider allowing alternative materials be applied in non-historic profiles beyond what is currently proposed, it would require amendments to the Historic District Design Regulations in LMC Chapter 15-13.

(IV) Next Steps for Materials Advisory Committee.

The Materials Advisory Committee will remain on call to review new siding products that require extra scrutiny, such as products that imitate wood. The Materials Evaluation Framework will be tested in the field over the next several months and updated as needed. The Advisory Committee will meet after a three-month test period to review the framework and make adjustments. Additionally, the Committee will check in with the HPB at least annually to review and update the Master List.

- With the rapid pace of new siding materials developed each year, the Master List of Non-Historic Materials and Finishes should be periodically reviewed and updated.
- This review is also an opportunity to 'de-list' a material if it does not retain its quality and compatibility over time.

Department Review

The Planning Department, Executive Department, and City Attorney's Office reviewed this report.

Exhibit

A: Draft Materials Evaluation Framework

B: Example Materials

MATERIAL CLASS	Composites	Laminate Panels	Fiber Cement	Glass Fiber Reinforced Concrete (GFRC)	Extruded Aluminium	Gauged Metal
PRODUCT TYPES	Capped Wood-Plastic Composite (WPC); Mineral-Based Composite; Engineered Wood	ACM and MCM Panels; Wood Veneer Panels; aka High-Presssure Laminates (HPL); exterior phenolic; Natural Fiber Core (NFC); thermoplastic (polyethelene) core, fire-retardant core, non-combustable core	High-density panels; medium-density panels; compressed panels	Spray-up (high strength continuous fiber; Premix (castable shorter fiber)	V-Groove /V-Joint Panels, tongue and groove, ship-lap/plank, board and batten, woodgrain textured panels, arch panels	Copper panels, rolled steel, corrugated metal
EXAMPLE PRODUCTS	PASS: Modern Mill; Everlast; Millboard FAIL: NewTechWood; LP SmartSide	Alpolic; Fundermax; Parklex Prodema	PASS: Equitone; Nichiha; SVK, Allura FAIL: James Hardie	Oko Skin	Geo-Lam; Facil Facades; Knotwood; Longboard	
STEP 1: DURABILITY						
Lifetime Durability (substrate warranty period)	Minimum 25 year substrate warranty (50 year lifespan)		Minimum 20 year warranty	Minimum 10 year warranty	Minimum 25 year substrate warranty (50 year lifespan)	Must be a minimum 0.19 inches, matte finish. UL2218 Class (1-4)
(SURFACE) Surface Failure (UV Exposure/Image Fade/Chaulking) - for factory applied finishes	ASTM D2244 (color fade): ΔE ≤ 3 and D4214 (chaulking): #8 is acceptable	ASTM D2244 (color fade): ΔE ≤ 3 acceptable up to 10 years & D4214 (chaulking): #8-10 after 10 years is acceptable	ASTM D2244 (color fade): ΔE 3 and D4214 (chaulking): #8 is acceptable	ASTM D2244 (color fade): ΔE 2-5 and D4214 (chaulking):		
(SUBSTRATE) Moisture Aborption Rate; Freeze/Thaw Resistance	ASTM D792 (non-pvc composites); ASTM D1037 (for wood-based); D5229 (for advanced polymer matrix);	ASTM D570 (ACM Panels)	ASTM C1186: Type A, Grade IV minimum Density ≥ 1,500 kg/m³	EN 12467 Durability Calssification: Category A; Strength Classification: Class 4 or 5	N/A	
Fire Resistance Rating	Minimum Class B (Class III) based on E84 testing	Minimum Class A (Class I) based on ASTM E-84: Panels have a flame spread index of less than 25 and a smoke developed index of less than 450	N/A			
STEP 2: SUSTAINABILITY						
Recycled Content	Minimum of 20% recycled material	No minimum, must meet all other Sustainability metrics			Minimum 25% recycled	N/A
		- OR -				
Demonstrate low impact manufacturing process (total energy required, water consumption, waste generation, ecological toxicity)	Must have an Environmental Product Declaration (EPD)	Either EPD on file (ISO 14025 EPD), or for wood-based products FCS certification. FR (fire-retardant) core is the minimum acceptable core type for ACM panels. Modified wood products thermally treated (acetylated, furfurylated) are preferred over chemically treated wood.	Cradle to Cradle certified - Bronze or better or embodied carbon 16 to 20 kg CO2e per m² Must be panelized rainscreen format only — lap/plank siding excluded regardless of manufacturer or brand		Must have an EPD on file	N/A
		- AND -				
End-of-life Impact	≥ 50-year documented service life — OR — Partial recyclability documentation.	For laminate panels, forward to committee with core specification sheet and material separation detail. Wood veneer panels pass automatically b/c they are biodegradeable -- must have FSC certificate already on file from above step	N/A (products are inert and non-toxic at end of life, and both carry documented service lives of 50+ years)		no minimum requirement, beyond alloy discolusure	N/A
		- AND -				
Energy Performance	ASTM E2357 compatibility: Must not prevent ≤ 0.04 cfm/ft² wall assembly	ASTM E283 ASTM E331: ≤ 0.06 cfm/ft² + no uncontrolled water intrusion	ASTM E2357 compatibility	Must support continuous insulation + air barrier systems	built-in insulation backers (e.g., rigid foam) and thermal breaks	N/A
STEP 3: COMPATABILITY						
Image repeat / texture pattern repeat	For products that imitate wood in image and/or texture, provide product sample for evaluation					N/A
Image Resolution	For products that imitate wood in image, provide product sample for evaluation					N/A
Sheen	LOW LUSTRE, MATTE					
Profile and Dimensions	DIMENSIONS = panel width: min 5 inches; max 10 inches / panel length: min 4 feet. PROFILE = panels must be unifrom rectilinear, similar to Dutch lap; nickel gap; board and batten, tongue and groove, shiplap, clapboard. Open joint rainscreen systems allowed where gap is no more than 3/8". Large format panels allowed as ornamental feature, no more than 25% of a facade.					only allowed as ornamental, covering not more than 25% of a facade.

COMPOSITE SIDING

MODERN·MILL



EVERLAST®
Advanced Composite Siding



millboard®



FIBER CEMENT

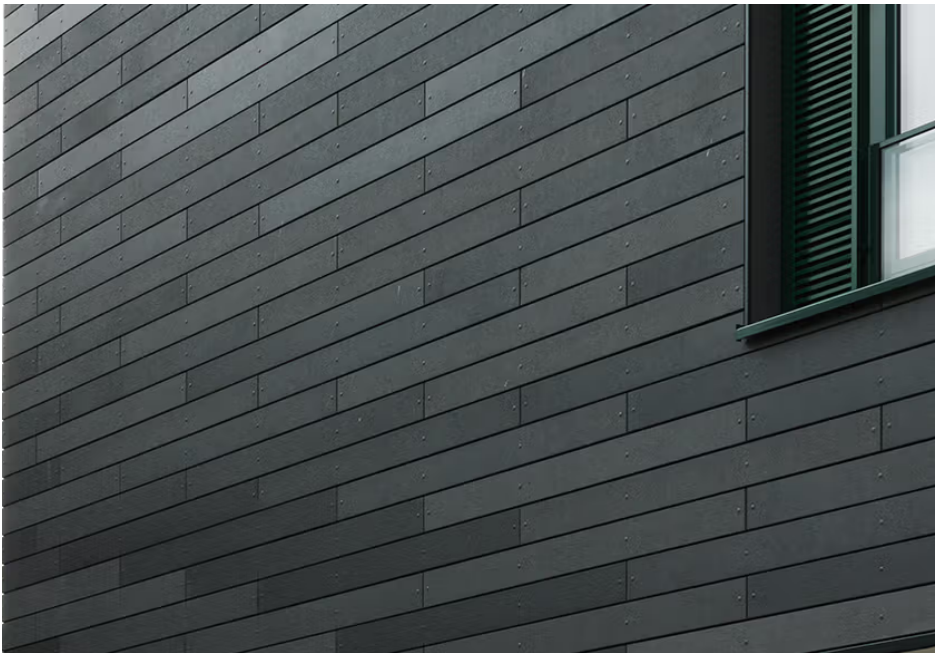
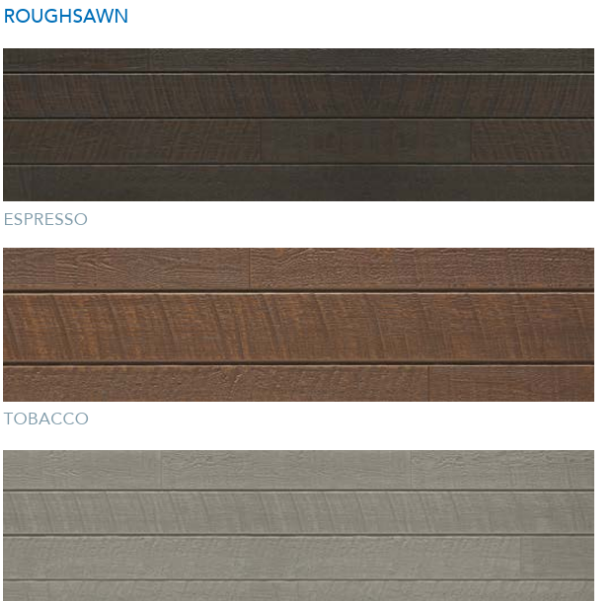


EQUITONE [linea]



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GLASS FIBER REINFORCED CONCRETE (GFRC)



EXTRUDED ALUMINUM

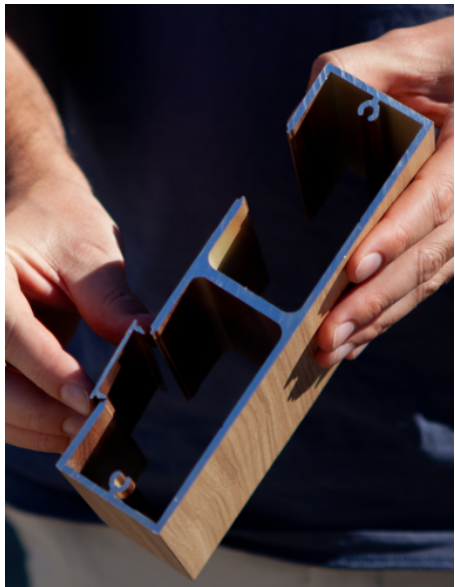


Geolam
Architectural Eco-Technology



Aluminum core clad in composite wood veneer

Extruded aluminum profile clad in laminate veneer



KNOTWOOD

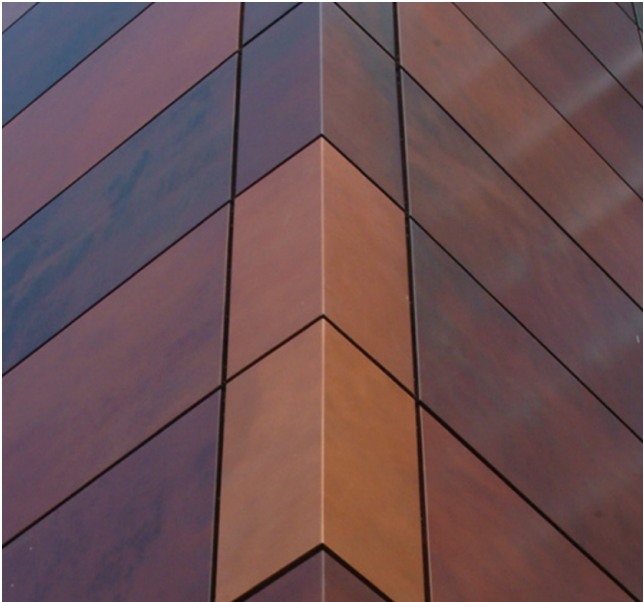


facil
façades

METAL COMPOSITE MATERIAL (MCM) PANELS



ALPOLIC



PARKLEX PRODEMA



LONGBOARD
INSPIRING ARCHITECTURE

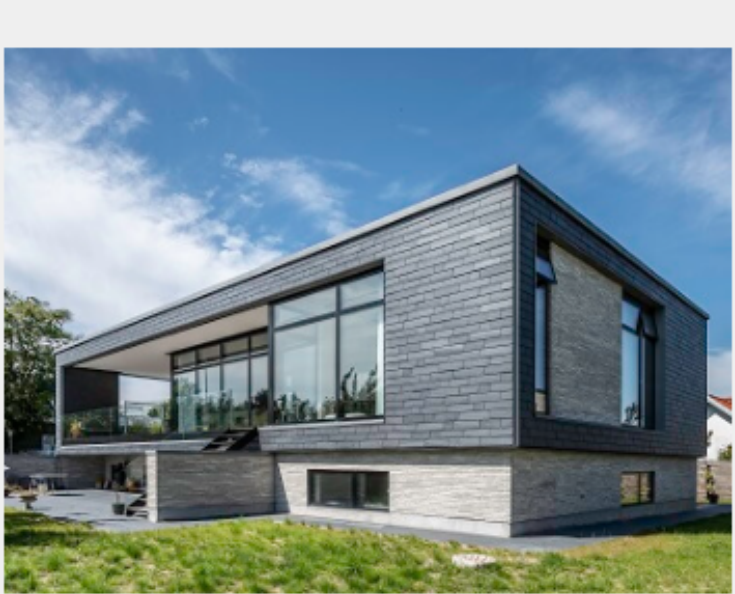
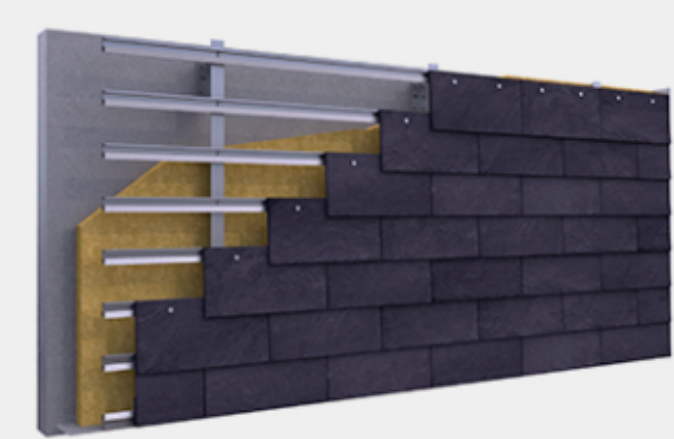


STONE CLADDING NOT TRADITIONALLY USED AS A PRIMARY SIDING MATERIAL

NATURAL SLATE RAINSCREEN CLADDING



BRICK, STONE VENEER, ADHERED STONE, STONE APPLIED WITH MORTAR



Historic Preservation Board Staff Report



Subject: Fences in Historic Residential Districts
Application: PL-25-06546
Authors: Meredith Covey, Planner II
Lillian Zollinger, Planner III
Date: June 3, 2026
Type of Item: Land Management Code Amendment

Recommendation

(I) Review potential Land Management Code amendments regarding Fences in residential Historic Zoning Districts, (II) conduct a public hearing, and (III) consider forwarding a positive recommendation for the Planning Commission's consideration on June 24, 2026, and later City Council consideration (Exhibit A, Draft Ordinance).

Analysis

The City Council directed staff and the Historic Preservation Board to evaluate two questions:

- I. What Fence type and materials are compatible and preserve the character of our Historic Districts?
- II. Where should Fences be installed in residential Old Town Right-of-Way (ROW)?

(I) What Fence type and materials are compatible and preserve the character of our Historic Districts?

Based on research of peer communities, best practices, and input from the HPB, the Planning team drafted the following Land Management Code (LMC) updates to address type and materials for Fences proposed for both Historic and Non-Historic Residential Sites in the Historic Zoning Districts.

Design and Type

The most common types of Fences in Park City historically were picket Fences, woven wire Fences, or simple metal Fences. Fence materials were installed in a way that allows visibility of the front yard and home.

The 1983 Historic District Design Guidelines and the 2009 Design Guidelines for Historic Districts and Historic Sites detail that solid wood Fences in the front yard should be avoided. 1983 Historic District Design Guidelines includes dimensions for wood picket Fences, indicating "the boards were 3 1/2" wide with a spacing of 1 3/4" between boards." The guidelines state that solid wood Fences with no spacing between vertical boards shall be avoided.



Figure 1: Picket Fence with spacing, image from Google.



Figure 2: Board Fence with no spacing, image from Google.

However, these requirements were removed when the regulations were overhauled in 2019. For both Historic and Non-Historic Structures, the current regulations for new Fences include:

- Fences should reflect the building's style and period.
- Wood and metal Fences and traditional styles should be featured when visible from the ROW.
- Other styles of Fences are allowed when not visible from the ROW.
- Sustainable materials are encouraged.
- Vinyl and plastic materials are not allowed.

The Planning team recommends updating the LMC to reflect the original regulations that prohibited solid Fences:

- Picket Fences, woven wire Fences, and simple metal Fences are allowed. Ornate wrought iron, board Fences, split or horizontal rail, railroad tie, or timber Fencing are prohibited when visible from the primary public ROW.
- Fences, other than picket fences, shall not be more than 50% solid to void.
- Spacing of pickets for picket Fences must be a minimum of 1/2 the width of the picket.

Materials

The 1983 Historic District Design Guidelines state, “[t]ypically, wood picket Fences were used and these were painted.” Research on peer communities also suggests that Historic wood Fences were painted. Through previous updates to the LMC, the HPB has indicated that they are supportive of unpainted wood being used as siding material at new residential infill and on new additions to Historic Structures.



Figure 3: 1940s tax photo courtesy of the Park City Museum

For both Historic and Non-Historic Residential Sites, the Planning team recommends updating the LMC to require that:

- Fences shall be made of wood, metal, or a combination of wood and metal in a style seen historically.
- Untreated wood and metal are prohibited; weather resistant coatings shall be utilized.

At Non-Historic Residential Sites, the Planning team recommends the following:

- Alternative materials which must demonstrate compatibility with the Structure’s style and materials may be proposed and reviewed by the Planning Department.

- Alternative materials shall demonstrate longevity and ability to withstand snow removal operations.

(II) Where should Fences be installed in residential Old Town in Right-of-Way?

Fences installed on private property may be installed up to the property line – they may be up to four feet in height along the Street or Sidewalk. Fences proposed to be installed in City ROW require an encroachment agreement and City Engineer approval.

ROWs are managed by municipalities for the purposes of facilitating transportation and utilities for the Public. ROWs typically extend beyond the limits of the built surface (i.e. beyond the roadway, sidewalk, curb and gutter). Some utilities are often installed outside of the built surface instead of under it; this facilitates maintenance and allows for adequate separation between different utilities. The additional width also allows the City to maintain the built surface and any other City assets within the ROW without disturbing private property.

In residential Old Town, property lines vary in their relationship to the built ROW. There are often inconsistencies between where Streets were platted in the 1800s and where they were built. This creates an area typically between the edge of the sidewalk or back of curb for a ROW and private property (shown in yellow in the image below).

For example, on Park Avenue, the ROW property line extends beyond the sidewalk. However, portions of this ROW have been incorporated into residential front yards, which sometimes include Fences.



Figure 4: Excerpt from Nearmap of Park Avenue showing the ROW outlined in black, the Road highlighted in orange, the sidewalk highlighted in blue, additional ROW highlighted in yellow, and Fences in the ROW in red. Utilities are often found throughout the full width of the ROW.

Because of these gaps between platted ROW, built ROW, and private property, there can be challenges with consistent Fence installations along the streetscape, as well as for snow removal and snow storage.

Pursuant to Municipal Code of Park City (MCPC) [§ 14-4-4](#) and [§ 14-4-9](#), property owners are responsible for clearing snow from the sidewalk in front of their property and storing the snow on site. However, Public Works is responsible for snow removal from the Streets in Park City.¹ During snowstorms, Public Works may store snow along ROW and within snow storage easements on private property. Fence installations can impede this.

In 2025-2026, the City Council reviewed and took Final Action on Fences within the ROW and requested evaluation of Fences and snow removal. (Since that time, on April 9, 2026, the City Council [adopted an amended code](#) to delegate review and Final Action on Fences in the ROW to the Engineering Department.) Property owners may wish to construct a Fence due to safety or privacy concerns, continuity of their yard to the Street, or alignment with the location of Fences along the Streetscape. Locating Fences

¹ MCPC [§ 14-4-9](#)

in Old Town ROW requires evaluation of snow storage, aesthetics, privacy, and historic context.

In general, the Engineering and Public Works Departments do not support private Fences within the public ROW. In the Historic District, many sidewalks are designated as Tier 1 walkways under Municipal Code [§ 14-4-9](#) because they provide critical pedestrian access to the library, schools, businesses, and other destinations. These walkways receive priority snow removal service. Fences located adjacent to sidewalks can impede snow storage and removal operations, reducing the City's ability to maintain safe and accessible priority pedestrian routes.

In areas where front-yard fencing is a common and established feature of the neighborhood, Engineering and Public Works may evaluate encroachment requests on a case-by-case basis under the authority delegated to the City Engineer by Municipal Code [§ 2-4-11](#). As part of this review, Engineering typically requires a minimum setback of four feet from the back of the sidewalk. This setback provides space for snow removal operations and generally preserves access to utilities located behind the sidewalk.

Majority HPB input to date is that Fences in the ROW should be installed as they were historically, up to the sidewalk. A minority of members expressed support in allowing Historic Sites to have Fences installed adjacent to the sidewalk if new Fences for non-Historic sites are installed with a 2-foot setback.

On May 8, 2026, staff collected feedback from members of the public at the Historic Preservation Celebration. While responses were limited, the participants were aligned with the HPB's majority recommendation for a 0-foot setback from the sidewalk.



Figure 5: Image of diorama made by staff to collect public input on Fence locations.



Figure 6: Staff at the Historic Preservation Celebration outlining proposed LMC amendments to Park City residents.

The HPB's input has been provided to the Engineering Department for consideration as they evaluate Fences in Old Town on a case-by-case basis. Staff requests input from the HPB on whether any revisions are recommended to the majority advice.

Department Review

The Planning Department, Engineering Department, Public Works Department, Executive Department and City Attorney's Office reviewed this report.

Notice

Staff published notice on the City's website and the Utah Public Notice website on May 20, 2026. The Park Record published courtesy notice on May 20, 2026.

Exhibit

A: Draft Ordinance No. 2026-XX

Project Background

On November 18, 2025, the City Council reviewed a property owner's request to install a Fence within City Right-of-Way (ROW) and requested a broader policy discussion with the Historic Preservation Board (HPB) on:

- The location of Fences in context of a Historic Structure and Streetscape.
- Snow storage easements and the location of Fence.

- The types of materials and style of Fences allowed.
- How to balance the impact of Fence installations on aesthetics, public safety, and snow removal in the Historic Residential Districts ([New Business Item 1](#); [Meeting Minutes](#)).

On December 3, 2025, the HPB conducted a work session with the Planning, Public Works, and Engineering Departments ([Staff Report](#); [Meeting Minutes](#)) regarding the above items. The HPB requested additional information on the following:

- Potential amendments to the Land Management Code (LMC) to better describe materials and Fence types for compatibility in Historic Districts.
- Potential design solutions and materials that have demonstrated longevity and ability to withstand snow removal operations.
- Locations within Old Town where snow removal is particularly problematic.

On January 7, 2026, the HPB conducted a work session to review the above requests ([Staff Report Item 6.A](#); [Minutes](#)). The HPB concluded the following regulations were appropriate for Fences in Historic Districts:

- Fences should maintain a traditional solid-to-void ratio to require more openness along the streetscape.
- Picket Fences should have spacing between the pickets, a minimum of 1/2 the width of the picket.
- Traditional materials should continue to be required at Historic Sites. These materials include wood and metal, or simple wire. Plastic and vinyl Fences are prohibited.
- Flexibility may be considered with non-historic sites, alternative materials, which could be proposed and reviewed by the Planning Department.

On March 4, 2026, the Historic Preservation Board reviewed and forwarded a recommendation on the location of a Fence in the ROW at 1304 Park Avenue ([Packet](#), Agenda Item 7.A; [Minutes](#)). The Historic Preservation Board took into account the larger policy discussion from December and January as well as recommendations by the Engineering Department, Planning Department, and Public Works.

On April 9, 2026, the City Council approved code amendments that delegated review of fence locations in the City ROW to the Engineering Department ([Staff Report New Business Item 2](#); [Minutes](#)). After this decision, all Fences proposed in the ROW must obtain an Encroachment Agreement with the Engineering Department.

Based on HPB discussions to date, Planning staff drafted potential LMC amendments outlined in Exhibit A.

Ordinance No. 2026-XX

**AN ORDINANCE AMENDING LAND MANAGEMENT CODE CHAPTER 15-13
REGULATIONS FOR HISTORIC DISTRICTS AND HISTORIC SITES**

WHEREAS, the purposes of the Land Management Code (LMC) are to promote the general health, safety, and welfare of the present and future inhabitants, businesses, and visitors of the City and to protect and enhance the vitality of the City's resort-based economy, the overall quality of life, the Historic Character, and unique mountain town community;

WHEREAS, the LMC implements the goals and policies of the Park City General Plan;

WHEREAS, Historic Character is one of the core values in the Park City General Plan;

WHEREAS, Strategy 5O in the General Plan is "[e]valuating the Historic District Design Regulations for consistency and potential modifications that further preservation efforts while supporting a degree of flexibility" and the related action is "[e]valuating streetscape standards that support walkability efforts and reinforce the historic nature of Park City's older neighborhoods/urban form."

WHEREAS, Strategy 5P of the General Plan is "[r]eviewing new construction for suitability and compatibility of infill development within the Historic Districts" and the related action is "[a]nalyzing the influence of site design and architecture as part of the review, including the impact of setbacks, fence height, and fence location on the streetscape and the pedestrian experience."

WHEREAS, the purpose of the Historic Preservation Board is to, in part, preserve the City's unique historic character and to encourage compatible design and construction in the City's Historic Districts and Historic Sites through periodic updates to Land Management Code (LMC) Chapters 15-11 *Historic Preservation* and 15-13 *Regulations for Historic Districts and Historic Sites*;

WHEREAS, pursuant to LMC § 15-11-11, from time to time, the HPB may recommend changes to the *Regulations for Historic Districts and Historic Sites* to the Planning Commission and City Council, provided that no changes in the guidelines shall take effect until adopted by an ordinance of the City Council;

WHEREAS, on December 3, 2025, the Historic Preservation Board conducted a work session on potential amendments to the LMC to consider updates to Fence regulations in the Historic Residential Zoning District;

WHEREAS, on January 7, 2026, the HPB conducted a second work session on Fences in Old Town;

WHEREAS, on March 4, 2026, the Historic Preservation Board provided input on the location of a Fence within a Historic District Right-of-Way taking into account the larger policy discussion from December and January as well as recommendations by the Engineering Department, Planning Department, and Public Works;

WHEREAS, on May 8, 2026, the Planning team sought public input on Fences in Old Town and the proposed updates at the Historic Preservation Celebration;

WHEREAS, on June 3, 2026, the Historic Preservation Board conducted a public hearing and forwarded a _____ recommendation to the Planning Commission and City Council;

WHEREAS, on June 24, 2026, the Planning Commission conducted a duly noticed public hearing and forwarded a _____ recommendation to the City Council;

WHEREAS, on _____, the City Council conducted a duly noticed public hearing.

NOW, THEREFORE BE IT ORDAINED by the City Council of Park City, Utah, as follows:

SECTION 1. AMEND MUNICIPAL CODE OF PARK CITY LAND MANAGEMENT CODE TITLE 15. The recitals are incorporated herein as findings of fact. Municipal Code of Park City Title 15 Land Management Code Chapter 15-13 *Regulations for Historic Districts and Historic Sites* are hereby amended as outlined in Attachment 1.

SECTION 3. EFFECTIVE DATE. This Ordinance shall be effective upon publication.

PASSED AND ADOPTED THIS ____ day of _____ 2026.

PARK CITY MUNICIPAL CORPORATION

Ryan Dickey, Mayor

Attest:

City Recorder

Approved as to form:

City Attorney's Office

DRAFT

ATTACHMENT 1

15-13-2 Regulations For Historic Residential Sites

B. Specific Regulations

1. Site Design

e. Fencing

(1) Historic Fencing shall be preserved and maintained.

(2) Historic Fencing may be reconstructed based on photographic evidence. The reconstruction shall match the original in design, location, color, texture, and material.

~~(3) [New fencing should reflect the building's style and period. New wood and metal fencing located where viewable from adjacent public rights-of-way should feature traditional design and pattern. Split or horizontal rail, railroad tie, or timber fencing may be located where not viewable from adjacent public rights-of-way, but should be avoided where visible from the primary public right-of-way. Vinyl or plastic-coated fencing is not appropriate.]~~

Fences shall be wood, metal, or a combination thereof in a style seen historically. Untreated wood and metal are prohibited, and weather resistant coatings shall be utilized. Plastic and vinyl are prohibited.

(4) Solid, ornate wrought iron, board, split or horizontal rail, railroad tie, and timber Fences within the Front Yard or where visible from the Right-of-Way are prohibited.

(5) Picket Fences, woven wire Fences, and simple metal Fences are allowed within the Front Yard or where visible from the Right-of-Way.

(6) Picket Fences shall have a minimum picket spacing of one-half (1/2) the width of the picket.

~~(4)~~ (7) New fencing should be designed to minimize its environmental impacts. New fencing should use green material and should take into account site impacts such as shading, natural topography, ~~and~~ drainage, and snow removal and storage.

~~(5)~~ (8) Drought tolerant shrubs should be considered in place of fencing or walls.

~~(6)~~ (9) Arbors emphasizing a fence gate or entry shall be subordinate to the associated historic building or structure and shall complement the design of the historic structure and fencing in materials, features, size, scale, and proportion, as well as massing to protect the integrity of the historic site.

15-13-8 Regulations For New Residential Infill Construction (and Non-Historic Residential Sites) In Historic Districts

B. Specific Regulations

1. Site Design

e. Fences

(1) ~~[New fencing should reflect the building's style and period. New wood and metal fencing located where viewable from adjacent public rights-of-way should feature traditional design and pattern. Split or horizontal rail, railroad tie, or timber fencing may be located where not viewable from adjacent public rights-of-way, but should be avoided]~~

~~where visible from the primary public right-of-way. Vinyl or plastic-coated fencing is not appropriate.]~~

Fences shall be wood, metal, or a combination thereof in a style seen historically. Untreated wood and metal are prohibited, and weather resistant coatings shall be utilized. Plastic and vinyl are prohibited.

(2) Solid, ornate wrought iron, board, split or horizontal rail, railroad tie, and timber Fences within the Front Yard or where visible from the Right-of-Way are prohibited.

(3) Picket Fences, woven wire Fences, and simple metal Fences are allowed within the Front Yard or where visible from the Right-of-Way.

(4) Picket Fences shall have a minimum picket spacing of one-half (1/2) the width of the picket.

~~(2)~~ (5) New fencing should be designed to minimize its environmental impacts. New fencing should use green material and should take into account site impacts such as shading, natural topography, ~~and~~ drainage, and snow removal and storage.

~~(3)~~ (6) Drought tolerant shrubs should be considered in place of fencing or walls.

~~(4)~~ (7) Arbors emphasizing a fence gate or entry shall be subordinate to the associated historic building or structure and shall complement the design of the historic structure and fencing in materials, features, size, scale, and proportion, as well as massing to protect the integrity of the historic site.

Historic Preservation Board Staff Report



Subject: 844 Empire Avenue
A Significant Historic Site
Application: PL-26-06801
Author: Jacob Klopfenstein, Planner II
Date: June 3, 2026
Type of Item: Modification to Material Deconstruction

Recommendation

(I) Review the modification to Material Deconstruction approval to remove approximately 255 square feet of Historic Material and to modify the previously approved panelization plan to panelize nine panels instead of the previously approved eight panels at 844 Empire Avenue, (II) conduct a public hearing, and (III) consider approving the modification based on the Findings of Fact, Conclusions of Law, and Conditions of Approval outlined in the Draft Final Action Letter (Exhibit A).

Description

Applicant: Robin Dunleavy
Julie Wright, Applicant Representative

Location: 844 Empire Avenue

Zoning District: Historic Residential – 1 (HR-1)

Adjacent Land Uses: Residential, Public Right-of-Way

Reason for Review: The Historic Preservation Board reviews request for Material Deconstruction.¹

HDDR Historic District Design Review
HPB Historic Preservation Board
HR-1 Historic Residential – 1 District
LMC Land Management Code
SFD Single-Family Dwelling

Terms that are capitalized as proper nouns throughout this staff report are defined in LMC [§ 15-15-1](#).

Summary

The Applicant proposes modifying the Historic Preservation Board's (HPB) Feb. 7, 2024 Material Deconstruction² approval (Exhibit B) to remove approximately 255 square feet

¹ LMC [§ 15-11-12.5](#)

² LMC [§ 15-15-1](#) defines Material Deconstruction or Dismantling as “The disassembly of structures for the purpose of salvaging and reusing as many of the construction materials or building components. In some cases, deconstruction or dismantling may be used to remove non-historic materials from a historic site or

of Historic siding from the east façade of the Significant Historic Structure to accommodate an addition, and to modify the previously approved panelization plan to panelize nine panels instead of the previously approved eight panels.

The HPB approved the removal of 386 square feet from the east façade to accommodate the previous owner's east-side addition to the Significant Historic Structure. The property changed ownership in September 2025 and the Applicant intends to pursue the previous owner's remodel, rehabilitation, and addition project at the Site with modifications.



Figure 1: Applicant's rendering of the proposed remodel and addition project at 844 Empire Avenue. The proposed addition, which requires removal of Historic Material, is shown on the left.

Please see Attachment 1 for the Applicant's full plans set and narrative.

Background

844 Empire Avenue is Lot 1 of the 844 Empire Avenue Plat Amendment Lot 1, recorded with Summit County on January 13, 2025 (Entry No. [1230098](#)). The Significant Historic Site is developed with a Single-Family Dwelling (SFD) that was constructed c. 1904, according to the [Historic Site Inventory Form](#). A 2014 fire damaged the structure, and it has been vacant since then.

structure or to remove those historic construction materials or building components that are beyond repair.”

The Historic Preservation Board (HPB) approved the previous owner's Material Deconstruction and Panelization request to panelize the Significant Historic Structure and remove approximately 386 square feet of siding from the east façade on February 7, 2024 ([Meeting Packet](#), Item 6.A.; [Meeting Minutes](#) p. 3-8). Please see Exhibit B, HPB Final Action Letter, for further details.

The Planning Director approved the previous owner's HDDR to rehabilitate and remodel the Significant Historic Structure and construct an addition on May 1, 2025 (Exhibit C).

The previous owner entered into an Encumbrance and Agreement for Historic Preservation on July 2, 2025 (Summit County Recorder Entry No. [1238470](#)).

The property changed ownership in September 2025, and the Applicant recorded an assignment of encumbrance on September 22, 2025 (Summit County Recorder Entry No. [1241341](#)). The Applicant obtained the previously approved HDDR plans and the architect provided authorization for the Applicant to use the plans on November 12, 2025.

The Applicant intends to pursue the previous owner's remodel, rehabilitation, and addition project at the Site with modifications, including adding a basement level, lowering the rear window dormers of the Historic Structure, and restoring the truncated gable roof (see Exhibit D, Planning Director Final Action Letter, approved February 5, 2026).

The Applicant submitted a request to extend the HDDR approval on April 27, 2026, while revisions to the explored plans are reviewed. The Planning Director approved the one-year extension of HDDR approval request on May 21, 2026.

Analysis

(I) The proposal to remove approximately 255 square feet of Historic Material complies, as conditioned with Land Management Code Section 15-11-12.5, Historic Preservation Board Review For Material Deconstruction.

The HPB reviews requests for Material Deconstruction for compliance with LMC [§ 15-11-12.5](#) *Historic Preservation Board Review For Material Deconstruction*.

The Applicant proposes removing 255 square feet of Historic siding from the east façade of the Significant Historic Structure. Pursuant to LMC [§ 15-11-12.5\(A\)\(2\)](#), the HPB reviews requests to remove Historic Material to accommodate new additions.

Like the previous owner's project, the Applicant's modification includes a proposed east-side addition, and requires removal of approximately 255 square feet in a different location on the façade than the previously approved addition.

Please see Fig. 2 below showing the east façade of the Structure with the Applicant's

Material Deconstruction request shaded in blue and the previous owner's approved Material Deconstruction outlined in red.

The previous owner proposed removing approximately 386 square feet of Historic Material from the east façade to accommodate a flat-roofed addition and upper-level window. The Applicant's current request is to remove Historic Material from the east façade to accommodate an addition with a gable roof, and does not include the upper-level window.

Although the Applicant requests removing less total square footage of the Historic material from the east façade than the previous owner, the Applicant proposes removing the material from a different location on the east façade.

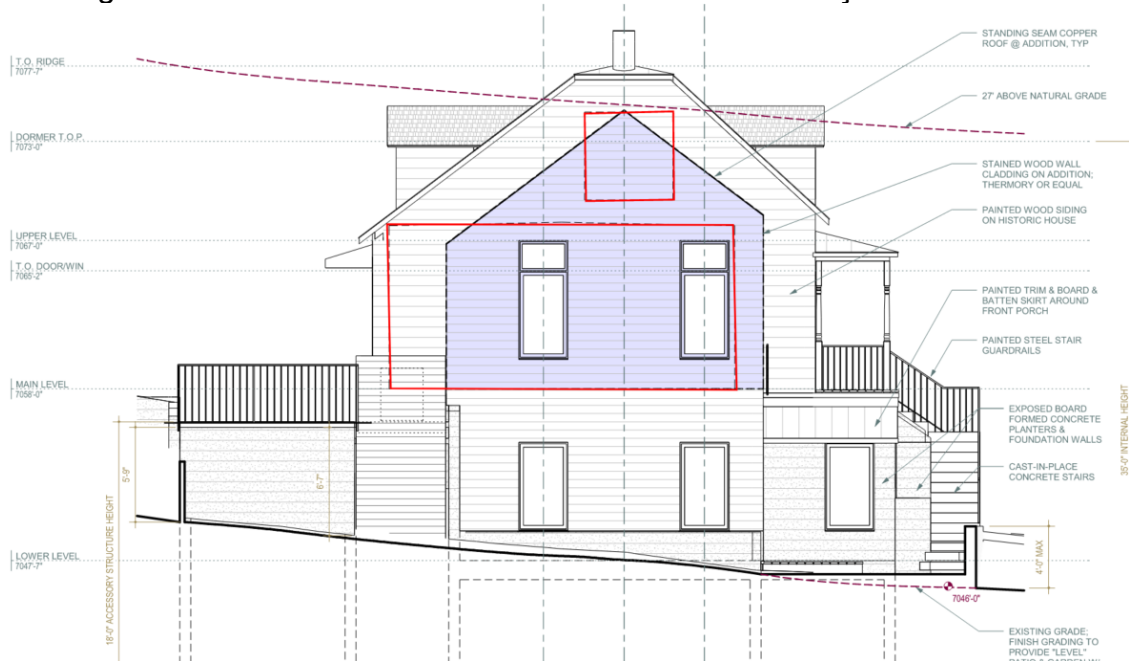


Figure 2: The east façade of the Significant Historic Structure at 844 Empire Avenue with the Applicant's Material Deconstruction request shaded in blue, and the previous owner's approved Material Deconstruction outlined in red.

The Applicant proposes extending the east-side addition down to the grade on the Site. The lower level of the Structure does not include Historic Material and is comprised of concrete cinder block walls, so the Applicant does not propose removing any Historic Material from the lowest level of the Structure:

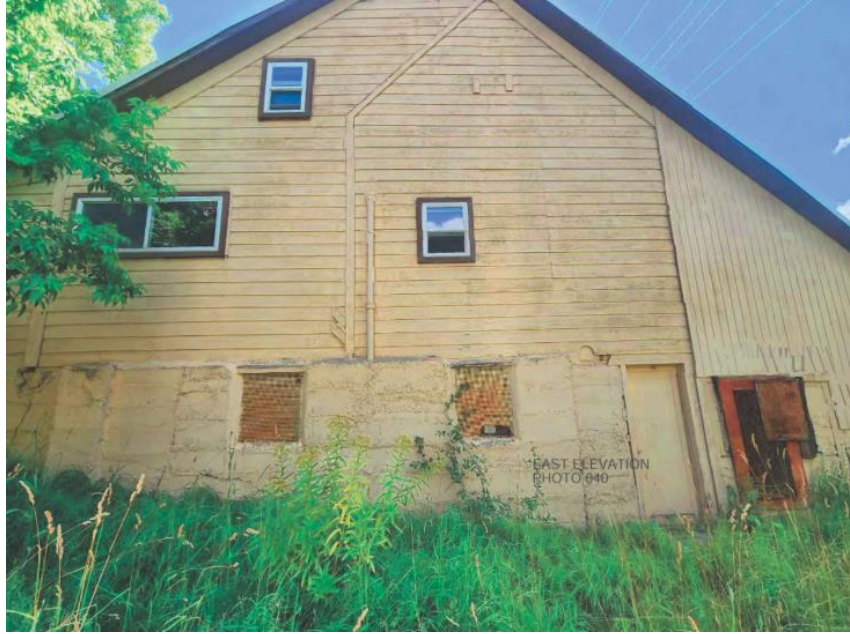


Figure 3: Current conditions of the east facade of the Significant Historic Structure at 844 Empire Avenue showing the non-Historic cinder block walls on the lowest level.

Condition of Approval 1 restricts the Applicant to removing no more than 255 square feet of Historic siding from the east façade of the Historic Structure. Condition of Approval 2 requires the Applicant to salvage and reuse all possible Historic Material.

Pursuant to LMC [§ 15-11-12.5\(B\)](#), Applicants requesting Material Deconstruction must submit a complete application. The Applicant submitted a complete application on May 8, 2026.

(II) The proposal to create an additional panel complies, as conditioned, with Land Management Code Section 15-11-14 *Disassembly And Reassembly Of A Historic Building Or Historic Structure*.

The Applicant also proposes modifying the previously approved panelization plan to split one 26-foot, 8-inch panel on the Historic front (north) façade into two smaller panels, creating a total of nine panels to be disassembled and transported from the site.

One panel would be approximately 15 feet, 2 inches long, and the other would be approximately 11 feet, 6 inches long:

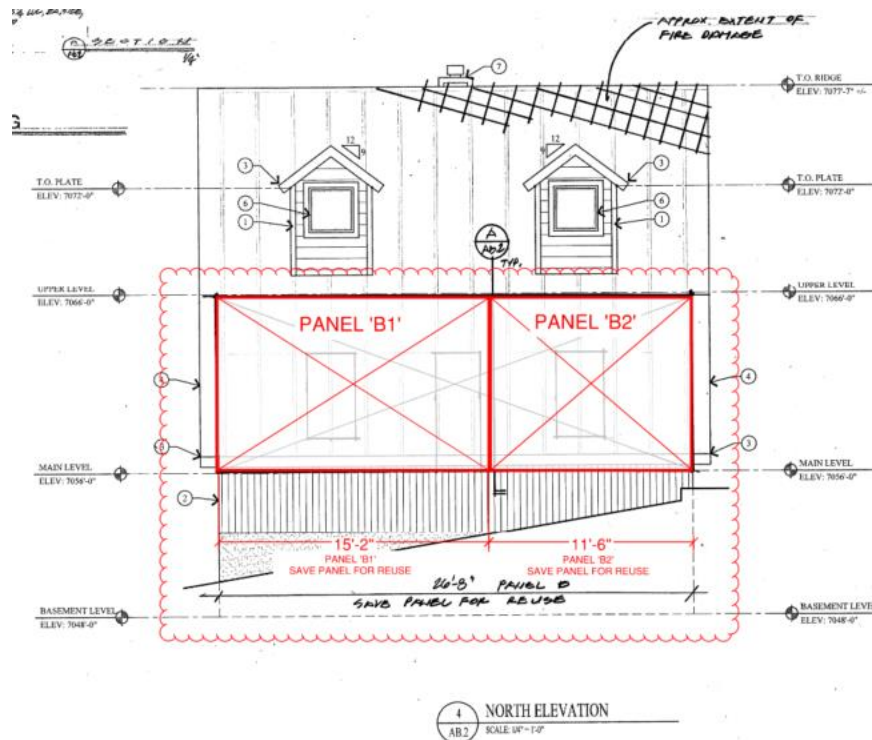


Figure 4: Excerpt from Applicant's modified panelization plan showing modified panelization of Historic front (north) facade.

The Applicant does not propose any changes to the amount of Historic Material proposed to be retained through panelization. The Applicant indicates that the purpose of the modification to the panelization plan is to split the longer panel into two shorter, more manageable lengths, which the Applicant believes will allow the material to be preserved more easily during deconstruction, transportation, storage, and relocation.

Please see Exhibit E for the Applicant's full modified panelization plan and panel storage plan.

The Historic Preservation Board must find that proposals to disassemble and reassemble Historic Structures comply with criteria for disassembly and reassembly of a Historic Structure outlined in LMC [§ 15-11-14\(A\)](#).

Pursuant to LMC [§ 15-11-14\(A\)\(1\)](#), a licensed structural engineer must certify that the Historic Structure cannot reasonably be moved intact. On December 10, 2023, the previous applicant's structural engineer found multiple structural issues of the building, including that multiple wall panels of the Historic Structure had been damaged by fire, soil retention, or structural cuts from the construction of the existing additions (see Exhibit F, Structural Engineer Report).

In addition to a structural engineer's determination, pursuant to LMC [§ 15-11-14\(A\)\(2\)](#), Applicants must demonstrate compliance with at least one of the below criteria for the HPB to approve a request to disassemble and reassemble a Historic Structure:

- a. The proposed disassembly and reassembly will abate demolition of the Historic

- Building(s) and/or Structure(s) on the Site; or
- b. The Historic Building(s) and/or Structure(s) are found by the Chief Building Official to be hazardous or dangerous, pursuant to Section 116.1 of the International Building Code; or
- c. The Historic Preservation Board determines, with input from the Planning Director and the Chief Building Official, that unique conditions and the quality of the Historic Preservation Plan warrant the proposed disassembly and reassembly; unique conditions include but are not limited to: (1) If problematic site or structural conditions preclude temporarily lifting or moving a building as a single unit; or (2) If the physical conditions of the existing materials prevent temporarily lifting or moving a building and the applicant has demonstrated that panelization will result in the preservation of a greater amount of historic material; or (3) All other alternatives have been shown to result in additional damage or loss of historic materials.

On January 10, 2024, the Chief Building Official determined the Significant Historic Structure is hazardous or dangerous pursuant to International Building Code Section 116.1 (see Exhibit G).

(III) The proposed modification complies, as conditioned, with Land Management Code Section 15-13-2 Regulations for Historic Residential Sites.

Pursuant to LMC [§ 15-11-12.5\(A\)\(2\)](#), the Applicant's request for Material Deconstruction must be analyzed for compliance with LMC [§ 15-13-2 Regulations for Historic Residential Sites](#).

The Applicant's modification request will be reviewed for compliance with LMC [§ 15-13-2](#) by the Planning Director through the Historic District Design Review (HDDR) process. Condition of Approval 3 requires the Applicant to obtain HDDR approval for the proposed modified addition and remodel project prior to submitting a building permit.

LMC [§ 15-13-2](#) criteria relating to additions to Historic Residential Structures are outlined below with staff analysis:

LMC § 15-13-2 Criteria	Analysis of Proposal
LMC § 15-13-2(B)(4)(a)(1): Additions to historic buildings should be considered only when it is demonstrated that the new use of the building cannot be accommodated by solely altering interior spaces.	The Applicant proposes an addition to increase the interior living space of the SFD. The Applicant proposes maintaining the SFD Use.
LMC § 15-13-2(B)(4)(a)(2): Additions to historic structures shall be considered	The Applicant proposes an addition on the east façade of the Historic Structure,

with caution and shall be considered only on non-character defining facades, usually tertiary and occasionally secondary facades.	a secondary façade. The proposed addition will not impact or obstruct the Historic front (north) façade.
LMC § 15-13-2(B)(4)(a)(3): Additions should be visually subordinate to historic buildings when viewed from the primary public right-of-way.	The proposed addition is set back approximately five feet from the front façade of the Historic Structure, and the highest roof ridge of the proposed addition is approximately two feet, eight inches shorter than the highest roof ridge of the Historic Structure on the Site.
LMC § 15-13-2(B)(4)(a)(4): Additions to historic structures shall not be placed so as to obscure, detract from, or modify historic roof forms.	The proposed addition will not impact the roof form of the Historic Structure.
LMC § 15-13-2(B)(4)(a)(5): Additions to historic structures shall not contribute significantly to the removal or loss of historic material.	The Applicant proposes removing approximately 255 square feet of Historic material from the east façade of the Historic Structure to accommodate the addition.
LMC § 15-13-2(B)(4)(a)(6): Where the new addition abuts the historic building, a clear transitional element between the old and the new should be designed and constructed. Minor additions, such as bay windows or dormers do not require a transitional element.	The Applicant proposes an addition with a footprint of approximately 315 square feet, or approximately 40% of the 791-square-foot footprint of the Historic Structure. Pursuant to LMC § 15-13-2(B)(4)(b)(2), transitional elements are not required for additions with a footprint less than 50% of the Historic Structure's footprint.
LMC § 15-13-2(B)(4)(a)(7): Maintain and preserve additions to structures that are significant to the era/period of restoration.	There are no existing additions to the Historic Structure, except for an enclosure of the Historic front porch, which the Applicant proposes to remove to restore the Historic front façade of the Historic Structure.
LMC § 15-13-2(B)(4)(a)(8): In-line additions shall be avoided.	The Applicant proposes an addition that is set back approximately five feet from the front façade of the Historic Structure.

LMC § 15-13-2(B)(4)(b)(2): A transitional element shall be required for any addition to a historic structure where the footprint of the addition is 50% or greater than the footprint of the historic structure.	The Applicant proposes an addition with a footprint of approximately 315 square feet, or approximately 40% of the 791-square-foot footprint of the Historic Structure, so a transitional element is not required.
LMC § 15-13-2(B)(4)(c)(1): Additions shall complement the visual and physical qualities of the historic building. An addition shall not be designed to be an exact copy of the existing style or imply an earlier period or more ornate style than that of the historic building.	The Applicant does not propose replicating an exact copy of the existing architectural style of the Historic Structure for the proposed addition. The Applicant proposes wood and glass materials for the addition, as well as a gabled roof form that is complementary to the existing style of the Historic Structure.
LMC § 15-13-2(B)(4)(c)(2): The addition shall be a contemporary interpretation of the historic structure's architecture style.	The Applicant proposes wood and glass materials for the addition that are complementary to the existing style of the Historic Structure. The Applicant also proposes dormers and doors that reflect a 2:1 height-to-width ratio that are compatible with the existing style of the Historic Structure.
LMC § 15-13-2(B)(4)(c)(3): Additions shall be subordinate in scale to the primary historic structure.	The proposed addition is set back approximately five feet from the front façade of the Historic Structure, and the highest roof ridge of the proposed addition is approximately two feet, eight inches shorter than the highest roof ridge of the Historic Structure on the Site.
LMC § 15-13-2(B)(4)(c)(4): Additions shall be visually subordinate to historic structures.	The proposed addition is set back approximately five feet from the front façade of the Historic Structure, and the highest roof ridge of the proposed addition is approximately two feet, eight inches shorter than the highest roof ridge of the Historic Structure on the Site.
LMC § 15-13-2(B)(4)(c)(6): Building Components and materials used on additions shall be similar in scale and size to those found on the historic building.	The Applicant proposes wood and glass materials that are compatible with the Historic District.

LMC § 15-13-2(B)(4)(c)(7): Window shapes, patterns and proportions found on the historic building should be reflected in the new addition.	Condition of Approval recommended: The Applicant proposes aluminum-clad wood windows. Condition of Approval 4 requires the Applicant to update the plans to include windows that reflect a 2:1 height-to-width ratio on the upper dormer of the proposed addition.
LMC § 15-13-2(B)(4)(c)(8): Windows, doors and other features on a new addition shall be designed to be compatible with the historic structure and surrounding historic sites.	Condition of Approval recommended: The Applicant proposes wood and aluminum-clad wood windows and doors. Condition of Approval 4 requires the Applicant to update the plans to include windows that reflect a 2:1 height-to-width ratio on the proposed addition.

(IV) The Applicant must comply with the approved Historic Preservation Plan for 844 Empire Avenue in accordance with Land Management Code Section 15-11-9 Preservation Policy.

The previous owner recorded an Encumbrance and Agreement for Historic Preservation on July 2, 2025 (Summit County Recorder Entry No. [1238470](#)) in accordance with the City's Preservation Policy outlined in LMC [§ 15-11-9](#).

The Applicant recorded an assignment of encumbrance on September 22, 2025 (Summit County Recorder Entry No. [1241341](#)) after purchasing the property. The assignment of encumbrance requires the Applicant to comply with the recorded Historic Preservation Plan.

Department Review

The Planning Department, Executive Department, and City Attorney's Office reviewed this report.

Notice

Staff published notice on the City's website and the Utah Public Notice website and posted notice to the property on May 20, 2026. Staff mailed courtesy notice to property owners within 300 feet on May 20, 2026. The *Park Record* published courtesy notice on May 20, 2026.³

³ LMC [§ 15-1-21](#)

Public Input

Public Input is attached as Exhibit H.

Alternatives

The Historic Preservation Board may:

- Approve the modification to Material Deconstruction.
- Deny the modification to Material Deconstruction and direct staff to make Findings for the denial.
- Request additional information and continue the discussion to a date certain.

Exhibits

A: Draft Final Action Letter

Attachment 1: Applicant's Narrative and Plans

B: HPB Final Action Letter

C: Planning Director Final Action Letter

D: Planning Director Final Action Letter approved Feb. 5, 2026

E: Modified Panelization Plan and Panel Storage Plan

F: Structural Engineer Report

G: Chief Building Official Determination

H: Public Input



Planning Department

June 3, 2026

Julie Wright

CC: Robin Dunleavy, Gibby Dunleavy

NOTICE OF HISTORIC PRESERVATION BOARD ACTION

Description

Address: 844 Empire Avenue, a Significant Historic Site

Zoning District: Historic Residential – 1 (HR-1)

Application: Modification to Material Deconstruction

Project Number: PL-26-06801

Action: APPROVED WITH CONDITIONS (See Below)

Date of Final Action: June 3, 2026

Project Summary: The Applicant proposes modifying the Historic Preservation Board's February 7, 2024 Material Deconstruction approval to remove approximately 255 square feet of Historic siding from the east façade of the Significant Historic Structure to accommodate an addition, and to modify the previously approved panelization plan to panelize nine panels instead of the previously approved eight panels.

Action Taken

On June 3, 2026, the Historic Preservation Board (HPB) conducted a public hearing and approved the modification to Material Deconstruction approval according to the following findings of fact, conclusions of law, and conditions of approval.

Background

1. The HPB approved the removal of 386 square feet from the east façade to accommodate the previous owner's east-side addition to the Significant Historic Structure on February 7, 2024.



Planning Department

2. The previous owner recorded an Encumbrance and Agreement for Historic Preservation on July 2, 2025 (Summit County Recorder Entry No. 1238470) in accordance with the City's Preservation Policy outlined in LMC § 15-11-9.
3. The property changed ownership in September 2025, and the Applicant intends to pursue the previous owner's remodel, rehabilitation, and addition project at the Site with modifications.

Findings of Fact

1. Pursuant to Land Management Code (LMC) § 15-11-12.5(A)(2), the HPB reviews requests to remove Historic Material to accommodate new additions. The Applicant proposes removing 255 square feet of Historic siding from the east façade of the Significant Historic Structure.
2. Pursuant to LMC § 15-11-12.5(A)(2), the Applicant's request for Material Deconstruction must be analyzed for compliance with LMC § 15-13-2 *Regulations for Historic Residential Sites*. The Applicant's modification request will be reviewed for compliance with LMC § 15-13-2 by the Planning Director through the Historic District Design Review (HDDR) process.
3. Pursuant to LMC § 15-11-12.5(B), Applicants requesting Material Deconstruction must submit a complete application. The Applicant submitted a complete application on May 8, 2026.
4. Pursuant to LMC § 15-11-12.5(B), the Planning Department shall provide public notice in accordance with LMC § 15-1-21. Staff mailed courtesy notice to property owners within 300 feet on May 20, 2026.
5. Pursuant to LMC § 15-11-12.5(B), the HPB shall conduct a public hearing prior to taking Final Action on request for Material Deconstruction. The HPB opened and closed the public hearing on June 3, 2026.
6. On December 10, 2023, the previous applicant's structural engineer found multiple structural issues of the building, including that multiple wall panels of the Historic Structure had been damaged by fire, soil retention, or structural cuts from the construction of the existing additions, and the Applicant's proposal to panelize an additional panel of the Historic Structure complies pursuant to LMC § 15-11-14(A)(1).
7. On January 10, 2024, the Chief Building Official determined that the Significant Historic Structure is hazardous or dangerous pursuant to International Building Code Section 116.1, and the Applicant's proposal to panelize an additional panel of the Historic Structure complies pursuant to LMC § 15-11-14(A)(2).



Planning Department

8. The Applicant proposes an addition to increase the interior living space of the SFD and proposes maintaining the SFD Use, which is allowed pursuant to LMC § 15-13-2(B)(4)(a)(1).
9. The Applicant proposes an addition on the east façade of the Historic Structure, a secondary façade that will not impact or obstruct the Historic front (north) façade, which is allowed pursuant to LMC § 15-13-2(B)(4)(a)(2).
10. The Applicant proposes an addition that is visually subordinate to the Historic Structure and is set back approximately five feet from the front façade of the Historic Structure, and the highest roof ridge of the proposed addition is approximately two feet, eight inches shorter than the highest roof ridge of the Historic Structure on the Site, required pursuant to LMC § 15-13-2(B)(4)(a)(3).
11. The proposed addition will not impact the roof form of the Historic Structure, required pursuant to LMC § 15-13-2(B)(4)(a)(4).
12. The Applicant proposes removing approximately 255 square feet of Historic material from the east façade of the Historic Structure to accommodate the addition, allowed pursuant to LMC § 15-13-2(B)(4)(a)(5).
13. The Applicant proposes an addition with a footprint of approximately 315 square feet, or approximately 40% of the 791-square-foot footprint of the Historic Structure and a transitional element is not required pursuant to LMC § 15-13-2(B)(4)(b)(2).
14. The Applicant proposes an addition that is set back approximately five feet from the front façade of the Historic Structure and is not in-line, allowed pursuant to LMC § 15-13-2(B)(4)(a)(8).
15. The Applicant does not propose replicating an exact copy of the existing architectural style of the Historic Structure for the proposed addition, allowed pursuant to LMC § 15-13-2(B)(4)(c)(1).
16. The Applicant proposes wood and glass materials for the addition that are complementary to the existing style of the Historic Structure. The Applicant also proposes dormers and doors that reflect a 2:1 height-to-width ratio that are compatible with the existing style of the Historic Structure, allowed pursuant to LMC § 15-13-2(B)(4)(c)(2).
17. Condition of Approval 4 requires the Applicant to update the plans to include windows that reflect a 2:1 height-to-width ratio on the upper dormer of the proposed addition, required pursuant to LMC § 15-13-2(B)(4)(c)(7).
18. The Applicant recorded an assignment of encumbrance on September 22, 2025 (Summit County Recorder Entry No. 1241341) after purchasing the property. The



Planning Department

assignment of encumbrance requires the Applicant to comply with the recorded Historic Preservation Plan.

Conclusions of Law

1. The proposal complies, as conditioned, with Land Management Code Section 15-11-12.5 *Historic Preservation Board Review For Material Deconstruction*.

Conditions of Approval

1. The Applicant shall remove no more than 255 square feet of Historic siding from the east façade of the Historic Structure as proposed in the Applicant's plans set dated April 1, 2026 (Attachment 1).
2. The Applicant shall salvage and reuse all possible Historic Material at the Site.
3. The Applicant shall obtain HDDR approval for the proposed modified addition and remodel project prior to submitting a building permit.
4. The Applicant shall update the plans to include windows that reflect a 2:1 height-to-width ratio on the proposed addition.
5. All previous conditions of approval applicable to the Applicant's project remain in effect.

This Final Action may be appealed pursuant to LMC [§ 15-1-18](#). If you have questions or concerns regarding this Final Action Letter, please call (385) 481-2037 or email jacob.klopfenstein@parkcity.gov.

Sincerely,

Douglas Stephens, Chair
Historic Preservation Board

CC: Jacob Klopfenstein

Attachment

- 1: Applicant's Narrative and Plans dated April 1, 2026

Per-View Comparison

Previously approved vs. 2026 Modification

844 Empire Avenue, Park City, Utah (HR-1)

Primary Historic Front: North (9th Street) | South: Crescent Tram

Secondary Façade: East | West: Empire Avenue

The **Feb. 7, 2024** and **May 1, 2025** final actions reflect careful review by the Historic Preservation Board and Historic Design Review. Those approvals thoughtfully extended the significant historic cottage for contemporary use, addressed parking and accessory needs on a steep lot, and kept the historic porch and primary street front legible from 9th Street. 2026 Modification builds on that foundation.

The new owner will live at 844 Empire **full time**. Owner needs differ from the assumptions behind those approvals. The applicant has adjusted the plan for **full-time livability** while further improving how the historic cottage reads from the street. At the rear, parking and accessory uses follow the downhill grade rather than stacking in front of the historic roofline, extending the same logic as the approved dormers that already made room for a primary bedroom the cottage could no longer comfortably hold. Read across the elevations that follow, 2026 Modification is intended to work as one coordinated **historic preservation response**: the historic cottage reads more clearly from public streets, less historic material is removed, roof character on the primary block is restored, new mass is integrated into the slope, and porch, ridge, and dormers remain what the public sees first from 9th Street and Crescent Tram.

Two dated plan sets are in the record (2024 to 2025). Where they differ materially, both are shown at left: **Feb. 7, 2024 HPB Final Action** (detached garage on Empire Avenue and heavier south/Crescent massing); **May 1, 2025 HDDR Final Action** (above-grade rear accessory, office/hot tub, west bump-out). High roof plan geometry is the same on both sets. 2026 Modification restores the historic cottage roof (clipped-gable character documented in tax photos; PL-25-06754 truncated gable with copper ridge cap on drawings), replaces the rear accessory with a grade-integrated car vault, and removes the west bump-out and detached garage from primary public views.

2026 Modification (May 2026)

Previously approved / HDDR (2024 to 2025)



EMPIRE RESIDENCE
RENOVATION & ADDITION

844 Empire Ave
Park City, UT
84060

Block 12, Snyder's
Addition

Project #2507

BRIGHT | Architects & Co.

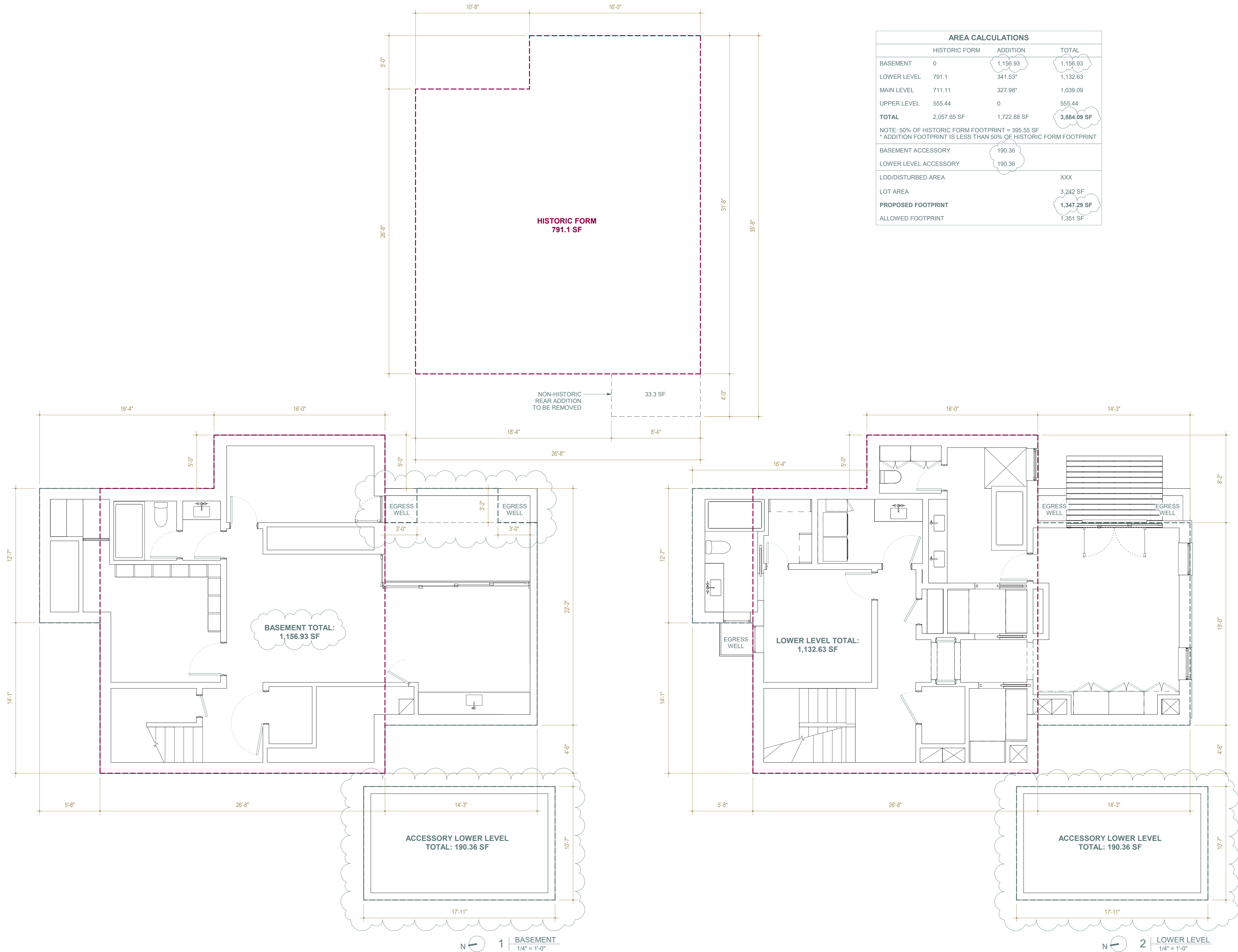
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ISSUED

HODR Modification Request	04/01/2026
Clarifications to MR	05/07/2026



EMPIRE RESIDENCE
RENOVATION & ADDITION

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Block 12, Snyder's
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HDR Modification Request 04/01/2025
Clarifications to MR 05/07/2025

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HDR Modification Request 04/01/2025
Clarifications to MR 05/07/2025

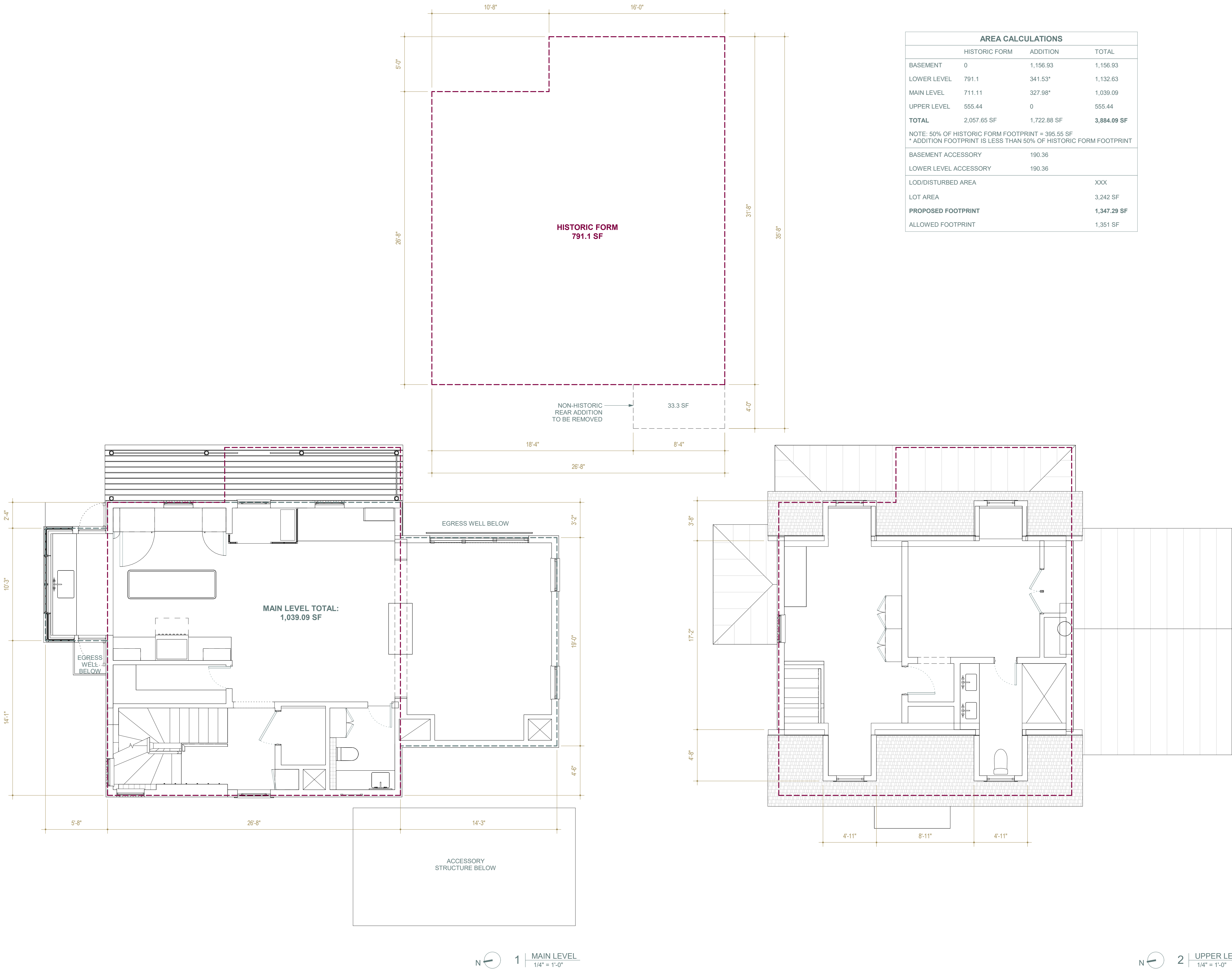
EXHIBIT - SQUARE
FOOTAGE

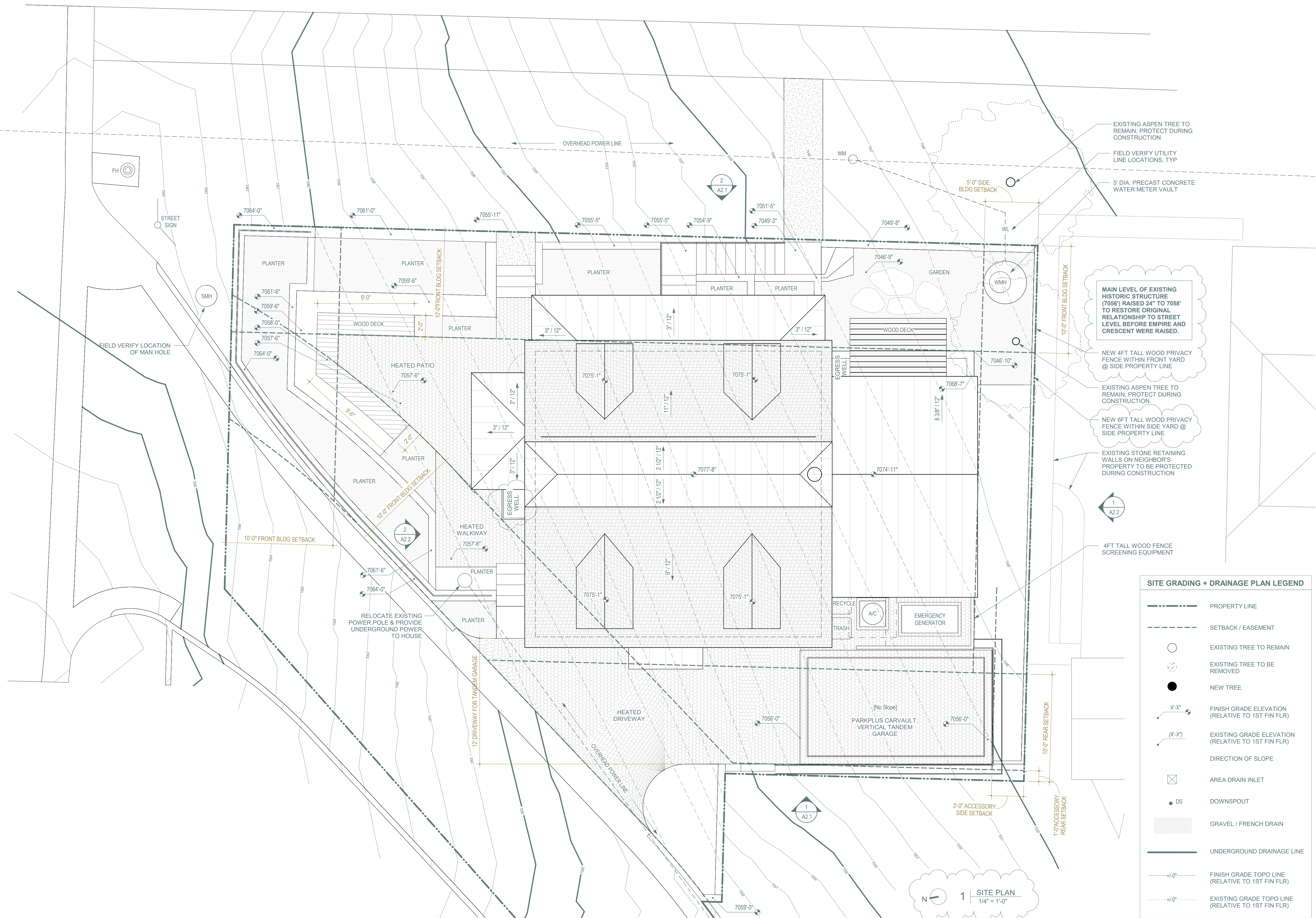
EX.2

5/8/2025 9:33:16 AM

Page 70 of 168

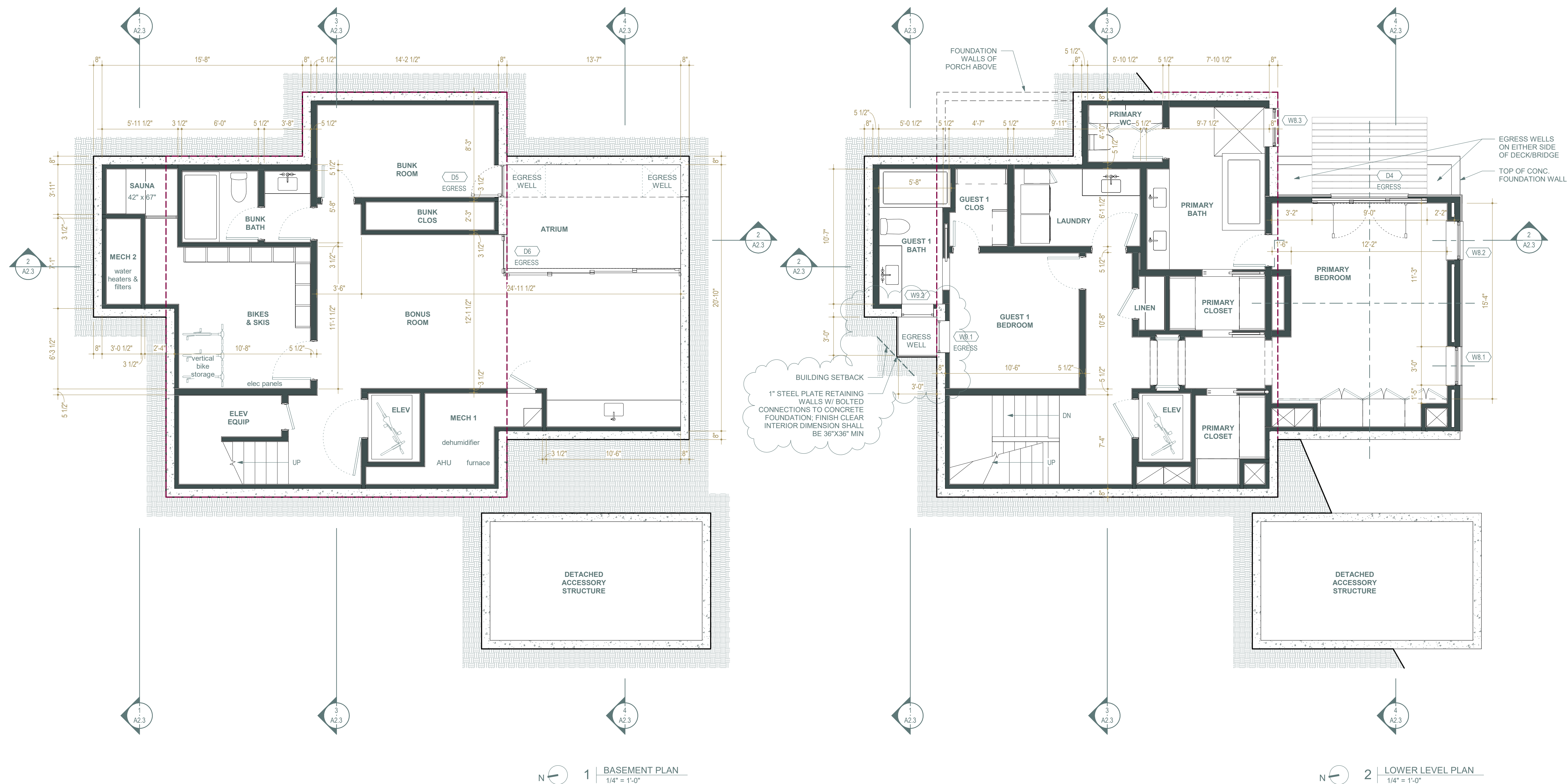
AREA CALCULATIONS			
	HISTORIC FORM	ADDITION	TOTAL
BASEMENT	0	1,156.93	1,156.93
LOWER LEVEL	791.1	341.53*	1,132.63
MAIN LEVEL	711.11	327.98*	1,039.09
UPPER LEVEL	555.44	0	555.44
TOTAL	2,057.65 SF	1,722.88 SF	3,884.09 SF
NOTE: 50% OF HISTORIC FORM FOOTPRINT = 395.55 SF * ADDITION FOOTPRINT IS LESS THAN 50% OF HISTORIC FORM FOOTPRINT			
BASEMENT ACCESSORY		190.36	
LOWER LEVEL ACCESSORY		190.36	
LOD/DISTURBED AREA			XXX
LOT AREA			3,242 SF
PROPOSED FOOTPRINT			1,347.29 SF
ALLOWED FOOTPRINT			1,351 SF





HDDR Modification Request	04/01/2026
Clarifications to MR	05/07/2026
Backgrounds for Structural	04/30/2026

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Page 73 of 16



EMPIRE RESIDENCE
RENOVATION & ADDITION

844 Empire Ave
Park City, UT
84060

Block 12, Snyder's
Addition

Project #2507

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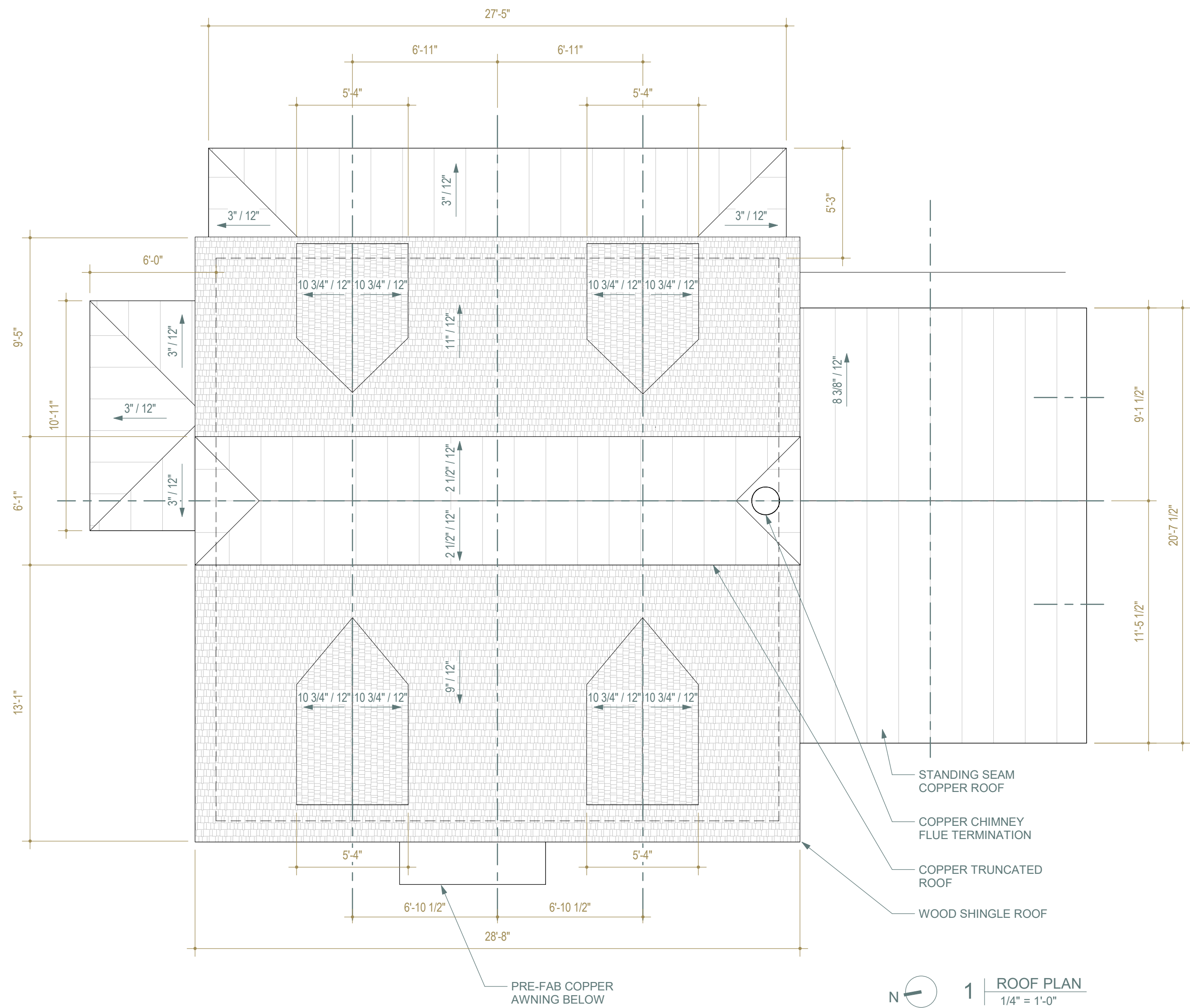
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ISSUED
Clarifications to MR 05/07/2026
Backgrounds for Structural 04/03/2026

ROOF PLAN &
ROOF DETAILS

A1.3



ROOF PLAN NOTES

- 1 LOCATE ALL ROOF PENETRATIONS AND ROOF-TOP MEP COMPONENTS TO BE HIDDEN FROM VIEW FROM THE STREET, FRONT YARD AND BACK YARD. NOTIFY ARCHITECT OF ANY RESTRICTIONS THAT WOULD PREVENT THIS AND GET ARCHITECT'S APPROVAL BEFORE SETTING EQUIPMENT AND/OR ROOF PENETRATIONS THAT MAY BE VISIBLE.
- 2 PROVIDE FLASHING AT ALL ROOF/WALL INTERSECTIONS PER S.M.A.C.N.A. RECOMMENDATIONS, TYP
- 3 PROVIDE FLASHING AT ALL ROOF EAVE/EDGE CONDITIONS PER S.M.A.C.N.A. RECOMMENDATIONS, TYP
- 4 PROVIDE FLASHING AT ALL ROOF PENETRATIONS PER S.M.A.C.N.A. RECOMMENDATIONS, TYP

EMPIRE RESIDENCE
RENOVATION & ADDITION

844 Empire Ave
Park City, UT
84060

Block 12, Snyder's
Addition

Project #2507

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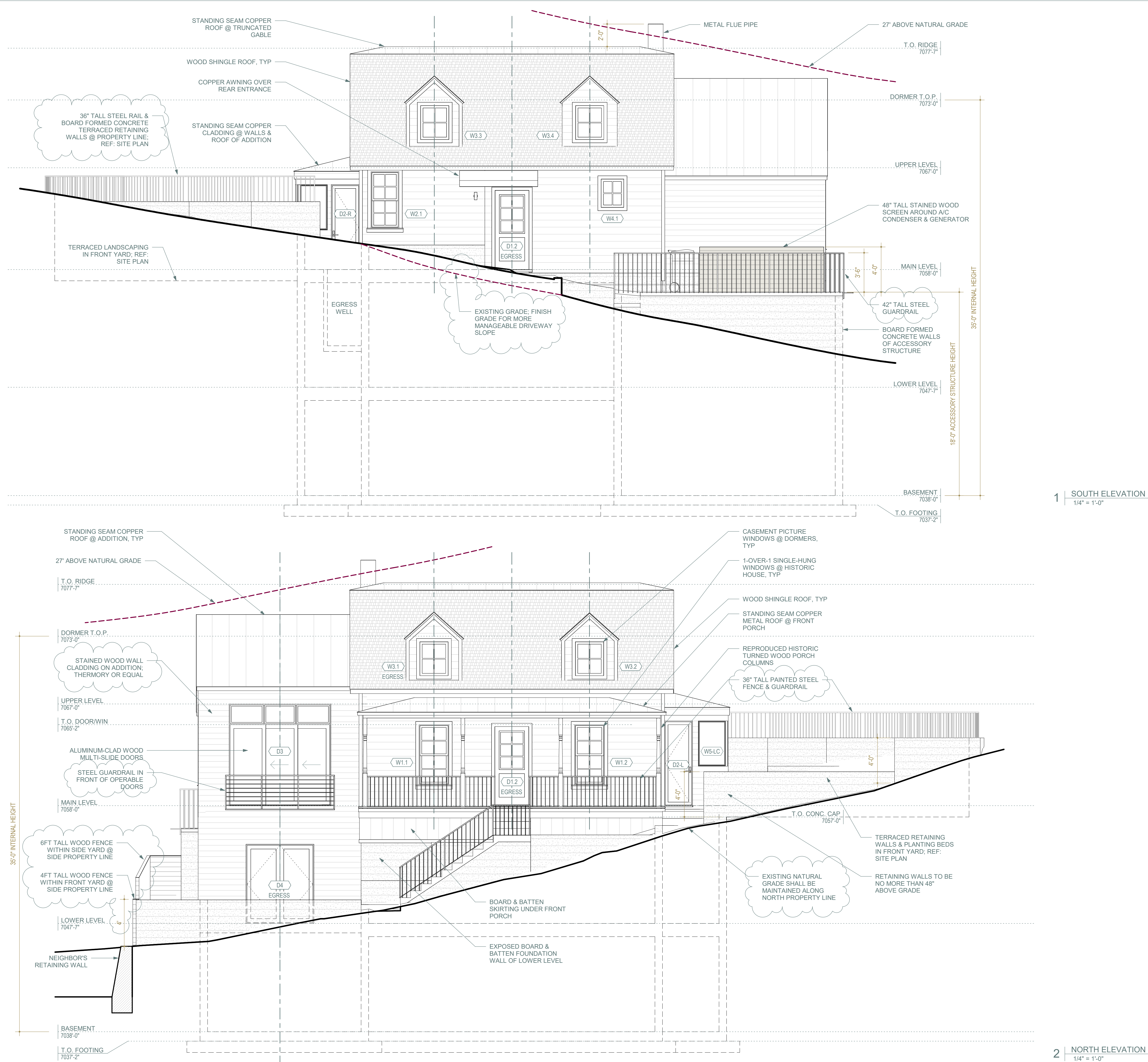
HDR Modification Request	04/01/2025
Clarifications to HDR	05/07/2025
Backgrounds for Structural	04/30/2025

ELEVATIONS

A2.1

5/8/2025 9:33:15 AM

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EMPIRE RESIDENCE
RENOVATION & ADDITION

844 Empire Ave
Park City, UT
84060

Block 12, Snyder's
Addition

Project #2507

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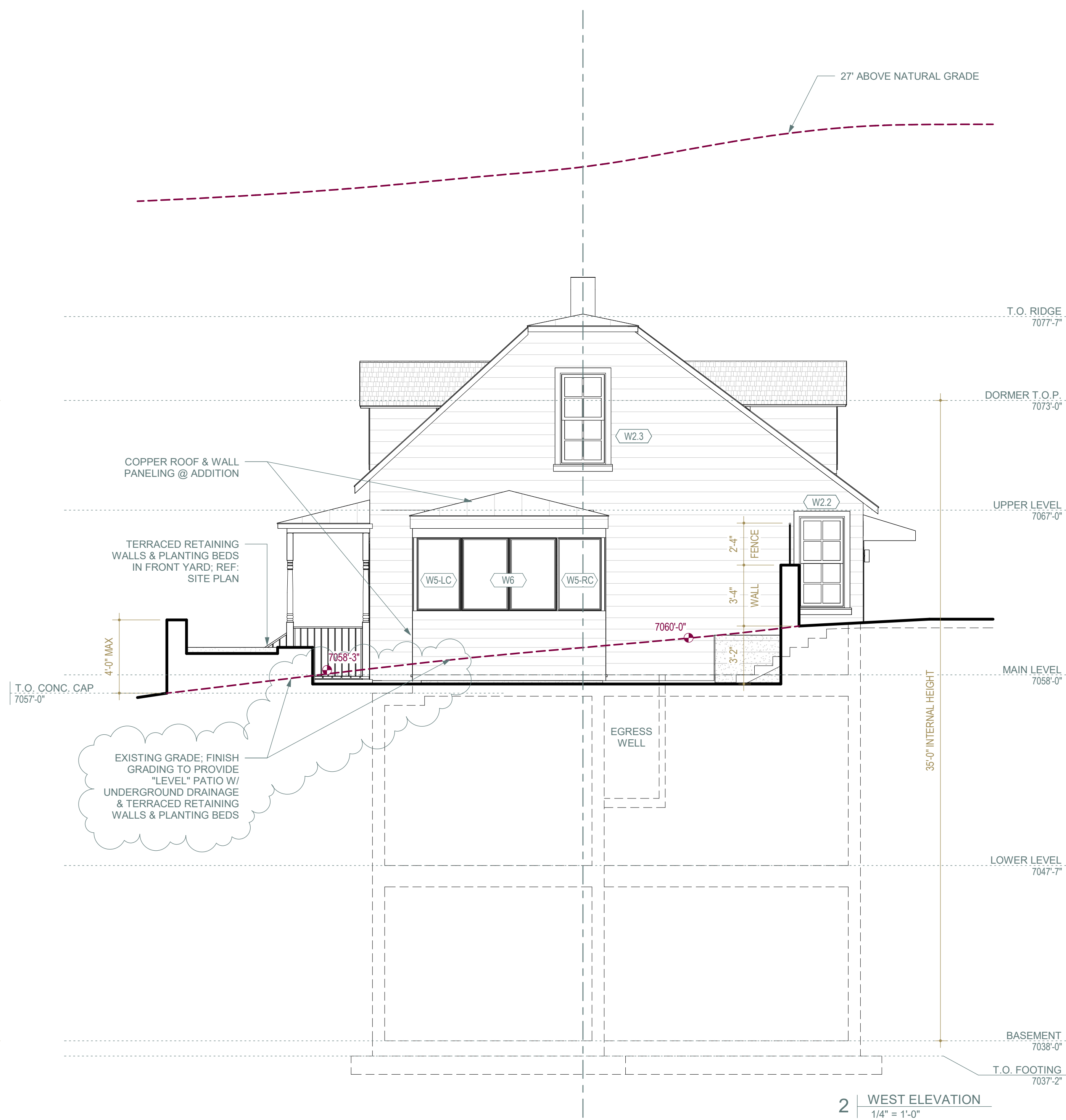
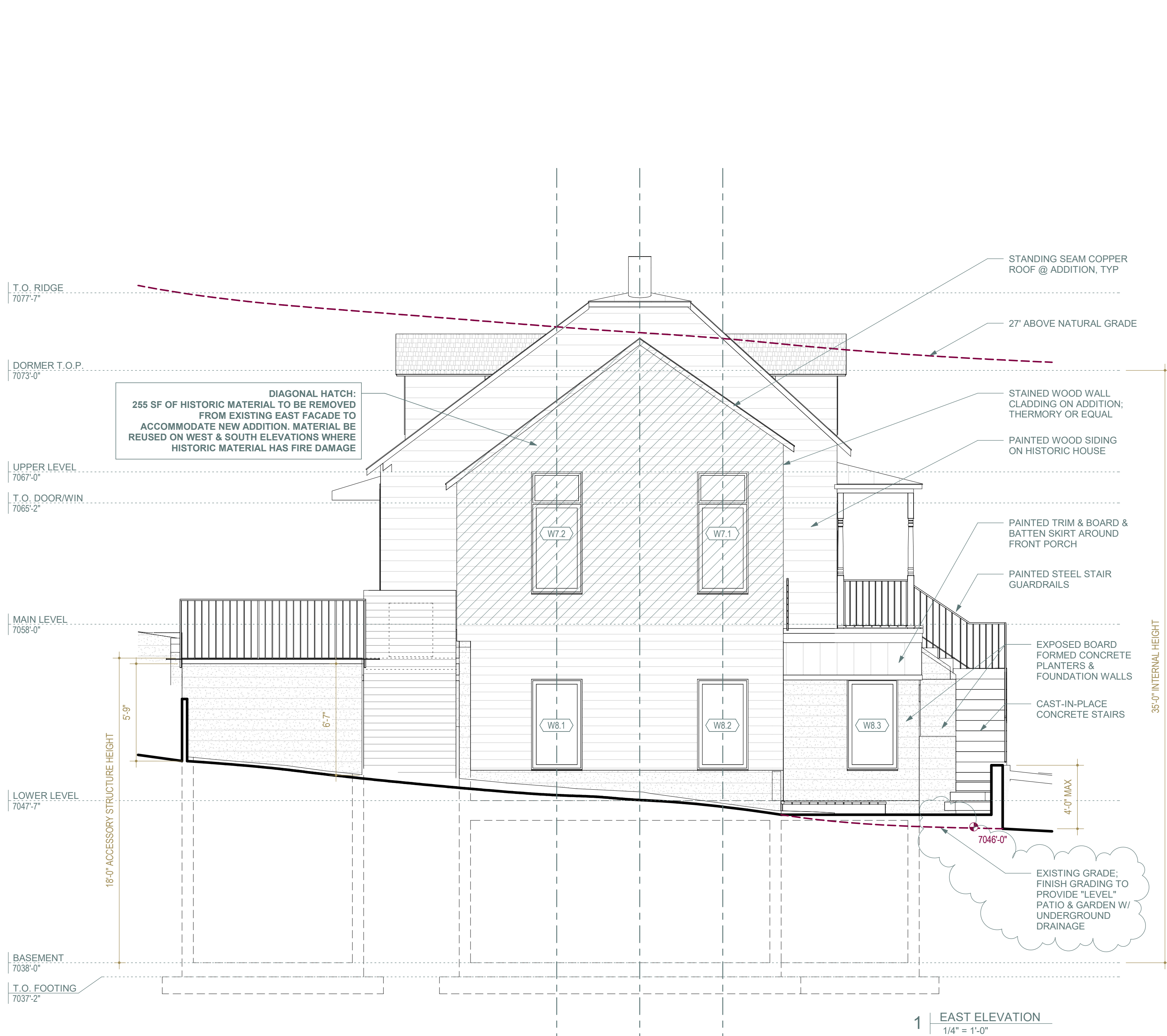
HDR Modification Request	04/01/2025
Clarifications to MR	05/07/2025
Backgrounds for Structural	04/30/2025

ELEVATIONS

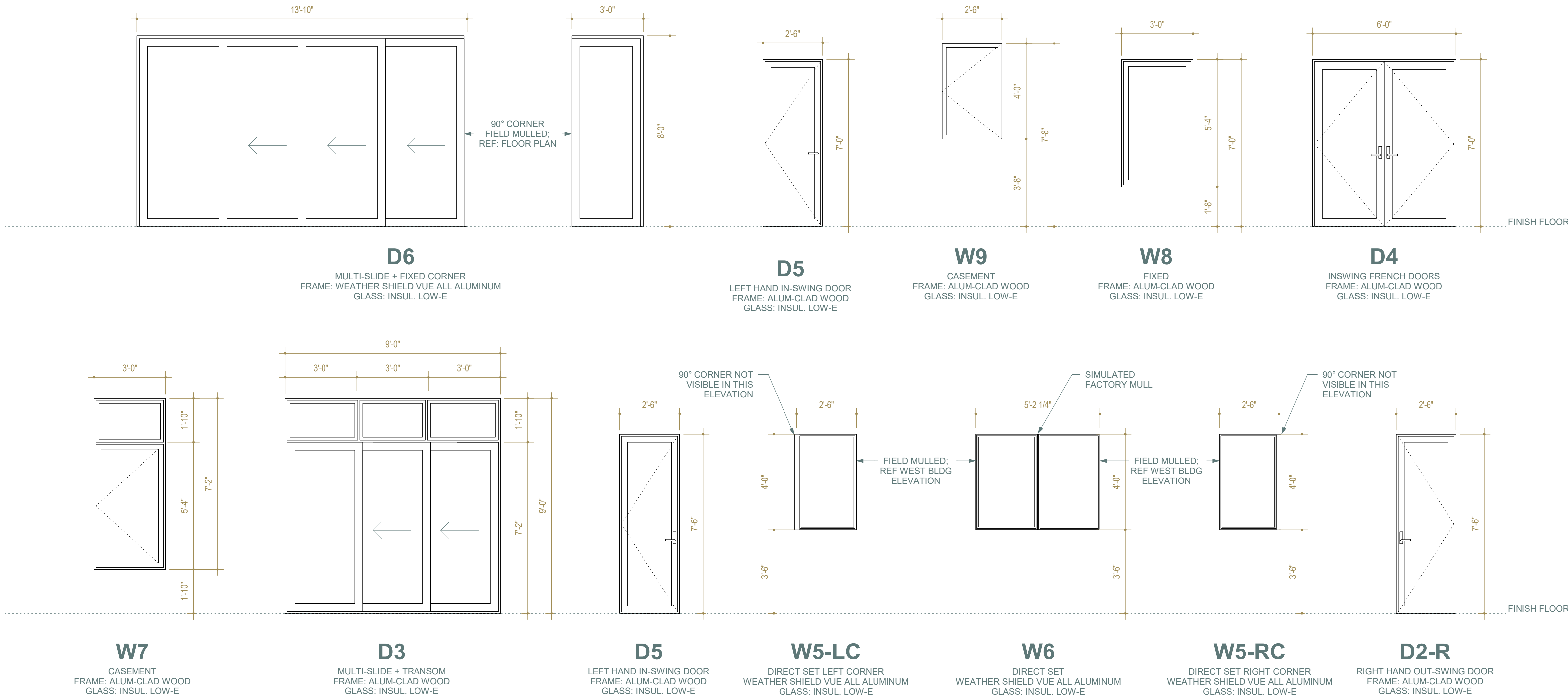
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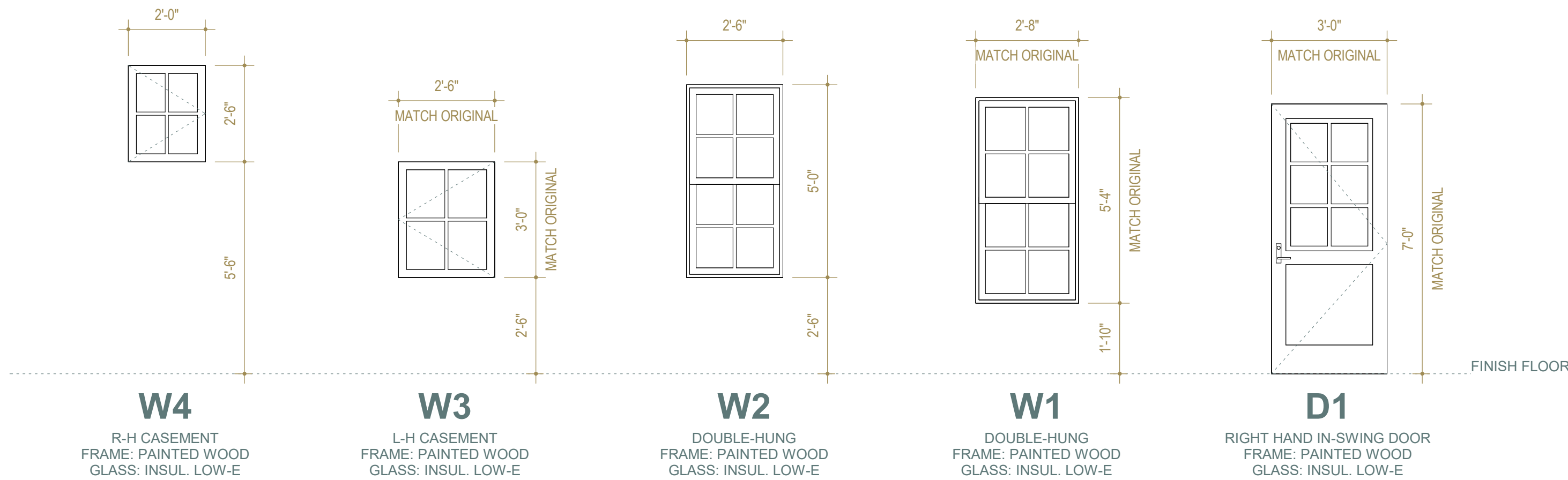
Page 76 of 168

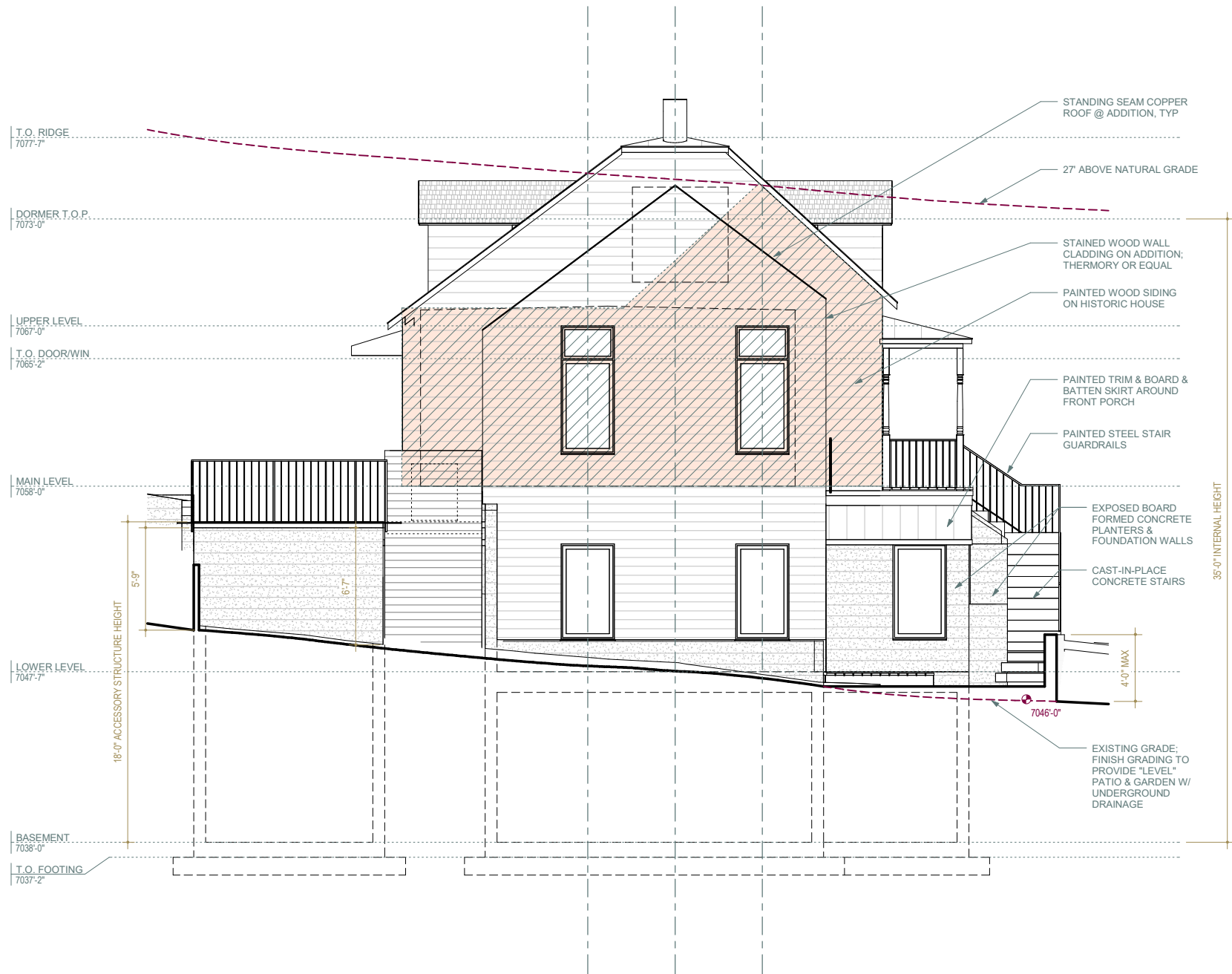


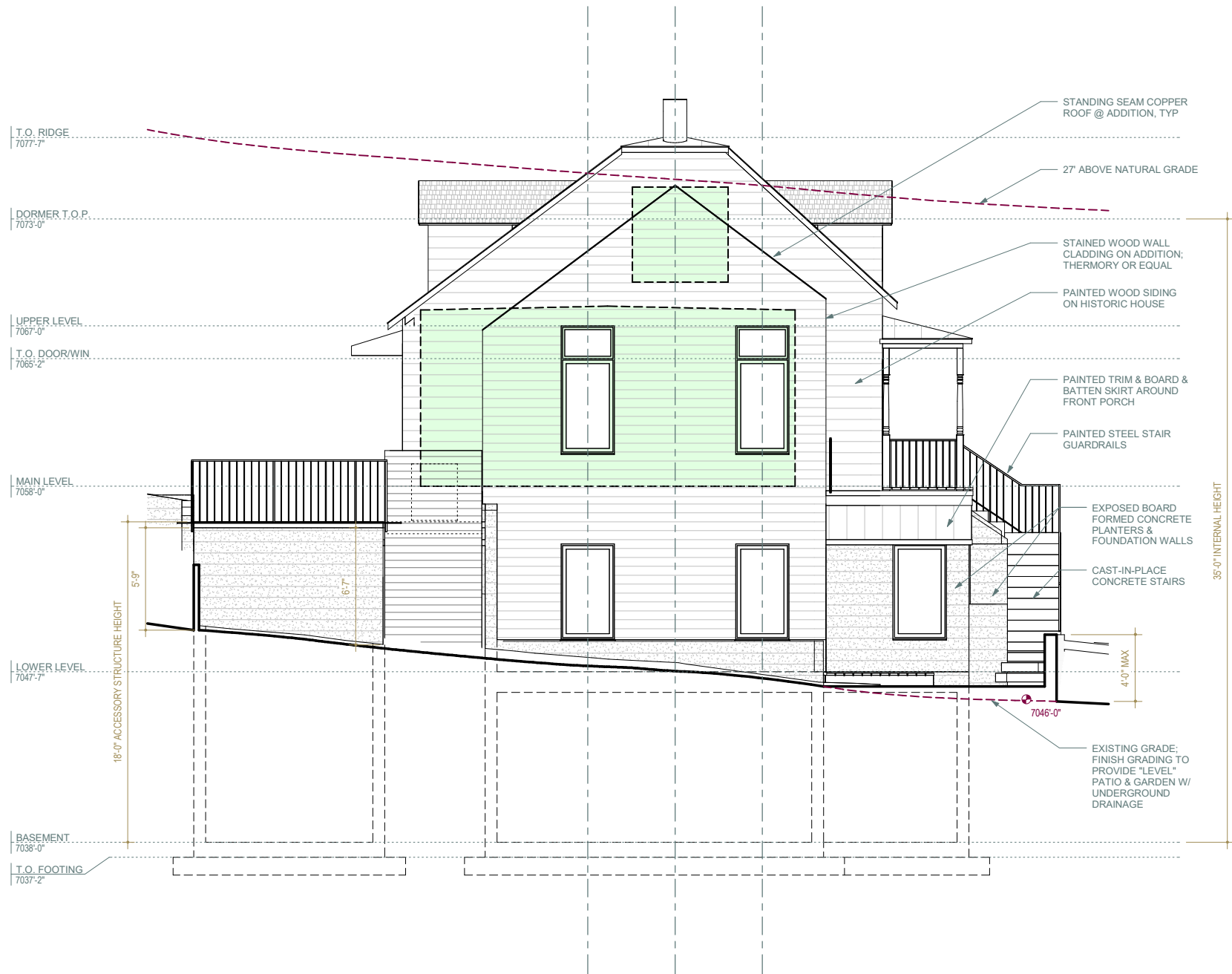
WINDOWS & DOORS ON ADDITION

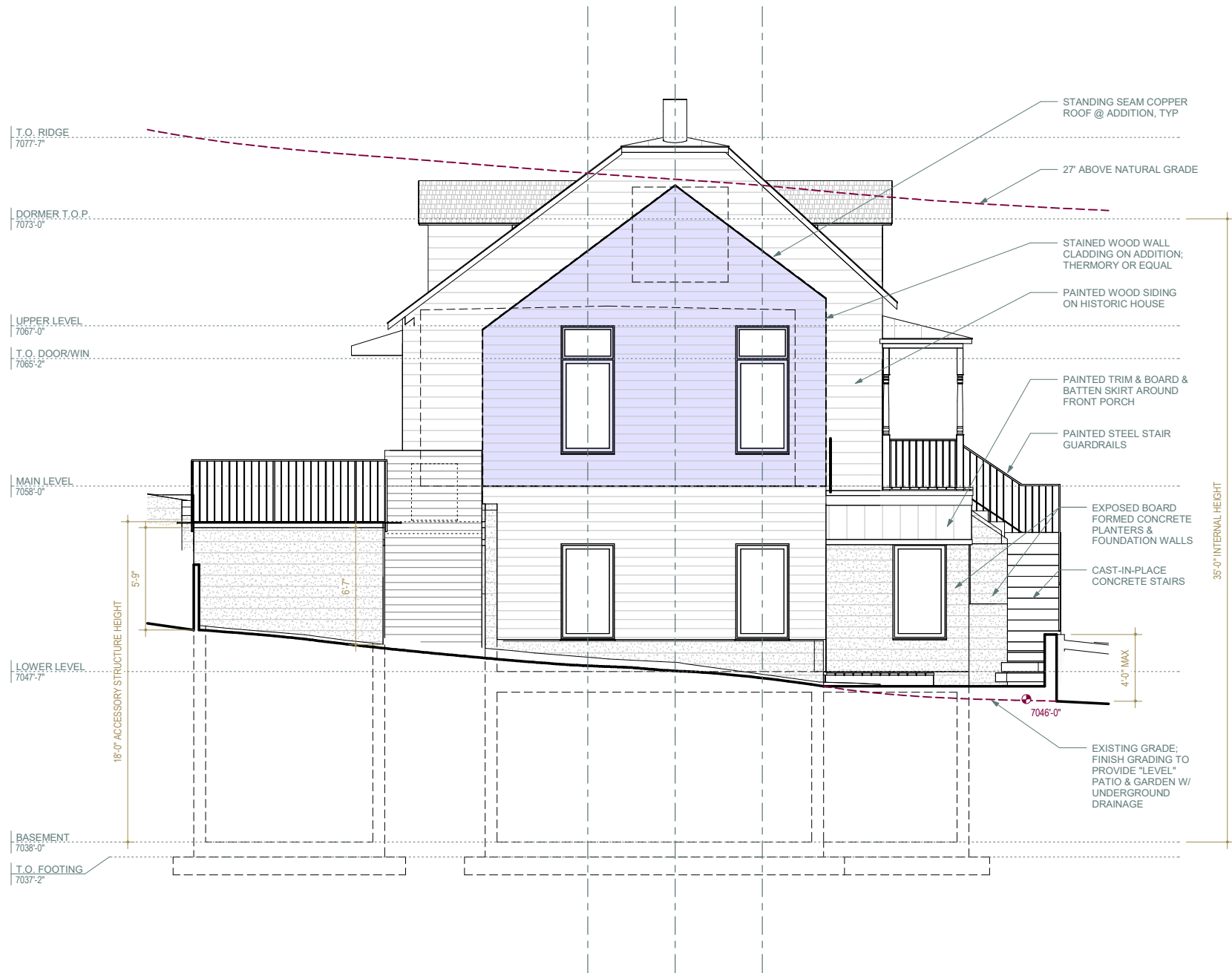


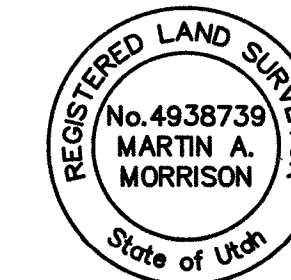
WINDOWS & DOORS ON HISTORIC BUILDING









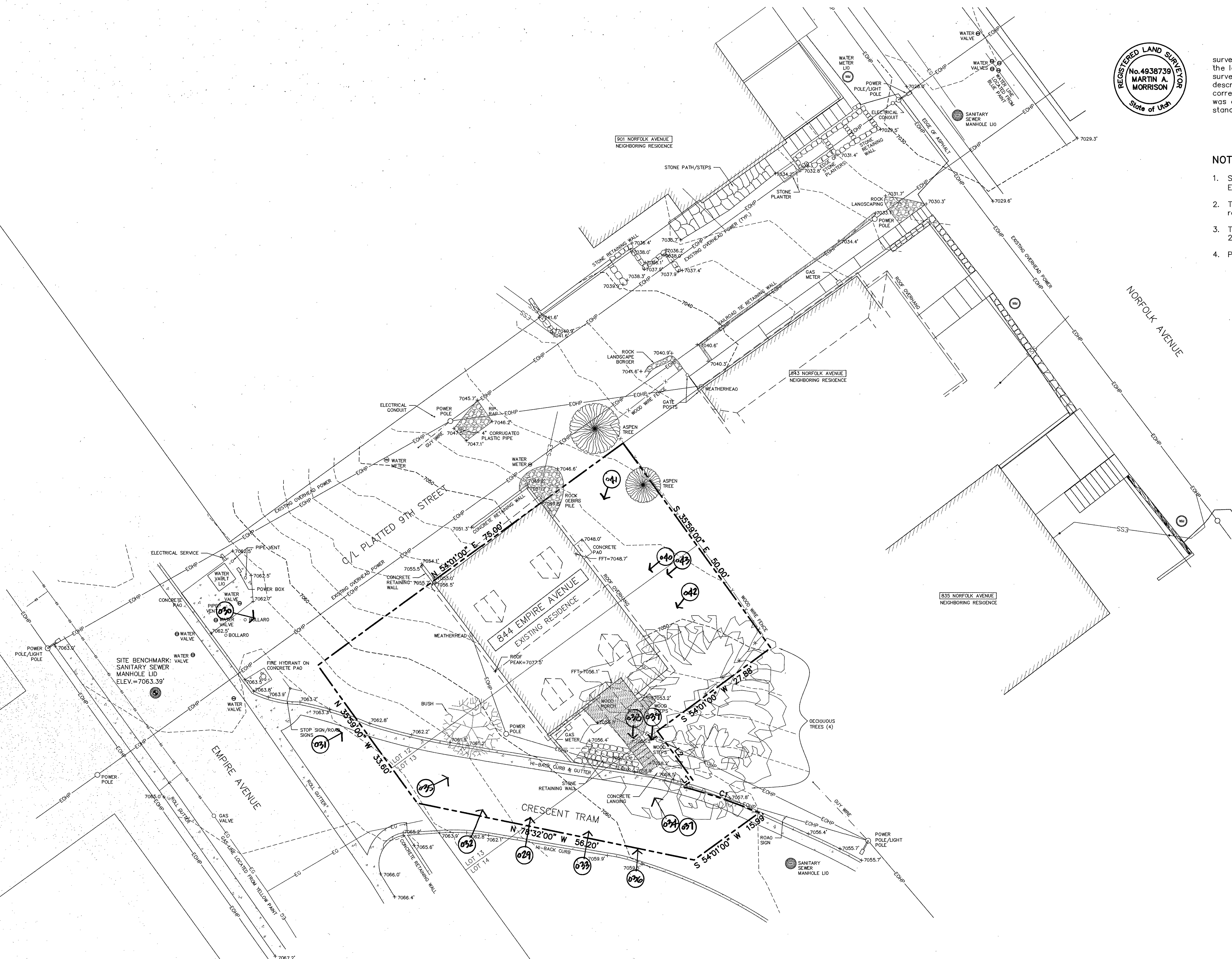


SURVEYOR'S CERTIFICATE

I, Martin A. Morrison, do hereby certify that I am a registered land surveyor and that I hold certification no. 4938739 as prescribed under the laws of the State of Utah. I further certify that a topographic survey has been made under my direction of the lands shown and described hereon. I further certify that this topographic survey is a correct representation of the land surveyed at the time the field work was completed and is in compliance with generally accepted industry standards for accuracy.

NOTES

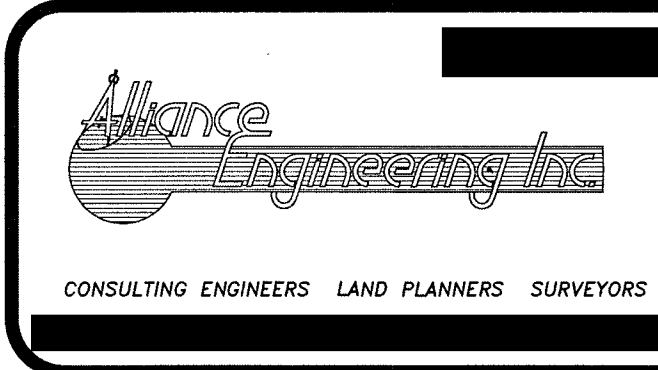
1. Site Benchmark: Sanitary Sewer Manhole Lid
Elevation=7063.39'
2. The architect is responsible for verifying building setbacks, zoning requirements and building heights.
3. This topographic map is based on a field survey performed on September 28, 2015.
4. Property corners were not set.



KEY
EXISTING CONDITION PHOTO

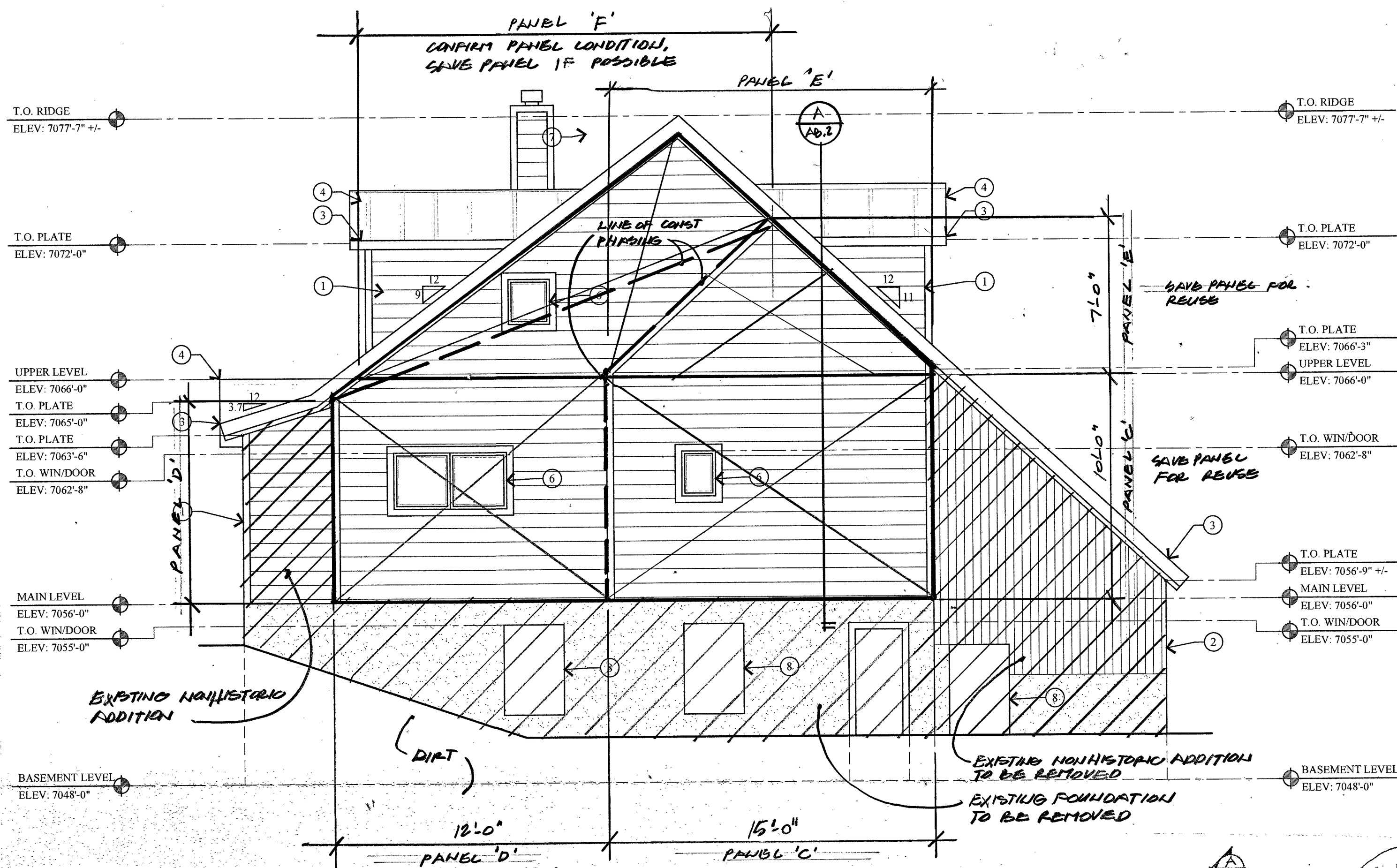
Existing Condition Photo Key Plan
11-17-23



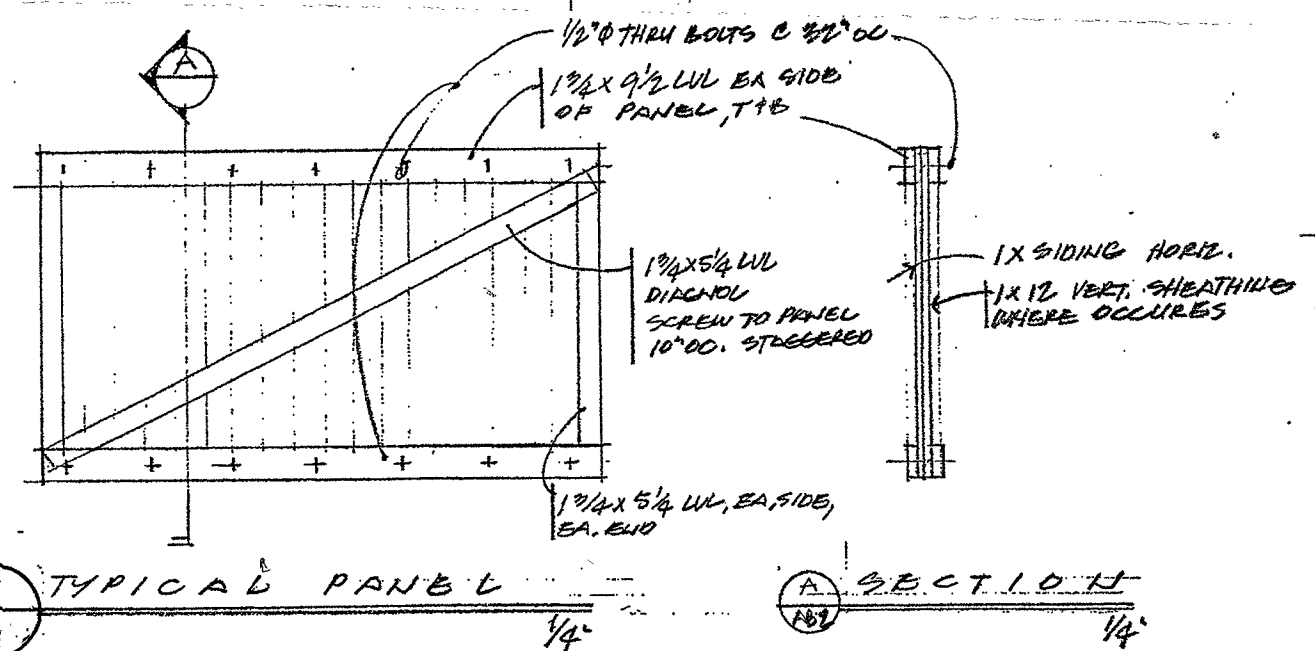
 CONSULTING ENGINEERS LAND PLANNERS SURVEYORS	STAFF: MARSHALL KING MARTY MORRISON JESSE MORENO	EXISTING CONDITIONS & TOPOGRAPHIC MAP 844 EMPIRE AVENUE BLOCK 14, SNYDER'S ADDITION TO PARK CITY	1 of 3
	DATE: 10/12/15	FOR: TODD M. GILBERT JOB NO.: 17-8-15 FILE: X:\SnydersAddition\dwg\srvtopo2015\170815.dwg	

2 of 3

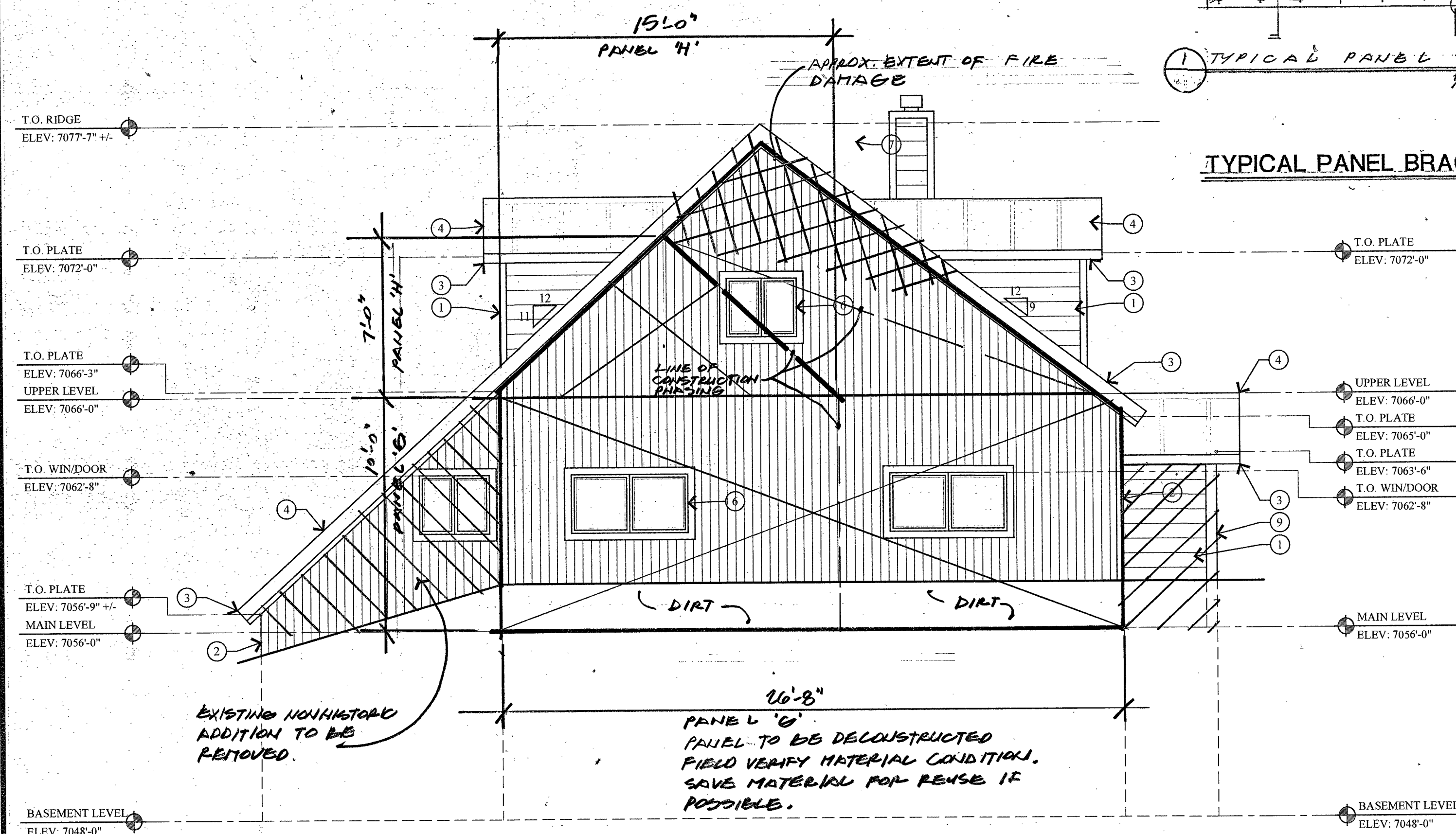
THE GRAPHIC MATERIAL AND DESIGN ON THIS SHEET ARE INSTRUMENTS OF SERVICE AND REMAIN AT ALL TIMES THE PROPERTY OF JONATHAN DEGRAY - ARCHITECT P.C. REPRODUCTION OR REUSE OF THE MATERIAL AND DESIGN CONTAINED HEREIN IS PROHIBITED WITHOUT THE WRITTEN CONSENT OF JONATHAN DEGRAY - ARCHITECT P.C. VIOLATORS WILL BE PROSECUTED TO THE FULLEST EXTENT OF THE LAW.
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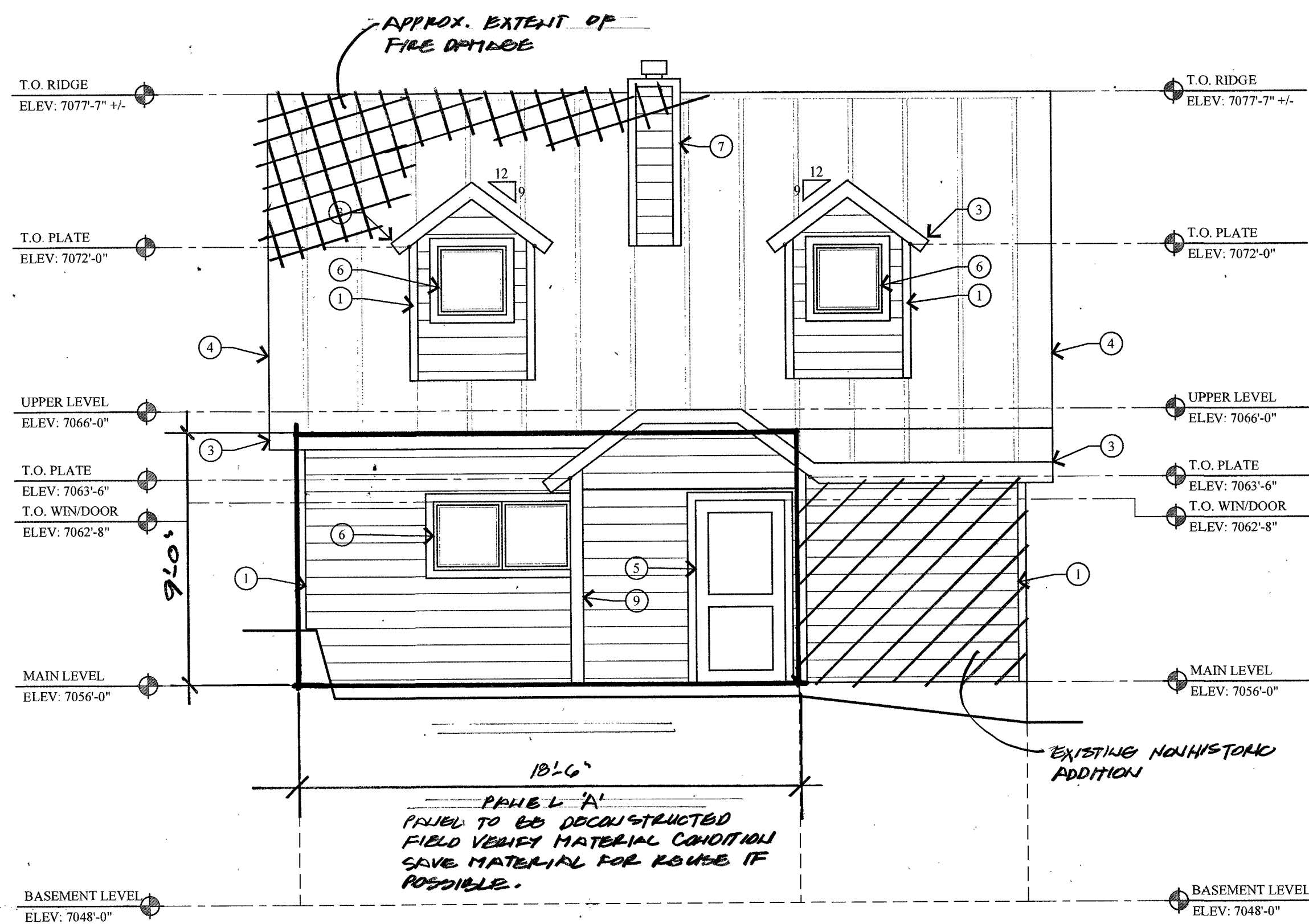
1 EAST ELEVATION
AB.2 SCALE: 1/4" = 1'-0"



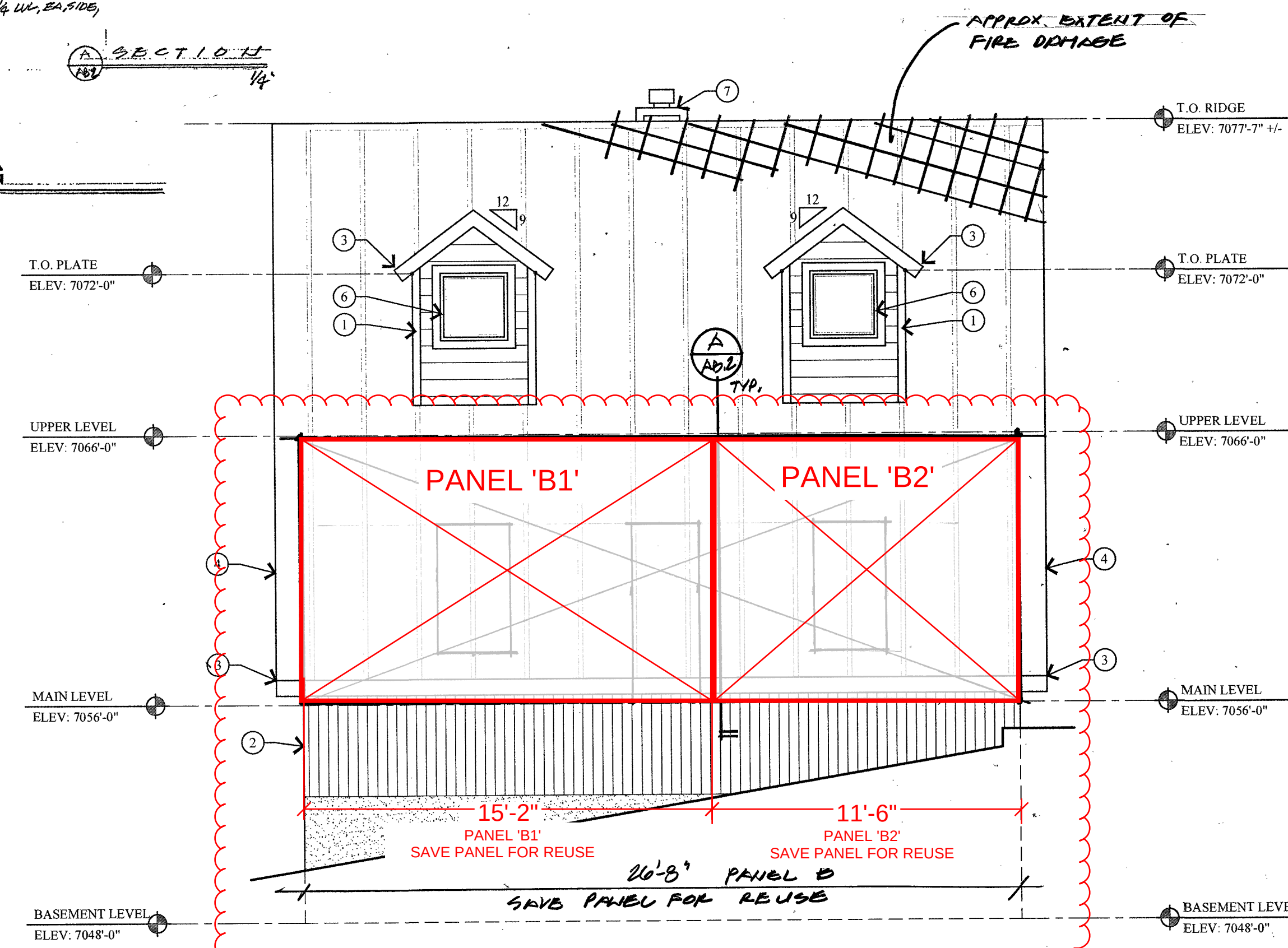
TYPICAL PANEL BRACING



3 WEST ELEVATION
AB.2 SCALE: 1/4" = 1'-0"



2 SOUTH ELEVATION
AB.2 SCALE: 1/4" = 1'-0"



4 NORTH ELEVATION
AB.2 SCALE: 1/4" = 1'-0"

KEY NOTES

- 1x8 HORIZONTAL LAP SIDING.
- 1x4 VERTICAL SIDING.
- ALL FLASHING, DRIP METAL, TRIM, FASCIA AND SOFFIT ARE IN POOR SHAPE AND NEEDS REPAIR.
- STANDING SEAM METAL ROOF.
- EXTERIOR DOOR, NOT ORIGINAL.
- WINDOWS ARE ALUMINUM FRAME W/ INSULATED GLASS.
- FRAMED CHIMNEY.
- WINDOWS OPENINGS HAVE BEEN FRAMED IN.
- 6x6 WOOD COLUMN, NOT ORIGINAL.

Panel Elevations

Jonathan DeGray
Architect

NEW RESIDENCE
HISTORIC DISTRICT DESIGN REVIEW

844 EMPIRE AVENUE, PARK CITY, UTAH 84060

AS-BUILTS
ELEVATIONS

REVISIONS:

DATE: 11-17-23

PROJECT NUMBER:

SHEET NUMBER:

3 of 3



UGC Land Ltd Co.



Monday, April 13, 2026

Park City Planning Department
City of Park City, Utah

Re: 844 Empire Avenue — panel storage (historic structure / panelization)

Dear Planning Department,

Please file the following as confirmation on behalf of UGC Land Ltd Co. for the historic residential work at 844 Empire Avenue:

- Storage: Removed panelized wall/floor assemblies will be stored indoors at UGC Land's Arena Building, Snowville, Utah — an enclosed building with controlled access.
- Trucking: UGC Land will schedule hauls between 844 Empire and that facility to match the general contractor's removal and reassembly sequence.
- Handling: Panels will be stacked and blocked off the ground, labeled, and tracked with a simple inventory so they can be matched for reinstallation.

Respectfully,

A handwritten signature in black ink, appearing to read "Dave Smith", written over a horizontal line.

Dave Smith
President
UGC Land Ltd Co.



Planning Department

February 7, 2024

Jonathan DeGray
[REDACTED]

CC: Todd Gilbert

NOTICE OF HISTORIC PRESERVATION BOARD ACTION

Description

Address:	844 Empire Avenue
Zoning District:	Historic Residential – 1
Application:	Material Deconstruction and Panelization
Project Number:	PL-23-05350
Action:	APPROVED WITH CONDITIONS (See Below)
Date of Final Action:	February 7, 2024
Project Summary:	The Applicant Seeks Approval for Material Deconstruction for a Portion of a Significant Historic Structure and Panelization to Facilitate a new foundation, the Rehabilitation of the Significant Historic Structure, and Construction of a Side Addition.

Action Taken

On February 7, 2024, the Historic Preservation Board conducted a public hearing and approved the Panelization and Material Deconstruction for 844 Empire Avenue according to the following findings of fact, conclusions of law, and conditions of approval:

Findings of Fact

1. The property is located at 844 Empire Avenue in the Historic Residential – 1 (HR-1) Zoning District.
2. The Site is designated a Significant Historic Site on Park City's Historic Sites Inventory.



Planning Department

3. The Property is also known as Lot 1 of the 844 Empire Avenue Amended Plat.
4. The house first appears on the 1900 Sanborn Fire Insurance Map as a simple, one and one half-story hall-parlor style home.
5. The Applicant's proposal is to panelize the Significant Historic Structure, construct a new foundation, and reassemble the Structure on the new foundation at approximately two feet (2') above its current elevation, as permitted in LMC § 15-13-2(B)(2)(b)(2).
6. On August 17, 2022, the Planning Department received a Historic District Design Review Pre-Application with a proposed design for a side addition and a detached garage structure.
7. On August 14, 2023, the Planning Department received a complete Historic District Design Review Application to lift the Historic Structure, construct a new foundation, construct a garage, remove approximately 386 square feet of siding from the east side façade to accommodate an addition, and modify approximately 277 square feet of the roof form.
8. On November 11, 2023, the Planning Department received revised plans proposing panelization of the Significant Historic Structure.
9. The discussion and figures of the Background and Analysis sections of the Staff Report dated February 7, 2024, are incorporated herein.
10. The Applicant proposes to remove approximately 386 square feet of siding from a secondary (eastern) façade to accommodate an addition, in accordance with LMC § 15-13-2(B)(4)(a)(2) and LMC § 15-13-2(B)(4)(a)(5).
11. The Applicant proposes to restore the historic front façade of the Structure and remove the non-contributing addition per LMC § 15-13-2(B)(4)(a)(2).
12. The Historic Preservation Board held a public hearing on November 1, 2023, and continued the item to December 6, 2023. The item was again continued to January 3, 2024, and once again to February 7, 2024.
13. On January 2, 2024, the Chief Building Official, Planning Director, and Historic Preservation Planner visited the site.
14. On January 10, 2024, the Chief Building Official determined the Structure was hazardous or dangerous per section 116.1 of the Building Code.

Panelization

1. On December 10, 2023, Shen Engineers, Inc. completed an updated structural report finding multiple wall panels had been damaged by fire, soil retention, or structural cuts from the construction of the existing additions.





Planning Department

2. The Chief Building Official, Planning Director, and Historic Preservation Planner visited 844 Empire Avenue on January 2, 2024.
3. On January 10, 2024, the Chief Building Official determined the Significant Historic Structure is hazardous or dangerous pursuant to International Building Code 116.1 and issued a letter detailing this determination.
4. The Applicant proposes panelizing eight panels.

Conclusions of Law

1. The proposal complies with the Land Management Code requirements pursuant to LMC § 15-11-12.5 Historic Preservation Board Review for Material Deconstruction.

Conditions of Approval

1. Final building plans and construction details shall reflect substantial compliance with the plans approved by the Historic Preservation Board on February 7, 2024. Any changes, modifications, or deviations from the approved design that have not been approved in advance by the Planning and Building Departments may result in a stop work order.
2. The applicant is responsible for notifying the Planning and Building Departments prior to making any changes to the approved plans.
3. Any changes, modifications, or deviations from the approved scope of work shall be submitted in writing for review and approval/denial in accordance with the applicable standards by the Planning Director or their Designee prior to construction.
4. The applicant shall amend the 844 Empire Avenue Amended Plat Note 3 to address the proposed garage access off Crescent Tram Road.
5. The applicant shall obtain Historic District Design Review approval from the Planning Director, or their Designee, prior to submitting a building permit.
6. The applicant shall provide the City with a Financial Guarantee, in accordance with LMC § 15-11-19, to be recorded with the Summit County Recorder's Office prior to submitting a building permit.
7. An encroachment agreement may be required prior to the issuance of a building permit for projects utilizing soils nails that encroach onto neighboring properties.
8. A Soils Report completed by a geotechnical engineer as well as a temporary shoring plan, if applicable, will be required at the time of building permit application.



Planning Department

9. The applicant shall maintain the panels of the Historic Structure in a secure manner including protection from vandalism, inclement weather, pest or rodent damage. The applicant shall submit a panel storage plan to the Planning Department for approval prior to panelization of the Significant Historic Structure.
10. The Historic Site shall be returned to original grade following construction of a foundation. The site shall be re-graded so that all water drains away from the Structure and does not enter the foundation. A plinth, or trim board at the base of the Historic Structure, shall be added to visually anchor the Historic Structure to the new foundation.
11. Historic materials removed from the Structure that are salvageable or in otherwise good condition shall be used to repair/replace irreparable materials on the Site.
12. The applicant shall obtain a variance to locate the garage within the proposed front setbacks.

If you have questions or concerns regarding this Final Action Letter, please contact Caitlyn Tubbs at (435)-615-5063 or email caitlyn.tubbs@parkcity.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Randy Scott", written over a horizontal line.

Randy Scott, Chair
Park City Historic Preservation Board

CC: Caitlyn Tubbs, AICP
Senior Historic Preservation Planner



Planning Department

May 1, 2025

Jonathan DeGray

CC: Todd Gilbert

NOTICE OF PLANNING DEPARTMENT ACTION

Description

Address: 844 Empire Avenue

Zoning District: Historic Residential – 1 (HR-1)

Application: Historic District Design Review

Project Number: PL-22-05350

Action: APPROVED WITH CONDITIONS (See Below)

Date of Final Action: May 1, 2025

Project Summary: The Applicant proposes a Historic District Design Review to restore a Significant Historic Structure, construct a 288-square-foot addition, and construct a 115-square-foot detached Accessory Building in the Historic Residential – 1 (HR-1) Zoning District.

Action Taken

On May 1, 2025, the Planning Director conducted a public hearing and approved the Historic District Design Review (HDDR) according to the following findings of fact, conclusions of law, and conditions of approval.

Findings of Fact

1. 844 Empire Avenue is Lot 1 of the 844 Empire Avenue Plat Amendment. The City Council approved the 844 Empire Avenue Plat Amendment in 2016 through Ordinance No. 2016-26.
2. 844 Empire Avenue is a Significant Historic Site developed with a Single-Family Dwelling (SFD) that was originally constructed c. 1904 during the Mature Mining



Planning Department

Era of Park City. The SFD sustained damage in a 2014 fire and has remained vacant since.

3. 844 Empire Avenue is an unusual lot subject to the requirements of LMC Section 15-4-17, Setback Requirements For Unusual Lot Configurations, because it fronts the platted, un-built 9th Street Right-of-Way (ROW), Empire Avenue, and Crescent Tram Road.
4. In 2015, the Planning Director determined the following Setbacks for 844 Empire Avenue, as outlined in Ordinance 2016-26 and illustrated in the below image:
 - a. From 9th Street, platted un-built ROW, front yard, ten feet (10') minimum. This is the historic front of the structure.
 - b. From Empire Avenue, front yard, ten feet (10') minimum.
 - c. From Crescent Tram, front yard, ten feet (10') minimum
 - d. From the south neighbor, rear yard, ten feet (10') minimum. This side is opposite of the historic front of the house.
5. On February 7, 2024 the Historic Preservation Board (HPB) conducted a site visit to examine the damaged materials at the Site and approved the Applicant's Material Deconstruction and Panelization request to facilitate the rehabilitation of the Historic Structure and addition.
6. The Applicant also petitioned the Planning Commission for a Plat Amendment to remove Plat Note 3 of the 844 Empire Avenue Plat Amendment, which required vehicle access to the site from Empire Avenue or through 9th Street in a location approved by the City Engineer. On March 13, 2024, the Planning Commission conducted a public hearing and denied the Plat Amendment. The Planning Commission ratified the Final Action denial on April 10, 2024.
7. On April 22, 2024, Applicant appealed the Planning Commission's denial of the Plat Amendment. On May 20, 2024, the Appeal Panel conducted a public hearing and continued the appeal to June 3, 2024. On June 3, 2024, the Appeal Panel heard the appeal and voted 2-1 to grant the appeal, reversing the Planning Commission's decision to deny the Plat Amendment (Packet, Item 6.A.; Minutes p. 2-10).
8. The Applicant recorded the 844 Empire Avenue Plat Amendment – Lot 1 Amended removing the plat note that restricted vehicle access to the site, with Summit County on January 13, 2025 (Recorder Entry No. 1230098).
9. On March 20, 2025, the Applicant submitted updated HDDR plans for the proposal to the Planning Department.
10. The Applicant proposes to:



Planning Department

- a. Rehabilitate and remodel the Historic Structure, including restoring the Historic front (north) façade that abuts the platted-but-unbuilt 9th Street right-of-way,
 - b. Construct a 288-square-foot addition,
 - c. Construct a detached, 115-square-foot Accessory Building that houses a spa tub on the southeast corner of the Lot,
 - d. Construct a driveway with access from Crescent Tram Road,
 - e. Construct a patio on the south side of the Historic Structure, and
 - f. Construct a patio on the northeast portion of the Lot.
11. The total proposed Building Footprint for the remodeled Historic Structure, addition, and detached Accessory Building is 1,350.5 square feet.
12. The proposal, as conditioned, complies with LMC Chapter 15-2.2 Historic Residential – 1 (HR-1) Zoning District.
 - a. Single Family Dwellings are an allowed Use in the HR-1 Zoning District, pursuant to LMC Section 15-2.2-2(A)(1).
 - b. The maximum Lot Area for a Single-Family Dwelling is 3,750 square feet.
 - i. Pursuant to LMC Section 15-2.2-4, Historic Sites are exempted from the maximum Lot Area requirement. However, the 844 Empire Avenue Plat Amendment Lot 1 Amended designates a Lot Area of 3,242 square feet for 844 Empire Avenue.
 - c. The minimum Lot width is 25 feet measured 15 feet back from the Front Lot Line. In the case of unusual Lot configurations, Lot width measurements shall be determined by the Planning Director.
 - i. As noted above, the Lot has three front yards: along the 9th Street right-of-way, along Empire Avenue, and along Crescent Tram Road.
 - ii. The Lot width measured 15 feet back from the front yard along the 9th Street right-of-way is approximately 75 feet.
 - iii. The Lot width measured 15 feet back from the front yard along Empire Avenue is approximately 30 feet.
 - iv. The Lot width measured 15 feet back from the front yard along Crescent Tram Road is approximately 43 feet, 6 inches.
 - d. The Maximum Building Footprint is established by Lot size according to the following formula: $\text{MAXIMUM FP} = (A/2) \times 0.9A/1875$ (Where FP = maximum Building Footprint and A= Lot Area).



Planning Department

- i. Using the formula outlined in LMC Section 15-2.2-3(E), the Maximum Building Footprint for 844 Empire is 1,351 square feet.
 - ii. The applicant proposes a Building Footprint of 1,350.5 square feet.
- e. For Lots less than 75 feet in depth, the Front and Rear Setbacks are 10 feet each (20 feet total). For Lots up to 75 feet wide, the minimum Side Setback is 5 feet.
 - i. As noted above, the 2016 Planning Director Determination designated minimum Front Setbacks of 10 feet for the front yards facing the 9th Street ROW, Empire Avenue and Crescent Tram Road. The Planning Director Determination also set a minimum Rear Setback of 10 feet for the southeast Lot line. The 2016 Planning Director Determination also designated a minimum Side Setback of 5 feet for the east side yard abutting the east neighboring property.
 - ii. The Applicant proposes a stoop that is 6 inches above Final Grade and encroaches approximately 2 feet, 6 inches into the Front Setback along Crescent Tram Road and will lead to a mud room entry on the west side of the Historic Structure. Sidewalks and pathways are allowed as an exception in the Front Setback, pursuant to LMC § 15-2.2-3(G).
 - iii. The Applicant proposes retaining walls that will be a maximum of 4 feet tall in the Front, Rear, and Side Setbacks on the west, northeast, and south sides of the Site. Pursuant to LMC § 15-2.2-3 and LMC § 15-4-2, retaining walls not more than 4 feet in height are allowed in Front Setbacks in the HR-1 Zone, and retaining walls not more than 6 feet in height are allowed in Rear and Side Setbacks.
 - iv. The Applicant proposes a patio that will be a maximum of 4 inches above Final Grade in the Front and Side Setbacks on the northeast portion of the Site and will encroach approximately 10 feet in to the Front Setback along the 9th Street ROW and encroach approximately 5 feet into the Side Setback along the east neighboring property. The Applicant also proposes a patio on the south side of the Historic Structure that will be a maximum of 4 inches above Final Grade and will encroach approximately 10 feet into the Front and Rear Setbacks along Crescent Tram Road and the south neighboring property.



Planning Department

- v. Pursuant to LMC § 15-2.2-3(G), decks and porches are allowed in Front Setbacks but cannot exceed 10 feet in width and cannot project more than 3 feet into the Front Setback. Pursuant to LMC § 15-2.2-3(H), patios within Rear Setbacks must not exceed 30 inches above Final Grade and must be set back at least 1 foot from the rear Lot line. Pursuant to LMC § 15-2.2-3(J), patios within Side Setbacks must not exceed 30 inches above Final Grade.
- vi. Staff recommends Condition of Approval ###, which requires the Applicant to update plans prior to submitting for a Building Permit that revise the proposed patios on the northeast corner of the site and south side of the Historic Structure to comply with Setback requirements.
- vii. The applicant proposes a driveway with access from Crescent Tram Road that is approximately 10 feet wide. Pursuant to LMC § 15-2.2-3(G), driveways leading to a garage or approved parking area are allowed in the Front Setback. Parking access for this property is allowed from Crescent Tram Road because the plat note prohibiting access from Crescent Tram Road was removed in 2024 (see Background section above for more details).
- viii. Pursuant to LMC § 15-2.2-3(G), roof overhangs are allowed as an exception in the Front Setback so long as they do not encroach more than 3 feet into the Front Setback. The Applicant also proposes a roof overhang extending over a mud room that encroaches approximately 10 inches into the Front Setback on the west side of the Historic Structure.
- ix. Pursuant to LMC § 15-2.2-3(H), roof overhangs projecting not more than 2 feet into the Rear Setback are allowed. The Applicant also proposes a roof overhang extending over a patio on the south façade of the Historic Structure that will encroach approximately 2 feet into the Front Setback from Crescent Tram Road and 2 feet into the Rear Setback from the south neighboring property.
- x. The Applicant proposes steps measuring approximately 3 feet, 8 inches in height from Final Grade within the Front Setback abutting the 9th Street right-of-way. LMC § 15-2.2-3(G) notes that uncovered steps that do not exceed 4 feet in height above Final Grade are allowed as an exception in the Front Setback.



Planning Department

- xi. Detached Accessory Buildings not more than 18 feet in height and located at least 5 feet behind the front façade of the main structure are allowed as an exception in the Side Setback, but must be located at least 3 feet from the side Lot line. The applicant proposes a detached Accessory Building at the southeast corner of the property that is 17 feet, 9 3/8 inches tall and located approximately 29 feet behind the front façade of the structure. The proposed Accessory Building is located 3 feet from the east side Lot line.
- f. Site plans and Building designs must resolve snow release issues to the satisfaction of the Chief Building Official.
 - i. Staff recommends Condition of Approval 1, which requires the Applicant to obtain Chief Building Official approval for proposed snow release plans for the site, pursuant to LMC Section 15-2.2-3(K).
- g. LMC Section 15-2.2-5 establishes a maximum Building Height in the HR-1 zone of 27 feet above Existing Grade. However, LMC Section 15-2.2-4 exempts existing Historic Structures from Building Height requirements and states that existing Historic Structures that do not comply with Building Footprint, Building Height, Building Setbacks, Off-Street parking, and driveway location standards are valid Non-Complying Structures.
 - i. The Historic Structure at 844 Empire Avenue is approximately 27 feet, 3 inches above Existing Grade.
- h. LMC Section 15-2.2-4 states that additions to Historic Structures must comply with Building Height standards for the HR-1 zone.
 - i. The proposed east-side addition to the Historic Structure is a maximum of 18 feet, 6 inches above Existing Grade.
 - ii. The Applicant also proposes a detached Accessory Building at the southeast corner of the property that is 17 feet, 2 inches in height.
- i. LMC Section 15-2.2-5(B) establishes requirements for a 10-foot horizontal stepback in the downhill façade at a maximum height of 23 feet from where the Building Footprint meets the lowest point of Existing Grade.
 - i. Neither the proposed addition nor the proposed detached Accessory Building exceed 23 feet from Existing Grade.



Planning Department

- j. LMC Section 15-2.2-5(A) establishes a maximum interior Building Height of 35 feet, measured from the lowest finish floor plane to the point of the highest wall top plate that supports the ceiling joists or roof rafters.
 - i. The Applicant proposes a maximum interior height of 32 feet, 7 inches for the Historic Structure.
 - ii. The proposed interior height of the west-side addition to the Historic Structure is a maximum of 22 feet, 11 inches.
 - iii. The interior height of the proposed detached Accessory Building is approximately 21 feet, 11 inches.
- k. Pursuant to LMC Section 15-2.2-5(C), the roof pitch of the Contributing Roof Form of a structure must be between 7:12 and 12:12 and occupy a minimum horizontal distance of 20 feet measured from the primary façade to the rear of the building, as viewed from the primary public right-of-way.
 - i. The proposed Contributing Roof Form of the Historic Structure at 844 Empire is an 11:12 pitch on the north side, and a 9:12 pitch on the south side. This roof form occupies a horizontal distance of approximately 27 feet, 8 inches when measured from the north-side primary facade, which is the historic front of the home and fronts the 9th Street right-of-way.
 - ii. The Applicant proposes a flat roof for the east-side addition to the Historic Structure. Pursuant to LMC § 15-2.2-5(C), Secondary Roof Forms may be below a 7:12 pitch. The Applicant also proposes a flat roof for the detached Accessory Structure. LMC § 15-2.2-5(C)(4) states that Accessory Structures may be below a 7:12 roof pitch.
- 13. The proposal, as conditioned, complies with LMC Chapter 15-3 Off-Street Parking.
 - a. LMC § 15-3-6(A) requires two parking spaces for SFDs; however, pursuant to LMC § 15-2.2-4, Historic Structures that do not comply with Off-Street Parking requirements are considered valid Non-Complying Structures.
 - b. The applicant proposes a driveway on the west side of the structure that is approximately 10 feet wide and 25 feet deep. No other parking areas are proposed for the Site.



Planning Department

14. The proposal, as conditioned, complies with the February 7, 2024 Historic Preservation Final Action Letter approving Material Deconstruction and Panelization of the Historic Structure.
- a. The HPB approved the Applicant's Material Deconstruction and Panelization request for the site to construct a new foundation, rehabilitate the Historic Structure, and construct an addition on the east side of the Historic Structure.
 - i. Condition of Approval 11 notes that all previous Conditions of Approval relating to the Applicant's proposal remain in effect.
 - b. The Applicant's proposal also includes constructing a mud room abutting the west side of the Historic Structure and adjacent to the driveway that is approximately 46 square feet. The mud room provides entrance access to the Historic Structure from the driveway. The Applicant's Historic Preservation Plan indicates that the west side of the structure does not contain any Historic siding, and the Historic siding has been removed and replaced on the west façade. Because the west façade does not contain Historic siding, the Applicant's proposal to construct a mud room abutting the west façade of the Historic Structure does not require additional HPB approval for Material Deconstruction.
 - c. The Applicant proposes removing approximately 386 square feet of siding from the east façade of the Historic Structure to accommodate the 288-square-foot addition. The HPB Final Action Letter requires the Applicant to amend Plat Note 3 to address the proposed vehicle access from Crescent Tram Road. The Applicant recorded the 844 Empire Avenue Plat Amendment – Lot 1 Amended removing the plat note that restricted vehicle access to the site, with Summit County on January 13, 2025
 - d. The HPB Final Action Letter also requires the applicant to:
 - i. Obtain HDDR approval and record a Financial Guarantee in accordance with LMC § 15-11-9. The Applicant intends to pay the Financial Guarantee following HDDR approval.
 - ii. Obtain an encroachment agreement for any aspect of the project that utilizes soils that encroach onto neighboring properties.
 - iii. Submit a Soils Report completed by a geotechnical engineer and temporary shoring plan, if applicable, prior to Building Permit issuance.



Planning Department

- iv. Maintain the panels of the Historic Structure securely and provide the Planning Department with a panel storage plan prior to Panelization.
 - v. Return the Historic Site to its original grade after construction of the foundation, regrade the site such that water drains away from the Historic Structure, add a plinth or trim board at the base of the Historic Structure to visually anchor the Historic Structure to the new foundation, and use any Historic materials removed from the Historic Structure that are salvageable to repair any irreparable materials at the Site.
15. The proposal, as conditioned, complies with LMC Section 15-13-2 Regulations for Historic Residential Sites.
- a. The proposal is analyzed for compliance with LMC Section 15-13-2 Regulations for Historic Residential Sites. The Analysis section of the May 1, 2025 Historic District Design Review Staff Report is incorporated herein.
16. Staff published notice on the City's website and the Utah Public Notice website and posted notice to the property on April 17, 2025. Staff mailed courtesy notice to property owners within 300 feet on April 16, 2025. The Park Record published courtesy notice on April 17, 2025.

Conclusions of Law

1. The proposal, as conditioned, complies with LMC Chapter 15-2.2 Historic Residential – 1 (HR-1) Zoning District.
2. The proposal, as conditioned, complies with LMC Chapter 15-3 Off-Street Parking.
3. The proposal, as conditioned, complies with the February 7, 2024 Historic Preservation Final Action Letter approving Material Deconstruction and Panelization of the Historic Structure.
4. The proposal, as conditioned, complies with LMC Section 15-13-2 Regulations for Historic Residential Sites.

Conditions of Approval

1. The Applicant shall update plans prior to submitting for a Building Permit that revise the proposed patios on the northeast corner of the site and south side of the Historic Structure to comply with Setback requirements. Pursuant to LMC Section 15-13-2(B)(1)(b)(2) and LMC Section 15-13-2(B)(1)(c)(1), the Applicant



Planning Department

- shall update plans prior to submitting for a Building Permit such that the character of the Significant Historic Site is not significantly altered by substantially changing the proportion of built and/or paved area to Open Space.
2. The Applicant shall obtain Chief Building Official approval for proposed snow release plans for the site, pursuant to LMC Section 15-2.2-3(K).
 3. The Applicant shall re-grade the site where feasible to maintain the natural topography and original grading of the site. Final Grade shall be within 4 feet of Existing Grade, pursuant to LMC Section 15-2.2-5.
 4. Painting, staining, or plastering over stone or concrete retaining walls is prohibited.
 5. The Applicant shall obtain an Encroachment Agreement with the Engineering Department for the heated driveway prior to Building Permit issuance.
 6. The Applicant shall use a textured or poured paving material other than smooth concrete for the new driveway.
 7. The Historic Structure shall not be raised or lowered more than 2 feet from its original floor elevation at the Site.
 8. Double-hung windows that reflect a 2:1 height-to-width ratio are required on the Historic Structure.
 9. New glazing shall match the visual appearance of Historic glazing. Metallic, frosted, tinted, stained, textured and reflective finishes are prohibited.
 10. Removing or obstructing any Historic elements or materials to install gutters and downspouts is prohibited. The Applicant shall use half-round gutters for new gutters on the Site.
 11. The Applicant shall use Water Wise Landscaping at the site. If watering systems are necessary, the Applicant shall use watering systems that minimize water loss, such as drip irrigation. Watering systems at the Site shall be designed to minimize their appearance from areas viewable from the primary public right-of-way.
 12. All previous Conditions of Approval pertaining to the Applicant's proposal, including but not limited to Conditions of Approval included in the Historic Preservation Board's February 7, 2024 Final Action Letter, remain in effect.
 13. The proposed work will require a Building Permit through the Building Department.
 14. The proposed work requires a Final Inspection by both the Building and Planning Departments.



Planning Department

15. Modifications to the project require a modification application submittal to the Planning Department, payment of application fee, review for compliance with required standards, and Planning and Building Department approval.
16. The designer, architect, and/or applicant shall be responsible for coordinating the approved architectural drawings, documents, and/or plans with the approved construction drawings and documents. The overall aesthetics of the approved HDDR architectural plans shall take precedence. Any discrepancies found among these documents that would cause a change in the approved construction drawings shall be reviewed and approved prior to construction.
17. This Historic District Design Review (HDDR) Waiver Letter and approval shall expire one year following the date of this letter at 5 PM (Mountain Time). The Applicant shall obtain a Building Permit for the proposed work prior to that date. If a Building Permit for the proposed work is not approved before that date, this Waiver Letter shall be voided, and the Applicant will be required to submit a new HDDR application to pursue the proposed work.
18. The Applicant shall obtain a construction access agreement with adjacent property owners for any work occurring within 5 feet of the property line and any construction-related disturbance that may encroach onto an adjacent property.

If you have questions or concerns regarding this Final Action Letter, please call (385) 481-2037 or email jacob.klopfenstein@parkcity.org.

Sincerely,



Rebecca Ward
Planning Director

CC: Jacob Klopfenstein, Project Planner



Planning Department

February 5, 2026

Julie Wright

CC: Gibby Dunleavy

NOTICE OF PLANNING DIRECTOR ACTION

Description

Address: 844 Empire Avenue

Zoning District: Historic Residential – 1 (HR-1)

Application: Modification to Historic District Design Review

Project Number: PL-25-06754

Action: APPROVED WITH CONDITIONS (See Below)

Date of Final Action: February 5, 2026

Project Summary: The Applicant proposes modifying the approved Historic District Design Review (HDDR) plans to add an additional basement level, restore the Historic truncated gable roof form of the Significant Historic Structure, and lower the rear dormers on the south façade of the Significant Historic Structure.

Action Taken

On February 5, 2026, the Planning Director conducted a public hearing and approved the Modification to the Historic District Design Review (HDDR) for 844 Empire Avenue according to the following findings of fact, conclusions of law, and conditions of approval:

Procedural History

1. The previous owner obtained Historic Preservation Board approval for Material Deconstruction and Panelization of the Significant Historic Structure at 844 Empire Avenue on February 7, 2024.



Planning Department

2. The previous owner obtained HDDR approval to remodel and rehabilitate the Significant Historic Structure at 844 Empire Avenue, and construct an addition, on May 1, 2025.
3. The previous owner entered into an Encumbrance and Agreement for Historic Preservation for 844 Empire Avenue on July 1, 2025 (Entry No. 1238470).
4. The Applicant purchased the property, and the previous owner assigned the Encumbrance and Agreement for Historic Preservation for 844 Empire Avenue to the Applicant through an Assignment of Encumbrance, recorded with Summit County on September 22, 2025 (Entry No. 1241341).
5. The previous architect authorized the Applicant's Representative to use and modify the approved HDDR plans on November 12, 2025.
6. On December 29, 2025, the Applicant submitted a Modification to the HDDR to:
 - a. Add a basement level.
 - b. Lower the height of the rear dormers of the Significant Historic Structure.
 - c. Restore the Historic truncated gable roof of the Significant Historic Structure.

Findings of Fact

1. 844 Empire Avenue is in the Historic Residential – 1 (HR-1) Zoning District.
2. 844 Empire Avenue is Lot 1 of the 844 Empire Avenue Plat Amendment Lot 1 Amended plat, which was recorded with Summit County on January 13, 2025 (Entry No. 1230098) and establishes a Lot size of 3,242 square feet for 844 Empire Avenue.
3. For Lots that are 3,242 square feet in the HR-1 Zoning District, LMC § 15-2.2-3(E) establishes a maximum Building Footprint for 844 Empire of 1,351 square feet. The Applicant proposes a Building Footprint of 1,350.5 square feet.
4. LMC § 15-2.2-5 establishes an exterior height limit of 27 feet.
5. LMC § 15-2.2-4 states that existing Significant Historic Sites that do not comply with Building Height are valid Non-Complying Structures
6. The Applicant proposes an exterior height of approximately 28 feet for 844 Empire Avenue, a Significant Historic Structure that is a valid Non-Complying Structure with regard to Building Height pursuant to LMC § 15-2.2-4.
7. The Applicant proposes Final Grade to be within 4 feet of Existing Grade.
8. The Applicant proposes modifying the approved HDDR plans to construct an additional basement level below the Significant Historic Structure at the Site.
 - a. The maximum interior height of 35 feet, measured from the Lowest Floor Plane of the additional basement level to the highest wall top plate that



Planning Department

supports the dormers of the Significant Historic Structure, complies with LMC § 15-2.2-5(A).

9. According to the Physical Conditions Report, due to alterations to the Significant Historic Structure over time and damage from the fire, no Historic roof material remains.
10. LMC § 15-13-2(A)(8) requires that for roofs on Historic Structures, each site should be recognized as a physical record of its time, place and use, and owners are discouraged from introducing architectural elements or details that visually modify or alter the original building appearance when no evidence of such elements or details exists.
11. The Applicant proposes restoring the truncated gable roof to the building's original appearance as evidenced by the 1940s-era tax photo of the Historic Structure.
12. The Applicant proposes lowering the height of the dormers on the rear (south) façade of the Historic Structure to match the height of the dormers on the front (north) façade.

Conclusions of Law

1. The proposed Modification to Historic District Design Review complies, as conditioned, with Land Management Code Chapter 15-2.2 *Historic Residential – 1 District*.
2. The proposed modification complies, as conditioned, with Land Management Code Section 15-13-2 *Regulations for Historic Residential Sites*.

Conditions of Approval

1. Pursuant to LMC § 15-2.2-5, Final Grade shall be within 4 feet of Existing Grade.
2. Removing, altering, or destroying any Historic materials at the Site is prohibited.
3. The Applicant shall update the project plans to eliminate the additional window in between the two dormers on the rear (south) façade of the Historic Structure prior to Building Permit submittal.
4. All work associated with the modification must comply with the approved Historic Preservation Plan for 844 Empire Avenue (Summit County Recorder Entry No. 1238470).
5. The Applicant shall use recognized Historic preservation methods appropriate to any Historic materials impacted at the Site.



Planning Department

6. If replacement materials are necessary, they shall match the Historic materials in scale, dimension, profile, material, texture, and finish, and shall be made of a minimum 50% recycled or reclaimed materials.
7. Vinyl and aluminum siding and windows are prohibited. Wood or aluminum-clad wood windows are allowed.
8. The exterior walls of the proposed basement addition shall not extend beyond the exterior wall planes of the Historic Structure and proposed addition.
9. Any egress wells for the additional basement level shall be located behind the midpoint of secondary facades, on the rear or tertiary façade, or in a location not visible from the primary public Right-of-Way.
10. All previous Conditions of Approval related to 844 Empire Avenue remain in effect, including but not limited to Conditions of Approval from the February 7, 2024, Material Deconstruction Final Action Letter and the May 1, 2025, Historic District Design Review Final Action Letter.
11. The proposed work requires a Building Permit.
12. The proposed work requires a Final Inspection by both the Building and Planning Departments.
13. Modifications to the project require a modification application submittal to the Planning Department, payment of application fee, review for compliance with required standards, and Planning and Building Department approval.
14. The designer, architect, and/or applicant shall be responsible for coordinating the approved architectural drawings, documents, and/or plans with the approved construction drawings and documents. The overall aesthetics of the approved architectural plans shall take precedence. Any discrepancies found among these documents that would cause a change in the approved construction drawings shall be reviewed and approved prior to construction.
15. This Final Action Letter and approval shall expire one year following the date of this letter at 5:00 PM (MT). The Applicant shall obtain a Building Permit for the proposed work prior to that date. If a Building Permit for the proposed work is not approved before that date, this Waiver Letter shall be voided, and the Applicant will be required to submit a new application to pursue the proposed work.

If you have questions or concerns regarding this Final Action Letter, please call 385-481-2037 or email jacob.klopfenstein@parkcity.gov.

Sincerely,



Planning Department

A large, stylized handwritten signature in blue ink, consisting of several loops and a long horizontal stroke, positioned above a horizontal line.

Rebecca Ward
Planning Director

CC: Jacob Klopfenstein

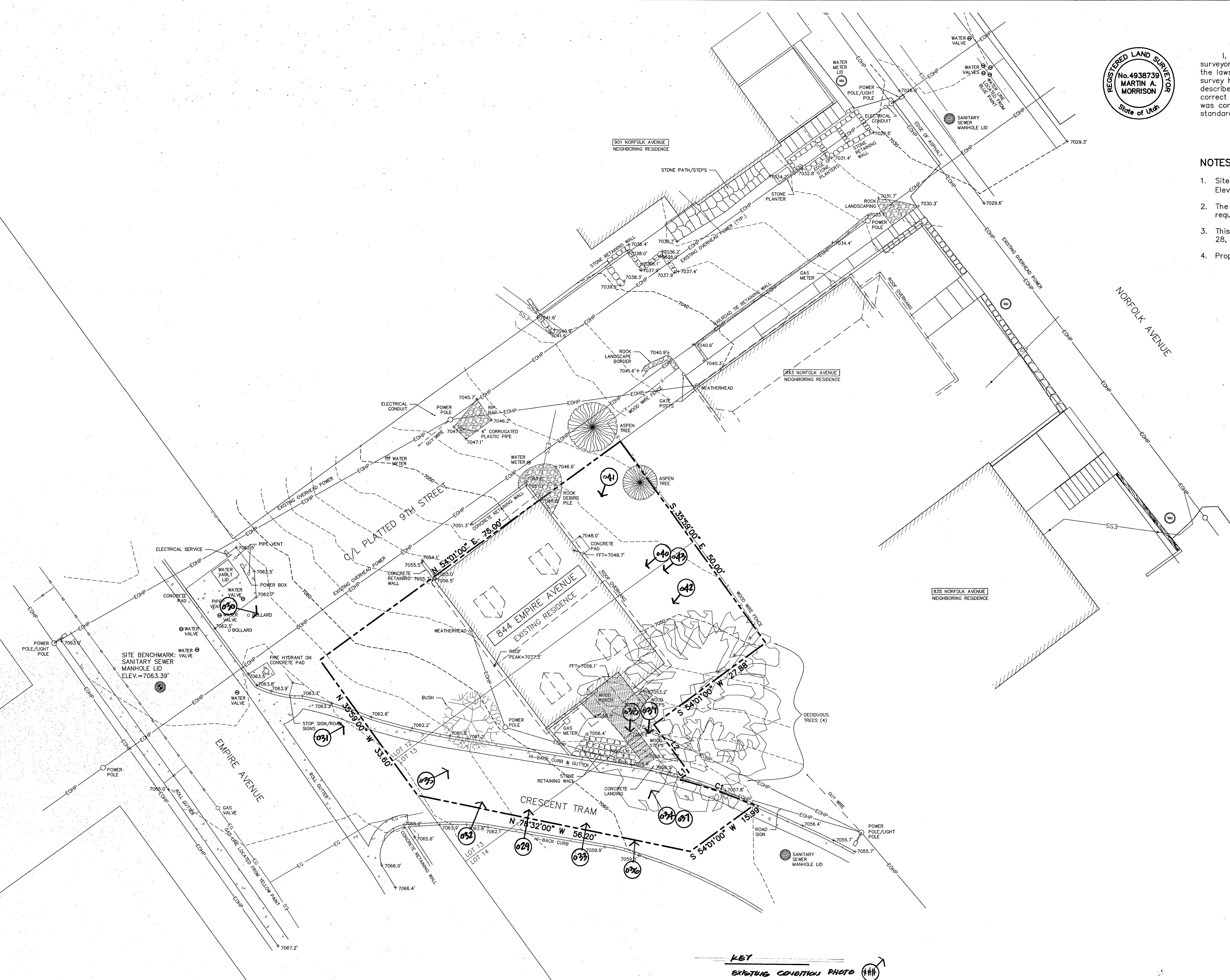


SURVEYOR'S CERTIFICATE

I, Martin A. Morrison, do hereby certify that I am a registered land surveyor and that I hold certification no. 4938739 as prescribed under the laws of the State of Utah. I further certify that a topographic survey has been made under my direction of the lands shown and described hereon. I further certify that this topographic survey is a correct representation of the land surveyed at the time the field work was completed and is in compliance with generally accepted industry standards for accuracy.

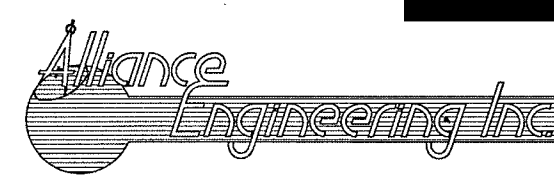
NOTES

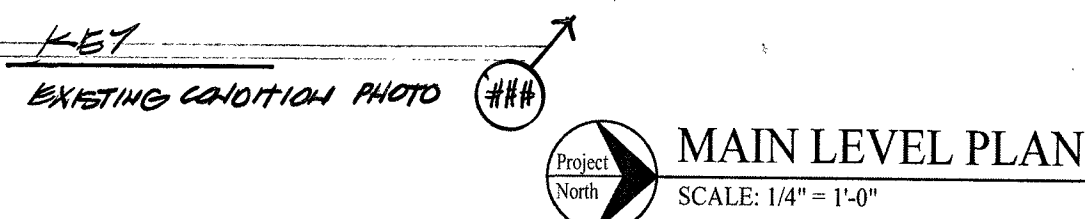
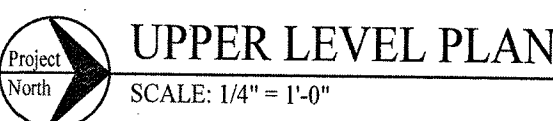
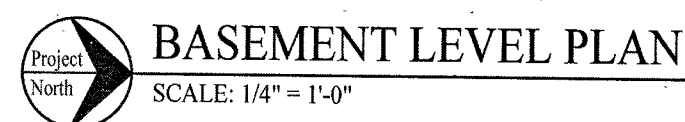
1. Site Benchmark: Sanitary Sewer Manhole Lid Elevation=7063.39'
2. The architect is responsible for verifying building setbacks, zoning requirements and building heights.
3. This topographic map is based on a field survey performed on September 28, 2015.
4. Property corners were not set.



Existing Condition Photo Key Plan
11-17-23



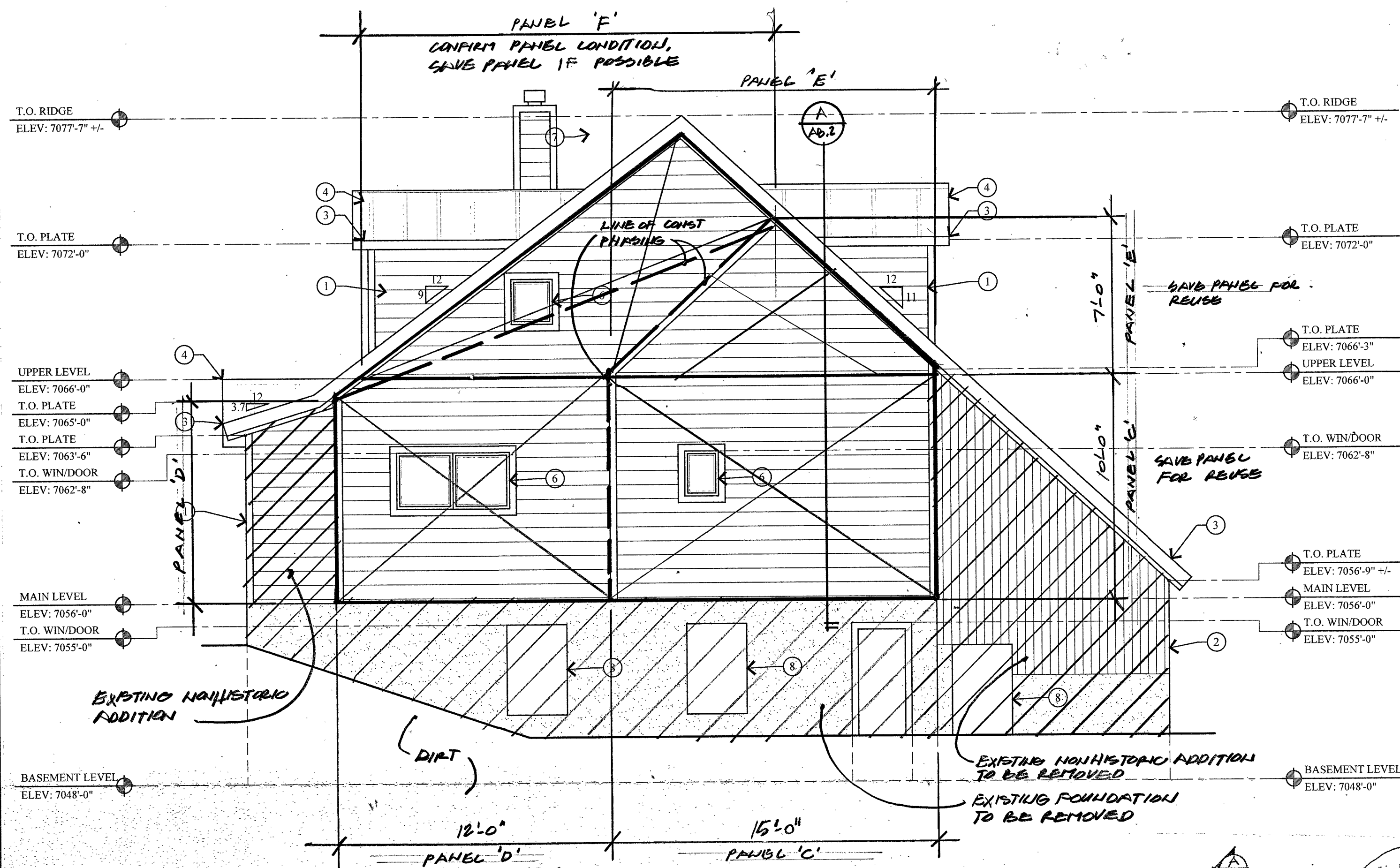
 CONSULTING ENGINEERS LAND PLANNERS SURVEYORS	STAFF: MARSHALL KING MARTY MORRISON JESSE MORENO	EXISTING CONDITIONS & TOPOGRAPHIC MAP 844 EMPIRE AVENUE BLOCK 14, SNYDER'S ADDITION TO PARK CITY	1 of 3
	DATE: 10/12/15	FOR: TODD M. GILBERT	
	JOB NO.: 17-8-15	FILE: X:\SnydersAddition\dwg\srvtopo2015\170815.dwg	



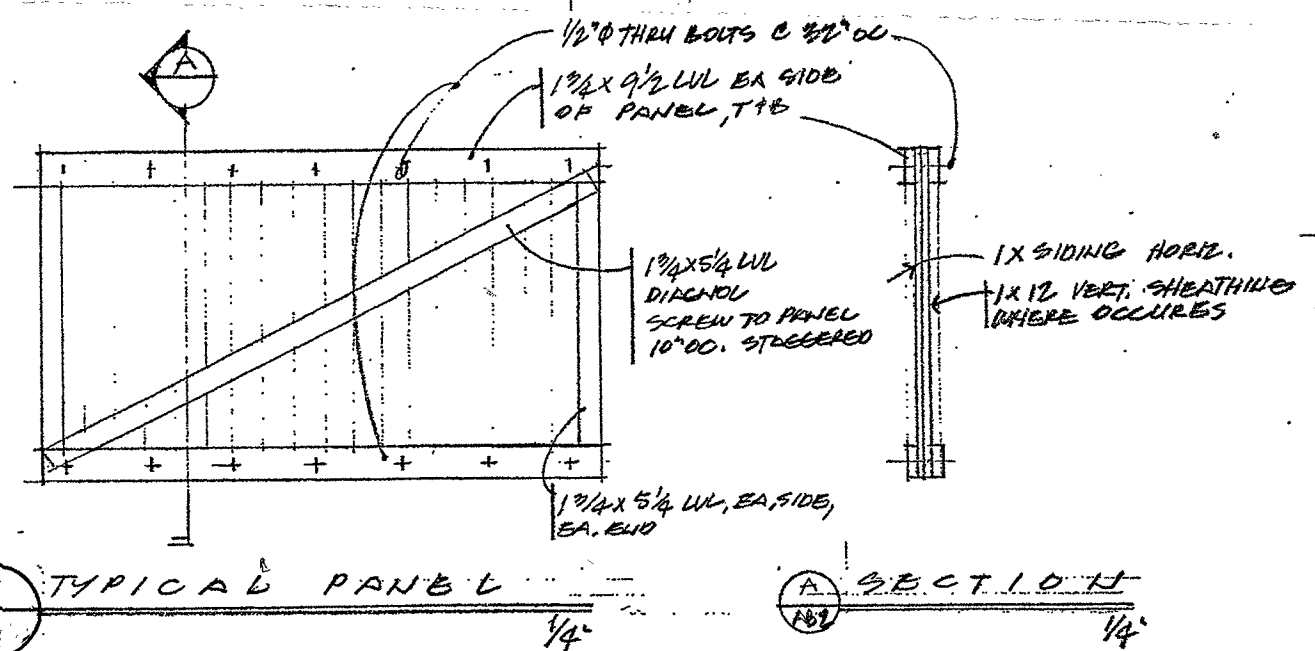
Panel Plans

1	1x8 HORIZONTAL LAP SIDING.
2	1x4 VERTICAL SIDING.
3	ALL FLASHING, DRIP METAL, TRIM, FASCIA AND SOFFIT ARE IN POOR SHAPE AND NEEDS REPAIR
4	STANDING SEAM METAL ROOF.
5	EXTERIOR DOOR, NOT ORIGINAL.
6	WINDOWS ARE ALUMINUM FRAME W/ INSULATED GLASS.
7	FRAMED CHIMNEY.
8	WINDOWS OPENINGS HAVE BEEN FRAMED IN.
9	6x6 WOOD COLUMN, NOT ORIGINAL.
10	WINDOWS OPENING.
11	DOOR OPENING.
12	THE MASONRY CHIMNEY IS ORIGINAL TO THE HISTORIC STRUCTURE. THE CHIMNEY NO LONGER FUNCTIONS AS A SMOKE FLUE.

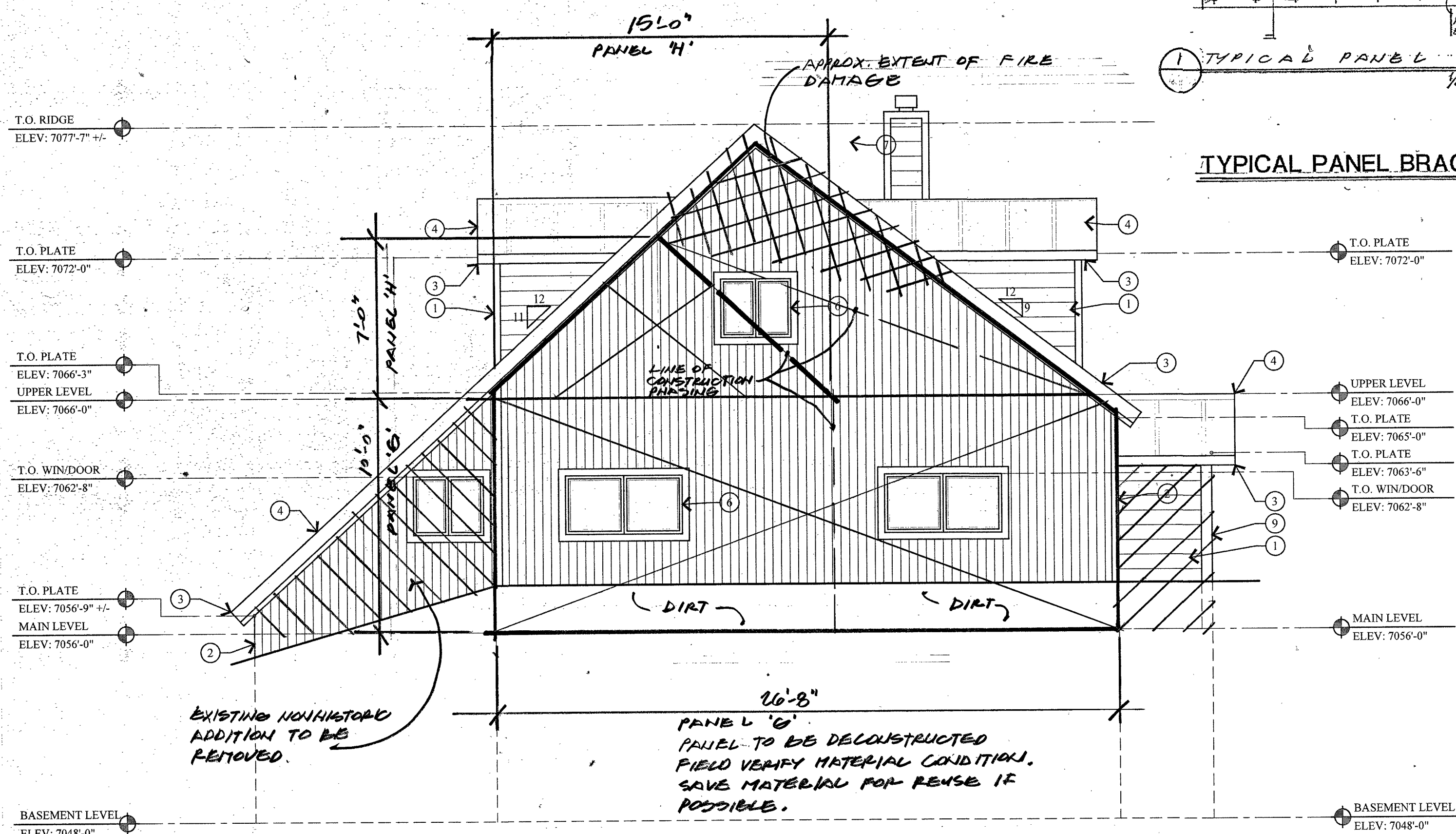
THE GRAPHIC MATERIAL AND DESIGN ON THIS SHEET ARE INSTRUMENTS OF SERVICE AND REMAIN AT ALL TIMES THE PROPERTY OF JONATHAN DEGRAY - ARCHITECT P.C. REPRODUCTION OR REUSE OF THE MATERIAL AND DESIGN CONTAINED HEREIN IS PROHIBITED WITHOUT THE WRITTEN CONSENT OF JONATHAN DEGRAY - ARCHITECT P.C. VIOLATORS WILL BE PROSECUTED TO THE FULLEST EXTENT OF THE LAW.
JONATHAN DEGRAY - ARCHITECT P.C. ALL RIGHTS RESERVED



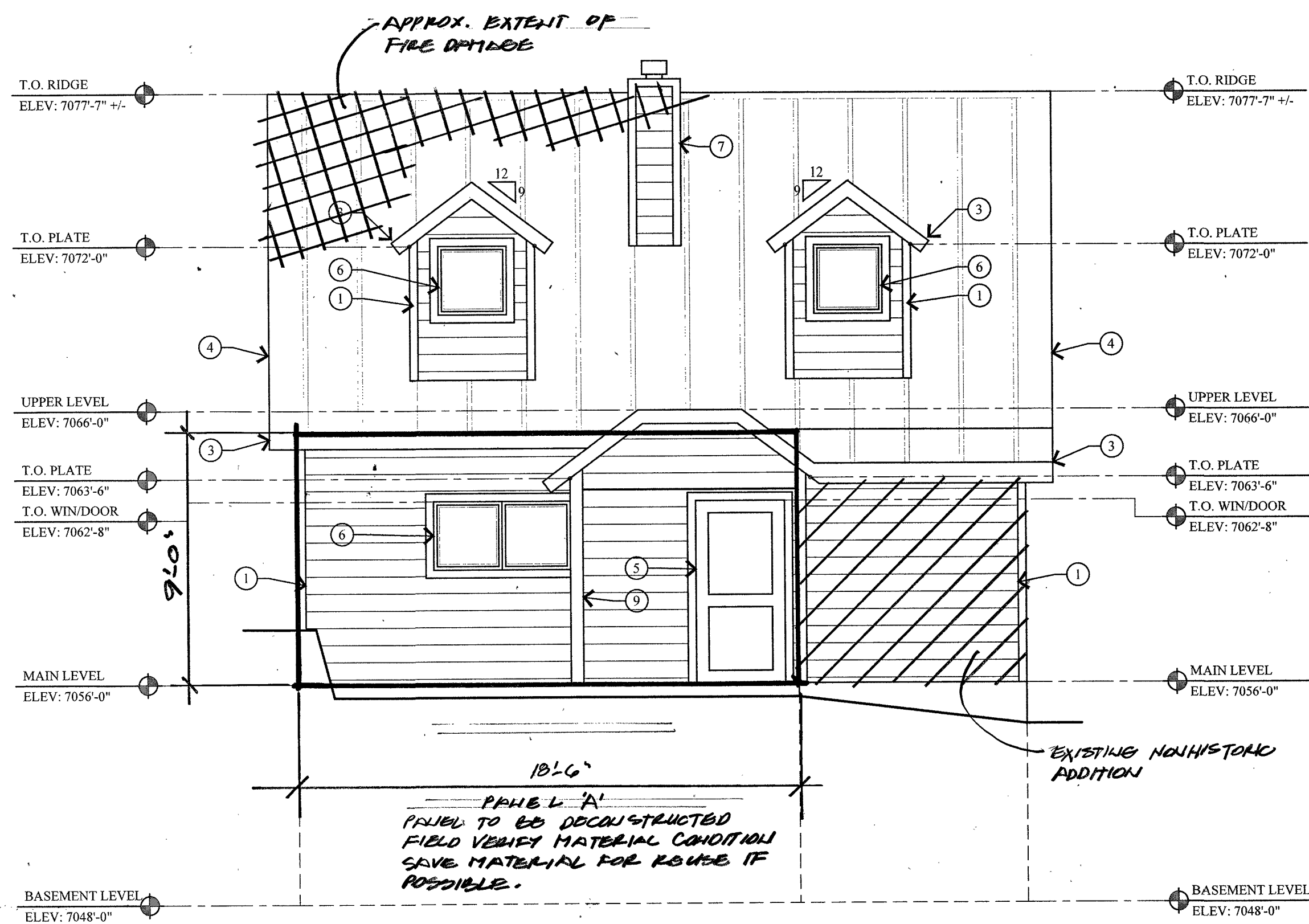
1 EAST ELEVATION
AB.2 SCALE: 1/4" = 1'-0"



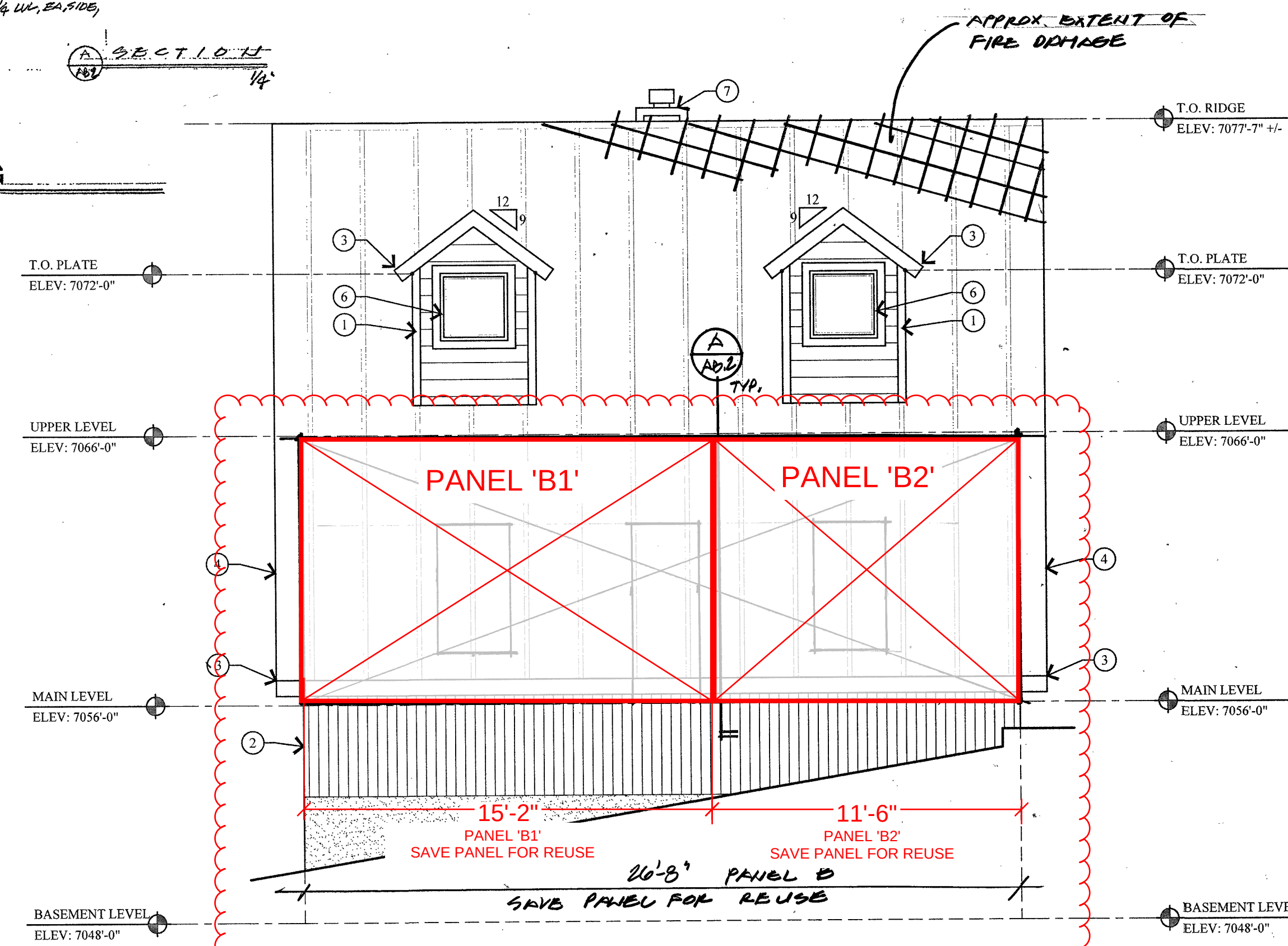
TYPICAL PANEL BRACING



3 WEST ELEVATION
AB.2 SCALE: 1/4" = 1'-0"



2 SOUTH ELEVATION
AB.2 SCALE: 1/4" = 1'-0"



4 NORTH ELEVATION
AB.2 SCALE: 1/4" = 1'-0"

KEY NOTES

- 1x8 HORIZONTAL LAP SIDING.
- 1x4 VERTICAL SIDING.
- ALL FLASHING, DRIP METAL, TRIM, FASCIA AND SOFFIT ARE IN POOR SHAPE AND NEEDS REPAIR.
- STANDING SEAM METAL ROOF.
- EXTERIOR DOOR, NOT ORIGINAL.
- WINDOWS ARE ALUMINUM FRAME W/ INSULATED GLASS.
- FRAMED CHIMNEY.
- WINDOWS OPENINGS HAVE BEEN FRAMED IN.
- 6x6 WOOD COLUMN, NOT ORIGINAL.

Panel Elevations

Jonathan DeGray
Architect

NEW RESIDENCE
HISTORIC DISTRICT DESIGN REVIEW

844 EMPIRE AVENUE, PARK CITY, UTAH 84060

AS-BUILTS
ELEVATIONS

REVISIONS:

DATE: 11-17-23

PROJECT NUMBER:

SHEET NUMBER:

3 of 3



UGC Land Ltd Co.



Monday, April 13, 2026

Park City Planning Department
City of Park City, Utah

Re: 844 Empire Avenue — panel storage (historic structure / panelization)

Dear Planning Department,

Please file the following as confirmation on behalf of UGC Land Ltd Co. for the historic residential work at 844 Empire Avenue:

- Storage: Removed panelized wall/floor assemblies will be stored indoors at UGC Land's Arena Building, Snowville, Utah — an enclosed building with controlled access.
- Trucking: UGC Land will schedule hauls between 844 Empire and that facility to match the general contractor's removal and reassembly sequence.
- Handling: Panels will be stacked and blocked off the ground, labeled, and tracked with a simple inventory so they can be matched for reinstallation.

Respectfully,

A handwritten signature in black ink, appearing to read "Dave Smith", written over a horizontal line.

Dave Smith
President
UGC Land Ltd Co.

██████████
██████████
██████████
██████████@ gmail.com

Dec., 10, 2023

Mr. Jonathan DeGray, AIA
Jonathan DeGray - Architect

██████████
██████████

Subject: Further Review Report of Park City House
At 844 Empire Ave.
Park City, Utah

To Whom It May Concern:

After further review of the existing structure, we have found out more structural issues of the building:

1. The west wall of the house was fire damaged and needs to be removed.
2. There are some generally cut up panels of the existing west and east walls due to multiple additions. The cut has reduced the strength of the walls dramatically. The walls need to be replaced.
3. The west wood wall is retaining soil and appears to have been retaining for many years. It is not acceptable and the walls need to be replaced with concrete walls.
4. The south wall has been reframed and is not historic. It can be removed.
5. Even though the west wall had been reframed, it needs to be replaced with the new retaining wall.

Based on the original report and the further findings above, we would strongly recommend to panelize the existing building.

We hope that the information contained herein will assist you in your planning efforts. Should you have any further questions, please feel free to contact our office at your convenience.

Best Regards,

Henry Shen

Henry Shen, SE,

Shen Engineers, Inc.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]@gmail.com

The report dated on Aug., 2023 is attached.

Aug., 21 2023

Mr. Jonathan DeGray, AIA
Jonathan DeGray - Architect

[REDACTED]

[REDACTED]

Subject: Physical Condition Report of Park City House
At 844 Empire Ave.
Park City, Utah

To Whom It May Concern:

We have performed a site investigation of the building on Aug. 14, 2023 with the architect Jon DeGray. The conclusions on the house are as follows:

1. The existing roof joists are 2x4 at 24" on center on a sloped roof spanning 8'-0" to 12'-0". The 12'-0" roof joists are 12% capacity of the code. The 8'-0" roof joists are 16% capacity of the code. They need to be upgraded or replaced with new roof joists. We suggest reframing roof ridge and valley beams and installing new roof joists.
2. The existing roof deck is 1x wood plank installed perpendicular to the existing joists. It doesn't have any capacity of shear diaphragm value. Suggest installing new 5/8" plywood or OSB with 10d @ 6" on center nailing.
3. The existing main and crawl space floor joists are possibly 2x6 @ 24" on center spanning 8'-0" to 12'-0. Most of them were totally rotted out. They have to be replaced or at least sistered with new floor joists.
4. All the existing headers need to be upgraded. We will review each one of them when design is available.
5. Portion of the upgraded exterior walls are 2x4 studs @ 16" o.c. w/1x12 planks. Another portion of the exterior walls are built with 1x12 planks installed vertically. The exterior walls with 1x12 vertical planks have no capacity for wind, seismic or gravity loads.
6. The 1/3 portion of existing concrete footings and foundations may be poured not too long ago and they seem to be in fair shape. But since the scope of the project is to create the basement, then eventually the concrete will be removed.
7. The north part of the existing house is in so bad shape on both the roof and the walls. We were told that that portion is non-historical. If so, remove the north part of the house.
8. To lift the existing house, the existing house needs to be temporarily shored and then upgraded. For construction crews' safety concern, penalizing the existing house is strongly recommended.

We hope that the information contained herein will assist you in your planning efforts. Should you have any further questions, please feel free to contact our office at your convenience.

Best Regards,

Henry Shen

Henry Shen, SE,

Shen Engineers, Inc.

██████████
██████████

██████████
██████████@gmail.com



January 10, 2024

844 Empire Ave
Park City, UT 84060

CC: 844 Empire Ave. Structural Determination
Re: PL-22-05350

NOTICE OF CHIEF BUILDING OFFICIAL DETERMINATION:

Project Address: 844 Empire Ave.
Project Description: Planning Director and Chief Building Official Determination for the Integrity of the Structure
Date of Action: January 2, 2024

ACTION TAKEN BY CHIEF BUILDING OFFICIAL

The historic house at 844 Empire Avenue has been designated as Significant on the City's Historic Sites Inventory. It is deemed to be in the interest of the citizens of Park City, as well as the State of Utah, to encourage the preservation of Buildings, Structures, and Sites of Historic Significance in Park City. These Buildings, Structures and Sites are among the City's most important cultural, educational, and economic assets. In order that they are not lost through neglect, Demolition, expansion or change within the City, the preservation of Historic Sites, Buildings, and Structures is required.

The Chief Building Official, based on the submitted engineering report and after visiting the site, finds the structure at 844 Empire Ave. needing to be panelized in order to preserve historic elements of the structure. Due to a previous fire which has compromised portions of the roof, walls that have been buried in soil for many years deteriorating the wood material, and general structural concerns, preserving the panels remaining intact seems to be the best pathway to preservation.

If you have any questions regarding this determination, please don't hesitate to contact the Building Department at 435-615-5101.

Sincerely,

Dave Thacker
Chief Building Official/Fire Code Official
dave.thacker@parkcity.org
(435) 615-5115

Rebecca Ward
Planning Director
rebecca.ward@parkcity.org
(435)-615-5046

PUBLIC INPUT

May 28, 2026

Please let me know what the modification is for removal of historic material that the applicant wants for 844 Empire. If they want to remove more historic material, I strongly object. The largest amount of historic fabric on the house is facing me (the east side of 844) and the large addition will already destroy most of it. This is a Significant House on the registry! If you are able to give my comments to the HPB I'd appreciate it.

Thank you,

Linda McReynolds

Historic Preservation Board Staff Report



Subject: Historic District Grant Program
Author: Elissa Martin, Planning Project Manager
Date: June 3, 2026
Type of Item: Work Session

Recommendation

(I) Review potential updates to the Historic District Grant Program (HDGP) application form, eligible work items, and evaluation criteria, (II) review the potential near-term updates and staff findings, and (III) provide feedback.

Acronyms

HDGP	Historic District Grant Program
HPB	Historic Preservation Board
ILS	Intensive-Level Survey
LMC	Land Management Code
RDA	Redevelopment Area

Terms that are capitalized as proper nouns throughout this staff report are defined in LMC [§ 15-15-1](#).

Background

The Historic Preservation Board (HPB) held two work sessions, one on March 4 and one on April 1, 2026, to discuss potential updates to the HDGP. During the March 4, 2026 work session, the HPB discussed funding levels and possible budget increases for the grant program and forwarded a unanimous recommendation to City Council to increase funding levels for the Main Street Redevelopment Area (RDA) and the Citywide General Fund, based on staff's analysis that funding levels for the HDGP have not increased since at least 2015 and have not reflected rising construction and labor costs. See the [March 4, 2026 HPB Meeting Packet](#) (Item 6.A). On April 9, 2026, the City Council considered increasing the HDGP funds. The Council supports the HPB's recommendation but requested that the funds be evaluated mid-year due to budget constraints ([Meeting Minutes](#), p. 2).

On April 1, 2026, the HPB focused on prioritizing program updates that should be implemented in 2026 and discussed broader policy topics that would be appropriate to address with City Council at a future date. Staff outlined recommendations from the 2018 Duval Study that have not been implemented to date, which include but are not limited to (Exhibit A):

1. Establishing a communications strategy to raise awareness, build community knowledge and engagement, and tell Park City's story.
2. Establishing a regular annual cycle of reporting. Audiences for regular reporting include the Historic Preservation Board, Mayor and City Council, and the general

public.

3. Establishing metrics for tracking and reporting outcomes.
4. Creating a database of projects to track them from the time a grant is awarded to the time the grant is paid out (we have started to do this).
5. Defining a target list of investment priorities where the grant can make a difference and review it annually to keep it current. Consider public projects, historic mine structures, distressed properties, roof replacements, large remodels, and incentivizing above-minimum-standard outcomes (form, materials, details).

During the previous HPB work sessions the HPB provided feedback on prioritization of program updates and gave specific feedback to staff regarding the recommended changes. The purview of this work session is to review the immediate updates that have been implemented in advance of launching the updates in the FY27 Grant Cycle.

Additionally, staff outlined next steps for implementation of near-term program updates as well as potential policy updates.

Immediate updates:

- Revise eligible work to include safety upgrades, retaining walls, and foundation work
- Revise the grant scoring matrix/evaluation criteria to align with eligible items and support HPB decision making
- Update the application form to improve the information submitted with a grant application
- Improve outreach efforts to increase awareness of the HDGP

Near-term updates:

- Define a target list of investment priorities, including a database for vacant and dilapidated Historic Sites
- Develop a communications strategy
- Define metrics for tracking and reporting and establish an annual reporting cycle
- Develop criteria and incentives for ski-era resources to be eligible for grant funding

Policy updates to explore for future recommendations to City Council:

- Revisiting the lien requirements, evaluating whether it is a disincentive
- Evaluating the cost share structure
- Evaluating whether special requirements should be in place for Historic Sites that are used as nightly rentals

See the [April 1, 2026 HPB Meeting Packet](#) (Item 7.A)

Analysis

(I) The HPB reached consensus on changes to the list of eligible work items.

The HPB discussed revisions to the list of work items eligible for the HDGP. The HPB agreed that landscaping should *not* be added as an eligible work item because it takes away the focus on Historic Structures, which has been the overarching goal of the Grant Program from its inception – to preserve Historic Structures. The HPB also rejected radon mitigation systems as an eligible work item but did concur with staff that asbestos and lead abatement should be eligible work items to incentivize the preservation of Historic Structures by ensuring they are habitable.

The HPB agreed that the list of eligible work items should include “restoration of retaining walls” and “repair or replacement of foundations” to encourage these important structural elements of a Historic Site to be restored.

As a result, the proposed updated eligibility requirements are as follows:

Eligible work may include interior and/or exterior repair, Preservation, Rehabilitation, or Restoration, including Historic Architectural features and structural elements, as well as mechanical systems. Depending on the existing conditions and specific project scope, some examples of eligible work include, but are not limited to:

- *Repairing/Restoring/replacing windows*
- *Repointing masonry*
- *Restoring Historic retaining walls*
- *Repairing or replacing Historic Structure foundations*
- *Repairing or replacing roofs*
- *Painting exterior*
- *Electrical updating*
- *Upgrading mechanical systems*
- *Upgrading insulation*
- *Reconstructing Historic porches*
- *Restoring Historic features*
- *Abating lead or asbestos*

Ineligible Work includes, but is not limited to:

- *Acquisition costs*
- *New additions*
- *Landscaping/flatwork*
- *Interior remodeling/new finishes*
- *Interior paint*

(II) The HPB requested updates to the grant evaluation criteria and scoring matrix to align with the eligible work items and support the HPB’s decision making.

The current Evaluation Criteria used to score grant requests were established in Spring 2023 after several work sessions were conducted with the HPB. During the March 2026 HPB work session, Board members expressed interest in revisiting the evaluation criteria to ensure that projects are awarded that align with the HDGP goals and objectives and the list of eligible work items. Staff updated the evaluation criteria based on feedback given at the previous work session. The current evaluation matrix and the draft updated evaluation matrix are provided below for comparison:

Criteria Evaluation	Scoring Value	Staff Score	HPB Score
Character defining historic elements of the structure and/or site will be preserved and/or restored as viewed from the primary right-of-way.	0: Non-visible historic elements will be preserved or restored 1: Few visible historic elements will be preserved or restored 2: Several visible historic elements will be preserved or restored 3: Majority of visible historic elements will be preserved or restored 4: All visible historic elements will be preserved or restored		
Proposed improvements to the site will positively impact the vitality of the historic context of the neighborhood.	0: No proposed improvements 1: Minimal positive impact 2: General positive impact 3: Significant positive impact		

Proposed design and scope of work uses best practices for the treatment of historic materials.	0: None 1: Insufficient 2: Average 3: Above average 4: Exceeds expectations		
The historic features and elements of the structure and/or site will be enhanced by the proposed work.	0: Minimally enhanced 1: Generally enhance 2: Exceeds expectations		
Proposed work facilitates reversal of non-historic elements or alterations.	0: None 1: Some 2: Exceeds expectations *Note: If no non-historic elements or alterations are present mark N/A.		
Priority is given to restoration and treatment of historic materials, rather than replacing historic materials and features in-kind.	0: No priority given to restoration 1: Minimum priority given 2: Some priority given 3: General priority given 4: Exceeds expectations		

Draft updated scorecard:

Criteria Evaluation	Scoring Value	Staff Score	HPB Score
OVERALL:	(UP TO 6 POINTS)		
1. <i>The proposed design and scope of work uses best practices for the treatment of historic materials / the upgrades include high quality materials or equipment</i>	0: Below Average 1: Average 2: Above average 3: Exceeds Expectations		
2. <i>Historic features and critical elements of the structure and/or site will be enhanced by the proposed work.</i>	0: None 1: Minimally enhanced 2: General positive impact 3: Significant positive impact		
EXTERIOR IMPROVEMENTS:	(UP TO 8 POINTS)		
3. <i>Character defining historic elements of the structure and/or site will be preserved and/or restored as viewed from the primary right-of-way and will positively impact the vitality of the historic context of the neighborhood.</i>	0: No impact 1: Minimal positive impact 2: General positive impact 3: Significant positive impact		
4. <i>Proposed work facilitates reversal of non-historic elements or alterations.</i>	0: No 2: Yes		
5. <i>The scope of work includes restoration of Historic materials and features or replacing historic materials and features that may have been lost or are irreparable.</i>	1: Minor restoration or replacement of historic materials/features 2: Average restoration or replacement of historic materials/features 3: Significant restoration or replacement of historic materials/features		
SAFETY/STRUCTURAL IMPROVEMENTS:	(UP TO 8 POINTS)		
6. <i>Priority is given to restoration and treatment of historic materials, rather than replacing historic materials and features in-kind.</i>	2: Minor safety or structural upgrades 4: Some safety or structural upgrades 8: Significant safety or structure upgrades		

(See Exhibit B)

(III) The HPB requested updates to the HDGP application form to require additional information from applicants.

The HPB discussed ideas to improve grant application submittals, including requiring competitive bids for grant requests \$10,000 and over, and requiring the project description to include a narrative on how the proposed project addresses the grant evaluation criteria. Additionally, the HPB requested the grant application include a section on “tips on how to prepare your grant application for success” with suggestions on how to make their application stronger, including that it should be well organized, not hand-written, and include all requested information.

Proposed updates to the application submittal requirements are as follows:

- **Project Description** describing the proposed scope of work, detailed specifications, and reason for applying for a Historic District Grant.
 - Please address applicable grant evaluation criteria in your project description.

• ~~**Cost Estimate for the proposed work.**~~

- **Breakdown of Proposed *Scope of Work and Estimated Costs*** of the proposed eligible improvements (page 6).
 - **At least two competitive bids/quotes must be obtained and submitted for any grant request that is \$10,000 or over**
- **Estimated Timeline** of the proposed project (page 8).
- **Historic District Design Review** approval letter. Please contact the Planning Department if this has not been completed. The grant application will not be accepted without this approval letter.
- Schematic, conceptual **Drawings** as they apply to the proposed project. This may include but is not limited to site plans, elevations, and floor plans.
- **Color Photographs** of existing conditions. Include a general view of the building and setting, including the building in the context of the streetscape; the front; perspective view showing front façade and one side, and rear façade and one side; detailed view of affected work area.

(IV) The HPB agreed that additional outreach to increase awareness of the HDGP is needed.

The Planning Department hosted the first annual Historic Preservation Celebration for Park City on May 8, 2026 at the McPolin Farm. The goal of this event is to celebrate and increase community awareness of Historic Preservation efforts in the City and encourage property owners to take advantage of resources to preserve and restore Historic Sites.

At the celebration, the Historic Preservation team presented information to event attendees about the HDGP, featuring before and after photos of past grant recipients, the history of the program, eligible work items and how to apply for a Historic District Grant. The Silver King Coalition Mine Site restoration project, which was a FY25 Historic District Grant recipient and was also selected for the 2026 Historic Preservation Award, was also featured at the event. (See additional outreach initiatives discussed below in Analysis Section V).

(V) The HPB discussed additional near-term program update priorities to accomplish in 2026.

Develop a Communications Strategy

The HPB has prioritized the Duval Study recommendation to develop a Communications Strategy. In addition to launching the first annual Historic Preservation Celebration, Planning staff currently works to increase awareness about the program in the following ways:

- Updates are in progress to the HDGP webpage to provide basic information on

the grant program upfront, and a new page that features the before and after photos of past grant recipient projects.

- Implementation of the annual Historic Preservation Award.
- Historic Preservation Celebration

To expand on what is already being implemented, the Communications Strategy could include the following additional initiatives that would also be carried out by staff:

- Create an informational campaign that highlights the many ways grant funding can be used, including for restoration efforts that go over and beyond the minimum requirements for compliance, such as installing wood windows instead of aluminum clad windows, or funding to assist with a portion of the overall restoration scope of work.
- Distribute targeted mailings to encourage property owners to apply for a grant, prior to each annual grant cycle, or even quarterly.
- HDGP webpage updates and/or social media posts that feature historic preservation resources, a live 'counter' that displays current funding levels for each area, recent grant recipients with a short slideshow or storyboard that features the history of the Site, including information about the original homeowners from the historic mining era.
- Public service announcements and press releases to get the word out about the upcoming funding cycle.

Define metrics for tracking and reporting and establish an annual reporting cycle.

The Duval Study discusses the benefits of establishing metrics to track the grant program's efficacy and success. Metrics can include economic impacts, such as enhanced property values, tourism levels, and overall revitalization. The Study notes that an important metric to support an increase in funding levels is the amount of private investment that has been spurred by public dollars. Additional research would be needed to develop an appropriate set of metrics that can realistically be tracked, to measure the program's success.

The Study also calls for establishing an annual reporting cycle. Currently, Planning staff tracks grants that are awarded in each funding cycle to stay up to date on the funding account balances and to monitor progress of each grant project to completion and ultimate reimbursement. The current database is a spreadsheet; the recommendations from the April 5, 2023 HPB work session staff report, suggested creating a public-facing map showing Historic Sites that have been awarded a grant and include before and after photos.

An annual report could also track the total number of grant requests, versus those that were approved and denied, in each quarter, the requested funding amounts, as well as the type of work being funded. The annual report would be a helpful tool to garner

support for possible budget increases to adjust funding levels, as noted above. The annual report would be the responsibility of Planning staff and would be published on the HDGP webpage and presented to the HPB each year to provide an opportunity for the HPB to weigh in on the program's successes and possible areas for improvement.

Define a target list of investment priorities, including a database to track vacant and dilapidated Historic Sites.

The Duval Study recommends developing a list of investment priorities for the HDGP, that may include important Historic resources, such as Historic Mine Sites, distressed structures, restoring or replacing critical structural elements such as roofs and foundations, and incentivizing above-minimum-standard outcomes (form, materials, details).

Staff recommends the list of investment priorities include vacant Historic Sites and Historic Structures that are at risk of demolition, which the Planning Department already has on file. Not including Historic Mine Sites, there are at least 12 Historic Sites within the City that are vacant, unoccupied, or dilapidated. Five are within the Lower Park Avenue RDA, two are within the Main Street RDA. The remaining five are outside the RDAs, so a grant request for any of those sites would be disbursed from the General Fund; however, two of those sites are City-owned; one has recently been stabilized and another site has approved funding to stabilize this coming FY.¹ As of February 2026, eight of the 12 vacant Historic Sites had active applications for rehabilitation, though some have been on hold for several years.

If the Board is supportive, staff could conduct additional outreach to property owners of vacant and dilapidated Historic Sites and inform them about the HDGP. Staff could also maintain ongoing discussions with those property owners to determine if there is a path forward to preserving or rehabilitating the Historic Sites.

Inclusion of ski-era resources, such as A-frames, in the HDGP.

Currently, only Landmark and Significant Historic Sites are eligible for the HDGP, and ski-era dwellings are not. The General Plan recommends establishing a range of options to incentivize the preservation of documented historic resources associated with the ski era, such as A-frame dwellings from the 1960s and 1970s. The General Plan also recommends completing an Intensive-Level Survey (ILS) to document the ski-era resources present in Park City. The results of the ILS will provide further clarification on ski-era resources that could be eligible for grant funding in the future.

Further research is needed to define what qualifies as a historic ski-era resource and the potential for requiring property owners to dedicate a façade preservation easement as a condition of receiving a Historic District Grant.

(VI) Future policy topics to be considered in coordination with City Council

¹ The Spriggs Barn and the Accessory Structures near 360 Daly Avenue.

1. Revisiting lien requirements

Currently, recipients of Historic District Grants must enter into a lien agreement that requires the Grantor to repay the grant if the property is sold within five (5) years of the grant award within thirty (30) days of closing the sale of the property, in the amount set forth below, plus interest:

Payment of principal, plus interest of twelve percent (12%) per year, compounded monthly, accruing from the date of disbursement of the grant:

- a) within one year, 100% of grant;
- b) within the second year, 80% of grant;
- c) within the third year, 60% of grant;
- d) within the fourth year, 40% of the grant;
- e) within the fifth year, 20% of the grant

The purpose of the lien is to prevent a grant recipient from using HDG funds to make improvements to a Historic Site only to “flip” the property and make a profit from the improvements. The lien requirement has been a long-standing policy of the HDGP, implemented since its inception. The HPB discussed whether this policy is a disincentive to property owners interested in applying for a grant and also whether it is a necessary requirement. One HPB member opined that the lien requirement seems unnecessary, because regardless of who owns the home or if someone profits off the home, the grant funding is going towards restoration of a Historic Structure and that is ultimately most important. Another HPB member pointed out that the lien requirement could be a deterrent for some property owners, because unexpected life events may cause a grant recipient to have to sell their house prior to the five-year lien being lifted; the reasons for selling can vary and may not always be because they are trying to flip the home. Some HPB members thought that at the very least, reducing the lien term to 2-3 years and only requiring it for grants over \$10k or \$20k could be a good compromise.

2. Evaluating the cost share structure.

Currently, grants are awarded in an amount up to 50% of the total cost of the proposed project. Does the HPB find that this funding structure is appropriate or should alternative funding ratios be explored?

3. Requesting information on the intended Use of a Historic Site

During the previous work session, the HPB was conflicted on whether the HDGP application should ask for Information on intended Use; i.e. if the property will be owner-occupied, a long-term rental or a Nightly Rental. Some HPB members felt that it should not matter what the intended Use is, so long as the grant funding is going towards restoring a Historic Site, while other HPB members felt that it was not an appropriate use of taxpayer money to fund improvements for the benefit of a nightly rental. One

HPB member suggested that for future grant recipients, a nightly rental business license should be prohibited.

The Duvall Study delved into this topic, as part of the Stakeholder Interviews, insofar as whether grant eligibility should include a focus on whether the property owner is a primary owner or secondary owner. Interviewees acknowledged ownership has been trending more towards secondary ownership and that this distinction may greatly reduce the number of Historic Sites that would be eligible, which is not preferable.

Department Review

The Planning Department, Executive Department and City Attorney's Office reviewed this report.

Exhibits

A: 2018 Duval Companies Study

B: Grant Evaluation Scorecard draft update

Historic Grant Study

Park City
Planning Department

2018



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Foreword from the Mayor

Park City's historic architecture contributes to our sense of place while paying tribute to our industrial mining history. We have the opportunity to embrace our past through our historic preservation efforts while encouraging new architecture that is both of its time and paying tribute to our historical roots. Since 1987, the Historic District Grant program has incentivized private investment in historic preservation through a matching grant program that invests public funds to offset the often restrictive costs of restoration projects. The success of the Historic District Grant program's early efforts contributed to Old Town's transformation from a dilapidated ghost town into the thriving downtown that exists today.

Historic preservation has not only revitalized our downtown but spurred the local economy. Property values within Park City's two (2) National Register Historic Districts—the 1979 Main Street National Register Historic District and the 1984 Mining Era Residences Thematic National Register District—are some of the highest statewide. Additionally, historic preservation efforts have led to Main Street emerging as the cultural heart of our community. Small-scale commercial buildings such as the Old County Sheriff's Office at 509 Main Street have served as incubator spaces for start-ups while rehabilitation projects such as that at High West Distillery, formerly the National Garage, at 703 Park Avenue are embraced by local businesses that provide vibrancy to our local entertainment district.

Historic preservation has also contributed to City Council's goals for sustainability. For decades, the historic preservation movement has recognized that existing buildings are inherently greener when compared to demolition and new construction, particularly when considering their embodied energy and the carbon impacts generated by new construction. The Historic District Grant program encourages property owners to maintain and restore existing historic materials, reducing the demand for new milled lumber and demolition waste.

The buildings and sites that contribute to our community's historic fabric promote economic vitality, socially equity, and a strong, resilient complete community. Much of the restoration work to bring back the vibrancy of these structures is credited to the Historic District Grant program. This study is key to helping us move forward with restructuring the grant program so that it may continue to incentivize and promote historic preservation efforts in our community.

Sincerely,



Jack Thomas
Mayor
January 2014 - January 2018



Andy Beerman
Mayor
January 2018 - Present

Preface

As early as the 1970s, Park City recognized the need to safeguard its industrial mining history through historic preservation. These early efforts were initiated by local residents utilizing private investment to rehabilitate their historic miner's shacks and commercial buildings; however, by 1987, the City had established the Historic District Grant program to further incentivize preserving historic buildings through a collaborative public-private partnership. The grant program played a significant role in promoting historic preservation while also spurring investment. Park City's commitment to historic preservation has continued to prosper, and today the City has some of the highest property values in the state.

Since its creation in 1987, Park City's Historic District Grant program has been modified to continue to serve the needs of the community. Initially developed as a matching grant program to offset the costs of exterior restorations, grant requests were reviewed on an annual basis and small expenditures provided seed money for small projects. As the grant program matured and costs of construction increased, the grant program was reviewed on a "first-come, first serve" basis with grant distributions increasing to cover the costs of whole-house renovations. As grant awards increased, staff and the Historic Preservation Board began to question the effectiveness of this public-private investment.

Changes to government accounting rules (GASB) in 2014 to the Historic District Grant program led to the Park City Planning Department engaging Kjersti Monson of Duval Development, LLC in 2017. Ms. Monson has provided a detailed history of the grant program in order to aid staff and decision makers in understanding the history of the program. On November 16, 2017, Ms. Monson engaged leadership in an in-depth, robust work session with City Council and the Historic Preservation Board (HPB) to identify current priorities, conditions, and trends. The outcome of that discussion, as well as her community engagement, has served as the basis for her recommendations in this report to restructure the program going forward.

This report is intended to aid staff in considering options and priorities as we continue to revise and adapt the grant program to changing demands. Originally, the Historic District Grant program served as a catalyst to incentivizing historic preservation by helping to offset the costs of expensive exterior restorations; however, as real estate prices have increased and the trend in renovations has shifted from small-scale to larger, more intensive projects, the goals and priorities of the grant program have changed. As we move forward with restructuring the Historic District Grant program, it will be imperative that we find a way to balance these changing demands while still encouraging and promoting historic preservation in throughout the community.

Sincerely,



Bruce Erickson, AICP
Planning Director



Doug Stephens
Historic Preservation Board Chair

Acknowledgments

City Council

Andy Beerman, Mayor (2018-present)

Jack Thomas, Mayor (2014-2017)

Becca Gerber

Tim Henney

Steve Joyce

Lynn Ware Peek

Nann Worel

Cindy Matsumoto, Councilperson (2010-2017); City Council liaison to HPB

Historic Preservation Board

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Introduction

Park City has benefited culturally and economically from the community's longstanding dedication to historic preservation. The initial success in 1979 of achieving national designation for the historic Main Street district, followed by the creation of a dedicated commission in the early 1980s (the Historic District Commission, which in 2003 was restructured as the Historic Preservation Board) focused on preservation matters, led to purposeful and strategic public investments in restoration, enhancement, and interpretation.

It was the Historic District Commission (HDC) that designed and implemented the Historic District Grant (HDG) program.

the goal of incentivizing private investment through an injection of public dollars.

The overwhelming private response to the grant program over many years has resulted in hundreds of properties improved through not only investment of dollars, but through cultivation of knowledge and a culture of preservation.

Applicant property owners entered into purposeful dialogue with the City and the HDC as they explored their options and achieved compliance with guiding preservation policies. Newspaper articles highlighted and interpreted significant renovation stories, and in so doing served to celebrate the town's history.

Historic preservation has contributed to Park City's vibrant Main Street.



The character and charm of historic Main Street has contributed to Park City's appeal as a destination for both tourism and events. Economic activity has risen as a result of the community's policies and investments in preservation.

Because funds for the HDG program originated with the Redevelopment Agency (RDA) – which remained the funder for much of the life of the grant, there was an underlying framework of economic development thinking in the program's formation and administration. It was a dollar-for-dollar matching grant program designed as a public-private initiative, and was fully intentioned about

The Park City Historical Society and Museum recognized achievements in historic preservation with certificates and plaques. As more properties were renovated and became contributing properties, the downtown that was once considered “blighted” became one of the most desirable places to live in the country: a place of great character and a viable second home option for many.

The overwhelming success of Park City's historic-building investments, to which the Historic District Grant program has been a core contributor, has led to a different set of challenges and issues for the community. Policymakers are now wrestling with how to maintain affordability in housing, and how to retain local primary residents in light of the area's desirability as a second home and short term rental option.

The Historic District Grant program has been a major player in the growth and success of Park City as

a tourist destination and a valued community. The program has had a long and illustrious life, with great success over many decades, and it has evolved over time. The grant program of today is not the same as the program that was launched in 1987. Levels of funding, types of grants, and eligible expenditures have all evolved numerous times over the course of the grant program's life, and the City has sensed that the program must evolve again to adapt to new community realities and to reflect current City goals.

The purpose of this study, commissioned and overseen by the Planning Department, has been to document the grant's history, understand and contextualize the grant through the lens of current priorities and conditions as well trends through time, and to make recommendations for how to shape the grant going forward so that it can continue to contribute to both the character and the values of Park City.

History

ABOUT THE PROGRAM

In 1977, the Park City Redevelopment Agency was created with multiple goals in mind, most notably the improvement of Main Street. In 1979, as part of a burgeoning preservation movement, the City succeeded in having Main Street designated as a National Register Historic District, and city leaders envisioned enhancements to downtown that would contribute to Park City becoming a recreational and touristic destination.

Under the same leadership who sought the National Register designation, additional historic residential and historic commercial zoning was put in place by the City over the next couple of years, and historic properties were identified. In 1981, the Historic District Commission was created by ordinance and given broad powers within the historic districts, including authority over the review and approval of building permits, demolition permits, and shaping preservation policy.

Although there was significant interest in preservation and renovation in these early years, demonstrated through formal actions of government in ordinance and policy, there were very limited resources to undertake renovation of historic properties. A headline on December 18, 1986 in the Park Record declared "Renovation is expensive, but it may be the only hope." The article laments historic properties in limbo – homes that are too run down to be rented or inhabited, yet too expensive to fix.

In their first few years, the Historic District Commission explored several ways to incentivize restoration of historic properties by owners, including a revolving loan program, a matching grant program, and a no-strings-attached grant program. In March 1987, the HDC conducted surveys to identify homeowner needs pertinent to historic renovation activities, and a month later they presented their finalized proposal for the preferred incentive program: a matching grant program for historic renovations.

The Historic District Grant program, approved that spring, was part of a proposed 3-year, \$2.5 million initiative of the RDA to improve downtown Park City, including park, street, historic property, and parking enhancements. It was initially conceived as a three-year program, but was so successful and popular that it became institutionalized. In the first year, 33 projects were funded. In the second, 40, and in the third, 47. It was designed to be simple, with a one page application once a year, and the results were immediate and dramatic, leveraging an incredible private response of over 100 projects completed in the first 5 years (by 1991) with approximately half a million public dollars invested.

This pace heated up, with 224 projects reported complete just three years later, in 1994. Over the next two decades, hundreds of projects would be completed, and more than \$2 million would be invested, transforming Park City into a quaint destination with a strong sense of place and touristic appeal.

CHANGES & ADAPTATION

The goals and criteria for the program changed over time. From 1987 to 1991, the grant was for exteriors only – intended to fund “physical improvements to the outside of the building so all residents would benefit.” In 1992, foundation and stabilization work became eligible. Wiring heating and plumbing became eligible expenditure in 1995. By 1997, critical structural and foundation work became the major focus and priority of the grant.

Funding levels and the number of grants also changed over time. The initial \$5,000 residential maximum and \$10,000 commercial maximum became \$10,000/\$15,000 respectively in 1998, and during that same year a \$50,000 grant was offered for the first time. Grant maximums by type were eventually phased out and replaced by a common pool of allocated funds distributed to eligible and approved projects on a first come first served basis. This was one of the changes implemented under new grant governance put in place in 2003.

Changing Authorities & Governance

In July 2003, a sweeping set of actions disbanded the Historic District Commission and replaced it with the Historic Preservation Board, which was given more limited authority. During this time, the City also streamlined and restructured other parts of government leading to the departure or dismissal of three department directors: community development, administrative services, and leisure services.

The HDC had become the subject of ire by many who claimed that the

Commissioners held too much power to make subjective decisions, and that their authority was unchecked. Initial indications by elected officials that the Commission would be eliminated were not well received, however, and a restructuring by ordinance was pursued instead. In the restructuring, a new body was formed with diminished authority. City staff would now take on the authority to review and approve permit applications – a power previously held by the HDC. Demolition permit decisions in historic districts were shifted to an independent hearing board. The newly formed Historic Preservation Board would retain the authority to shape city policy on preservation, and would continue to oversee the grant program.

One of the first changes made to the Historic District Grant program was to end the annual application and award cycle and replace it with year-round applications and awards, a change which remains a popular characteristic of the program today. Although the change was a welcome one for homeowners, it had the potentially unintended consequence of reducing opportunities for annual press coverage of the program.

In past years, reporters covered announcements of the upcoming deadline, informational meetings were organized in the weeks leading up to the deadline, metrics from the previous grant cycle were published (including fun facts like which street had received the most investment that year), and human interest stories were featured about very significant properties or projects renovated that year. The annual cycle also inspired events and awards, for instance the Historical Society honoring the best projects with certificates and plaques at an annual event.

Adapting to New Rules

In 2014, changes to government accounting rules (GASB) resulted in a finding that the City could no longer fund capital improvement projects with Capital Improvement Project (CIP) funds for projects or assets the City does not own. Historic District Grants constituted capital improvement projects of this type.

The Historic District Grant program was originally housed in the CIP and funded with the Main Street and Lower Park Avenue (LoPA) RDA funds as directed by Council and included in the RDA resolutions. The funding questions raised in 2014 spurred broader questions about administering the program including a review of the application process and eligibility criteria, which reflected an interest in aligning the program more closely with other City priorities and objectives.

In 2012, City Council adopted the Park City 2030 Long Range Strategic Plan, and defined a set of priorities that reflected a significant policy focus on housing, transportation, and energy. The top priority identified was affordability. Staff and elected officials observed that Park City was becoming an expensive place to live, and, in particular, the historic districts were becoming popular second home communities where locals and primary residents were at risk of being priced out.

In a conversation with Planning Director Bruce Erickson, it was evident that this trend was perceived as not only a housing challenge, but a vibrancy challenge. In addition to promoting an equitable and complete community, Erickson is focused on keeping a local influence on and around Main Street and elsewhere,

noting that chains and franchises diminish the value of Park City as a place with a unique local flavor that tourists and residents both value.

To keep local influence vibrant, it's important to make it possible for primary residents, who comprise local business owners and the workforce that supports them, to remain in Park City, owning and operating authentic local establishments and not being driven out by rising costs of housing. For many reasons, affordable housing is a major initiative of the City and a value that policymakers and staff seek to embed in public dollars expended.

The HPB was asked to review recommended changes to the program, and to provide direction regarding the application process and policy for administration of the program.

At that time, the HPB approved the following changes, which began to reflect consideration of primary versus secondary homeowners and their eligibility to receive Historic District Grants:

- Houses lived in by primary residents (those houses in which the homeowner or a renter lives in full time) can be awarded up to 50% of

Locally owned and operated businesses contribute to the vibrancy and authenticity of Main Street. It's important to support primary residents in Park City.



Main Street is home to many unique local businesses and establishments. A sense of authenticity and local flavor is generated as a result of local influence and investment.

Recommended Changes Approved

Issues directly and tangentially pertinent to an update of the Historic District Grant program were fleshed out by staff with leadership at a Council working session on October 9, 2014. In a staff report to City Council, a recommendation was made for Council to review and adopt a new policy for the administration of the Historic District Grant program. Staff brought the matter to the Historic Preservation Board on November 5, 2014.

their eligible costs, while homes which are to be used as secondary homes or nightly rentals (i.e. not lived in by the primary residents) can be awarded up to 40% of eligible costs.

- Commercial properties continue to be eligible for up to 50% of construction costs regardless of ownership.
- An additional 10% may be awarded to those property owners committed to renovating a significant structure to elevate its status to *landmark*.

Staff sought and received a positive recommendation from the HPB to City Council on the proposed changes, and on December 4, 2014, staff recommended to City Council that they review recommended changes and adopt a policy for administration of the program.

In January 2015, staff submitted a report to City Council consistent with this recommendation, and Council supported staff recommendations. Throughout 2015-2016, staff considered ways to adjust the program in light of the funding question and adopted City priorities. On January 5, 2017, the following staff report was made to City Council:

"Since 1987, the Historic District Grant program has operated continuously with the support of City Council and the Historic Preservation Board (HPB). The Historic Preservation Grant program was originally housed in the Capital Improvement Project (CIP) and funded with the Main Street and Lower Park

Avenue (LoPA) RDA funds as directed by Council and included in the RDA resolutions.

With changes to the government accounting rules (GASB) in 2014, the City can no longer fund capital improvement projects with CIP funds for projects or assets the City does not own such as properties awarded grants through the Historic District Grant program. In 2015, staff revised the Historic District Grant program in order to reflect changes to the GASB.

Due to the concerns and feedback we received from the Historic Preservation Board (HPB) in early 2015-2016, staff has been analyzing ways in which to restructure the grant program."

The Planning Department engaged Duval to document the grant's history, understand and contextualize the grant through the lens of current priorities and conditions as well trends through time, and to make recommendations for how to shape

the grant going forward so that it can continue to contribute to both the character and the values of Park City. This report is the outcome of that engagement, and is intended to inform staff and policymakers as they consider options and make decisions about the grant program in its next iteration.

Analysis

An analysis of history and trends was necessary to inform the process of defining the next iteration of the Historic District Grant program. Considerations included Park City land value trends, a study of buying power of grant dollars over time based on costs of construction, ownership trends, economic impacts, and City values and priorities.

SOURCES & METHODS

For this study, decades of parcel data from multiple sources was utilized, including Summit County, the City of Park City, and the US Census. Additional non-parcel data sources include the ENR Construction Cost Index, City staff reports, adopted plans and policies, and news archives (Park City Record) spanning 1979-2004. Finally, direct engagement

preservation, and the grant's performance over time. A summary of findings follows.

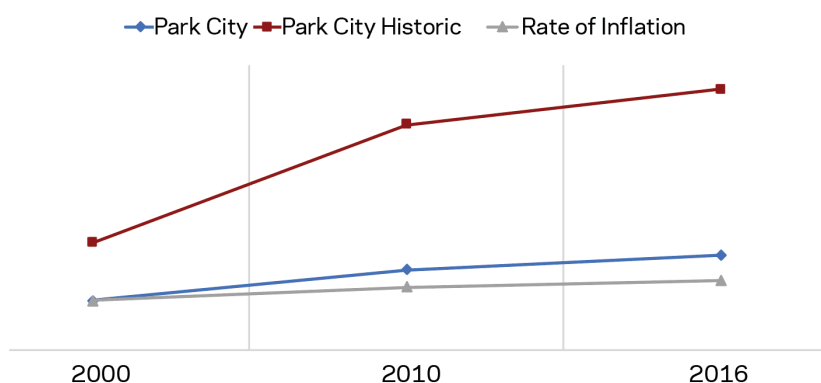
Based on sample data, Park City property values have risen more and at a faster rate in historic districts than in the city generally. 1990 data was too incomplete to analyze, but the trend of a widening gap is legible in an analysis of data from 2000-16..

The City completed a housing assessment and plan in 2012 aimed at addressing growing challenges of affordability, and these issues have been raised by both City staff and stakeholders as an important consideration in determining how to shape and administer the grant.

Park City's investments in historic preservation, as well as the success

Property values in Park City have risen faster than inflation, especially in historic districts.

LAND VALUE \$ / ACRE



A random sample of parcels was analyzed, showing the value of land per acre over a sixteen year period in Park City. Values in historic districts were greater and rose faster than the city-wide average.

was undertaken, including stakeholder interviews, a facilitated workshop with leadership and a technical advisory meeting with staff.

the city has seen as a ski and resort destination, have created lasting value and appeal, which brings both benefits and costs.

FINDINGS & OBSERVATIONS

Our analysis has considered property values, income, ownership trends, economic impact of historic

Because land value in Park City has outpaced the rate of inflation over decades, and land value in historic districts has risen at an even greater rate than Citywide, affordability and

equity concerns have now become a focus of policymaker attention.

Wealthy Households a Large Share of Total

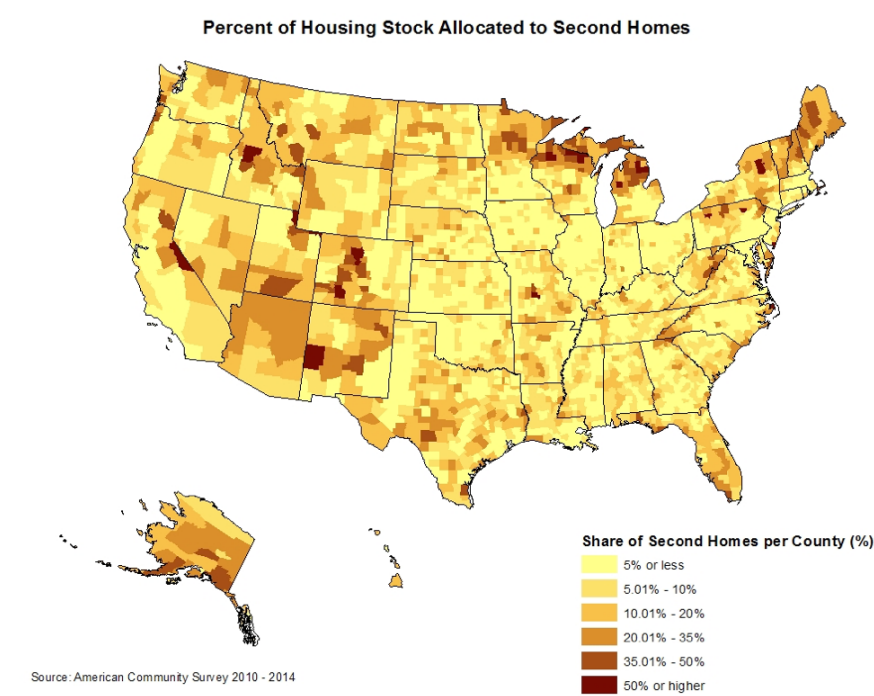
Park City’s median household income in 2015 was \$105,102, which is almost twice the US median income of \$53,889. It also exceeds the median income in the state of Utah (\$60,727) and Summit County (\$91,773). The median household income in Park City grew from \$90,567 in 2000 to \$1,050,102 in 2015, outpacing inflation by over 15%, while the US median household income shrank over that same period from \$79,542 in 2000 to \$53,889 in 2015.

Households with income over \$200,000 per year comprise over 25% of households in Park City; by comparison, households earning over \$200,000 per year make up just over 5% of all households in the U.S.

Affordability of housing is a major concern of Park City leadership, who commissioned a housing study in 2010 and have since taken steps to make the issue a policy priority. Deeper consideration of this issue is beyond the purview of this report, but it is included as an observation due to the interest of some stakeholders in addressing affordability goals in the expenditure of public dollars, including grant dollars.

Secondary Homeownership is a Factor

The National Association of Home Builders (NAHB) estimated from American Community Survey data that in 2014, the share of second homes among the entire U.S. housing stock was 5.6% . For those areas with robust second home markets like Summit County, there are pros and cons to having a much higher rate of non-primary owners. In a 2011 analysis , the Summit County



More than half of residences in Summit County are second homes.

With access to scenic beauty, skiing and recreation, Summit County has become a popular second home market.

Assessor found that more than half the homes in the County were in non-primary ownership. This places Summit County in company with other major second home markets, though still not breaking into the range of the top ten counties which range from 62% (Dukes County, Massachusetts) to nearly 80% (Hamilton County, NY) second homes.

According to the Assessor, the tax benefits garnered by the presence of second home owners are desirable, but are countered for some by a sense of diminishing community cohesion.

Two themes pertinent to second home ownership rates have been specifically identified through outreach and engagement. One is about maintaining housing affordability so that Park City remains a complete community with a strong sense of local identity. The other is about ensuring that the City retains its authenticity and unique character through the viability of locally owned and operated businesses. If the owners of these vibrant establishments can no longer afford to be a resident of Park City, they could be lost and replaced by establishments with less interest in reflecting local identity.

These issues are a consideration of the Historic District Grant program design inasmuch as the City and the Historic Preservation Board have directed that ownership type should inform levels of eligibility for grant support.

Historic Preservation has Economic Impact

PlaceEconomics, with the University of Pennsylvania, prepared a study for the Advisory Council on Historic



Authentic locally owned businesses are an important part of Park City's character and identity.

Preservation (AHCP) in 2011 (updated in 2013) called Measuring Economic Impacts of Historic Preservation. The study proposes a number of metrics for use in placing economic value on historic preservation, including:

- Jobs / Household Income
- Property Values
- History/Culture Tourism
- Environmental Measurements
- Downtown Revitalization

The study outlines the definition and purpose of such metrics, as well as potential methods of analysis. Detailed work on the subject of economic impact is beyond the scope of this study, and yet the economic impact of historic preservation has been a substantial part of Park City's story and is important to observe in this context.

Metrics are a Valuable Tool

Leadership may wish to pursue the development of metrics for Park City to guide future policy and to test several hypotheses that can be made based on a more casual analysis of the facts:

- Jobs have grown along with businesses, events, and resorts in Park City, and the City's investment in historic resources like Main Street has contributed to that.
- Property values have grown in part due to historic investments, with values in historic districts above the City average.
- Tourism has boomed in Park City; natural resources and character-building historic resources are both major contributors to Park City's appeal as a destination.
- Restoration of older properties contributes to sustainability with building efficiency and compact development benefits. Metrics for environmental/historic preservation outcomes could be developed.
- Downtown revitalization was the original purpose that drove the RDA and HDC to pursue public investments in both infrastructure and historic preservation in the 1980s. That trajectory has transformed historic Park City and created economic value.

Buying Power Outpaced the Cost of Construction

The average cost of construction nationally, according to the ENR Construction Cost Index (CCI), has risen by 2.37 times from the time of the grant’s launch in 1987 to the current day, meaning in short that it has become more expensive to build things. In 1987, the CCI was \$4,406 and by 2016 the CCI had risen to \$10,443.

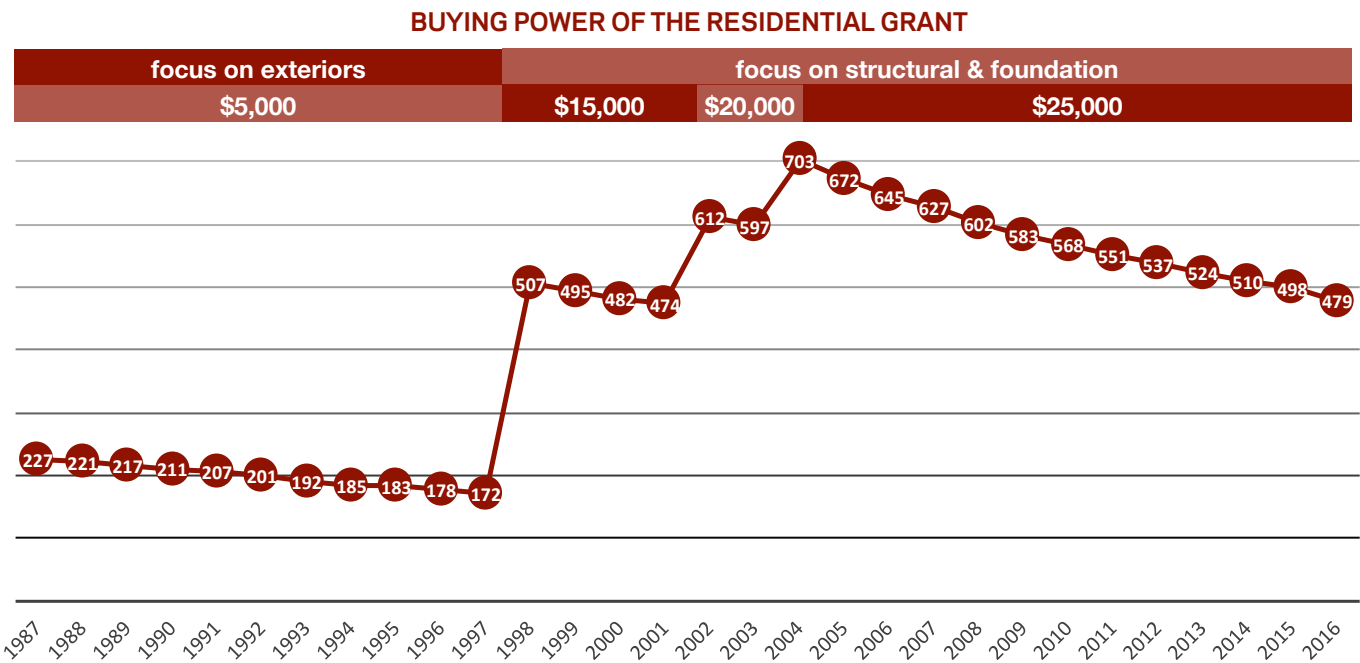
Many stakeholders who were interviewed during the engagement process identified *rising construction costs* as a reason for the diminished perceived relevance of the grant program. However, the rise in construction costs over time was matched and exceeded by a more significant rise in the buying power made possible by the rising value of grant awards over time.

An analysis was conducted of historical data for the grant program and the “buying power” it has provided. Grant awards were logged over time based on City data and newspaper records. The maximum allowable grant value for each year was recorded, and that was converted to “buying power” for that year using the ENR Construction Cost Index data for the same year.

It’s clear that each grant dollar can buy a certain amount of materials and labor in a given year. What was less clear prior to the analysis was whether the grant’s buying power had diminished over time due to construction costs.

The data demonstrates that the buying power of the maximum grant declined over the first decade, but then rose at a higher rate than construction costs due to grant

Rising construction costs were matched and exceeded by the rising value of grant awards.



“Buying power” is a unit of labor hours + materials that the maximum grant in a given year could buy based on the ENR Construction Cost Index for that year. The chart shows, for instance, that from 1987 to 1997, the buying power of a \$5,000 grant steadily decreased, but when the maximum award grew to \$15,000 in 1998, buying power was more than double what it was in the initial year of the grant.

Average grant size has risen slightly over time.

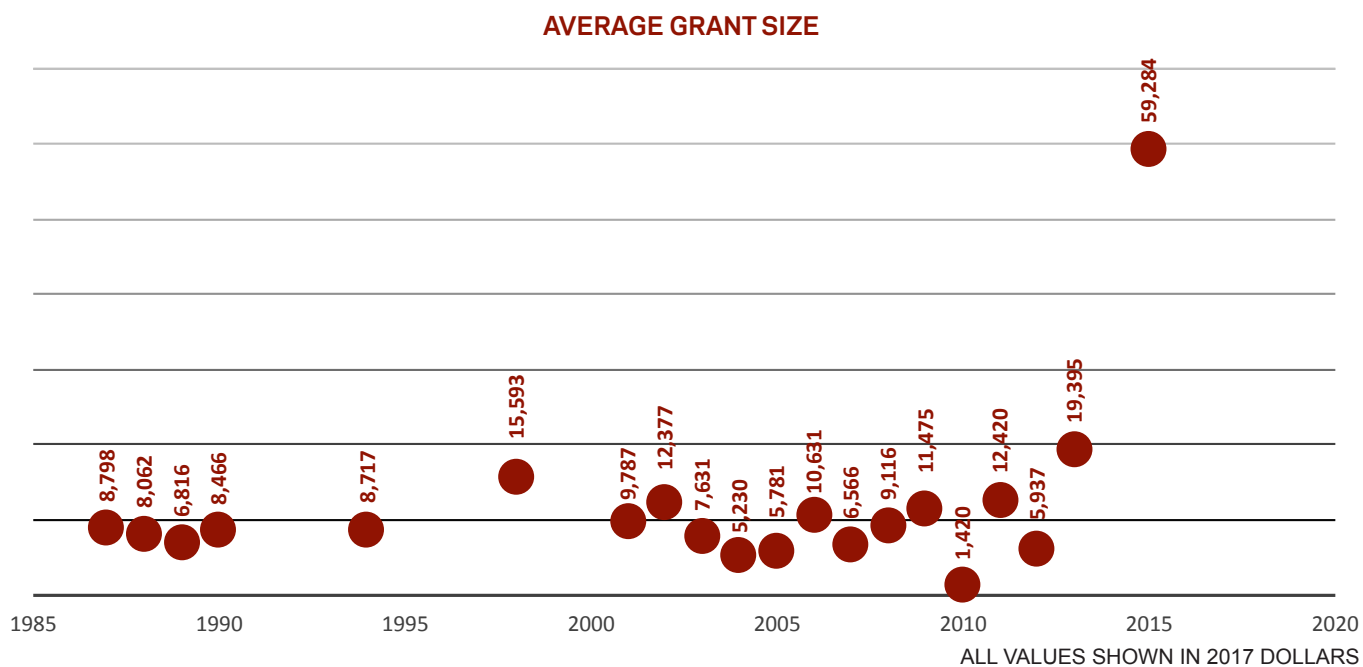
awards becoming larger over time. For approximately the first decade of the grant's life, residential awards were capped at \$5,000 and commercial at \$10,000. Both residential and commercial caps were raised to \$15,000 in 1988, then raised again in the early 2000s to \$20,000. The current maximum award that the HPB can approve is \$25,000, though larger awards can be given with approval of Council. The buying power generated by these "raises" over time have enabled residents to buy more labor hours and materials in the latter life of the grant than they could in the early years - even accounting for the rising cost of construction. These findings are inconsistent with the prevailing assumption that the grant had more buying power in its early years. It would be more accurate to say that there were a larger number of grants

awarded in the early years, and that the impact of the grant to numerous properties was more widely known and publicized.

Average Grant Value Rose Slightly Over Time

The average grant size is the total dollars awarded for a given year divided by the number of grants awarded, adjusted to 2017 dollars. For those years between 1987 and 2016 where data was available about both the *total annual grant dollars awarded* and the *total number of grants awarded*, an average grant size was discernible.

Because early years are characterized by large numbers of grants whereas later years have few total grants, there is more deviation from year to year in later years.



Average grant size was analyzed for all years where the total value of grant money awarded and the total number of grants awarded were both known. It is shown here with all values adjusted to 2017 dollars. There is more deviation in recent years due to far fewer grants being awarded, and there is a significant outlier in 2015 when a single large grant was awarded..

Number of Grants Dropped in 2003

In 2003, significant structural program changes to governance and administration occurred which may have, with other factors such as the 2002 Winter Olympics, dampened the number of applicants to the grant.

First, the governing body was restructured: the Historic District Commission was dissolved due to perceptions of overreaching authority, and replaced by the Historic Preservation Board. Second, the grant ceased to be administered as an annual competitive process and became a year-round application.

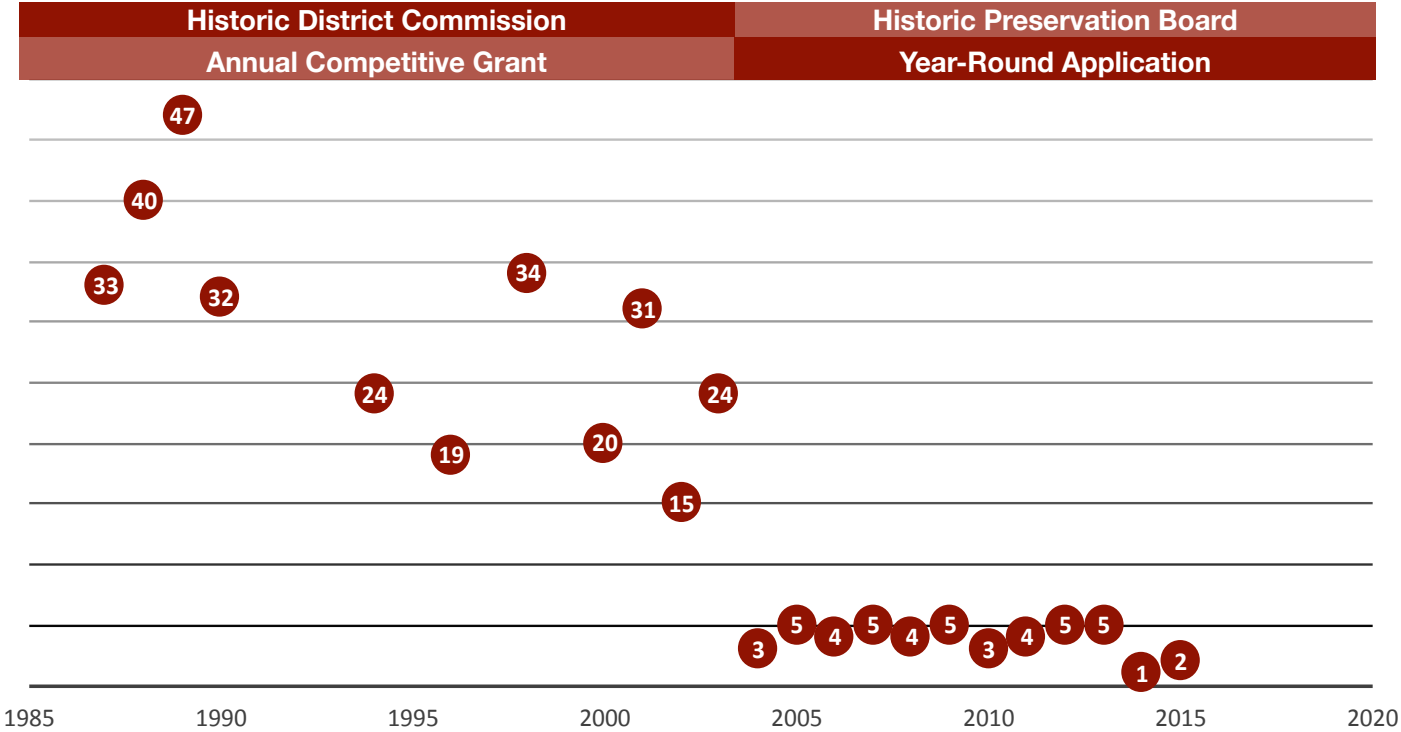
After 2003, it appears the grant became less visible to the community. The pre-2003 program had, by virtue of the nature of a competitive award, driven a community information and news cycle. Informational meetings would take place leading

up to the deadline; detailed human interest stories would take place about projects and results from the last year's awards; and the newspaper would publicize the list of winning properties along with some analysis such as which streets garnered the most investment. All of these touchpoints provided fertile ground for community dialogue and preservation awareness.

Historically, the grant has leveraged significant private investment in hundreds of properties within the historic districts, and through regular coverage in the newspaper, it has raised the public consciousness about the value of the community's history, resulting in a growing sense of common purpose and commitment to invest. The grant has raised the perceived appeal of historic districts and their desirability for additional private investments, including business, tourism, and programming investments.

The Historic District Commission administered an annual competitive grant program until 2003. Thereafter, the Historic Preservation Board and City of Park City have supported year-round applications.

TOTAL NUMBER OF GRANTS AWARDED ANNUALLY



The number of grants awarded annually dropped in 2003 and remained low. Also in 2003, which is also the year that two significant changes in grant administration occurred: the restructuring of the governing board and the shift from an annual competitive cycle to year-round applications.



Engagement

STAKEHOLDER ENGAGEMENT

Interviews with Program Users

Assessment of Grant Program Through User Experience Interviews

A selected group of users were contacted and interviewed about their direct experience with the program.

One of the most useful sources of information for any study is community engagement. For this study, valuable insights were drawn from stakeholder interview subjects, “goals workshop” participants, and technical advisors. A summary of engagement outcomes follows.

STAKEHOLDER INTERVIEWS

Eleven stakeholders were contacted for interviews about the Historic District Grant program, resulting in 7 interviews being conducted over two weeks in March 2017. Interview subjects represented differing expert or firsthand perspectives on the program, and included grant recipients, an architect, representatives of stakeholder organizations such as the Chamber of Commerce, the Park City Historical Society & Museum, and the oversight body, the Historic Preservation Board.

Interview Questions

Interviewees were asked the following seven questions:

1. What is your personal experience with the Historic District Grant program?
2. Do you and your peers have a generally held perspective on the Historic District Grant program? If you were to take the temperature of peers on preservation matters, and specifically grants to properties for restoration, what would the general feeling be? Is it your opinion that the general view of you and your peers is shared by most people?
3. Have you experienced a process with the Historic Preservation Board? What are your thoughts about the role of the HPB?
4. What do you think is necessary for the City to understand in crafting revisions to the Historic District Grant program? What's most important and successful about the program and its goals, and what may need another look?
5. What criteria do you think are most important to include in evaluating the eligibility of an applicant?
6. Are there any difficulties to be aware of? Are there any ways that you feel the program has been mis-used in the past?
7. Can you share a success story about the grant?

SUMMARY OF STAKEHOLDER OBSERVATIONS

In answering each of the questions posed, common themes were touched on among interviewees. Themes included an assessment of the program's value, comments on the process, and ways that the program could be improved. A summary of "interview takeaways" on these broad themes follows.

Perceived Value of the Historic District Grant Program

- The program is valued by those that have used it – however, most people don't really know very much about the program.
- On the commercial side, property owners are one step removed from the issue. Business owners have a stake in the character of Main Street, but they are renting – the property owners are one step removed.
- Preservation is a commonly held value, but issues like affordability and transportation are potentially more pressing topics today.

Success of the Historic District Grant Program

- It was very successful 20 years ago when it supported local people trying to invest in the community and build their own equity as residents. Created a sense of personal pride and investment.
- It is still useful, but due to rising construction costs, it's not as much of a carrot as it used to be.
- It is still useful, but due to rising home values and changing demographics (rising numbers of millionaire second home owners in Old Town), the grant is not serving the purpose it once did.
- It contributes to historic character, which is very important to people. Historic home tours and historic home dinners are very popular.
- Preservation contributes to sustained stable property values and economic value for tourism.
- One inadvertent negative outcome of the improved historic district is that locals get pushed out due to high property values and nightly rentals.

Ease and Value of Participating in the Program

- Homeowner interviewees who had participated directly in the program thought it was worth it, and stated that it was not an unreasonable process to go through for their project.
- It was observed that many property owners of historic properties would view the grant amount as inconsequential, and could take it or leave it.
- Many people either don't know about the program or don't bother to apply because of the sense that it will be a lot of work.
- Professionals who had some history with the program cautioned about avoiding leaving room for subjective decision-making by governing entities.
- It is perceived as a benefit to homeowners that grants are awarded as reimbursement at the end of the process, since there are often unanticipated costs along the way.

SUMMARY OF STAKEHOLDER RECOMMENDED IMPROVEMENTS

Interviewees provided detailed recommendations about program goals, grant award amount, criteria/eligibility, and administration. Their detailed comments follow.

Definition of Goals

- Restate the goals of the program in a way that's relevant to today. There is a perception that the people who own historic properties are well off and don't need grant assistance.
- The original goal was to support Park City residents and to restore homes in need of work that otherwise would not be restored. There is general agreement among interviewees that this dynamic has changed along with the demographics and property values in Old Town.
- Enhance and sustain Old Town in a way that contributes to the city's economy, increasing tourism and economic value.
- Ensure that Old Town retains its character by preserving historic structures, and offering interpretive opportunities.
- Focus the dollars on incentivizing higher levels of quality than are required by minimum compliance, for instance, incentivizing premium wood windows rather than standard, by making windows a grant eligible improvement.
- Using the defined goals, make a clear framework for decision-making by City staff, the HPB, and users.
- Clearly stated goals and criteria should be defined to manage homeowner expectations and avoid the perception of subjective decision-making.
- A point system should be developed.
- Staff and commissioners should be trained.

Size of Grant

- There is a common perception that the grants are small and inconsequential to historic property owners. There was consideration of making grant awards larger, reflecting today's real costs and home values.
- Typical grant amounts currently available will not get any project over the "but for" hurdle. Most people doing these projects today are not going to be swayed by a \$10,000 grant. One respondent suggested that \$40-\$50,000 would be a meaningful grant level.
- The grant is valued by homeowners doing smaller projects like roof work, or those doing the work themselves who are less impacted by rising costs of construction.
- It was suggested that a case could be made for increased public investment by measuring the amount of private investment that has been spurred by public dollars.
- There was consideration of making the grant "smarter" to be more of an incentive to achieving specific "above-minimum requirements outcomes."
- Doing things above minimum requirements costs more for homeowners, and having an incentive to do so would drive higher quality outcomes.

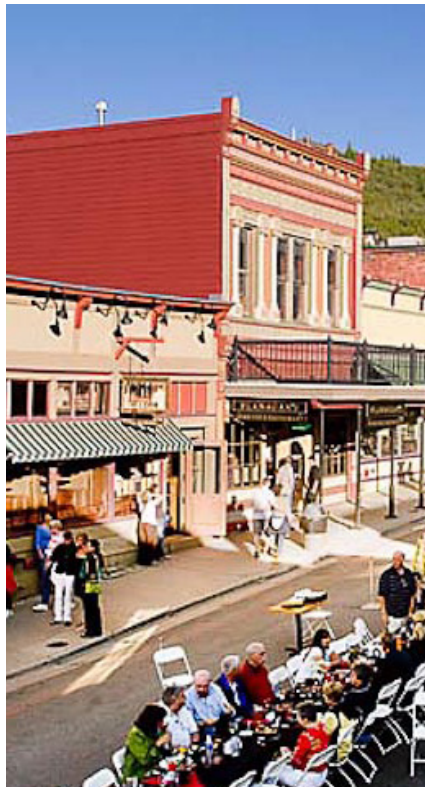
Criteria

- There is a general sense among interviewees that awarding grants to those who do not need public assistance to make their renovation feasible is not ideal, but there is little consensus about how to address the issue.
- Some interviewees felt that although there may be a perception issue, the grant is not a social program and the real goal is to save and improve historic stock – so who owns the property is a secondary issue that should not drive criteria.
- Other interviewees felt differently, and discussed the possibility of means testing as criteria for eligibility. Some observed that the grant is simply a non-issue in the calculus of a second home buyer who is planning a million-dollar renovation, so perhaps trying to “tune” the grant based on this factor isn’t going to be impactful.



Eligibility

- The City could identify homes that remain to be restored, assess the kind of work they need, and seek to understand why owners are choosing not to do the work. This may help to define criteria, and to design the grant to assist.
- Staff seek clear criteria for eligible types of work. Should the focus be on work that contributes to saving a building like foundation, structural, or roofing? Or the opposite: work that incentivizes above-minimum standard details, like windows and trim? Should tear-downs that are reconstructed be eligible?
- Should the grant privilege primary over secondary owners? Or focus on property restoration, with no preference for characteristics of ownership? It was observed that a lot of locals are moving out of Old Town, and that the community has changed in ways that the grant will not reverse.



Administration

- Interviewees encourage the City to make sure resources are available year-round.
- Include as much staff-level decision-making about eligibility and so on as possible to avoid uncertainty going in to the Historic Preservation Board process.
- Establish clear, specific language defining what decisions need to be made by the HPB (and conversely, what is not the purview of the HPB, including design), and establish an objective path to making decisions.
- Provide training to HPB members on their specific authorities, and on the Park City Historic District Guidelines that they are to apply to their decisions; also, ensure that there is common understanding by Board members of the fact that the National Park Service guidelines are different, more stringent, and not required.

Park City residents with direct experience of the grant program were interviewed and provided detailed feedback.

STAFF ENGAGEMENT

Technical Advisory Meetings

Issues Identification with Staff and Technical Experts

Two technical advisory meetings were held with staff, with one focused on funding and one focused on administration. Expert staff were engaged with detailed questions that emerged out of research and stakeholder engagement. Staff contributed their insights and observations about the grant program.

The following issues, which should inform the design of the next iteration of the Historic District Grant Program, were identified.

ISSUE 1: Funding Sources and Dynamics

The grant funding source has shifted from capital to operating dollars, so rollover is no longer an option. Budgets are on a one-year cycle, and unexpended funds cannot be retained for use in the next budget year. This presents a challenge because the time between the grant being awarded and the funds being dispersed is more than one year. The result is uncertainty and risk with regard to how many grants are outstanding at any given time, and when payments will come due.

Because the program allocation is a set amount, which does not change from year to year based on, for instance, projected distributions; and because no rollover is possible; and because funds are not pooled but split into three buckets tied to specific geographies; and because a single grant can be a fairly substantial chunk of allocated funds for an eligible area; it is hypothetically possible that all funds could be expended in one area very early in a given year, with other grants coming due and no resources to pay them. This uncertainty is currently being managed by staff, but additional steps could be considered to mitigate the risk. Factors to consider in administering the grant include:

- The grant funding source is operations, not capital
- There is no rollover
- The period between award and distribution is likely 2 years
- Grant sizes are growing
- The total program allocation is currently split between three buckets

It is additionally relevant to note that the Main Street RDA will expire in four years. Staff is aware of this and will work with policymakers on an extension. They are already anticipating what needs to be done to anticipate and manage grants that will be coming due during a period of potential uncertainty.

ISSUE 2: Alignment with City Goals

The mission and principles guiding the grant should be aligned with city goals and values. For instance: How could the grant encourage consideration of affordability? Could assistance with the cost of renovation help some owners to preserve naturally occurring affordable housing by mitigating the need for debt service on loans that could drive rents up?

Projects with the potential or intention to contribute to city goals through enhanced outcomes could be identified in the following ways:

- at Design Review;
- through a checklist on the application; and,
- with a scoring system that rewards required elements as well as including the opportunity to earn bonus points for “bid enhancement”

ISSUE 3: Competitive Grant Cycle

Staff and technical advisors endorsed the notion of a regular schedule of application deadlines throughout the year that would introduce merits and competition to the selection. Multiple deadlines per year would be necessary considering the fluidity of project starts.

A regular cycle of deadlines and decisions would have multiple benefits. (1) It would be easier for staff to administer; (2) it would lead to applications competing on the merits; (3) applicants in competition would be more incentivized to be responsive to City goals by identifying and delivering enhanced outcomes; (4) it would be newsworthy and therefore give the city an opportunity to communicate on a regular basis about program goals and successes. This kind of communication can build a sense of community through greater awareness of the town's historic places and assets.

ISSUE 4: Grant Administration

Staff expressed concern that current eligibility requirements may not provide sufficiently specific tools to ensure that grant dollars are not inadvertently subsidizing projects that don't need assistance or would happen anyway as a matter of course with existing regulations. Staff and policymakers want to ensure that funds are used wisely, in a targeted fashion, to implement City goals. This will require a more robust framework governing eligibility and requirements.

Options that were suggested to ensure successful administration of funds include the creation of specific criteria that lead to more targeted grants, potential means testing, scoring for enhancements, and even adopting the practice of promoting and implementing an "investment target" for each grant cycle.

Technical advisory meetings informed the study and recommendations. City staff identified issues and provided insight into grant funding and administration.



Park City staff provided technical, budgetary, and administrative insights.

LEADERSHIP ENGAGEMENT

Elected Officials & Historic Preservation Board

Mission, Values and Goals Workshop with Leadership

An engagement workshop was held with the Mayor, City Council, and Historic Preservation Board, which oversees the grant program. Leadership was engaged with questions intended to shape the mission and values for the future of the grant program.

On November 16, 2017, Park City planning staff and their consultant conducted an engagement workshop with the Historic Preservation Board and Mayor at the Council's regular meeting. After a presentation summarizing the grant's history, takeaways from stakeholder outreach, and draft recommendations for the next iteration of the grant program, the Board and Mayor participated in an interactive discussion focused on three topics: Mission and Values; Outcomes; and, Principles and Criteria for the grant. The meeting was noticed, and was open to the public, and the presentation and engagement exercise were recorded.

Participants' comments were noted by scribes on large notepads. Also, participants filled out and submitted worksheets, which were scanned and saved. The following fill-in-the-blank statements were the basis of discussion.

Engagement Statements

Participants discussed Mission, Values, Outcomes, and Principles/Criteria for the grant. They considered these fill-in-the-blank statements:

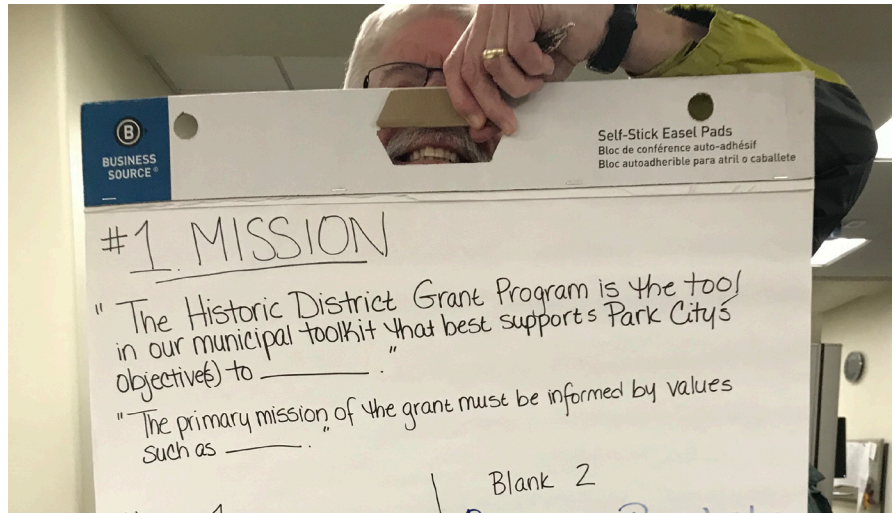
- "The Historic District Grant program is the tool in our municipal toolkit that best supports Park City's objective(s) to ____." (Mission & Values)
- "The primary mission of the grant must be informed by values such as ____." (Mission & Values)
- "The primary outcome of the grant should be ____." (Outcomes)
- "Pursuing enhanced outcomes for the Historic District Grant program does/does not make sense because ____." (Outcomes)
- "This grant could help Park City meet these additional goals: ____." (Outcomes)
- "Determinations for applicant eligibility should include consideration of ____." (Principles & Criteria)
- "The best way to make sure that we are targeting investment in areas consistent with our mission is to apply criteria such as ____." (Principles & Criteria)

Elected and Board leadership participated in an interactive working session focused on the mission, values, and desired outcomes for the grant program.



Engagement of leadership occurred in a regular Historic District Preservation meeting in Council Chambers. It was a noticed public meeting.

Workshop participants were given prompting statements to spur discussion about mission, values, and criteria for the next iteration of the grant program.



Park City Historic Preservation Board members and elected leadership participated in a facilitated discussion focused on mission, values, principles and criteria for the future of the grant program. Participants provided observations rooted in current policy focus areas and adopted City goals and objectives.

High Level Takeaways from Leadership Engagement

- The **mission** of the grant program should be to tell Park City's story, promote community knowledge and engagement, and make a meaningful difference.
- The **values** that should inform the next iteration of this grant program include our commitment to an affordable, complete community, responsible and impactful stewardship of public dollars, and an authentic sense of place.
- The most important **outcomes** of the grant are (1) to make the story of Park City visible and present, through all the town's periods of significance; and (2) to make a proactive and positive difference in the lives of our residents and businesses. Ideally, the grant should be applied to projects or outcomes that may not happen but for the investment.
- In addition to primary outcomes, the grant should seek to reward applications with the potential for achieving **enhanced outcomes**, including those that build community identity by contributing to a greater awareness of history; contribute to affordability and social equity; and support a quality Main Street.
- Applicant **criteria** should include a preference for full-time residents of Park City. The grant should also consider ways to target investment through project criteria supporting authentic mass, form and scale; and above minimum compliance in material selection and details.

Detailed Comments from Leadership Engagement: **MISSION >>****The grant should contribute to telling the story of Park City.**

- Preserve historic character, neighborhood character, and historic building stock.
- Save historic structures from neglect
- Tell the story of buildings, and the people who lived in them.
- Build knowledge in the community about the town and its history.

Promote community knowledge and engagement.

- Get the community involved and engaged through greater awareness.
- Don't just regulate. Encourage qualitative outcomes.
- Instead of focusing on regulation and minimum compliance, focus on encouraging better restoration.

Use public dollars responsibly. Make a difference.

- Define how and where the grant can make a difference.
- The City has changed since the grant was introduced in the 80s. This grant level is not a difference-maker to investor-owners. Residents for whom it is significant are fewer now.
- Where can this grant play a role in today's environment?
 - o Public buildings
 - o Distressed properties
 - o Roof repairs and smaller repairs
 - o Large remodels
 - o Historic Mine structures

Detailed Comments from Leadership Engagement: **VALUES >>****We want a complete community, with permanent residents, locally owned businesses, and affordability.**

- We want residents permanently living in these houses.
- Support local people; they are the ones who own and operate authentic local businesses.
- Support residents who want to preserve their family homes.
- Support residents who want to stay in town.

We want to target the grant dollars where they can make a difference.

- *Impact Investing*: The grant should make a difference in large project feasibility, even if it's just one project per year (impact investing rather than "spreading peanut butter"). Make sure we can respond to those big opportunities.
- *Incentivize Better Outcomes*: Inspire more authentic restoration by incentivizing recipients to exceed minimum standards for windows, corner boards, roof details, scale, and materials.

We want the physical environment of our community to tell our story, and to feel authentic.

- The grant should support telling our story, and should take an interest in mining structures, as well as family and community history.
- The grant should contribute to our community's authenticity.

In the discussion of outcomes, leadership focused on two key objectives:

(1) To make the story of Park City visible and present, through all the town's periods of significance.

(2) To make a proactive and positive difference in the lives of our residents and businesses.

Detailed Comments from Leadership Engagement: **OUTCOMES >>**

We want to make our community's story visible.

- Contribute to the story of Park City with restoration that reflects the town's unique story.
- Reveal the Mining legacy: We can tell a 150-year history, unlike many mountain resort towns. That's a differentiating feature.
- Tell the whole story; ensure we're revealing all of the periods of significance
- Enhance Main Street.

We want our investment to matter.

- Don't throw money at something that doesn't move the needle.
- We can make a difference on mining legacy.
- We can make a difference with targeted big investment.
- We can move the needle on details and quality exceeding minimum standards..

The grant should fully support our values.

- Outcomes should fully support the values identified through discussion and outlined above.

We want to take care of our community and be proactive.

- Owners of distressed homes should be made aware of the opportunity for assistance (homes needing new roofs, structural work, stairs, and so on). Social equity and residents in need should be a consideration.
- Commercial buildings and businesses that contribute to telling Park City's story should be proactively approached. Support businesses and properties (for instance on Main Street) through facade improvement grants to assist with visual narrative.

Build a sense of community by expanding historical awareness and recognizing good people doing good things.

- Create awareness of town, district, neighborhood, and street narrative and history.
- Recognize and acknowledge people doing great things. People take a lot of pride in their homes - make sure we're telling their stories (newspaper, awards and recognition) and celebrating the work they're doing to contribute to the town.

Contribute to affordability and equity, and be inclusive.

- Find ways for the grant to contribute to social equity.
- Ensure that the grant contributes to preservation being understood as an activity that is not just for the wealthy - it should be inclusive.

Leadership seeks to keep the grant true to its core mission of preservation, while making it responsive to new City goals and priorities.

"We need to tell Park City's story."

"We need to take care of our community."

"We shouldn't throw money at something that doesn't move the needle."



Unlike many destination communities, Park City has an engaging history that stretches back hundreds of years. The community's history as a silver mining town is an important part of the town's, and its residents, identity.

PHOTO COURTESY OF PARK CITY MUSEUM & HISTORICAL SOCIETY

Detailed Comments from Leadership Engagement: **PRINCIPLES & CRITERIA>>**

Applicant eligibility criteria should support our goals and values.

- Ownership type. Participants all agreed that preference should be given to full-time residents.
- There was discussion but not affirmation of applying means testing to ensure that grant dollars are awarded to applicants in need of assistance.

We should target our investment.

- Our public investment should contribute to the authenticity of mass, form, and scale.
- We should seek above minimum compliance in material selection, details and form.

We should use the grant for its core purpose.

- Consensus about supporting the core mission of restoration and preservation, and "telling Park City's story," was strong.
- There was not consensus about using the grant program to influence trends having little to do with preservation, such as nightly rentals.



Observations

Summary of Observations from Analysis and Engagement

A number of high level observations were derived from a review of the grant's history (as documented in news archives), trends discernible in an analysis of City and County data, and themes identified through outreach and engagement with staff and stakeholders.

1) The primary objective of the grant is the restoration of historic property.

The grant should focus first and foremost on what it was designed for: restoration of historic properties; but because there is a strong desire for all public dollars spent to contribute to adopted City Council Priorities and Goals, the application process could incorporate other values through the use of "bid enhancement goals.

- a) Preserve the stock
- b) Support permanent residents
- c) Support transient residents
- d) Consider other enhancement goals

2) The grant program is a public investment that should continue.

The grant is perceived as valuable by those who have participated in the program, and should continue to be made available. However:

3) Public awareness of the grant should be expanded.

There is very low awareness of the grant compared to what is evidenced in the early years; note that the grant became much less visible (both as a news item and in terms of the number of awards given) after the restructuring in 2003 when the HDC was disbanded. Strategies such as hosting public information sessions, soliciting news coverage to report on metrics or highlight subject properties and owners, and giving awards, could be re-introduced.

4) Year-round applications & awards are desirable.

The grant shifted from being a once-per-year application and award program to being open to applications year-round in 2003. Consensus is that it should continue to be available year-round.

5) The buying power of grant dollars has not diminished over time.

The buying power of the maximum residential award today exceeds the buying power of the maximum residential award in the first decade of the grant's life, calling into question the prevailing assumption that more funds are needed per grantee to make the grant relevant.

6) The grant can be designed to encourage better-than-minimum compliance outcomes.

The grant is not perceived to meet the "but for" test for most renovations today. It will not be a significant factor for homeowners in deciding whether a renovation happens or doesn't happen, but depending on the design of the program, it could influence the standards by which certain design and construction decisions in the renovation are made (such as choosing details and finishes that are higher quality than minimum standards require).



The community values its visual character, and seeks to tell a story about identity and history through preservation.

7) Applicants desire clarity on fundamentals.

There is a perceived need for more clarity during the process, especially on these matters:

- a)** Available Funding at Any Given Time
- b)** Detailed Criteria for Approval by the HPB

8) Training and education will enhance outcomes.

Education and training could enhance the success of the program and its outcomes; consider the following:

- a)** Train Historic Preservation Board members on the Board's authorities, and on the proper policy standards to apply in making decision to approve or not approve a project.

- b)** Train contractors and building professionals in policies and practices pertinent to historic preservation, and provide certification with regular renewals.
- c)** Educate the public about the value of historic properties, and contextualize historic properties in the story of the City.
- d)** Assuming the City introduces a preferred vendor or vendor training program, inform applicants about the City's trained vendor list.



Recommendations

The Historic District Grant program has contributed substantially to the character and vitality of Park City. With thoughtful refinement, it will continue to do so.

Much has changed since the origin of the grant program in the early 1980s, including residency and tourism dynamics, historic resource conditions, population growth, development, and economic conditions. These changes, along with resulting administrative and implementation challenges identified by staff and stakeholders, led to the review and reconsideration of the grant program. This study, and the recommendations herein, are the outcome of that review.

Policymakers, staff, stakeholders, and the Historic Preservation Board have contributed time, talent, and expertise to this assessment of the current program, and their input has shaped objectives for the future program. Qualitative research and quantitative data analysis laid a foundation of knowledge about existing conditions, and along with engagement outcomes, informed the resulting recommendations.

The recommendations that follow are presented as a roadmap for Park City staff and leadership to refine what has historically been a very successful grant program, and to bring it up to date in accordance with current conditions, values, and opportunities for impact.

1. Adopt a Historic District Grant program mission statement that reflects contemporary conditions, values, and opportunities for impact.

1.1. Adopt a mission statement and identify values to guide grant investments.

1.1.1. Draft a mission statement based on adopted City goals and objectives, and the values and engagement outcomes that emerged from this study.

1.2. Establish primary and enhanced target outcomes.

1.2.1. Define primary outcomes that the grant should measurably impact, including preservation of neighborhood character, preservation of historic stock, achieving higher than minimum standard outcomes, and telling Park City's story through the physical environment.

1.2.2. Define supplemental or enhanced outcomes that the grant could incentivize, such as affordability, public realm enhancement, resident retention, or assisting residents in need.

1.2.3. Review and revise the list of eligible improvements.

1.2.4. Ensure desired outcomes are consistent with eligible uses of funds.

1.3. Establish goals and topics for regular reporting.

1.3.1. Define reporting objectives based on the outcomes from Recommendations 1.1 and 1.2.

1.3.2. Establish metrics for tracking and reporting outcomes, and apply them to Recommendation 5.

1.3.3. Establish a regular annual cycle of reporting. Audiences for regular reporting include the Historic Preservation Board, Mayor and City Council, and the general public.

2. Create Historic District Grant program guidelines that enable grant administrators to responsibly steward impactful public investment.

2.1. Update grant eligibility requirements according to defined mission and target outcomes.

2.1.1. *Projects.* Review existing Project type eligibility, and refine according to the updated program mission and goals.

2.1.1.1. Ensure that grant dollars are not subsidizing outcomes that would happen anyway under existing regulations.

2.1.1.2. Define a target list of investment priorities where the grant can make a difference, and review it annually to keep it current. Consider public projects, historic mine structures, distressed properties, roof replacements, large remodels, and incentivizing above-minimum-standard outcomes (form, materials, details).

2.1.2. *Applicants.* Review existing Applicant eligibility requirements, and refine according to the updated program mission and goals.

2.1.2.1. Ensure that grant dollars are not subsidizing applicants who don't need public assistance.

2.1.2.2. Build in preferred status for permanent residents.

2.1.2.3. Build in preferred status for locally owned and operated commercial properties.

2.2. Make the grant competitive.

2.2.1. Create a cycle of multiple application deadlines per year.

2.2.2. Create a clear and transparent scoring system.

2.2.2.1. Define the program's "core requirements" and craft a scoring system based on it. Consider the program mission outlined in the

goals workshop with leadership, including the desire to preserve historic character, save historic structures from neglect, promote community knowledge and engagement, achieve better restoration outcomes, and invest public dollars in ways that make a difference (“move the needle”).

2.2.2.2. Define desired “enhanced outcomes” and craft a system of bonus points based on it. Consider the values that emerged out of the goals workshop with leadership, including the objectives for complete community, equity, and affordability.

2.3. Use administrative discretion to achieve the greatest program impact in each cycle.

2.3.1. Give grant administrators discretion to select a single large project or many smaller projects in a cycle, depending on their assessment of how the grant will be most impactful.

2.3.2. Give grant administrators discretion to accept applications of all types, or to define themes for each grant cycle according to perceived need or opportunity.

3. Create an application manual to make the process informative and easy for everyone.

3.1. The manual should include a program description and guidelines.

3.2. The manual should provide information about the application process, including an overview of grant awards available, application deadlines, a process map, criteria for decision-making, and required forms and submittals.

3.3. The manual should refer applicants to the City’s list of vendors who have completed the training program.

3.4. The manual should direct applicants to supplemental resources for those who wish to learn more about preservation, including links to guiding regulations, training and education opportunities, and Park City interpretive experiences.

3.5. The manual should provide information about program history and successes.

4. Define program funding sources and levels.

4.1. Work with City and Board leadership to right-size the grant commitment.

4.1.1. Review the current capacity of the grant in total and by source; and make a determination of whether to raise, reduce, or maintain the current level of funds in light of outcomes from Recommendation 1.1 and 1.2.

4.2. Mitigate constraints on funding sources.

4.2.1. Review the sustainability of funding sources (each RDA, General Fund) and take steps to ensure that needed capacity is maintained for out-year commitments.

4.2.2. Identify constraints resulting from the distribution of the total grant dollars by source, and consider how to mitigate for areas of need and opportunity that may be challenged as a result.

4.3. Ensure that there is clear and transparent definition of funding sources and constraints available to the public.

5. Build a database of grant supported projects for management and reporting purposes.

5.1. Create a database of projects to track them from the time a grant is awarded to the time the grant is paid out.

5.2. Apply metrics defined in Recommendation 1.3 into a program database, so that the performance and contribution of projects supported by the grant program can be measured.

5.3. Use the database to mitigate the management challenges inherent in the current disconnect between the fixed level of non-rollover funding sources (operations, not capital dollars) and the multi-year activities that the grant dollars fund, by incorporating projections over time.

5.3.1. Create a rolling 3- year schedule of projected grant payouts, including: project address, grant amount, estimated date of payout projected (year 0, 1, and 2), and project grant funding source (identify which pool dollars will come from).

5.3.2. Keep records of actuals for each project, including the amount and date of actual payout, and contribution to primary outcomes, consistent with Recommendation 1.2.1.

5.3.3. Record project contributions to enhanced outcomes, consistent with Recommendation 1.2.2.

5.4. Include data about the funding source for each project.

5.4.1. Identify the source and amount of funds committed to each project.

5.4.2. Use the database to project future years' available funds for each source based on grant commitments. For each application deadline, issue a report on the current (application) year plus the next two to three years. Because the grant is comprised of multiple pools of funding, each with unique constraints; and because grant commitments from a prior year

may come due and reduce available funds in a given area at a given time depending on how project timelines converge; there has been difficulty in defining “available funds” at any given time.

5.4.3. Ensure that staff consider projected available funds by pool when they define target outcomes for the upcoming grant cycle, in keeping with Recommendation 2.3.

6. Introduce and sustain training and education to enhance preservation outcomes.

6.1. Create and administer a training program on policies and practices in historic construction, through which contractors and building professionals can be granted “preferred vendor” status by the City; assume regular renewals.

6.2. Create a City “preferred vendor” list of historic contractors. Make this list available to applicants, and incentivize them to utilize the services of trained professionals.

6.3. Continue on-boarding training for Historic Preservation Board members on the Board’s authorities.

6.4. Create a publicly available brochure, the HPB Policy & Decision-Making Guide, outlining the Board’s authorities, criteria, and timeline for decision-making.

6.5. Provide, or coordinate, community education about the impacts of historic preservation (cultural, economic, & environmental), policies & standards, and criteria for decision-making. Topics could range from practical learning about regulatory frameworks to local history.

7. Establish a communications strategy to raise awareness, build community knowledge and engagement, and tell Park City’s story.

7.1. Establish a website with program information and resources.

7.1.1. Communicate program information (outcomes of Recommendation 1), and include downloadable program guidelines and application manual (outcomes of Recommendations 2 and 3)

7.1.2. Feature target themes and objectives for the upcoming funding round (as envisioned in Recommendation 2.3)

7.1.3. Feature program highlights: news coverage, photographs, resident or project spotlights (see Recommendation 7.3), goals and opportunities, and interest pieces about town history.

7.1.4. Provide links to supplemental resources including national standards, relevant Park City policies and zoning, community education

opportunities (Recommendation 6.5), preferred vendor information (Recommendation 6.1), and the HPB Policy & Decision-Making Guide (outcome of Recommendation 6.4).

7.1.5. If feasible, create a tool for people to simply type in their address and receive preliminary feedback about their property's eligibility and upcoming deadlines.

7.2. Create opportunities for news coverage.

7.2.1. Issue news releases about upcoming application deadlines and funding round themes, regular reporting, project successes, grant history, and so on.

7.2.2. Alert news and media about upcoming decisions that will be on the agenda for Board and Council meetings.

7.3. Recognize projects and people who have made significant contributions through use of the grant.

7.3.1. Coordinate with preservation organizations on awards or honors for outstanding contributions to historic preservation and interpretation.

7.3.2. Recognize projects that have achieved enhanced outcomes.

Criteria Evaluation	Scoring Value	Staff Score	HPB Score
OVERALL:	(UP TO 6 POINTS)		
1. <i>The proposed design and scope of work uses best practices for the treatment of historic materials / the upgrades include high quality materials or equipment</i>	0: Below Average 1: Average 2: Above average 3: Exceeds Expectations		
2. <i>Historic features and critical elements of the structure and/or site will be enhanced by the proposed work.</i>	0: None 1: Minimally enhanced 2: General positive impact 3: Significant positive impact		
EXTERIOR IMPROVEMENTS:	(UP TO 8 POINTS)		
3. <i>Character defining historic elements of the structure and/or site will be preserved and/or restored as viewed from the primary right-of-way and will positively impact the vitality of the historic context of the neighborhood.</i>	0: No impact 1: Minimal positive impact 2: General positive impact 3: Significant positive impact		
4. <i>Proposed work facilitates reversal of non-historic elements or alterations.</i>	0: No 2: Yes		
5. <i>The scope of work includes restoration of Historic materials and features or replacing historic materials and features that may have been lost or are irreparable.</i>	1: Minor restoration or replacement of historic materials/features 2: Average restoration or replacement of historic materials/features 3: Significant restoration or replacement of historic materials/features		
SAFETY/STRUCTURAL IMPROVEMENTS:	(UP TO 8 POINTS)		
6. <i>Priority is given to restoration and treatment of historic materials, rather than replacing historic materials and features in-kind.</i>	2: Minor safety or structural upgrades 4: Some safety or structural upgrades 8: Significant safety or structure upgrades		