ATTACHMENT J: ANALYSIS OF STANDARDS FOR MAJOR ALTERATIONS TO THE ELKS BUILDING

Standards for Certificate of Appropriateness for Altering of a Landmark Site or Contributing Structure Including New Construction of an Accessory Structure (21A.34.020.G)

In considering an application for a Certificate of Appropriateness for the alteration of a contributing structure in a historic district, the Historic Landmark Commission shall find that the project substantially complies with all of the general standards that pertain to the application and that the decision is in the best interest of the City. The proposal is reviewed in relation to those that pertain in the following table.

A Preservation Handbook for Historic Residential Properties & Districts in Salt Lake City, primarily Chapters 8 and 9, but also 2, 3, 4, 5, 6, 7, and 13, are the relevant design guidelines for this design review. The Design Objectives and related design guidelines are referenced in the following review where they relate to the corresponding Historic Design Standards for Alteration of a Contributing Structure Including New Construction of an Accessory Structure (21A.34.020.G), and can be accessed via the links below. Design Guidelines as they relate to the Design Standards are identified in Attachment X to this report. https://slcgov.com/historic-preservation/historic-preservation-commercial-design-guidelines https://codelibrary.amlegal.com/codes/saltlakecityut/latest/saltlakecity ut/0-0-0-66359

Standard	Analysis	Finding
1. A property shall be used for its historic purpose or be used for a purpose that requires minimal change to the defining characteristics of the building and its site and environment;	The existing building was built in 1923 as a social club containing meeting, dining and recreational space, hotel rooms for visiting Elks members, and support space for those functions, including a number of offices. After the Elks sold the building in the 1970s, the new owners converted the building to offices, restaurants, and movie theaters. The proposed use will be commercial offices. Staff finds that this is a compatible use for the building that will require minimal change to its defining characteristics.	Complies

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided;

With the exception of the item discussed below, the proposed work would not alter any characterdefining features of the historic structure or site.

Front Entrance Plaza Changes:
As outlined in the key issues section of the Staff
Report, the original building design created two
entry levels. The base and finish grade of the Elks
Building was set above the sidewalk, with access
to the front doors by a set of stone steps flanking a
roman-arched tunnel entrance to the basement of
the building. The front doors were used by most
visitors to the building, while the basement tunnel

entrance was used by Elks members as a part of the club's ritual, and to access the functions reserved for members in the basement.

The design was integrated into the existing streetscape pattern on the block at the time, in which buildings on the north side of South Temple were situated a story or more above the sidewalk, with prominent retaining walls. This raised, podium-like effect is still evident in the finished grade of some remaining historic buildings along South Temple such as the Covey Apts and Cathedral of the Madeline. However, the streetscape evident in historic photos is no longer typical, specifically between State Street and the Brigham Apartments, because so many historic buildings were demolished and retaining walls were removed as the sites have been regraded over time.

The applicants propose to preserve the primary elevation of the tunnel entry, entry wall and elks head keystone, and flanking columns. The remaining granite blocks, small columns, and original light fixtures will be removed and saved and reused in the design of the proposed public plaza.

Staff finds that while not an ideal solution, enough of the historic materials and defining elements of the entrance will be retained in the new design so that the overall historic character of the entire Elks Building will be preserved.

Complies

3. All sites, structures and objects shall be recognized as products of their own time. Alterations that have no historical basis and which seek to create a false sense of history or architecture are not allowed;	The proposed alterations, including the front entry plaza alterations, window opening changes on the east and west elevations, and the rooftop addition are modern in design and are differentiated from the historic structure with contrasting but compatible materials.	Complies
4. Alterations or additions that have acquired historic significance in their own right shall be retained and preserved;	Staff finds that the alterations and additions made to the building after its construction, and in particular those alterations made during the late 1970s renovation have not acquired significance in their own right. The proposed work undoes many of those changes.	Complies
5. Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved;	The Elks Building does have distinctive features, finishes, construction techniques, and examples of craftsmanship. These elements include the brick and terra cotta primary wall and cornice materials Front Entrance Plaza Changes: As outlined in the key issues section of the Staff Report, the original building design created two entry levels. The lower level was used by members of the Benevolent and Protective Order of Elks (BPOE, or Elks) and had a ritual function within the organization. The upper story entrance was used by visitors, non-members, and accompanying Elks as the main entrance to the building. This dual function was no longer relevant when the Elks sold the building and moved. The entry feature has remained but according to the applicants has created a security and access issue. The proposed alteration would remove the steps and terracing and create a ground level plaza. The former entrance and wall features would remain. This is not an ideal solution from a preservation standpoint, but Staff finds that is acceptable within the scope of the entire project.	Complies

6. Deteriorated architectural features shall be repaired rather than replaced wherever feasible. In the event replacement is necessary, the new material should match the material being replaced in composition, design, texture and other visual qualities. Repair or replacement of missing architectural features should be based on accurate duplications of features, substantiated by historic, physical or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other structures or objects;	Apart from the changes to the entrance plaza with separate findings below, any deteriorated architectural features will be repaired or replaced with like material. Front Entrance Plaza Changes: The proposed design retains the original granite archway entrance, granite posts, and light fixtures. The proposal would also repurpose original materials from the front entrance for use in the new plaza. This work won't be based on conjectural design or incorporate salvaged elements from other buildings in any way that this standard is intended to address.	Complies
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible;	The applicant is proposing to clean the existing brick and terra cotta walls of the building using a low-pressure wash with chemicals and methods typically approved for masonry cleaning on other projects.	Complies
8. Contemporary design for alterations and additions to existing properties shall not be discouraged when such alterations and additions do not destroy significant cultural, historical, architectural or archaeological material, and such design is compatible with the size, scale, color, material and character of the property, neighborhood or environment;	The proposed alterations use contrasting design and materials to differentiate the historic building from the new work. Staff finds that the alterations and additions are compatible with the size, scale, color, materials, and character of the existing building and the surrounding properties.	Complies

9. Additions or alterations to structures and objects shall be done in such a manner that if such additions or alterations were to be removed in the future, the essential form and integrity of the structure would be unimpaired. The new work shall be differentiated from the old and shall be compatible in massing, size, scale and architectural features to protect the historic integrity of the property and its environment;	The essential form and integrity of the Elks Building would not be impaired with this proposal. The proposal would remove incompatible previous additions so that the building's original form will be more readily apparent. The rooftop addition will be set back from the historic roofline and differentiated in materials and design. Other work on the building such as the addition of window openings will be compatible in terms of this standard. Front Entrance Plaza Changes: The proposed design retains the original granite archway entrance, granite posts, and light fixtures. The proposal would also repurpose original materials from the front entrance for use in the new plaza. However, new work will be clearly differentiated from the old work remaining	
10. Certain building materials are prohibited including the following: a. Aluminum, asbestos, or vinyl cladding when applied directly to an original or historic material.	The project does not involve the direct application of aluminum, asbestos, or vinyl cladding to any historic materials.	N/A
11. Any new sign and any change in the appearance of any existing sign located on a landmark site or within the H Historic Preservation Overlay District, which is visible from any public way or open space shall be consistent with the historic character of the landmark site or H Historic Preservation Overlay District and shall comply with the standards outlined in chapter 21A.46 of this title.	Not applicable—the proposal does not involve any signage.	N/A