



# Staff Report

PLANNING DIVISION  
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

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To: Salt Lake City Historic Landmark Commission

From: Krissy Gilmore, Principal Planner  
(385) 214-9714 or [Kristina.gilmore@slcgov.com](mailto:Kristina.gilmore@slcgov.com)

Date: October 14, 2021

Re: PLNHLC2021-00605 – Re-roof

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## Minor Alteration

**PROPERTY ADDRESS:** 1024 E 1<sup>st</sup> Avenue  
**PARCEL ID:** 09-32-459-007  
**HISTORIC DISTRICT:** Avenues Historic District  
**ZONING DISTRICT:** SR-1A  
**DESIGN GUIDELINES:** Residential Design Guidelines

**REQUEST:** This is a request by Dynamic Roofing & Construction, representing the property owner, to approve a re-roof request. The matter is being referred to the Historic Landmark Commission for a decision because Staff concludes that the re-roof does not comply with standards of review and adversely affects the historic district. The building is considered contributing to the character and integrity of the Avenues Local Historic District.

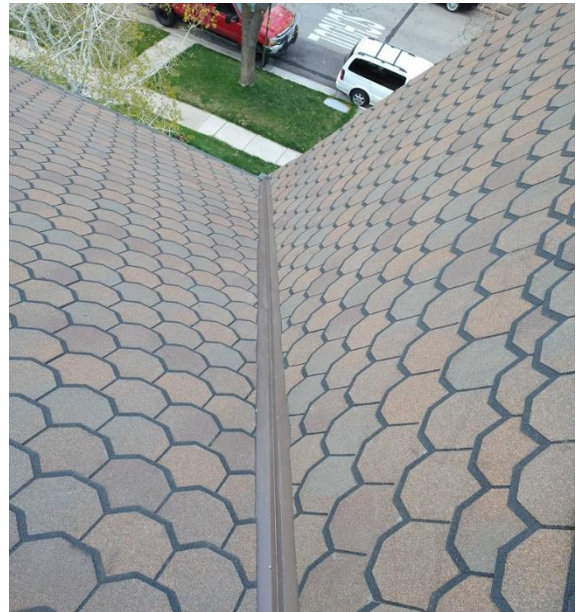
**RECOMMENDATION:** Based on the analysis and findings outlined in this staff report, it is Planning Staff's opinion that the proposed material for a re-roof does not meet the applicable standards of approval, specifically standards 2 and 3. As such, Staff recommends that the Commission deny the request.

### ATTACHMENTS:

- A. [Site & Context Map](#)
- B. [Current Photographs](#)
- C. [Historic Photographs](#)
- D. [Historic Survey Information](#)
- E. [Analysis of Standards for Minor Alterations in a Historic District](#)
- F. [Applicable Design Guidelines](#)
- G. [Public Process and Comments](#)

## **BACKGROUND:**

The applicant submitted a minor alteration application for the proposed re-roof. Generally, re-roof applications for historic properties are reviewed at a staff level. At the time of the application submittal, the work was already completed and in noncompliance with Salt Lake City regulations. This application was initially submitted for administrative review for a replacement of the existing composite shingles on the primary home and garage. The home was replaced with asphalt CertainTeed Carriage House Shingles 21SQ in the color brownstone and the garage was replaced with OC Duration Shingles in the color Teak10 SQ. The proposed shingles on the primary home, Carriage House Shingles, have a faux shadow design that does not meet the historic guidelines as it creates a false sense of history. The shingles proposed for the garage are found to be appropriate for the historic district.



*Photograph provided by applicant of new roof. Please note that the work has already been completed.*

## **BUILDING, SITE, AND CONTEXT:**

The subject property contains a historically contributing single-family building. The Reconnaissance Level Survey (RLS) for the Avenues Historic District indicates that the building was constructed in 1892. The two-story Victorian home is an example of pattern book design. Many of the home's original details were removed or covered when the house was sided with asbestos shingles, probably in the 1950s. The roof shingles that were replaced were likely not the original shingles, given the extensive history of the structure. Nevertheless, the structure is considered a significant, historically contributing structure to the Avenues Local Historic District.

## **KEY ISSUE:**

### **Replacement of material to mimic a false sense of history and architecture**

The character of a roof is a prominent defining feature of a historic building. It reflects the traditional design of the structure and contributes to the historic nature of the neighborhood. Safeguarding the roofing characteristics and ensuring its integrity in historic buildings is an important goal in historic preservation.

While asphalt shingles are generally an appropriate replacement material for most roofs, the design of the proposed shingles in this instance mimic a more dimensional shingle. The City's adopted historic guidelines and zoning ordinance discourage imitation materials designed to look like other materials.

The project includes an asphalt shingle roof with a faux shadow line designed to look like a more dimensional shingle, creating a false sense of history and architecture. Primarily, the proposal does not meet Standard 21A.34.20.G.3 since the roofing material is designed to look like other materials.

*21A.34.20.G.3. states: 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.*

Additionally, the Historic Design Guidelines are specific in that the shingle shape and character should be similar to the original form. While it is difficult to see the roof in historical photos, more recent photos from the Avenues Local Historic District Reconnaissance Level Survey 2007-2013 appear to show a simple, typical shingle design. It is worth noting that it is somewhat difficult to see in photos given the height of the home from the grade of the street. The roof is most visible from the east-facing façade rather than directly in front of the house.

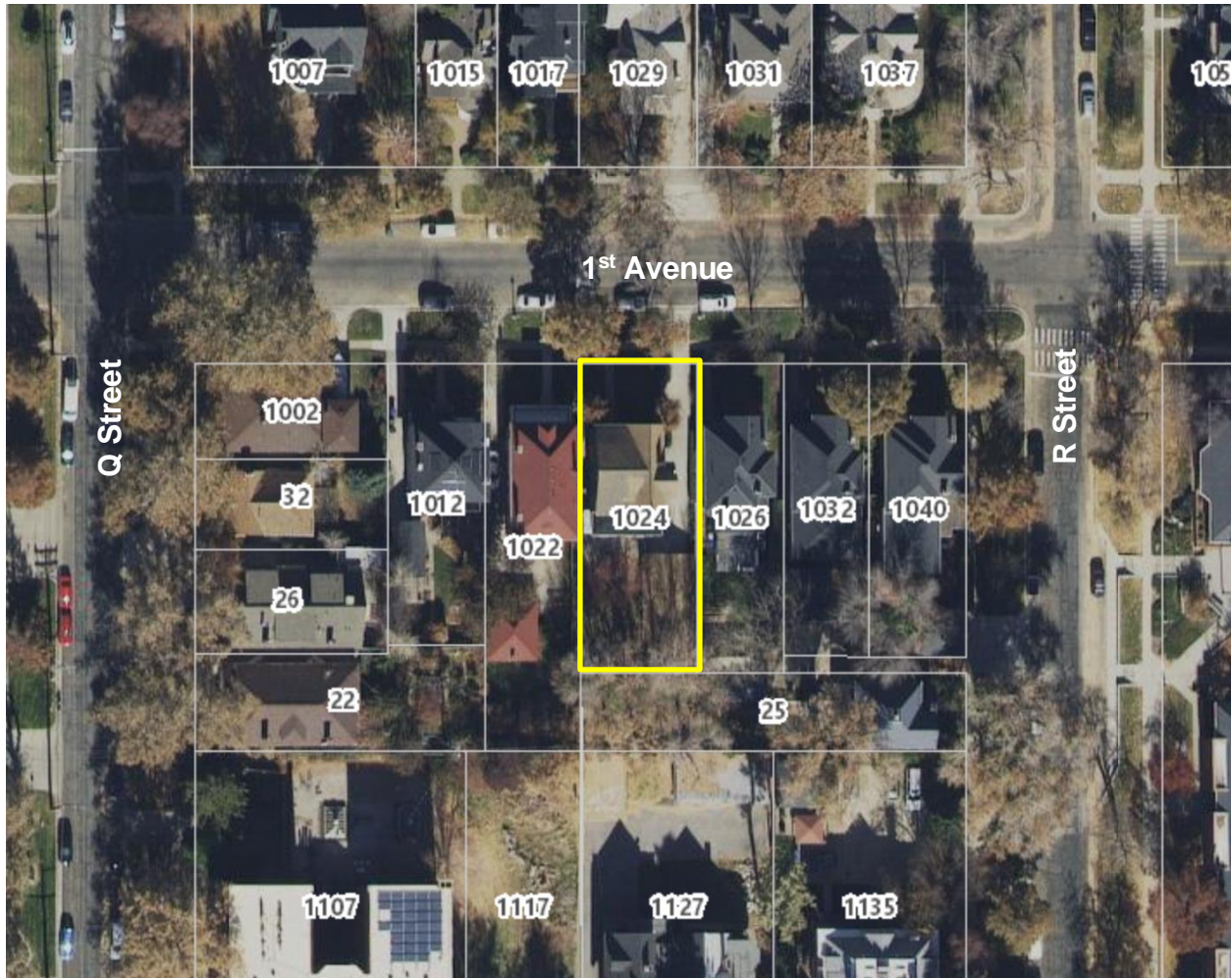
**NEXT STEPS:**


If the request is denied by the HLC, the applicant will not be issued a COA. The applicant could proceed with repair and replacement utilizing appropriate materials, as necessary, with another minor alteration application that could be reviewed administratively.

If the Commission disagrees with Staff's recommendation and the project is approved, the applicant would receive a COA to proceed with the project as represented in this Staff Report.

# ATTACHMENT A: Site & Context Map

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 Subject Property



## **ATTACHMENT B: Current Photographs**

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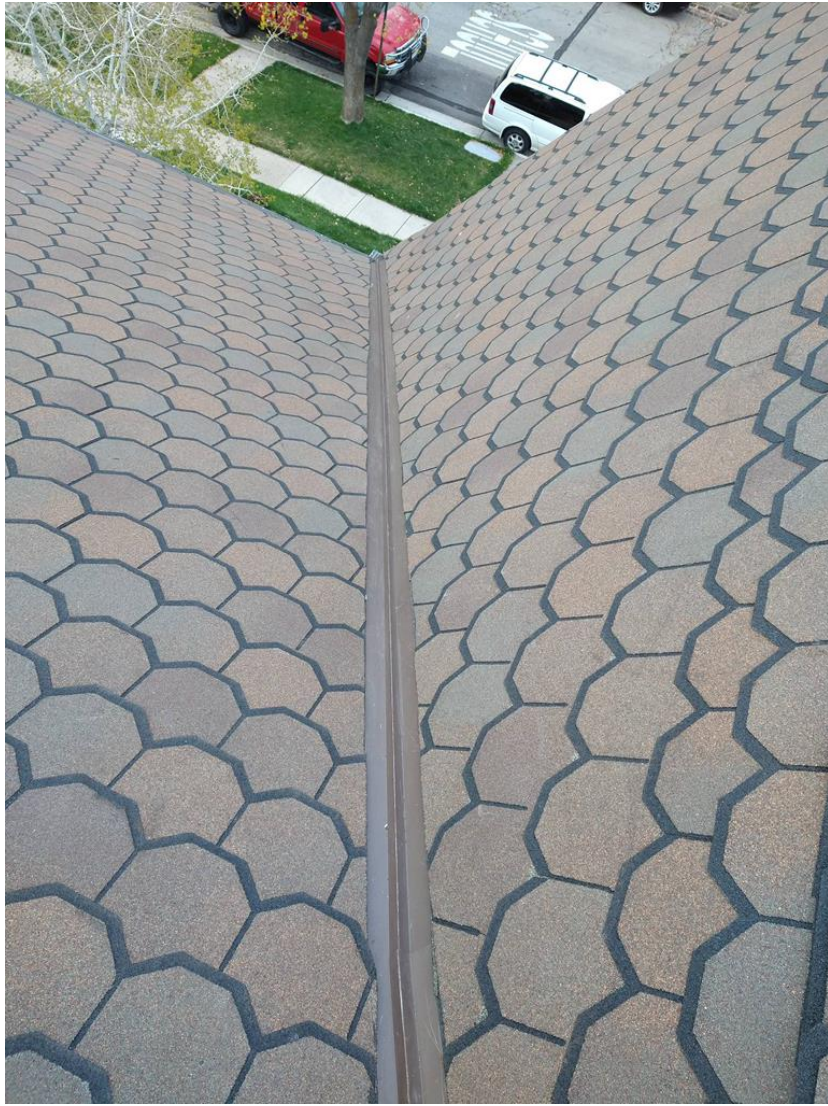
*Front/North façade*





*Side/East façade*





*Image provided by the applicant of new re-roof*

## **ATTACHMENT C: Historic Photographs**

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*Historic Tax Photo.  
Source: Salt Lake County*





*Avenues Historic District Survey, 2007 - 2013*

## **ATTACHMENT D: Historic Survey Information**



# Utah State Historical Society Historic Preservation Research Office Structure/Site Information Form

1  
IDENTIFICATION

Street Address: 1024 1st Avenue Plat G Bl. 5 Lot 3  
Name of Structure: Russel L. Tracy/Eugene W. Kelly House T. R. S.  
Present Owner: Heinrich E. Kuennemann UTM:  
Owner Address: Tax #: 5-1548

2  
AGE/CONDITION/USE

Original Owner: Joseph P. Bache Construction Date: 1892 Demolition Date:  
Original Use: single family  
Present Use: Occupants:  
 Single-Family  Park  Vacant  
 Multi-Family  Industrial  Religious  
 Public  Agricultural  Other  
 Commercial  
Building Condition: Integrity:  
 Excellent  Site  Unaltered  
 Good  Ruins  Minor Alterations  
 Deteriorated  Major Alterations

3  
STATUS

Preliminary Evaluation: Final Register Status:  
 Significant  National Landmark  District  
 Contributory  National Register  Multi-Resource  
 Not Contributory  State Register  Thematic  
 Intrusion

4  
DOCUMENTATION

Photography: Date of Slides: 5/77 Date of Photographs:  
Views: Front  Side  Rear  Other  Views: Front  Side  Rear  Other   
Research Sources:  
 Abstract of Title  City Directories  LDS Church Archives  
 Plat Records  Biographical Encyclopedias  LDS Genealogical Society  
 Plat Map  Obituary Index  U of U Library  
 Tax Card & Photo  County & City Histories  BYU Library  
 Building Permit  Personal Interviews  USU Library  
 Sewer Permit  Newspapers  SLC Library  
 Sanborn Maps  Utah State Historical Society Library  Other

### Bibliographical References (books, articles, records, interviews, old photographs and maps, etc.):

Salt Lake County Records.  
Salt Lake City Building Permit, #621, October 22, 1892.  
"Tracy, Russel L." Men of Affairs in the State of Utah, SLC: The Press Club of SLC,  
1941, p. 70.  
"Tracy, Russel L." Deseret News, May 17, 1945, p. 1; May 18, 1945, p. 11; May 19, 1945,  
p. 5.

Architect Builder: Carroll/E. DarlingBuilding Materials: asbestos shingle siding Building Type/Style: Victorian eclectic

Description of physical appearance &amp; significant architectural features:

(Include additions, alterations, ancillary structures, and landscaping if applicable)

This is a two-story Victorian home, probably of pattern-book design. Most of its original details were removed or covered when the house was sided with asbestos shingles, probably in the 1950's. The tall front gable was probably covered with wood shingle siding, as was the second floor, which is flared out over the first. The second floor porch still has the original wooden paired columns, while those on the first are gone. Above the large first floor front window is an art-glass transom.

--Thomas W. Hanchett



## Statement of Historical Significance:

- |   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> Aboriginal Americans | <input type="checkbox"/> Communication          | <input type="checkbox"/> Mining          | <input type="checkbox"/> Science            |
| <input type="checkbox"/> Agriculture          | <input type="checkbox"/> Conservation           | <input type="checkbox"/> Minority Groups | <input type="checkbox"/> Socio-Humanitarian |
| <input type="checkbox"/> Architecture         | <input type="checkbox"/> Education              | <input type="checkbox"/> Political       | <input type="checkbox"/> Transportation     |
| <input type="checkbox"/> The Arts             | <input type="checkbox"/> Exploration/Settlement | <input type="checkbox"/> Recreation      |   |
| <input type="checkbox"/> Commerce             | <input type="checkbox"/> Industry               |  |   |

This two-story Victorian house of pattern-book design is historically significant because of its association with Russel L. Tracy and Eugene W. Kelly.

It was built in 1892 for Joseph P. Bache, an apparently interesting person about whom it would be nice to know more. Unfortunately, the only information available about him is found in Salt Lake City Directories. According to them, at the time he built the house he was "Utah Territorial Librarian" and "Clerk, Supreme Court." Bache evidently held the house as rental property until 1894 when he sold it to Russel L. Tracy. According to his obituary, he was "a noted Salt Lake financier and philanthropist." Tracy was born in Mansfield, Ohio, December 10, 1860. In 1883 he moved to Cheyenne, Wyoming, and in 1884 founded the Tracy Loan and Trust Company. In 1892 he moved to Salt Lake City and transferred headquarters of the company here. Eventually, the business became one of the largest of its kind in the Intermountain West. In addition to commercial affairs, Tracy was active in community affairs. He financed the Boy Scout camp, known as Tracy Wigwam, in Millcreek Canyon, and funded the Tracy Aviary in Salt Lake's Liberty Park. Tracy was a member of the Congregational Church.

In 1906 Tracy moved to a larger house in Salt Lake City (1285 Military Way) and sold this one to Eugene W. Kelly. He was born in Fillmore, Utah in 1873, received his schooling there and remained in the town until coming to Salt Lake City in 1902. Active in politics, while in Fillmore he served as its mayor, in the state legislature, and as chairman of the Utah State Republican Committee. Upon coming to Salt Lake City he founded Rowe and Kelly Men's Clothing Store, later Mullett-Kelly, and continued his involvement in politics. In the 1930's he was twice an unsuccessful candidate for the office of Salt Lake City Mayor, and in 1936 unsuccessfully sought the Republican nomination for Governor. He was



1024 1st Avenue-1892

also widely known for editorials appearing in local newspapers boosting Utah. In 1923 he sold the house to Zora W. Phinney. She was not listed in Salt Lake City Directories, and was evidently an out of town investor. She held the house for two years, and in 1925 sold it to a commercial painter named John T. Fornander. Three years later, in 1928, he sold it to Thomas A.C. Bruce and his wife Chloe. They held it as a rental property until 1936 when they lost it in a tax sale. For the next ten years, Zion's Benefit Building Society was the owner. In 1946 the company sold it to Lillian M. Taylor, an insurance salesperson. She lived in it until the late 1950's. In the early 1960's the house was converted into a number of small apartments. When the present owner bought it, he converted it back into a single family residence.

Property Type: 111

BATCH KEY  
1805052612

Structure/Site Information Form

Street Address: 01024 FIRST AV

UTM: 14809 14809

Name of Structure:

T. 01.0 N R. 01.0 E S. 32

Present Owner: KUENNEMANN\*HEINRICH\*E\* & CHARLOTTE  
1024 1ST AVE

Owner Address: SLC, UTAH 84103

Year Built (Tax Record): 1898 Effective Age: 1920

Tax #: 05 1548

Legal Description 01 Kind of Building: RESIDENCE

OM AT NW COR LOT 4 BLK 5 PLAT G SLC SUR E 3 RD S 8 RD W 3 RD N 8 RD TO BEG

Original Owner:

Construction Date:

Demolition Date:

Original Use:

Present Use:

Building Condition:

Integrity:

Preliminary Evaluation:

Final Register Status:

- |                                       |                                |  |   |                                     |  |   |
|---------------------------------------|--------------------------------|--|---|-------------------------------------|--|---|
| <input type="checkbox"/> Excellent    | <input type="checkbox"/> Site  | <input type="checkbox"/> Unaltered         | <input type="checkbox"/> Significant      | <input type="checkbox"/> Not of the | <input type="checkbox"/> National Landmark | <input type="checkbox"/> District       |
| <input type="checkbox"/> Good         | <input type="checkbox"/> Ruins | <input type="checkbox"/> Minor Alterations | <input type="checkbox"/> Contributory     | Historic Period                     | <input type="checkbox"/> National Register | <input type="checkbox"/> Multi-Resource |
| <input type="checkbox"/> Deteriorated |                                | <input type="checkbox"/> Major Alterations | <input type="checkbox"/> Not Contributory |                                     | <input type="checkbox"/> State Register    | <input type="checkbox"/> Thematic       |

Photography:

Date of Slides:

Slide No.:

Date of Photographs:

Photo No.:

Views:  Front  Side  Rear  Other

Views:  Front  Side  Rear  Other

Research Sources:

- |  |   |  |   |
|--|---|--|---|
| <input type="checkbox"/> Abstract of Title | <input type="checkbox"/> Sanborn Maps               | <input type="checkbox"/> Newspapers                    | <input type="checkbox"/> U of U Library |
| <input type="checkbox"/> Plat Records/Map  | <input type="checkbox"/> City Directories           | <input type="checkbox"/> Utah State Historical Society | <input type="checkbox"/> BYU Library    |
| <input type="checkbox"/> Tax Card & Photo  | <input type="checkbox"/> Biographical Encyclopedias | <input type="checkbox"/> Personal Interviews           | <input type="checkbox"/> USU Library    |
| <input type="checkbox"/> Building Permit   | <input type="checkbox"/> Obituary Index             | <input type="checkbox"/> LDS Church Archives           | <input type="checkbox"/> SLC Library    |
| <input type="checkbox"/> Sewer Permit      | <input type="checkbox"/> County & City Histories    | <input type="checkbox"/> LDS Genealogical Society      | <input type="checkbox"/> Other          |

Bibliographical References (books, articles, records, interviews, old photographs and maps, etc.):

Researcher:

Date:





986 E 1<sup>st</sup> Avenue  
D



1002 E 1<sup>st</sup> Avenue  
B



1007 E 1<sup>st</sup> Avenue  
A



1007 E 1<sup>st</sup> Avenue  
(garage)



1007 E 1<sup>st</sup> Avenue  
(fence)



1012 E 1<sup>st</sup> Avenue  
B



1015 E 1<sup>st</sup> Avenue  
B



1017 E 1<sup>st</sup> Avenue  
B



1022 E 1<sup>st</sup> Avenue  
B



1024 E 1<sup>st</sup> Avenue  
A



1026 E 1<sup>st</sup> Avenue  
B



*Architectural Survey Data for SALT LAKE CITY  
Utah State Historic Preservation Office*

RLS 2007, PAGE 15

Address/ Property Name	Eval/ Ht	OutB N/C	Yr.(s) Built	Materials	Styles	Plan (Type)/ Orig. Use	Survey Year RLS/ILS/Gen	Comments/ NR Status
986 E 1ST AVENUE	D	1/0	c. 2000	REGULAR BRICK	NEO-VICTORIAN	OTHER LATE 20TH C. SINGLE DWELLING	07	
1002 E 1ST AVENUE	B	0/0	1920	REGULAR BRICK	BUNGALOW PRAIRIE SCHOOL	BUNGALOW SINGLE DWELLING	07	SMALL ADDITION ABOVE ATTACHED GARAGE N04
1007 E 1ST AVENUE	A	0/2	1893	SHINGLE SIDING	SHINGLE STYLE	CENTRAL BLK W/ PROI	07	ARCH-FREDRICK ALBERT HALE SLC REGISTER
NEWELL BEEMAN/HOYT		2.5		STONE:OTHER/UNDEF.	QUEEN ANNE	SINGLE DWELLING		N04
1012 E 1ST AVENUE	B	0/0	1901	REGULAR BRICK SHINGLE SIDING	VICTORIAN ECCLECTIC	FOURSQUARE (BOX) SINGLE DWELLING	07	N04
1015 E 1ST AVENUE	B	0/0	1893	REGULAR BRICK	VICTORIAN ECCLECTIC QUEEN ANNE	CENTRAL BLK W/ PROI SINGLE DWELLING	07	N04
JOHN T. DONNELLAN HOUSE		2.5						N04
1017 E 1ST AVENUE	B	0/0	1892	REGULAR BRICK SHINGLE SIDING	VICTORIAN ECCLECTIC QUEEN ANNE	CENTRAL BLK W/ PROI SINGLE DWELLING	07	A.G. SNAKE/H.E. REDFIELD BLDRS N04
DAVID S. SYKES HOUSE		2						N04
1022 E 1ST AVENUE	B	0/1	1905	REGULAR BRICK	VICTORIAN ECCLECTIC	FOURSQUARE (BOX)	07	TJ STRNGER ARCH/OSCAR ENGDAHL-
JAMES J. BURKE HOME		2						N04
1024 E 1ST AVENUE	A	0/1	1892	SHINGLE SIDING	VICTORIAN ECCLECTIC	CROSSWING	07	CARROLL/E. DARLING; RECENT REHAB
RUSSEL L. TRACY/EUGENE W.		2.5						N04
1026 E 1ST AVENUE	B	0/1	1897	REGULAR BRICK SHINGLE SIDING	VICTORIAN ECCLECTIC	SIDE PASSAGE/ENTRY SINGLE DWELLING	07	JG ANDERSON CONTRACTOR N04
JOSEPH A. GRAHAM HOUSE		2						N04

?=approximate address

Evaluation Codes: A=eligible/architecturally significant B=eligible C=ineligible/altered D=ineligible/out of period U=undetermined/lack of info X=demolished

## ATTACHMENT E: Analysis of Standards for Minor Alterations in a Historic District

### H Historic Preservation Overlay District – Standards for Certificate of Appropriateness for Alteration of a Contributing Structure (21A.34.020.G)

In considering an application for a certificate of appropriateness for alteration of a landmark site or contributing structure, the Historic Landmark Commission, or the Planning Director, for administrative decisions, shall find that the project substantially complies with all of the following general standards that pertain to the application and that the decision is in the best interest of the City.

Standard	Analysis	Finding
<p><b>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;</b></p>	<p>The existing structure on site was constructed as a single family dwelling. The applicant is proposing to continue using it as single family dwelling.</p>	<p>Complies</p>
<p><b>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;</b></p>	<p>The proposal is to replace existing roof with a new asphalt roof with a faux shadow line. The faux shadow line creates a false sense of history by mimicking another material.</p>	<p><b>Does not comply</b></p>
<p><b>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;</b></p>	<p>Faux shadow lines on asphalt roofs are intended to replicate more dimensional materials, such as cedar shingles, which creates a false sense of architecture.</p>	<p><b>Does not comply</b></p>
<p><b>4. Alterations or additions that have acquired historic significance in their own right shall be retained and preserved;</b></p>	<p>The proposed work does not involve such alterations.</p>	<p>Not applicable</p>



<p><b>5. Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved;</b></p>	<p>It is difficult to determine the original roofing material from photographs, though it appears to be a more typical rectangle shape and design. The material to be replaced was likely not historic given the extensive history of the site.</p>	<p>Complies</p>
<p><b>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;</b></p>	<p>The scope of work does not include the repair of any deteriorated architectural features.</p>	<p>Not applicable</p>
<p><b>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;</b></p>	<p>The proposed work does not involve such alterations.</p>	<p>Not applicable</p>

<p><b>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;</b></p>	<p>This proposal does not involve an addition itself but inappropriate roofing material. The proposed work does not involve such alterations.</p>	<p>Not applicable</p>
<p><b>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;</b></p>	<p>The proposed work does not involve such alterations.</p>	<p>Not applicable</p>
<p><b>10. Certain building materials are prohibited including the following:</b></p> <p><b>a. Aluminum, asbestos, or vinyl cladding when applied directly to an original or historic material.</b></p>	<p>The proposed work does not involve such alterations.</p>	<p>Not applicable</p>

<p><b>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.</b></p>	<p>The project does not involve changes to or any new signage.</p>	<p>Not applicable</p>
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## **ATTACHMENT F: Applicable Design Guidelines**

A Preservation Handbook for Historic Residential Properties and District in Salt Lake City provides guidance and advice on ways to meet the design standards in the zoning ordinance, and Part II, Chapter 7: Roofs includes the relevant historic guidelines for this application and are identified below for the Commissions' reference:

[A Preservation Handbook for Historic Residential Properties and District in Salt Lake City, Chapter 7: Roofs](#)

### **Roof Materials**

When repairing or altering a historic roof, one should avoid removing historic roofing materials that are in good condition. Where replacement is necessary, such as when the historic roofing material fails to properly drain or is deteriorated beyond use, one should use a material that is similar to the original in style and texture. The overall pattern of the roofing material also determines whether or not certain materials are appropriate. For instance, cedar and asphalt shingles have a uniform texture, while standing seam metal roofs create a vertical pattern.

The color of the repaired roof section should also be similar to the historic roof material. Wood and asphalt shingles are appropriate replacement materials for most roofs. A specialty roofing material, such as tile or slate, should be replaced with a matching material whenever feasible.

Unless the existence of a historic metal roof can be demonstrated, either by existing material or through historic documentation such as photographs, the use of metal shingle or standing seam roofs on contributing structures should be avoided because of their texture, profiles and reflectivity.

### **7.3 Preserve original roof materials wherever feasible.**

- Removing historic roofing material that is in good condition should be avoided.
- Where replacement is necessary, use materials that are similar to the original in both style and physical qualities wherever possible.
- Use a color that is similar to that seen historically.
- Specialty materials such as tile or slate should be replaced with matching material whenever feasible: replacement of a few individual units may be all that is required with these durable materials.

## **ATTACHMENT G: Public Process and Comments**

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The following is a list of public meetings that have been held, and other public input opportunities, related to this project:

### **Public Hearing Notice:**

Notice of the public hearing for this project includes:

- Public hearing notice mailed on August 19, 2021.
- Public hearing notice posted on City and State websites on August 19, 2021.
- Sign posted on the property on August 23, 2021.

### **Public Comments:**

As of August 26, 2021, no public comment have been received. Any comments received after the publication of this staff report will be forwarded to the Commission.