



Historic Preservation Services

Community Development & Neighborhood Services

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MEMORANDUM

TO: Interested Parties

FROM: Kim Meyer, Interim Director, Community Development and Neighborhood Services
Maren Bzdek, Historic Preservation Services Manager

DATE: November 20, 2024

SUBJECT: Administrative Interpretation 2024-2 of Section 14-53 of the Municipal Code regarding the installation of substitute roofing materials on historic resources.

BACKGROUND:

The City of Fort Collins (the City) prioritizes climate action and climate resiliency through its adopted plans and policies, including the [Our Climate Future](#) plan adopted by City Council in 2021. In relation to historic and cultural resources, the City recognizes that:

1. Climate change represents an existential threat to cultural resources across the globe, including here in Fort Collins, and;
2. Resilient and durable roofing technologies with higher reuse/recyclability options are an important component of a comprehensive climate action and resilience, and of a waste diversion policy that reduces the periodic landfilling of non-recyclable, or difficult to recycle roofing products, and;
3. Many substitute roofing technologies can typically be incorporated into historic properties without causing harm to the cultural resources on those properties.

The City has adopted the federal [U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties](#) as the basis for approving or denying projects on properties that qualify as historic resources under Municipal Code [14-3](#) "Historic resources" (Adopted under Municipal Code 14-53). The National Park Service has issued guidance under the Rehabilitation treatment method related to roofing on historic buildings. That documentation includes:

- NPS Preservation Brief #4, *Roofing for Historic Buildings*: <https://www.nps.gov/orgs/1739/upload/preservation-brief-04-roofing.pdf>
- NPS Preservation Brief #16, *The Use of Substitute Materials on Historic Building Exteriors*: <https://www.nps.gov/orgs/1739/upload/preservation-brief-16-substitute-materials-2023.pdf>

POLICY STATEMENT:

As a result of the need for evolution related to the subject of climate resiliency for cultural resources in the face of climate change, and evolving understandings of the importance of historic integrity as traditionally interpreted, the City of Fort Collins, via approval by the Historic Preservation Commission on November 20, 2024, adopts the following for roof replacements on historic resources:

1. The federal *U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties* (the Standards), and supporting guidelines for roofing, will remain a basis for decision-making on historic resources in city limits or owned by the City of Fort Collins, consistent with Municipal Code [14-53](#).
2. Acknowledging that the Standards include four treatment methods (Rehabilitation, Preservation, Restoration, and Reconstruction), when *Rehabilitation* is the appropriate/selected treatment method (which will be true of most cases), the following practices are adopted related to common roofing types on historic buildings in Fort Collins:
 - a. In most cases, shingle roofs of any type may be replaced with any wood, asphalt, or polymer roofing material that is, or simulates, shingles. This includes newer, more durable shingle-style products such as stone-coated metal, or polymer shingle panels such as F-wave, Brava, etc. In general, concrete or cement fiber and standing seam/corrugated metal roofing will not be approved as a substitute for shingle roofs outside of specific cases where a Waiver of Conditions is warranted under Municipal Code [14-5](#) (please consult Preservation staff). This is due to the additional structural load and limited options for waste diversion for concrete and cement fiber, and the fact that corrugated metal and standing seam are generally not compatible with most historic buildings in Fort Collins. Roofing projects meeting this provision will be reviewed by staff only.
 - b. Wood shingle roofs will not be required to be maintained, although owners may elect to retain them provided replacements meet applicable, current building and roofing codes. In rare cases where the wood shingle roof is a character-defining feature for the property, the wood shingles may still be replaced with a substitute material but an appropriate substitute shall be used to accurately simulate a wood shingle roof. Please contact Preservation staff for current guidance.
 - c. In general, for flat roofs, with or without a parapet, substitute roofing of any kind that does not create a material preservation concern for the overall building or character-defining features will be allowed provided the roof remains flat or appears so from the public right-of-way. This includes the replacement of older tar-and-gravel or ballast systems with membrane roofs. Use of roofing materials such as concrete as a substitute would remain prohibited due to concerns with structural load and the interplay of such a roofing system with historic materials that may be damaged by high heat-coefficient materials like concrete.

- d. Specialized roofing types such as clay tile that are character-defining features generally shall be preserved and repaired as outlined in the Standards and their supporting guidelines. Non-historic/anachronistic clay tile roofing can be removed and can be approved administratively by City staff.
3. Where the other three federal treatment methods are appropriate/selected (Preservation, Restoration, Reconstruction), typically in museum environments and often where the City is the owner of the property (e.g., the Avery House, Elizabeth Stone’s Cabin, etc.), the original/historic roofing material shall be preserved/replaced in kind and substitutes will generally remain an inappropriate treatment. In select cases, under the Preservation, Restoration, or Reconstruction treatment methods, the Historic Preservation Commission or City staff may approve a Waiver of Conditions pursuant to Municipal Code 14-5.
4. In general, installation of roof vents, including eave, edge, or traditional “turtle” vents are all appropriate and may be approved via a staff-issued Certificate of Appropriateness. However, consistent with federal guidelines for roofing on historic buildings, residential owners are still encouraged to use less visible types of venting such as edge and ridge vents. Balancing ventilation with insulation in roofing systems remains a key factor in the health of historic buildings to avoid heat damage to historic building materials. The addition of larger rooftop features such as skylights, dormers, or large (i.e. industrial) vents remains subject to City Preservation review (Municipal Code 14, Article IV) and must meet the Standards.
5. Addition of insulation above the roof sheathing that adds no more than six (6) inches to the height of the roof at the eave will be approved via a staff-issued Certificate of Appropriateness, provided that:
 - a. A plain flat fascia is used to cover the added height at the eave;
 - b. The added height matches the historic roof pitch, with allowances for tapering toward the eaves; and
 - c. For buildings with parapets, no specific height limit for new insulation will be enforced on the condition that the new roof top remains at or below the historic parapet. New roof height above a parapet is generally prohibited, but an owner/applicant can apply for a Waiver of Condition to be issued by the Historic Preservation Commission under Municipal Code 14-5.
6. Gutters & Downspouts – Gutters and downspouts remain a critical element of good building care and are encouraged in all cases. Where historic gutter and downspout systems exist *and* are character-defining features, they will be required to be maintained. In most cases, gutters and downspouts are not a character-defining feature and will be subject to the following review:
 - a. Gutters should not obscure any character-defining features, such as decorative eaves or fascia. In these cases, half-round gutters, or shallow, plain gutters that are

installed above any character-defining design features, such as A, B, F, H, or I-style gutters, will be permitted. In some cases, added roof height for insulation may provide the added eave width to accommodate new/replacement gutters without obscuring character-defining eave trim, fascia, etc.;

- b. Downspouts should not obscure any character-defining features such as quoins, decorative porch posts, windows, eave trim, vergeboards, spindle work, etc.;
 - c. Downspouts should be located with extenders or splashpads to funnel water away from the foundation; and
 - d. It is strongly recommended that gutter and downspout work be accompanied by any necessary site work (informed by a civil engineer, if necessary), to ensure stormwater from the roof drains adequately away from the building to nearby bioswales, raingardens, or public stormwater infrastructure to avoid moisture build-up and related structural damage to the historic building.
7. Other roof-related repair work such as repair or replacement of decorative eaves, fascia, cornices, addition of new rooftop features such as dormers or skylights, or work affecting or repairing a chimney, remains subject to City Preservation review under Municipal Code Chapter 14, Article IV and, where those features are considered “character-defining,” treatment must meet the Standards. Solar installations are governed by a policy issued by the Historic Preservation Commission on April 17, 2024, available online, [HERE](#).

AVAILABLE FINANCIAL INCENTIVES:

In some cases, roof replacements on historic properties can qualify for historic preservation incentives such as the Colorado [Historic Tax Credit](#) or the Federal [Historic Tax Credit](#). Use of substitute materials *may* qualify, although strict adherence to the Standards would be necessary. *Please note: The flexibility of interpretation offered under City policy may not align with State or federal interpretation of the Standards for the incentive programs linked above. There may be cases where the City approves a substitute roof replacement under this policy that will not qualify for a state or federal tax credit. Please consult with City Historic Preservation staff and/or the staff of those state/federal programs before beginning a project if intending to leverage these preservation incentives to fund the project.*

The City does offer financial incentives to support replacement of specialized historic roofing types that are character-defining features of an historic property (i.e., essential parts of its historic character). These would typically include wood shingle or clay tile roofing, where there is limited availability of qualified contractors, and specialized expertise is needed to ensure, for example, a proper underlayment for wood shingle roofs to allow for adequate moisture release, or to ensure a high retention rate (90% or more) of clay tiles during removal for roof repair, improvement, and re-installation. For more information about Landmark Rehabilitation Loans, please visit: <https://www.fcgov.com/historicpreservation/landmark-rehabilitation>