



HISTORICAL AFFAIRS AND LANDMARK REVIEW BOARD
ARLINGTON COUNTY, VIRGINIA

TO: Historical Affairs and Landmark Review Board (HALRB)
FROM: Serena Bolliger, Historic Preservation Planner
DATE: May 11, 2022
SUBJECT: Proposed Window Replacement Guidance for the Maywood Local Historic District

Background Information

In the *Maywood Design Guidelines*, the list entitled ‘When is a CoA or ACoA Required?’ (p. ii) states that “Repair or replacement of roofs, siding, external doors and windows, awnings, trim, and other features with different materials and/or a different design” requires a Certificate of Appropriateness (CoA). The guidelines also state that “Original windows should be repaired and restored.” (Chapter 5: Exterior Renovation, p. 19). Historically, the Historical Affairs and Landmark Review Board (HALRB) has chosen to interpret that statement to mean that existing windows must be repaired and restored rather than replaced, unless in such poor condition that they can no longer function.

Based on both the *Maywood Design Guidelines* language and *The Secretary of the Interior’s Standards for Rehabilitation*, the policy of the Historic Preservation Program (HPP) staff has been to discourage window replacements in the Maywood Local Historic District (LHD). The relevant *Secretary of the Interior’s Standards* include:

Standard 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.

Standard 5: Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

Standard 6: Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.ⁱ

In addition, *The Secretary of the Interior’s Standards for the Treatment of Historic Properties Guidelines for Rehabilitating Historic Buildings*ⁱⁱ lists treatments that are and are not recommended. Below is an outline of those recommendations:

Recommended:

“Identifying, retaining, and preserving windows and their functional and decorative features that are important to the overall character of the building. The window material and how the window

operates (e.g., double hung, casement, awning, or hopper) are significant, as are its components (including sash, muntins, ogee lugs, glazing, pane configuration, sills, mullions casings, or brick molds) and related features, such as shutters.”

Not recommended:

“Removing or substantially changing windows or window features which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Changing the appearance of windows that contribute to the historic character of the building by replacing materials, finishes, or colors which noticeably change the sash, depth of the reveal, and muntin configurations; the reflectivity and color of the glazing; or the appearance of the frame.”

“Replacing windows solely because of peeling paint, broken glass, stuck sash, or high air infiltration. These conditions, in themselves, do not indicate that windows are beyond repair.”

In the last few years, the HALRB has received several replacement requests for wooden windows and vinyl windows in both contributing and non-contributing houses in the Maywood LHD. Typically, the HALRB has allowed the replacement of vinyl windows in-kind and required the restoration of wooden windows, particularly in original contributing buildings. However, in December 2021, the HALRB approved new in-kind replacement wooden windows on the original non-contributing dwelling at 2329 N. Edgewood Street (CoA 21-28). Upon doing further research, the HPP staff found records of window replacements having been approved in the early-1990s (e.g., 3213 23rd St. North in July 1993), indicating that shortly after the designation of the LHD the HALRB approved in-kind replacements of historic wooden windows if the new windows were identical; the HALRB found this action not inconsistent with the *Maywood Design Guidelines*. Over time as the design review process in the LHD became more established, the HALRB adopted a narrower interpretation which discouraged in-kind window replacements in favor of retaining historic windows; it may be that the periodic changing of HALRB members and differing preservation ideologies contributed to this stricter interpretation.

Proposal

Upon receiving formal direction from the HALRB at its April 20, 2022, virtual public hearing, the HPP staff has proposed clarifying language for window replacements which would allow the HALRB to provide consideration to requests for replacement windows in the Maywood LHD. This language includes standards for consideration and has been developed in response to an increasing number of requests from the community for replacement windows, as well as to changing national sentiment in the historic preservation field in support of allowing the replacement of windows in historic districts. Upon future approval by the HALRB, the finalized language would become Appendix H of the *Maywood Design Guidelines*.

See the accompanying draft document entitled “Appendix H: In-Kind Window Replacement Guidelines” for a full description of the proposed language.

Recommendation

The dimension, texture, and materiality of historic windows embody the character of each construction era and style. Historic wooden windows were constructed from old-growth trees with hard, rot-resistant wood and have aged in place, further solidifying over time and making them even more rot and disease resistant. With regular maintenance, historic wooden windows can be retained indefinitely. In



combination with storm windows, curtains, blinds, and/or appropriate weatherstripping, historic wooden windows also can be extremely energy efficient. In the interests of both historic preservation and sustainability, the HPP staff advocates that historic windows should not be replaced when they can be repaired and complemented with other technologies such as storm windows and curtains.

Notwithstanding the foregoing, the HPP staff recommends approval of the proposed window replacement guidance for the Maywood LHD. While the HPP agrees that keeping historic wooden windows may be feasible and rewarding, staff is receiving increasing numbers of window replacement requests in the district. The HPP also understands that to some owners or tenants of historic properties, window restoration may seem more daunting and costly than wholesale window replacement. Yet, staff wants to encourage historic preservation, where practicable, to be more accessible to the community. Providing guidance for window replacement consideration will help stewards of historic buildings understand that there is a variety of options available.

Currently in the Maywood LHD, the HALRB and HPP staff allow the in-kind replacement of deteriorated roofing, siding, decking, and other exterior construction materials. Until now, the stated practice of the Board and staff has been to identify the actual material of the existing windows as character-defining, including the wavy glass and the old-growth wood. Based on this new interpretation of *The Secretary of the Interior's Standard #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."), combined with the *Maywood Design Guidelines* language, the HPP staff is recommending that for non-character-defining windows, the overall material of wood is character-defining to Maywood, rather than the extant historic old-growth wood. Therefore, if applicants replace wooden windows in-kind with identical wooden windows, the character-defining nature of the windows would be retained in the LHD. Further, retaining the size of existing window openings would not impact either the historic openings or the traditional fenestration patterns of Maywood homes.

While the National Park Service has not changed its recommendations regarding the treatment of windows, some municipalities, including nearby local communities, have chosen to allow window replacement in historic districts. Based on similar preservation pressures to those faced in Arlington, New York Cityⁱⁱⁱ, the City of Alexandria^{iv}, and Washington, D.C.^v recommend window restoration but allow in-kind window replacement based on certain parameters.

In summary, the HPP staff recommends that:

- Typical, standard existing wood windows could be replaced in-kind;
- Decorative, non-standard windows (i.e., stained or leaded glass decorative windows; non-standard dormer, gable or staircase windows; decorative transoms; curved sashes) will be considered character-defining to the LHD and must be considered by the HALRB for restoration rather than replacement;
- A record of window replacements being undertaken in the LHD must be tracked through the CoA process (with required review and approval by the HALRB);
- A conditions assessment of existing typical, standard windows will not be required since such analysis could be considered subjective (and a lack of consistency in the outcomes of decisions after conditions assessments would be unfair and could be questioned in a court of law); and

- The policy language should not differentiate between contributing and non-contributing houses in the LHD since the *Maywood Design Guidelines* does not generally make such distinction for other design elements.

Lastly, the Arlington County Zoning Ordinance (ACZO) includes the following language which gives the HALRB the authority to make this type of minor clarifying language update to the *Maywood Design Guidelines* without the standard County Board review cycle:

Section 15.7.9.B

The Review Board may approve minor updates to historic district design guidelines, except for those APS-owned or ground-leased properties designated after January 1, 2016. Historic district design guidelines shall not be created, amended, or updated except after a public hearing.

Thus, the HPP staff considers this proposal a “minor amendment” to the ACZO because it would not change or reverse any existing language in the *Maywood Design Guidelines*, nor would it transfer approval power from any entity to another. Rather, this is a policy clarification to enable the HPP staff to make consistent recommendations to the HALRB regarding window replacements in the Maywood LHD. Likewise, this policy clarification would set clear expectations for Maywood property owners while also allowing the HALRB the ability to make consistent decisions regarding future window replacement requests in the district.

ⁱ Secretary of the Interior’s Standards for Rehabilitation, Accessed May 6, 2022.

<https://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm>

ⁱⁱ The Secretary of the Interior’s Standards for the Treatment of Historic Properties, ‘Rehabilitation’ p.102, Accessed May 6, 2022.

<https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>

ⁱⁱⁱ New York City Landmarks Preservation Commission, ‘Repairing, Retrofitting, and Replacing Windows’, Accessed May 6, 2022.

https://www1.nyc.gov/assets/lpc/downloads/pdf/pubs/fact%20sheet_Windows_2117-2.pdf

^{iv} City of Alexandria Historic Preservation Window Replacement Guidelines, Accessed May 6, 2022.

<https://www.alexandriava.gov/sites/default/files/2022-02/Historic-Preservation-Parker-Gray-Window-Guidelines-2016.pdf>

^vWashington D.C. Historic Preservation Review Board, ‘Window Repair and Replacement Preservation and Design Guidelines, Accessed May 6, 2022. <https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/HPO%20Window%20Guidelines.%2010%202011.pdf>