

HISTORIC PRESERVATION BOARD

CITY OF DELRAY BEACH

---STAFF REPORT---

MEETING DATE: June 26, 2017 and June 27, 2017 (if needed)

ITEM: 21 SW 1st Avenue, Old School Square Historic District (Building 'D') – Consideration of a Certificate of Appropriateness for the **Relocation** of a contributing structure.

RECOMMENDATION: Approve

GENERAL DATA:

Owner/Applicant: Atlantic Ave Development, LLC
and MGM Sundy House, LLC

Agent: Bonnie Miskel, Esq. – Dunay,
Miskel and Blackman, LLP

Location: 21 SW 1st Avenue between West
Atlantic Avenue and SW 1st Street

Zoning District: Old School Square Historic Arts
District (OSSHAD)

Historic District: Old School Square Historic
District

Building Reference: Building 'D', Porte Cochere House

Year Built: 1940

Present Use: Office, office equipment storage

Proposed Use: Sundy House guest house, office,
boutique



ITEM BEFORE THE BOARD

The item before the Board is the consideration of a Certificate of Appropriateness (COA) for the relocation of Building 'D', located at 21 SW 1st Avenue, Block 61, Old School Square Historic District, to a site on the Sundry House properties located at 106 and 116 South Swinton Avenue pursuant to LDR Section 2.4.6(B).

BACKGROUND / DESCRIPTION

Built in 1940 Building 'D' is located at 21 SW 1st Avenue between West Atlantic Avenue and SW 1st Street, Block 61 and is classified as contributing to OSSHAD. Building 'D's atypical placement on the lot (NW/SE axis) and other research indicates that Building 'D' was moved to its existing site on Block 61 from West Palm Beach. This occurred when its West Palm Beach neighborhood was condemned and buildings demolished or relocated due to excessive noise and damage from overhead flights after the PBIA runway was extended. There is no visible signage or plaque indicating the relocation of Building "D" or other buildings in OSSHAD that have been relocated to Delray Beach from elsewhere. To eliminate a false sense of history, it is recommended that a visible plaque or marker should be located nearby describing a building's relocation.

Architecturally, Building 'D' is a 2,738 1-story wood frame vernacular modified Craftsman style bungalow with a simple plan exhibiting a low pitch tiered side gable roofline covered with standing seam metal that appears to be in good condition. The exterior walls are painted wood siding and appears to be well maintained with no signs of structural distress. The windows are single hung non-impact multi-pane with single, double, triple and ribbon fenestration. East Façade (front) a non-historic pergola supported by posts projects over a platform porch of the main entrance that is accessed by a single pane door. Multi-pane ribbon style windows are noted on the south side of the main entry door. A projecting low-pitch front gable section lines up with the pergola. To the north of the main entrance is a lower tier with a 12/12 windows and paneled shutter. Another lower tier to the north ribbon style windows are flanked by columns. The lowest tier exhibits siding, ribbon multi-pane windows and columns. This space was originally a porte cochere that was enclosed and functions as an office. West Façade exhibits the lowest tier side gable roof with a single door flanked by double multi-pane windows entry on the north end of the façade. The second tier exhibits a single oculus window. The top tier and main house exhibits double and single multi-pane windows and a fireplace chimney extending from the west side gable roof. North Façade exhibits multiple tiered gable end roof line, a single glazed door on the south side and two large bay windows comprised of three multi-pane windows in the central gable. South Façade exhibits a low-pitch gable roof with three multi-pane windows symmetrically located on the south wall. Interiors - The interiors exhibit well-maintained wood paneled walls, multi pane partitions, and tile covered fireplace mantel, all appear in good condition. The main building is used for storage of office equipment.

The non-historic walls of the original porte cochere will be removed, the original columns, however, will be retained. The porte cochere restored will exhibit a header with single and double segmental arches with side gable roofline. The non-historic pergola over the main entrance will also be removed. Building 'D' will be restored to its original design after relocation with strict adherence to the Secretary of Interior Standards for Rehabilitation and Delray Beach Historic Preservation Design Guidelines.

The applicant is requesting to relocate Building 'D' approximately 638' south of its existing site at 21 SW 1st Avenue on Block 61 to a site on the southwest corner of the Sundry Block (address unknown) where it will front directly onto SW 1st Avenue immediately south of an existing 2-story 6-unit Residential Inn. Since a portion of Block 61 has a CBD overlay, which was intended to rejuvenate blighted areas such as West Atlantic Avenue, there is pressure for more intense development on Block 6 to make it economically feasible for redevelopment. Building 'D's 1-story and small footprint is incompatible with the proposed redevelopment of Block 61 where 2-story Residential Inns are proposed at its existing site. Although Building 'D' is proposed to be located just south of 2-story Residential Inns, it will also be co-located and in character with other historical buildings proposed nearby. The setting will be more compatible in character with Building 'D' than its existing location on Block 61 once it is

developed as proposed. Please refer to overall Site Building 'D' Relocation/Reconstruction and Master plan prepared by REG Architects, which shows Building 'D' in its proposed new location.

The intended use for Building 'D' on the Sundry Block will be available for adaptive reuse possibly incorporated into the operations of the Sundry House as a guest house, offices or boutique retail. The proposed mixed-use development on Block 61, hotels and residential Inns on Blocks 69 and 70 will be able to provide the necessary foot traffic needed to sustain the small boutiques and other uses proposed for Building 'D.' The architectural integrity of Building 'D' is preserved so that it can remain a viable and economically contributing historic resource.

The applicant's *Justification Relocation Statement* indicates that attempts over the past 15 to 20 years to find uses to occupy and sustain the historic structures that occupy Block 61 have not been successful as a whole or have only worked for temporary periods.

Landscaping Recommendations: The existing setting of the historic buildings on Block 61 and the Sundry Block exhibits an organic unplanned growth pattern that has evolved over time based on the buildings' occupant(s) and nature's determination. The Swinton Commons proposed development indicates the historic buildings will have adaptive uses and not used as a residences, as was their original purpose. Therefore, the overall landscaping palette and design for the historic buildings become an important and prominent aspect in their relocated "historic neighborhood."

The following are landscaping concept recommendations for the proposed historic buildings relocated sites:

- The landscaping proposal should reflect sensitivity to the overall appearance of the historic "neighborhood" as the landscaping matures over time.
- The proposed functions of the historic buildings in their relocated sites are yet to be determined. It is important that proposed landscape settings relate to the scale and is sensitive to the architecture of the historic structures and not to the building's proposed function, since the function is likely to change over time.
- Most of the historic buildings were initially built as residences for the early settlers of Delray Beach with the early landscaping likely minimal, informal and possibly more oriented to food-producing vegetation/landscaping, which is not practical or recommended. The landscaping, however, should be in keeping with the scale of the historic buildings and complementary to its architecture.
- The relocated site(s) should reflect a somewhat informal setting that would be less of a "traditional commercial landscape" scheme and more "garden-like" in their plant palette and overall design.

To ensure the historic building sites are landscaped appropriately, compatible, complementary, and maintainable over time it is recommended:

- The developer provide a basic landscaping plan and maintenance program specifically for the historic building(s) that reflect a somewhat less "traditional commercial landscape" and more "garden-like" setting that is compatible and complementary to the historic buildings approved by the city landscape planner.
- A leased building is likely to have multiple lessees and functional changes over time. Consequently, a lessee is less likely to invest in costly landscaping. This may result in a setting that may or may not be complementary to, or compatible with the historic building site(s) unless landscaping standards are in place approved by the city landscape planner. The lessee of a historic structure would be allowed to embellish the proposed landscaping with complementary vegetation approved by the City landscaping planner.
- Privately owned historic properties should have an overall landscaping plan that would also be a less "traditional commercial landscape" scheme and be more "garden-like" in

overall design that is compatible with and complementary to the historic building approved by the city landscape planner.

Consultant Requirement: It is important that the relocation of this and other historic buildings, as proposed do not create a false sense of historic placement if the project is approved. Therefore, it is imperative that the applicant be required to take measures to describe and explain the evolution and transition of Blocks 61, the Sundry Block, Block 69 and 70 as stated in the **Addendum** at the end of this report. Other structures have been successfully relocated in the past within Delray and in particular the OSSHAD.

DEVELOPMENT STANDARDS

Zoning and Use Review

Pursuant to **LDR Section 4.4.24(F), Development Standards**, the development standards as set forth in Section 4.3.4 apply, as noted in the chart below:

Setbacks:	Requirement	Proposed
Front (West)	25'	25'
Side Interior (North)	7'-6"	N/A
Side Interior (South)	7'-6"	7'6"
Rear (East)	10'	76'

As illustrated above, the proposal complies with the minimum setbacks of the Development Standards for the OSSHAD zoning district. Lot Coverage, Open Space, and Height will be reviewed for compliance with the Class V Site Plan.

**LDR SECTION 4.5.1
 HISTORIC PRESERVATION: DESIGNATED DISTRICTS, SITES, AND BUILDINGS**

Pursuant to **LDR Section 2.4.6(H)(5)**, Prior to approval, a finding must be made that any Certificate of Appropriateness which is to be approved is consistent with Historic Preservation purposes pursuant to Objective A-4 of the Land Use Element of the Comprehensive Plan and specifically with provisions of Section 4.5.1, the Delray Beach Historic Preservation Design Guidelines, and the Secretary of the Interior’s Standards for Rehabilitation.

Pursuant to **LDR Section 4.5.1(E)**, Development Standards, all new development or exterior improvements on individually designated historic properties and/or properties located within historic districts shall, comply with the goals, objectives, and policies of the Comprehensive Plan, the Delray Beach Historic Preservation Design Guidelines, the Secretary of the Interior’s Standards for Rehabilitation, and the Development Standards of this Section. Relief from Subsections (1) through (9) below may be granted by seeking a waiver approvable by the Historic Preservation Board, unless otherwise stated.

Pursuant to **LDR Section 4.5.1(E)(2)**, Major Development, the subject application is classified as Major Development as it is the “alteration of a building in excess of twenty-five percent (25%) of the existing floor area, and all appurtenances...”, and “the construction, reconstruction, or alteration of any part of the front façade of an existing contributing residential or non-residential structure and all appurtenances...”

The proposed improvements are considered “Major Development” in accordance with the LDR noted above.

Pursuant to LDR Section 4.5.1(E), in considering proposals for alterations to the exterior of historic buildings and structures and in applying development and preservation standards, the documented, original design of the building may be considered, among other factors.

Pursuant to LDR Section 4.5.1(E)(5), Standards and Guidelines, a historic site, building, structure, improvement, or appurtenance within a historic district shall only be altered, restored, preserved, repaired, relocated, demolished, or otherwise changed in accordance with the Secretary of the Interior's Standards for Rehabilitation, and the Delray Beach Historic Preservation Design Guidelines, as amended from time to time.

The applicable Standards are noted below:

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 3 Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Standard 2: The intent is to restore the Building 'D' to its original design. Building 'D' will be relocated mostly intact including its interior fireplace. The non-historic infill walls of the original port cochere, will be removed. The posts and headers will be restored with strict adherence to Secretary of the Interior's Standards for Rehabilitation, and the Delray Beach Historic Preservation Design Guidelines. The building will be in harmony with existing structures, other historic buildings, and lush setting at its proposed location.

Standard 3: The historic posts of the port cochere will remain intact once the infill non-historic walls are removed. And building relocated and restored in a manner consistent with its historic design. All work shall accomplished with strict adherence to the Secretary of Interiors Standards for Rehabilitation-and the Delray Beach Historic Preservation Design Guidelines.

Pursuant to LDR Section 4.5.1(E)(6)(a), Relocation, Relocation of a Structures in a Historic District or on an Individually Designated Site, relocation of a contributing or non-contributing building or structure or an individually designated building or structure to another site shall not take place unless it is shown that preservation on their existing or original site would cause undue economic hardship to the property owner in accordance with definition and requirements of undue economic hardship found in Section 4.5.1(H) or a building permit has been issued.

Building 'D' in its existing location is close to property that has a CBD overlay, which allows more intense development. The small size and footprint of Building 'D' does not comply with the needs of the applicant where 2-and 3-story Residence Inns are proposed. By moving it to its proposed relocated site, will eliminate the applicant's consideration of demolishing Building 'D'. At this time the owner has not claimed undue economic hardship. If the owner decides to claim undue economic hardship, they must comply and submit all materials requested in **Article 4.5, Section 4.5.1 (H)**.

Pursuant to LDR Section 4.5.1(E)(6)(a)1., Relocation, Relocation of Contributing or Individually Designated Structures, Criteria, when considering the relocation of a contributing structure from a historic district, or an individually designated structure from a site, the Board shall be guided by the following, as applicable:

- a. **Whether the structure will be relocated within the same historic district, into a new historic district, or outside of a historic district;**
- b. **Whether the proposed relocation may have a detrimental effect on the structural soundness of the building or structure;**

- c. **Whether the proposed relocation would have a negative or positive effect on other historic sites, buildings, or structures within the originating historic district, at the new site;**
 - d. **Whether the new surroundings of the relocated structure would be compatible with its architectural character; and,**
 - e. **Whether the proposed relocation is the only practicable means of saving the structure from demolition.**
- a) Building 'D'. will be relocated within the same historic district, OSSHAD;
 - b) Statement and Relocation Criteria, A Field Report by Robert J. Selinsky, P.E., August 13, 2015 and Mike Brovant of Wolfe House and Building Movers indicate that Building 'D' shows no signs of structural distress and no structural defects are noted in the exterior walls, and the building could be moved to its new location, including the existing fireplace);
 - c) The proposed relocation would not have a negative effect on other historic sites, buildings, or structures within the originating historic district, at the new site;
 - d) the new surroundings of the relocated structure would be compatible with its architectural character; and
 - e) The proposed relocation is the practicable means of saving the structure from the applicant's consideration for demolition.

Pursuant to LDR Section 4.5.1(E)(6)(a)2., Relocation, Relocation of Contributing or Individually Designated Structures, Relocation Plan, when considering the relocation of a contributing or individually designated structure, the Board shall require a Relocation Plan that includes the following:

- a. **A detailed explanation of the relocation method including the type of machinery and equipment to be utilized;**
 - b. **A demolition plan illustrating any parts of the structure to be removed or modified to facilitate the relocation;**
 - c. **An illustration of locations where the building will be split, as applicable;**
 - d. **The name of the Florida Licensed Building Mover who will relocate the structure(s) and the following support materials, if available:**
 - i. **A description of the Florida Licensed Building Mover's past experience in moving historic buildings of a similar construction technique.**
 - ii. **Photographs of prior relocation projects completed by the Florida Licensed Building Mover taken before and after the relocation, if applicable.**
 - e. **A certified engineering report which includes:**
 - i. **A relocation feasibility study with an assessment of the building's structural condition to determine any damage that might occur during the move.**
 - ii. **Details and a description of the historic structure's construction type including technique and materials and current condition of materials.**
 - iii. **Identification of any areas of concern, and how these areas will be addressed prior to the relocation.**
- a) The applicant's *Justification Statement and Relocation statements*, indicate that "Buckingham Structural Moving Equipment" will be used to move the structure, which shows the type of equipment that have been used to move buildings throughout the country. Information is found in the appendix of the application package.
 - b) The non-historic pergola, non-historic infill walls of the original porte cochere will be removed, and the header and posts will remain and be restored. These are modifications planned to move Building 'D' to its new location.
 - c) The small footprint of Building 'D' does not require it to be split for moving to new location.
 - d) Wolf House and building Movers will register as a subcontractor under a Florida General Contractor who supposedly will perform the preparatory work related to the right-of-way preparation, relocation of overhead utilities, traffic signals and general maintenances of traffic

during the preparation for any relocation. Backup information relating to the experience of Wolf House and Building Movers are included in the application found in the appendix.

- e) Building 'D' is a one-story woodframe structure with painted wood siding finish that shows no signs of structural distress, defects observed in the exterior walls noted by consulting engineers McCarthy and Associates.

Pursuant to LDR Section 4.5.1(E)(6)(a)3., Relocation, Relocation of Contributing or Individually Designated Structures, Supplemental Documentation, the following information shall be provided with the application for a Certificate of Appropriateness for relocation of a contributing or individually designated structure prior to Board consideration:

- a. **As built drawings of the building as it exists on its originating site before undertaking the move, particularly if the move will require substantial reconstruction, including but not limited to floor plans, elevations, and architectural details and profiles;**
- b. **Photographs of the site and the interior and exterior of the building, including but not limited to all elevations and exterior details.**
- c. **History of any code violations applied to the structure and property, along with an explanation of any pending violations or structure violations which have been issued within five (5) years of the application request.**

REG Associates provided; a) drawings of existing conditions at its original site, floor plans, elevations and architectural details and profiles; b) Multiple photographs of the site and interior and exterior of building are provided; an c) The building has no history of code violations within the past 5 years.

Pursuant to LDR Section 4.5.1(E)(6)(a)4., Relocation, Relocation of Contributing or Individually Designated Structures, Concurrent New Development Review, applications for a Certificate of Appropriateness for relocation shall be submitted concurrently with the application for a Certificate of Appropriateness for the new development on the originating site.

The applicant will submit COA for relocation concurrently with application for a Certificate of Appropriateness for the new development on the originating site

Pursuant to LDR Section 4.5.1(E)(6)(a)5., Relocation, Relocation of Contributing or Individually Designated Structures, Site Maintenance, if the originating site is to remain vacant and construction of the new development will not commence for more than 90 days following the relocation, the lot shall be sodded and maintained in a manner consistent with other open space in the historic district.

If the originating site remains vacant and construction of the new development does not commence after 90 days following the relocation, the applicant will sod and maintain the lot consistent with other open space in the historic district.

Pursuant to LDR Section 4.5.1(E)(6)(a)6., Relocation, Relocation of Contributing or Individually Designated Structures, Successful or Unsuccessful Relocation, the relocation of a historic structure is deemed successful when either no damage occurs during or as a result of the relocation or minimal damage occurs which is not deemed to compromise the integrity (structurally and architecturally) of the structure, and when the relocation is completed in accordance with the approved Certificate of Appropriateness, including the associated Relocation Plan.

- a. **If damage occurs during the relocation, then the property owner, applicant and/or Licensed Building Mover shall notify the Historic Preservation Planner and Chief Building Official within 24 hours of completion of the move to determine if the damage has compromised the integrity of the structure, thereby deeming the relocation as unsuccessful.**

- b. **If a relocation is not successful, then the property owner and/or applicant shall notify the Historic Preservation Planner and Chief Building Official within 24 hours of the failed relocation, or before the close of business on the next business day.**
- c. **Failure of any degree to successfully relocate the historic structure may result in the revocation of any site development relief (waivers, variances, internal adjustments, or other relief) associated with the relocation that has been granted by the Board or the City Commission, as required by the Planning and Zoning Director.**
- d. **The applicant or property owner may submit a written request for the reconsideration of any previously approved site development relief associated with the unsuccessfully relocated structure in accordance with the following:**
 - i. **The reconsideration request shall be submitted to the Planning and Zoning Director within five business days of notification of the unsuccessful relocation. The reconsideration will be placed on the next available agenda of the recommending or approving body as appropriate**
 - ii. **Requests for reconsideration shall include a statement regarding the relocation, documentation of the relocation, an explanation of the relocation failure, and how the relocation failed to meet the Relocation Plan of the approved Certificate of Appropriateness and the corrective actions to address issues caused by failed relocation.**

Applicant shall comply with **LDR Section 4.5.1(E)(6)(a)6**, (a - d) relating to damage that compromises the integrity of the structure and it is deemed a failure in relocation as well as requests for reconsideration.

Pursuant to LDR Section 4.5.1(E)(6)(a)7., Relocation, Relocation of Contributing or Individually Designated Structures, Public Notice: All applications for a Certificate of Appropriateness for the relocation of a contributing structure or an individually designated structure shall meet the "Additional Public Notice" requirements of LDR Section 2.4.2(B)(f)(j).

Applicant shall meet LDR Section 4.5.1(E)(6)(a)7 and Additional Public Notice requirements of LDR Section 2.4.2(B)(f)(j).

Pursuant to LDR Section 4.5.1(E)(6)(d), Relocation, Supplemental Requirements, all buildings and structures approved for relocation shall comply with the following:

- 1. **The building to be relocated shall be secured from vandalism and potential weather damage before and after its move, in a manner as approved by the Chief Building Official.**
- 2. **All structures approved for relocation and awaiting issuance of a building permit for the new development on the originating site shall be maintained so as to remain in a condition similar to that which existed at the time of the application.**
- 3. **All structures to be relocated pursuant to this Section shall comply with the requirements of Section 7.10.11, "Moving of Building: Historic Structures".**

Applicant shall meet all requirements pursuant to LDR Section 4.5.1(E)(6)(d), Relocation, Supplemental Requirements, (1-3) relating to maintaining structure while awaiting permit and complying with "Moving Historic Structures."

Comprehensive Plan

Pursuant to the Future Land Use Element, Objective A-4, the redevelopment of land and buildings shall provide for the preservation of historic resources. The objective shall be met through continued adherence to the City's Historic Preservation Ordinance and, where applicable, to architectural design guidelines through the following policies:

Pursuant to the Future Land Use Element, Policy A-4.1, prior to approval or recommending approval of any land use or development application for property located within a historic district or designated as a historic site, the Historic Preservation Board must make a finding that the requested action is consistent with the provisions of Section 4.5.1 of the Land Development Regulations relating to historic sites and districts and the “Delray Beach Design Guidelines”.

Pursuant to the Future Land Use Element, Objective A-9, the City shall support the conservation and rehabilitation of historically significant housing, especially where such housing is an identifying characteristic of a particular neighborhood.

Relocating Building 'D' from Block 61 to the Sundry Block within OSSHAD, the applicant preserves the historic resource meeting Comprehensive Plan Objective A-4. Building 'D's scale, and architecture possesses identifying characteristics of the existing neighborhood. The redevelopment of Block 61 with a partial CBD overlay allows more intense redevelopment which and will change the character of Block 61. Consequently, Building 'D' would no longer possess identifying characteristics with the new construction proposed for Block 61 were it to remain at its existing site. The Historic Preservation Board will determine that the requested action is consistent with the provisions of Section 4.5.1 of the LDRs.

ALTERNATIVE ACTIONS

- A. Continue with the following direction.
- B. Move to approve the COA (Building 'D') for the relocation of the contributing structure on the property located at 21 SW 1st Avenue, Block 61 to the property located at southwest section of the Sundry House property at 106 and 116 South Swinton Avenue OSSHD by adopting the findings of fact and law contained in the staff report, and finding that the request and approval thereof is consistent with the Comprehensive Plan and meets the criteria set forth in the Land Development Regulations, and the Secretary of the Interior's Standards for Rehabilitation.
- C. Move to deny the COA (Building 'D') for the relocation of the historic structure on the property located at 21 SW 1st Avenue,, Block 61 to the property located at southwest corner of the Sundry Block (address to be determined) OSSHD and law contained in the staff report, and finding that the request is inconsistent with the Comprehensive Plan and does not meet the criteria set forth in the Land Development Regulations, and the Secretary of the Interior's Standards for Rehabilitation.

RECOMMENDATION

Move to approve the COA (Building 'D') for the relocation of the contributing structure on the property located at 21 SW 1st Avenue, OSSHD to the property located at southwest corner of the Sundry House property at 106 and 116 South Swinton Avenue OSSHD by adopting the findings of fact and law contained in the staff report, and finding that the request and approval thereof is consistent with the Comprehensive Plan and meets the criteria set forth in the Land Development Regulations, and the Secretary of the Interior's Standards for Rehabilitation.

ADDENDUM - The above Recommendation is based on the following: The Swinton Commons mixed-use redevelopment project, if approved will substantially change the character of Block 61, the Sundry Block, Block 69 and Block 70, as it relocates/reconstruct six historically significant resources to their proposed sites and construct, 2-, 3- and 4-story buildings as proposed.

The Swinton Commons mixed-use redevelopment should only be approved if the applicant, at a minimum commits to the following:

- a) The applicant should be required to provide a standing "Historic Marker," or equivalent that clearly describes the relocations or reconstruction of historic buildings within OSSHAD based on the Swinton Commons mixed-use redevelopment project as proposed.
- b) The applicant would commit to keeping residents and visitors alike informed of the changes that have taken place within OSSHAD south of West Atlantic Avenue by dedicating space in the Cathcart House and/or Rectory for exhibits and sponsoring a knowledgeable individual to give presentations (timeframe to be determined) of the changes that have occurred on Block 61, 69, 70 & Sundry Block with the Swinton Commons redevelopment project.

Additionally, to avoid a false sense of history, particularly in a historic district, all buildings that have been relocated into or within a historic district should have a plaque or marker expressing its relocation history. These Actions would, at the very least educate the public, demonstrate honesty, avoid claims of presenting a false sense of history and appearance to the general public, and as importantly exhibit serious interest in preserving our historic resources in today's evolving environment.