# MONTGOMERY COUNTY HISTORIC PRESERVATION COMMISSION STAFF REPORT

Address: 1811 Brighton Dam Road, Brookeville Meeting Date: 4/23/2025

**Resource:** Master Plan Site #23/72 **Report Date:** 4/16/2025

**Prospect Hill** 

**Applicant:** Jeffrey Shirazi **Public Notice:** 4/09/2025

Review: HAWP Tax Credit: No

Permit Number: RETROACTIVE HAWP#1107314 Staff: Rebeccah Ballo

**PROPOSAL:** After the fact construction of a log cabin.

# **STAFF RECOMMENDATION**

Staff recommends that the HPC <u>approve with one (1) condition</u> the HAWP application with final approval delegated to staff:

1. The applicant must hire an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards for archaeology to conduct archaeological investigations around the foundation and in the vicinity of the new construction to identify whether there is any evidence of an historic outbuilding in the location or whether there is evidence of historical features or activity areas. This work could consist of close interval shovel test pits at 15-foot intervals in the immediate vicinity of the cabin, and up to two 3-by-3 foot excavation units along or near any possible historic foundations or other features. A draft report must be submitted to Staff for review and comments. Any comments must be addressed by the applicant's archaeologist and a final report submitted to the Historic Preservation Office. The final report must be completed within six (6) months of the approval of this HAWP.



Figure 1: The Prospect Hill Master Plan Historic Site at 1811 Brighton Dam Road is shaded in pink. The larger property boundaries are outlined in red.

# **PROPERTY DESCRIPTION**

SIGNIFICANCE: Master Plan Site #23/72, Prospect Hill

as a chapel, and a three-bay, side-passage section to the west.

STYLE: Vernacular DATE: 1783

Prospect Hill farm survives as a significant reminder of Montgomery County's Revolutionary-era heritage. The main house on the property was built by 1783 by James Holland, a Revolutionary War patriot, and used by him and other local patriots as a meeting place to discuss their role in the American Revolution. The 60-acre property includes the farmhouse with its intact, Federal-period interior detailing, an English barn, a single-crib barn, and a family cemetery. Historically, the property included a woolen mill, a stone quarry, and slave quarters, none of which are extant today. The main farmhouse is a two-story, frame structure, with a distinctive double-story porch extending across the south elevation. Similar galleried porches are found on the two nearby Holland Houses: Grafton Holland Farm and Landgate. The

house was built in two separate phases, including a one-room, two-bay section to the east, which served

The property at 1811 Brighton Dam Road measure 40 acres. The designated area measures 5.85 acres and includes the restored residence and its addition, Corn Crib, Main Barn, wooded areas, and pastures. The designated area also includes the Holland Family Cemetery (Burial Sites Inventory #36), which includes approximately 20 graves dating from 1816 to 1911 in a wooded area. <sup>1</sup>

# **BACKGROUND**

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<sup>&</sup>lt;sup>1</sup> The inventory form for the Holland Family Cemetery is available here: https://mcatlas.org/filetransfer/HistoricPreservation/Cemeteries/036\_Holland\_Family\_Brighton/036\_Holland\_Family\_Brighton\_2018\_Survey.pdf

On July 9, 2002, the County Council approved the historic designation of Prospect Hill as part of the *Final Draft Amendment to the Approved and Adopted Master Plan Olney-Sandy Spring- Goshen Areas*.

At the December 16, 2015, HPC meeting, the Commission approved the removal of a two-story, 20th century addition at the east side of the historic house as part of HAWP #23/72-15A. The 2015 HAWP also included rehabilitation of the historic house and the construction of a new two-story addition and hyphen connector at the east (right) side of the historic house. At the August 14, 2019, HPC meeting, the Commission approved revisions to the previously approved east-side addition as part of revision to HAWP #23/72-15A. The 2019 revision was chiefly concerned with adding a second floor to a porch on the north side (rear) of the approved addition. At its June 8, 2022, meeting, the HPC approved HAWP #992960² for the construction of a three-story vehicle barn measuring 33-by-44 to the northeast of the historic residence. That building has yet to be constructed.

In 2024, the Historic Preservation Office was alerted by Forest Conservation Staff with Montgomery Planning of numerous alterations to the property including grading alterations, stockpiling of materials. After further review, Historic Preservation staff concluded that the applicant installed fencing, graded the site, altered existing buildings, and constructed 12 outbuildings without the required Historic Area Work Permits. The applicant came to the HPC on July, 24, 2024 for a Preliminary Consultation to seek the HPC's guidance on these items. The HPC discussed the alterations and new construction items that they felt could be approved with a future HAWP application and which they did not find appropriate under Chapter 24A and the *Standards*. The applicant was instructed to return with a HAWP application for the items.<sup>3</sup>

Historic Preservation staff communicated with the applicant several times since that hearing in an attempt to move the application forward. The applicant did remove two shed roof/lean-to structures that had been placed against the historic corn crib during this time. However, after several months of continued inactivity on all the other violations, the Department of Permitting Services issued a Civil Citation against the applicant on December 2, 2024 for failure to obtain the required Historic Area Work Permits. The applicant and staff appeared in District Court on this matter on March 18, 2025. The applicant pled guilty and agreed to a 30-day abatement order at the hearing. Staff continues to work with the applicant, Department of Permitting Services, and the County Attorney's Office to remedy this situation.

# **PROPOSAL**

The proposal is seeking approval for the ocnsutrction of a log cabin/outbuilding (labeled as "Historic Cabin" in the Preliminary Consultation report) at the subject property. While the new construction is an after-the-fact alteration, it should be reviewed by the HPC as if the construction has not yet occurred.

# **APPLICABLE GUIDELINES**

When reviewing alterations and new construction within the Brookeville Historic District several documents are to be utilized as guidelines to assist the Commission in developing their decision. These documents include the Montgomery County Code Chapter 24A-8 (*Chapter 24A-8*), and the Secretary of the Interior's Standards for Rehabilitation (*Standards*). The pertinent information in these documents is

<sup>&</sup>lt;sup>2</sup> The approved plans for HAWP #992960 are available here: <a href="https://mcatlas.org/tiles6/06\_HistoricPreservation\_PhotoArchives/HAWP/06-08-2022/1811%20Brighton%20Dam%20Road,%20Brookeville%20-%20992960%20-%20Approval.pdf">https://mcatlas.org/tiles6/06\_HistoricPreservation\_PhotoArchives/HAWP/06-08-2022/1811%20Brighton%20Dam%20Road,%20Brookeville%20-%20992960%20-%20Approval.pdf</a>
<sup>3</sup> The staff report for the July 24, 2024 Preliminary Consultation is available here:

<sup>&</sup>lt;sup>3</sup> The staff report for the July 24, 2024 Preliminary Consultation is available here: https://montgomeryplanning.org/wp-content/uploads/2024/07/II.A-1811-Brighton-Dam-Road-Brookeville-Part1.pdf

outlined below.

# Montgomery County Code Chapter 24A-6

Historic area work permits-Generally.

- (a) Required. An historic area work permit for work on public or private property containing an historic resource must be issued pursuant to the provisions of this chapter before:
  - (1) Constructing, reconstructing, moving, relocating, demolishing or in any manner modifying, changing or altering the exterior features of any historic site or any historic resource located within any historic district.
  - (2) Performing any grading, excavating, construction or substantially modifying, changing or altering the environmental setting of an historic site or an historic resource located within an historic district;
- (b) Exceptions. Nothing in this section shall be construed to require the issuance of an historic area work permit for any ordinary maintenance, repair of exterior features, any customary farming operations or any landscaping, which will have no material effect on historic resource located within an historic district, of which such features are a part. For the purposes of clarification of this section, the commission shall develop and publish guidelines regarding what activities constitute ordinary maintenance and shall send a copy of these guidelines by registered mail to all owners of historic resources designated on the master plan.

# Montgomery County Code Chapter 24A-8

- (b) The commission shall instruct the director to issue a permit, or issue a permit subject to such conditions as are found to be necessary to ensure conformity with the purposes and requirements of this chapter, if it finds that:
  - (1) The proposal will not substantially alter the exterior features of an historic site or historic resource within an historic district; or
  - (2) The proposal is compatible in character and nature with the historical, archeological, architectural or cultural features of the historic site or the historic district in which an historic resource is located and would not be detrimental thereto or to the achievement of the purposes of this chapter;

# Secretary of the Interior's Standards for Rehabilitation

The Secretary of the Interior defines rehabilitation as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features, which convey its historical, cultural, or architectural values." The *Standards* read are as follows:

- 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.
- 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic

property and its environment would be unimpaired.

# **STAFF DISCUSSION**

This recently constructed building measures 25 feet long, 16 feet wide, and 16 feet tall. It is located about 30 feet to the west of the Main House and faces to the east. Its wood post foundation supports the timber walls, infilled with caulk. The gable and shed roofs are covered with a standing seam metal roof. The doors are wood plank, and the 1/1 sash windows are vinyl. A covered wood front porch is located on the front elevation. The applicant has added a covered shed roofed structure to the rear that measures approximately 22' wide by 24'8" deep. It is covered by a metal roof that matches the roof on the cabin. The roof is supported by wood posts set in concrete. While the cabin was constructed circa 2019, the shed roofed structure to the rear was constructed in the past year since the Preliminary Consultation hearing.



Figure 2: The cabin is circled in red in this 2024 aerial image of the site.



Figure 3: The cabin measures 25 feet long, 16 feet wide, and 16 feet tall.

Staff recommends approval of the construction of the log cabin/outbuilding located approximately 25 feet to the west of the Main House. The design intent was to mimic the look of a traditional log cabin, but its squared timbers and caulking between the wood give it a more contemporary appearance. In conformance with Chapter 24A-8(b)(1), the building does not substantially alter the exterior features of the historic site. Per Chapter 24A-8(b)(2), the 400-square-foot building's simple, one-story design is compatible in character with the historical, architectural, and cultural features of the historic site where small outbuildings in the farmyard were common. Likewise, the building meets the *Standards* because the historic character of the property has been retained and preserved and is clearly differentiated as new construction; and the essential form and integrity of the historic property would be unimpaired if the building is removed in the future. The shed roofed structure to the rear similarly meets the *Standards* and criteria from Chapter 24A. It's utilitarian form and use of metal roof materials are all appropriate for the site. It is located to the rear of the cabin and will not encroach upon the historic house or its setting. However, staff would not necessarily support making this lean-to structure into a permanent part of the cabin and any alterations, including adding flooring/decking or walls or any other alterations must come to the HPC for a revised HAWP.

At the Preliminary Consultation the HPC requested the applicant to submit dimensioned drawings for the cabin with all materials labeled. The drawings show these details.

Construction of the cabin may have damaged archaeological deposits or features associated with the site. Archaeological investigations should be conducted around the foundation and in the vicinity of the new construction to identify whether there is any evidence of an historic outbuilding in the location or whether there is evidence of historical features or activity areas. This work could consist of close interval shovel test pits at 15-foot intervals in the immediate vicinity of the cabin, and up to two 3-by-3 foot excavation units along or near any possible historic foundations or other features. Staff recommends the HPC adopt a condition of approval for the HAWP that this work be completed within six (6) months of the approval of this application.

# **STAFF RECOMMENDATION**

Staff recommends that the Commission <u>approve with one (1) condition</u> the HAWP application with final approval delegated to staff:

2. The applicant must hire an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards for archaeology to conduct archaeological investigations around the foundation and in the vicinity of the new construction to identify whether there is

any evidence of an historic outbuilding in the location or whether there is evidence of historical features or activity areas. This work could consist of close interval shovel test pits at 15-foot intervals in the immediate vicinity of the cabin, and up to two 3-by-3 foot excavation units along or near any possible historic foundations or other features. A draft report must be submitted to Staff for review and comments. Any comments must be addressed by the applicant's archaeologist and a final report submitted to the Historic Preservation Office. The final report must be completed within six (6) months of the approval of this HAWP;

and under the Criteria for Issuance in Chapter 24A-8(b)(1), (2), and Chapter 24A-8(d), having found that the proposal will not substantially alter the exterior features of the historic resource and is compatible in character with the purposes of Chapter 24A;

and with the Secretary of the Interior's Standards for Rehabilitation #9, and 10

and with the general condition that the applicant shall present an electronic set of drawings, if applicable, to Historic Preservation Commission (HPC) staff for review and stamping prior to submission for the Montgomery County Department of Permitting Services (DPS) building permits;

and with the general condition that final project design details, not specifically delineated by the Commission, shall be approved by HPC staff or brought back to the Commission as a revised HAWP application at staff's discretion;

and with the general condition that the applicant shall notify the Historic Preservation Staff if they propose to make **any alterations** to the approved plans. Once the work is completed the applicant will contact the staff person assigned to this application at 301-563-3404 or Rebeccah.Ballo@montgomeryplanning.org to schedule a follow-up site visit.



# **APPLICATION FOR** HISTORIC AREA WORK PERMIT HISTORIC PRESERVATION COMMISSION 301.563.3400

DATE ASSIGNED\_\_\_\_

Date

FOR STAFF ONLY:

HAWP#\_

# **APPLICANT:**

Name:			-mail:			
Address:			City:	Zip:		
Daytime Phone: _			Tax Account No.:			
AGENT/CONTACT	T (if applicable	<b>e</b> ):				
Name:		E	E-mail:			
Address:			Dity:	Zip:		
Daytime Phone: _			Contractor Registration No.:			
LOCATION OF BU	JILDING/PREM	IISE: MIHP # of Historic	Property			
map of the easen Are other Plannin	nent, and docur g and/or Hearir Variance, Recor ormation.	mentation from the Easeing Examiner Approvals /rd Plat, etc.?) If YES, incl	ment Holder suppo Reviews Required a ude information on	as part of this Application?		
		Nearest Cross	Nearest Cross Street:			
Lot:	Block:	Subdivision:	Parcel:	_		
for proposed we be accepted for New Const Addition Demolition Grading/Ex I hereby certify the	ork are submit review. Check ruction kcavation hat I have the a d that the const	Deck/Porch Fence Hardscape/Landsca Roof uthority to make the fore	on. Incomplete A Shed, Solar Tree r ape Windo Other egoing application, plans reviewed and	pplications will not /Garage/Accessory Structure		

Signature of owner or authorized agent

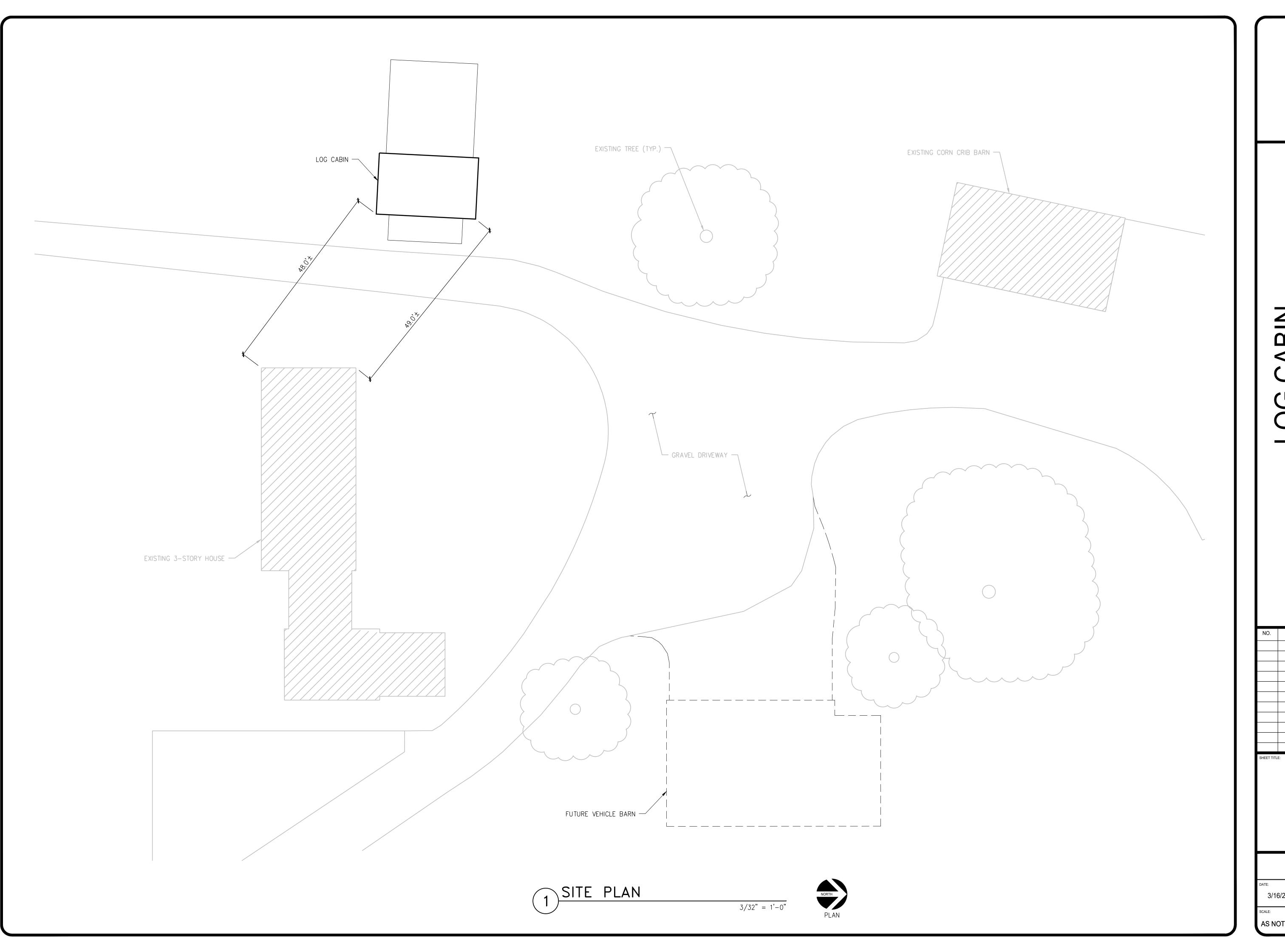
# HAWP APPLICATION: MAILING ADDRESSES FOR NOTIFING [Owner, Owner's Agent, Adjacent and Confronting Property Owners] Owner's mailing address Owner's Agent's mailing address Adjacent and confronting Property Owners mailing addresses

Description of Property: Please describe the building and surrounding environment. Include information on significant structures, landscape features, or other significant features of the property:
Description of Work Proposed: Please give an overview of the work to be undertaken:

Work Item 1:	
Description of Current Condition:	Proposed Work:
Work Item 2:	
Description of Current Condition:	Proposed Work:
Work Item 3:	
Description of Current Condition:	Proposed Work:

# HISTORIC AREA WORK PERMIT CHECKLIST OF APPLICATION REQUIREMENTS

	Required Attachments						
Proposed Work	I. Written Description	2. Site Plan	3. Plans/ Elevations	4. Material Specifications	5. Photographs	6. Tree Survey	7. Property Owner Addresses
New Construction	*	*	*	*	*	*	*
Additions/ Alterations	*	*	*	*	*	*	*
Demolition	*	*	*		*		*
Deck/Porch	*	*	*	*	*	*	*
Fence/Wall	*	*	*	*	*	*	*
Driveway/ Parking Area	*	*		*	*	*	*
Grading/Exc avation/Land scaing	*	*		*	*	*	*
Tree Removal	*	*		*	*	*	*
Siding/ Roof Changes	*	*	*	*	*		*
Window/ Door Changes	*	*	*	*	*		*
Masonry Repair/ Repoint	*	*	*	*	*		*
Signs	*	*	*	*	*		*



PROSPECT HILL FAMILY FARN

NO. REVISION DATE

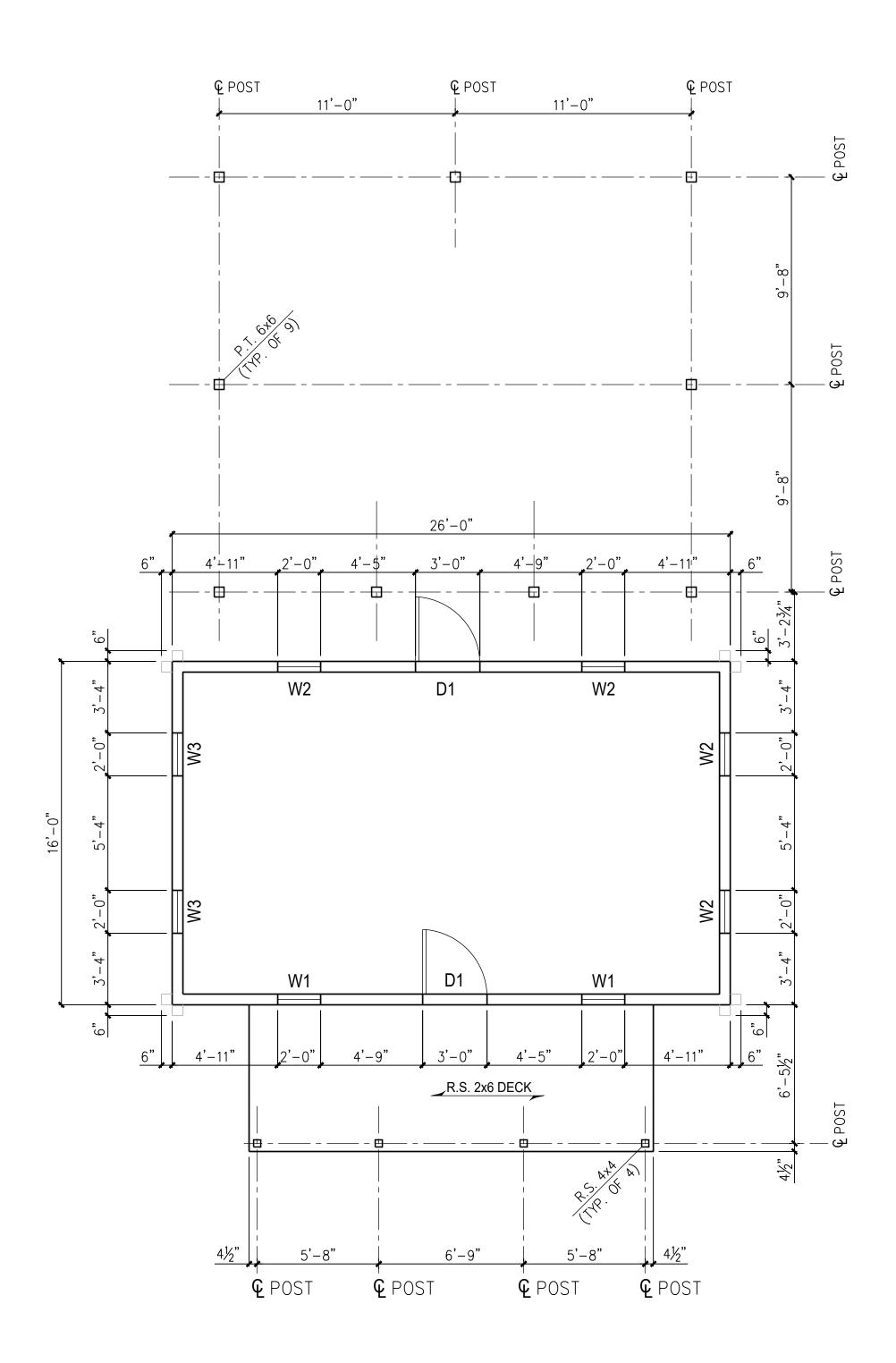
SITE PLAN

DATE:

3/16/25

SCALE:

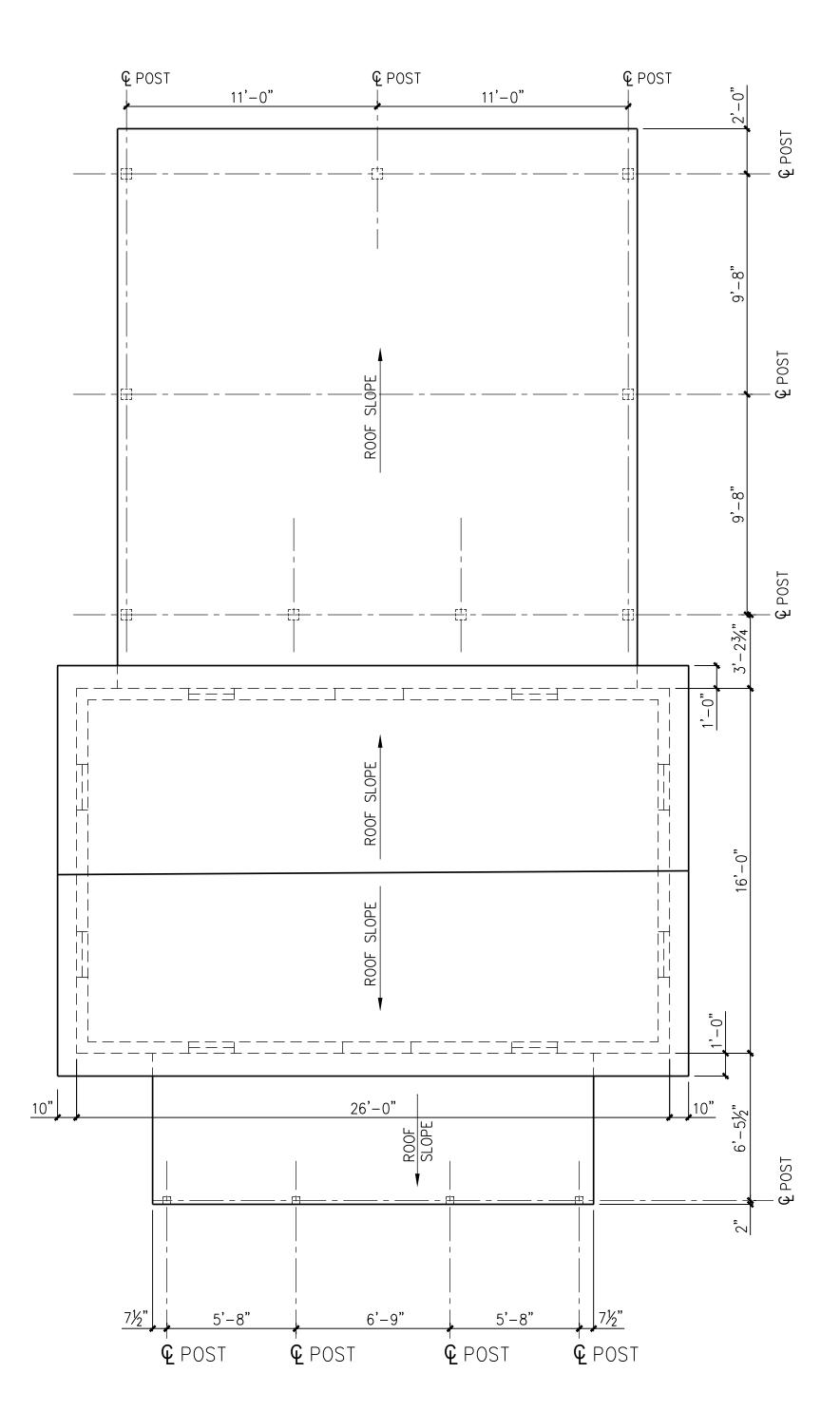
AS NOTED



1 ST FLOOR PLAN



1/4" = 1'-0"



2 ROOF PLAN



1/4" = 1'-0"

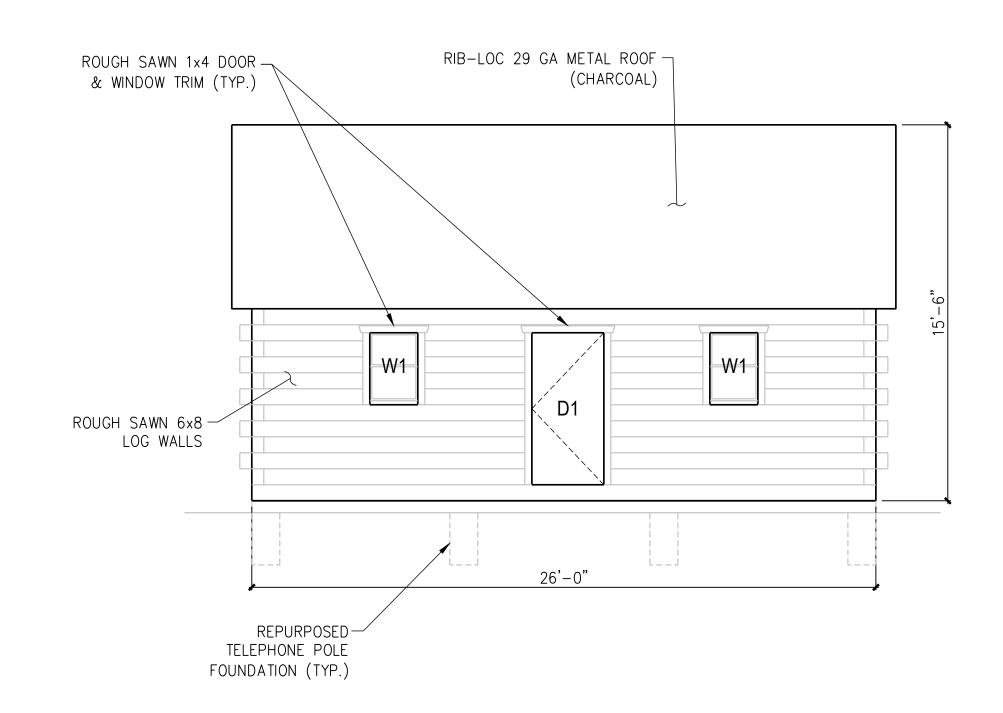
PROSPECT HILL FAMILY FAR

NO. REVISION DATE

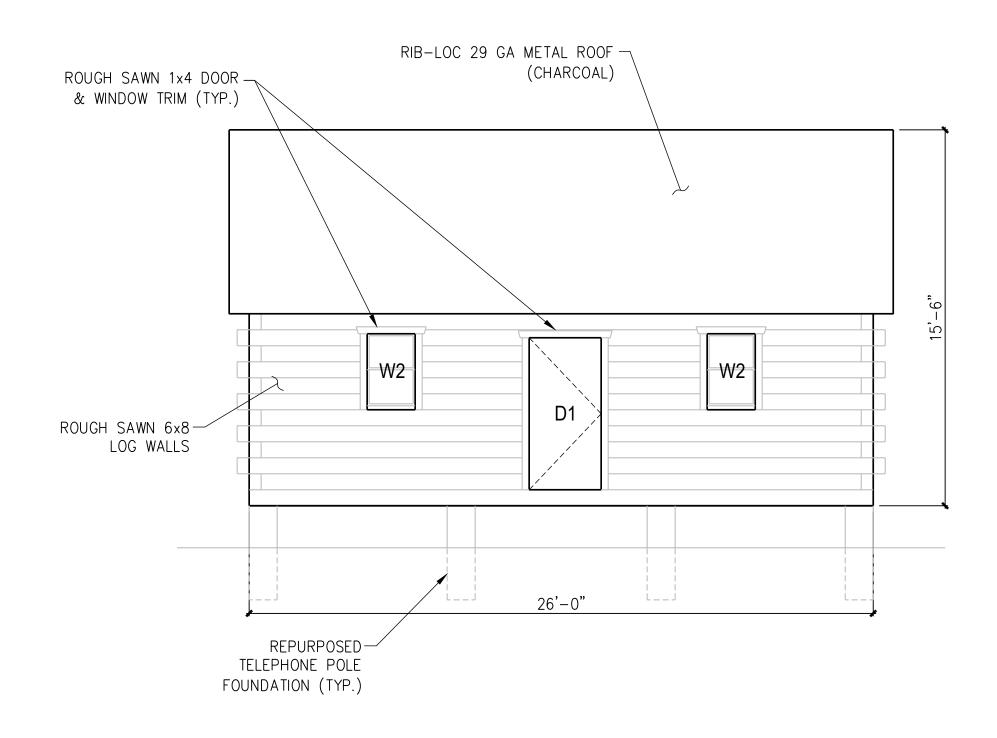
1ST FLOOR & ROOF PLAN

DATE:
3/16/25

SCALE:
AS NOTED

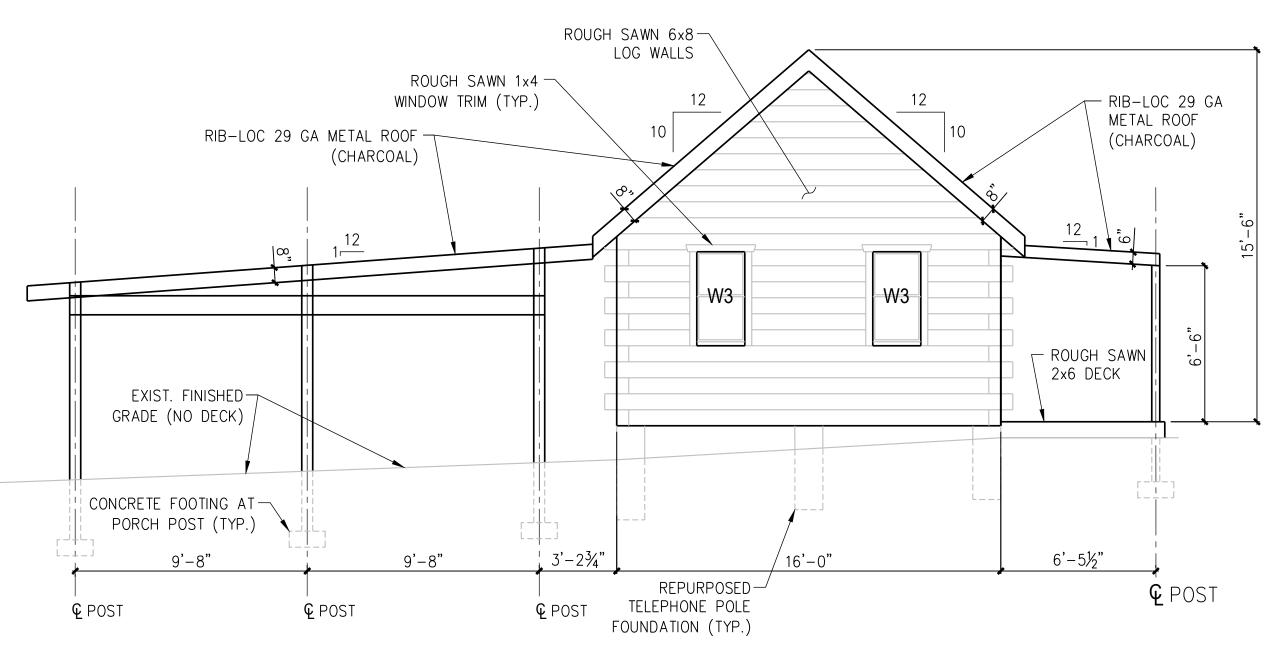


# 1 EAST (FRONT) ELEVATION 1/4" = 1'-0"



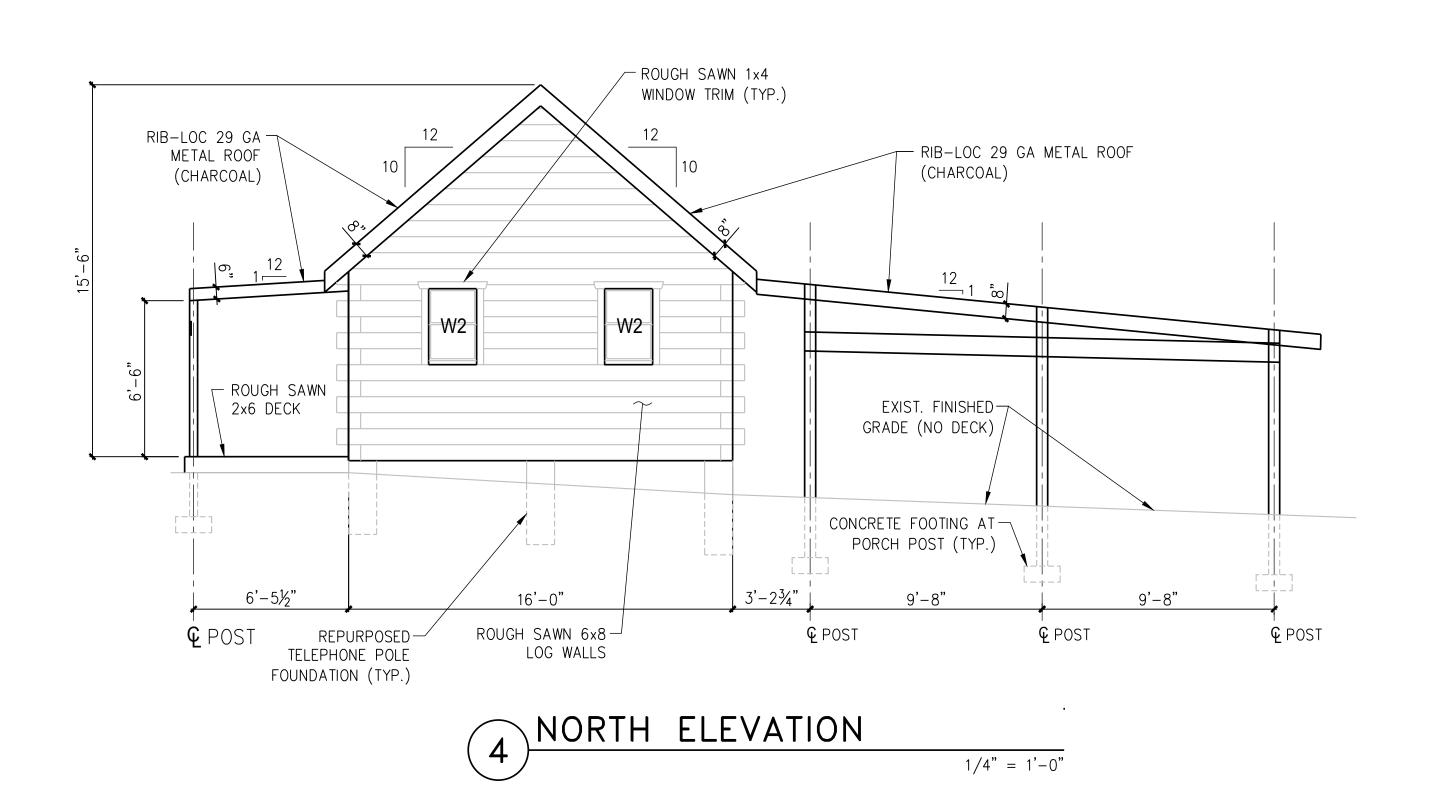
WEST (REAR) ELEVATION

1/4" = 1'-0"



SOUTH ELEVATION

1/4" = 1'-0"



WINDOW & DOOR SCHEDULE					
MARK	SIZE	NOTES			
W1	24"x36"	REPURPOSED DOUBLE HUNG, DOUBLE PANE, VINYL WINDOW			
W2	24"x38"	REPURPOSED DOUBLE HUNG, DOUBLE PANE, VINYL WINDOW			
W2	24"x45"	REPURPOSED DOUBLE HUNG, DOUBLE PANE, VINYL WINDOW			
D1	36"x74"	REPURPOSED WOOD DOOR			

(5) WINDOW & DOOR SCHEDULE N.T.S.

LOG CABIN PROSPECT HILL FAMILY FAR

1811 BRIGHTON DAM ROAD BROOKEVILLE, MD 20833

NO.	REVISION	DATE
SHEET TITL	E:	

ELEVATIONS & WINDOW/DOOR SCHEDULE

DATE:
3/16/25

SCALE:
AS NOTED

From: Office

To: <u>Ballo, Rebeccah</u>; <u>Jeffrey Shirazi</u>

Cc: work order

Subject: Re: HAWP Form Prospect Hill Farm

Date: Tuesday, March 18, 2025 4:23:28 PM

Attachments: <u>image001.png</u>

image002.png image003.png image004.png image005.png

<u>Updated Cabin Drawings.pdf</u> <u>Updated HAWP-Application.pdf</u>

**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Good afternoon,

I have attached a new application with updated site drawings here. The following are our responses for completion of our application:

- The HAWP application lists many items for review including the fence, grading and site alterations, etc. but the supporting application materials are only for the log cabin.
   Please revise page 2 of your application so that it only describes the work you are currently applying for.
  - See attached updated application.
- New Construction requires material specifications, photographs, and a tree survey.
   None of these items were in your application package. The written description of the windows, doors, and roof are not enough; we need the spec samples from the web or manufacturer's catalogue.
  - Please note that the log cabin was built with wood that was milled on site
    and the doors/windows were repurposed from other projects and used to
    build this cabin (instead of throwing them away and taking up more landfill
    space!!), therefore spec samples from the web or manufacturer's catalogue
    are not available. The following link is for the metal roofing that was used
    (<a href="https://www.becn.com/product/Coastal-Metal-Service-29-Gauge-RIB-LOC-Charcoal/C-376595/370141">https://www.becn.com/product/Coastal-Metal-Service-29-Gauge-RIB-LOC-Charcoal/C-376595/370141</a>)
- The site plan does not show the rear deck. Revise to show the deck.
  - This has been added, please see updated drawings.
- The site plan does not show the front porch. Revise to show the front porch.
  - This has been added, please see updated drawings.
- For the deck—is there any flooring or a substructure, or are these just posts supporting a canopy that is over dirt?
  - There is no deck at the rear porch, it will be dirt/stone.
- Relabel the west elevation as west (rear) elevation.
  - This has been added, please see updated drawings.
- For the elevations, please note the foundation material, the material for the trim on the door and window surrounds, and all decking/front porch flooring materials.
  - This has been added, please see updated drawings.

Please let us know if we need to make any changes,

## Best regards,



Assistant Office Manager

American Service & Installation Corp. workorder@AmericanServiceNow.com

Office: 301-924-3800

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VA #2705174530 Class A
MHBR #8327
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From: Ballo, Rebeccah <rebeccah.ballo@montgomeryplanning.org>

**Sent:** Friday, March 7, 2025 12:44 PM

To: Office <Office@americanservicenow.com>; Jeffrey Shirazi <Jeffrey@americanservicenow.com>

Cc: work order < Workorder@americanservicenow.com>

Subject: RE: HAWP Form Prospect Hill Farm

# Good morning,

I have reviewed the submitted application and determined it is incomplete. The case has been tentatively moved to the April 9<sup>th</sup> agenda. Please submit the following items no later than March 19<sup>th</sup> which is the due date for the April 9<sup>th</sup> hearing. I am happy to review items for completeness prior to that date. You can send them to me directly.

- The HAWP application lists many items for review including the fence, grading and site
  alterations, etc. but the supporting application materials are only for the log cabin. Please revise
  page 2 of your application so that it only describes the work you are currently applying for.
- New Construction requires material specifications, photographs, and a tree survey. None of these items were in your application package. The written description of the windows, doors, and roof are not enough; we need the spec samples from the web or manufacturer's catalogue.
- The site plan does not show the rear deck. Revise to show the deck.
- The site plan does not show the front porch. Revise to show the front porch.
- For the deck—is there any flooring or a substructure, or are these just posts supporting a canopy that is over dirt?
- Relabel the west elevation as west (rear) elevation.

• For the elevations, please note the foundation material, the material for the trim on the door and window surrounds, and all decking/front porch flooring materials.

Please let me know any questions.

Sincerely,



### Rebeccah Ballo

**Historic Preservation Supervisor** 

Montgomery County Planning Department 2425 Reedie Drive, 13<sup>th</sup> Floor, Wheaton, MD 20902 <u>Rebeccah.Ballo@montgomeryplanning.org</u> o: 301.563.3404









From: Office < Office@americanservicenow.com>

**Sent:** Friday, February 28, 2025 1:52 PM

To: HAWP < HAWP@montgomeryplanning.org>

**Cc:** work order < Workorder@americanservicenow.com>

Subject: HAWP Form Prospect Hill Farm

**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Good afternoon,

Attached is our HAWP application along with site drawings. Please let us know if you have any questions.

Best regards,



Assistant Office Manager

American Service & Installation Corp. workorder@AmericanServiceNow.com

Office: 301-924-3800

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DC #410518000633 MHIC #22483 VA #2705174530 Class A MHBR #8327 MDOT Certified MBE Contractor www.americanservicenow.com Master Plan Site/District/Atlas: Prospect Hill Master Plan Historic Site

### <u>Historic Preservation Commission Preliminary Consultation Report</u>

Address: 1811 Brighton Dam Road, Brookeville

Applicant(s): Jeffrey Shirazi

Proposal: Retroactive review of fencing installation, grading and site alterations, construction of various

outbuildings

Staff Contact: Chris Berger

HPC Commissioners Providing Comments: Robert Sutton (Chair), James Doman, Mark Dominianni, Michael Galway,

Jeffrey Hains, Zara Naser, Julie Pelletier, and Cristina Radu.

### Recommendations

The HPC had the following comments:

- The fencing, material storage, and agricultural structures (Historic Cabin, Woodshed, Shearing Shed, Aviana Feeder, Aviana Too Feeder, Windmill, Goat Structure, and Chicken Coop) were compatible with the property and had the support of the commissioners.
- Some of the structures and materials have substantially altered the historic character and environmental setting of the property.
- The C-containers and construction trailer are out of character with the historic property. One commissioner said they should be removed before the HAWP review.
- The fuel tanks posed a safety threat next to the Corn Crib, and the sheds should be moved. It was
  suggested to move them to a location away from the Corn Crib and reconfigure the two structures into a
  single structure with a gable roof.
- Opinions were mixed on where to best store the materials (stone, wood chips, and logs). One
  commissioner suggested placing them in one location along a tree line. Another said they were OK in their
  current locations.
- A site plan was important to show both the existing features and those proposed.
- The archaeological survey recommended by staff near the Historic Cabin should be conducted. Consider expanding the survey area closer toward to the house.

Staff recommends the following items be included in the HAWP application:

- A detailed, scaled site plan for the designated portion of the property that shows all construction and landscape features.
- Drawings of the "Historic Cabin" with dimensions and materials labeled.
- Specifications for the materials used in each of the newly constructed structures.
- Archaeological investigations should be conducted around the foundation and in the vicinity of the new
  construction to identify whether there is any evidence of an historic outbuilding in the location or
  whether there is evidence of historical features or activity areas. This work could consist of close interval
  shovel test pits at 15-foot intervals in the immediate vicinity of the cabin, and up to two 3-by-3 foot
  excavation units along or near any possible historic foundations or other features.

	Return for an additional preliminary consultation	
$\boxtimes$	Return for a HAWP in accordance with the Commission's recommendation	ıs