

Nicholson Jeanne

From: Hanzel Sarah
Sent: Thursday, August 06, 2015 10:20 AM
To: Nicholson Jeanne
Subject: FW: Case Report (comments and questions)

From: Shawn Krull [mailto:shawnkrull@yahoo.com]
Sent: Thursday, August 06, 2015 9:03 AM
To: Hanzel Sarah
Subject: Case Report (comments and questions)

Sarah:

I have questions and comments regarding the Case Report which has been submitted.

The applicant has brought forward these elements in the presentation of the case report. The details that follow hopefully can be applied to other case reports as well (hopefully explaining a bit of the length of the comments).

Lead Abatement:

There are two different processes and circumstance when lead needs to be addressed. Information regarding these two processes can be found on the EPA website. "RRP" (Renovation, Repair, and Paint) would be the process involved in this circumstance. RRP involves mitigating the disturbed lead in the process of repairs and renovation done by homeowners and contractors.

Full "Lead Abatement" is a process that involves the entire house (interior and exterior) to fully remove any and all lead from the premises. The comment from the applicant that the tenants would have to "Move out for 1-2 months" implies they are referring to the Full "Lead Abatement." process. Full "Lead Abatement" is usually dictated after an illness or other high levels of lead have been found causing immediate health issues or death, and is usually required by the EPA or another governmental institution. "RRP" is a process that most (if not all) painters will be prepared for.

The proper framing of the question ("Are you certified for RRP" as opposed to "Are you certified for Lead Abatement") would clarify the question for the painting contractors. Very few contractors are certified for true Full "Lead Abatement."

Also, although scraping paint is disturbing lead, so (to my knowledge) is the removal of siding in preparation for new siding and would also require the "RRP" certification. To my knowledge, the only person that can disturb lead without a license is the homeowner. I'm not certain how this applies when it is a rental.

Siding VS. Painting (Cost Analysis for Feasible and Prudent):

The cost presented for painting the exterior of the house (the estimate provided by Berendse and Sons) looks to me to be spot on for materials and labor. Berendse does (or should be able to) have a certification for "RRP." They are a well-respected painting company in Rapid City.

The cost for the siding (as stated by the applicant) implies that the siding cost estimate is "materials only," not "materials and labor." To effectively compare the two estimates, are you aware if this cost estimate for siding is "materials only" or "materials and labor?" And if it is for materials only, who will be installing, and are they certified for "RRP" if it is not the owner?

To use cost as a basis for determining Feasible and Prudent, I feel that comparing "materials and labor" to "materials and labor" would give an accurate estimation of the project.

Also, the estimate from Berendse states that "All wood replacement by owner prior to painting." Does the applicant have an estimate for the repair of the wood prior to Berendse Painting starting? That would need to be factored into their cost estimate as an example for their cause.

Tax Incentives:

The Attorney General stated in the letter to the City of Rapid City that cost could not be the only factor used when determining Feasible and Prudent Alternatives as they apply to the Department of Interior's Standards. Because this is an income-producing property, has the owner been advised and directed toward the tax credits as they apply to income-producing properties? Has anyone presented the formula to determine how much in credits this applicant could use to offset the expenses?

Siding Material:

I do not see in the case report where the actual product has been called out. The comment by the applicant was that the siding would have a wood grain. Both James Hardie and LP Smartside have a smooth product listed on their website.

Siding Corner Pieces:

The existing structure has siding corner pieces that provide a level of depth to the building. If replacement siding is approved, what will they be doing on the corners? Will they replace the corner pieces so it looks authentic, or are they planning on just a vertical board on the corners?

Feasible and Prudent:

There are several options that are available that would fit the Feasible and Prudent Category as alternatives.

A)) Repair and Replace:

With the "RRP" vs. "Lead Abatement" process clarified, scraping, repairing and painting the existing siding would be Feasible and Prudent, provided the owner framed the question correctly to the painting contractors. Many products are available to repair siding (epoxy sandable wood fillers, et al.), and replacing wood pieces with other wood pieces if the degradation on the board is too far gone for a repair. Preparation is absolutely key in a professional paint job, and if moisture content in the wood is properly monitored prior to the painting process, and a very good primer is used, a paint job would last much longer than what seems to be the situation in many homes throughout the district. Improper painting techniques combined with improper preparation (washing, scraping, moisture content, and priming) may save money in the short term, but it results in more problems later. There are several examples in the district where a paint job has been properly implemented on structures that were in similar disrepair, and (several years later), the paint job is still in remarkable condition.

If not A, then B)) Replace with In-Kind:

Another Feasible and Prudent alternative is replacing the wood lap siding with new wood lap siding and then painting it with the proper techniques and implementation. The Case Report states that the existing siding was cedar. Is there any verification that it is cedar? Cedar is an amazing product (naturally rot and decay resistant) and with a properly implemented paint technique, cedar can last decades (far longer than the warranty stated for composite siding), and potentially far longer than the current owner's interest in the property.

If it is Pine or Fir, however, replacing with In-Kind (although Feasible) I do not feel would be very Prudent. Pine is not naturally rot-resistant, and it is a very soft wood that damages and dents easily with hail and would result in maintenance and up-keep that I feel would be a continuous effort to maintain.

Is the siding actually cedar? Or is it Pine or Fir? In a former discussion about this project, I feel that it was determined that this was Pine Siding. Is there any record of that in the file?

If not A, and if not B, then C)) Replace Siding with Matching Finishes, Reveals, and Textures:

As stated above, James Hardie and LP Smartside have a smooth lap siding, and if the reveal were maintained and the corner pieces were installed on the corners (not the vertical boards), I feel that this would be an option to present as Feasible and Prudent, (provided the first option of painting and repairing were eliminated).

Would the homeowner be willing to use smooth siding and use the corner pieces to maintain the depth and "corner profile" of the structure's original architecture?

Thank you for your time in helping,

Shawn