

Historic Preservation 11.1 Review

Community Development
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South Dakota State Law SDCL 1-19A-11.1 Review Required

- SDCL 1-19A-11.1 requires local governments to extend certain protections to historic properties listed on national, state or local registers.
- Local governments are not to issue a permit for any project that would encroach upon, damage or destroy a designated property if there is a feasible and prudent alternative that would prevent such encroachment, damage or destruction.
- Projects subject to review under SDCL 1-19A-11.1:
 - 1) Any project which requires a permit and involves the exterior of a structure within a historic district
 - 2) Any project which requires a permit for demolition or moving and which is within a historic district or listed on the National Register
 - 3) Other: Rezoning, conditional use permits, street vacations

Applicant Name: Molly Richter, AIA Date: 6/25/2026
Project Address: 414 9th Avenue, Brookings, SD 57006
Mailing Address: [REDACTED]
Cell Number: [REDACTED] Email: [REDACTED]
Historic District:
☐ University ☐ Central ☐ Sexauer ☐ Commercial ☐ Individually Listed

1) General Project Description:

The structure at 414 9th Avenue is a two-story, 1,340 square feet residence built in 1914, situated on a 50' x 100' lot (Skinner's Second Addition, North 50 Feet, Lots 9-10, Block 4). The owner proposes relocating this structure to 1008 3rd Street, just beyond the boundaries of the Central Brookings Historic District. The owner also holds the adjacent property at 903 4th Street, which contains the architecturally dominant historic residence on what was originally a single full-depth lot extending from 4th Street to the alley. The 414 9th Avenue parcel was subdivided from that larger lot, with the current structure added to the rear portion at a later date. The proposed relocation will restore the original historic lot configuration, reunifying the parcel and enabling a comprehensive restoration of the principal residence at 903 4th Street. Removing the less architecturally significant rear structure will return 903 4th Street to its original prominence as a full-depth corner lot, enhancing the visual and historic integrity of both the property and the surrounding historic district.

2) Do you plan to repair the historic original materials? ☐ Yes ☒ No

3) What method will be used in treatment of the historic original materials?

The plan is to relocate the structure with minimal impact to historic materials. It will sit on a new concrete foundation, but at this time no changes to the exterior are planned.

If historic materials are damaged while moving then we will direct the GC to follow the Secretary of the Interior's Standards for the treatment of Historic Properties.

Standard #7: Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

- 4) If the proposal includes removal of any historic original materials or exterior features or spaces, provide documentation as to the condition of the original materials and reasons for removal.

N/A

- 5) If new materials are proposed, what materials will be used?

N/A

- 6) If new materials are proposed, what alternatives were considered?

N/A

Include a narrative of all feasible and prudent alternatives that have been considered for the project, describing how all possible efforts have been made to minimize harm to the historic property, including the reasons for rejection.

State of South Dakota Administrative Rule 24:52:07:03: "Alternatives must be based on factual reports, research, tried methods and professional and lay preservation advice. They must also be based on professional assessments of the value and basic structural condition of the affected property and estimates of a range of rehabilitation or mitigative options prepared by people experienced in historical preservation work.

- 7) Is replacement of missing features proposed? If so, substantiate with documentary, physical, or pictorial evidence.

N/A

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 #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.

- 8) Is the project attempting to qualify for State Property Tax Moratorium or Federal Tax Credit?

☐

Yes

☒

No

- 9) Does the proposal involve removal or moving of a structure? Please include a narrative of all feasible and prudent alternatives that have been considered for the project, describing how all possible efforts have been made to minimize harm to the historic property, including the reasons for rejection.

See attached explanation of reasoning behind relocating this structure.

9) Does the proposal involve removal or moving of a structure? Please include a narrative of all feasible and prudent alternatives that have been considered for the project, describing how all possible efforts have been made to minimize harm to the historic property, including the reason for rejection.

This case report has been prepared by Molly Richter, AIA, of Hogan Richter Architects, Corp., a licensed architect with over twenty years of experience in historical residential design and preservation. Ms. Richter was retained by the property owner to lead the restoration of 903 4th Street and to provide professional guidance on the question of the structure at 414 9th Avenue. Her authorship of this application constitutes her professional assessment and recommendation regarding the alternatives evaluated below.

Alternative 1: No Action — Retain the Structure at 414 9th Avenue in Place

The first alternative considered was retaining the structure at 414 9th Avenue in its current location, whether through continued use as a rental property, sale as a separate parcel, or rehabilitation in place. This alternative was evaluated and rejected for the following reasons.

Retaining the structure in place or selling it as a separate parcel would permanently sever the historic lot and foreclose any possibility of restoring the original configuration of the 903 4th Street property. The lot on which 414 9th Avenue sits was historically part of the larger 903 4th Street parcel, and the subdivision that created the current separate parcels diminished the historic setting and spatial integrity of the dominant corner residence. Continued separation of the two parcels perpetuates this condition indefinitely. The owner's preservation goal — restoring 903 4th Street to its original grandeur as a full-depth corner lot — cannot be achieved without reunifying the parcels, which requires the removal of the existing structure from 414 9th Avenue.

Rehabilitating the structure at 414 9th Avenue in place as a rental or investment property was also considered. While this would preserve the physical fabric of the building, it would not advance the broader preservation objective of restoring the historic lot and the integrity of 903 4th Street. The structure's presence on the site actively conflicts with the restoration of the historically significant principal residence. Accordingly, this alternative was rejected as inconsistent with the preservation goals of the project.

Alternative 2: Demolition of the Structure at 414 9th Avenue

Demolition of the structure at 414 9th Avenue was considered as an alternative to relocation. Demolition would achieve the lot reunification goal and allow the restoration of 903 4th Street to proceed. However, this alternative was rejected in favor of relocation because demolition would result in the permanent loss of a contributing historic resource. The structure, though less architecturally prominent than the principal residence at 903 4th Street, is a 1914 residential building that contributes to the district's historic character and building stock.

Relocation offers all of the benefits of demolition — lot reunification and restoration of 903 4th Street — while avoiding the irreversible harm of permanently eliminating a historic structure. The Secretary of the Interior's Standards for the Treatment of Historic Properties recognize relocation as preferable to demolition when a building cannot remain in its current location. In keeping with this principle, and in keeping with the City of Brookings' preservation objectives for the historic district, relocation was determined to be the more responsible course of action. Demolition was therefore rejected.

Selected Alternative: Relocation to a Compatible Site near the Historic District

Relocation of the structure to a new site on 3rd Street, approximately three blocks from its current location and just outside the Central Brookings Historic District, was selected as the preferred alternative. This approach preserves the physical fabric of the historic building, achieves the lot reunification necessary to

restore 903 4th Street, and keeps the structure in an older neighborhood where it will fit with the character, scale, and age of the adjacent properties.

This approach is directly supported by precedent within the district. A comparable relocation project at 824 5th Street demonstrated that removing a secondary structure and restoring the original lot of a historically significant residence produces measurable preservation benefits both for the individual property and for the broader experience of the historic neighborhood. That project has been recognized as a model for this type of intervention.

Basis for Decision and Professional Consultation (Responding to Sub-questions a–e)

(a) The decision to pursue relocation was based on factual research into the historic lot configuration, review of Brookings County assessor records, physical observation of both properties, and the professional judgment of the project architect, Molly Richter, AIA, Hogan Richter Architects, Corp. Ms. Richter brings over twenty years of experience in historic residential design and was retained specifically to advise on the preservation approach for this project. Her recommendation that relocation is the preferred alternative over demolition or status quo is reflected throughout this application.

(b) Alternatives beyond the immediate project were explored, including the long-term implications for the Central Brookings Historic District. Retaining the current lot configuration perpetuates a subdivision pattern that obscures the original development character of one of the district's more significant corner properties. The restoration of 903 4th Street benefits not only the individual owner but the district as a whole by recovering a historic spatial relationship that was lost through subdivision.

(c) The potential adverse effects of relocation on surrounding historic resources were carefully considered. The receiving site on 3rd Street has been evaluated for compatibility with the scale, age, and character of the structure being relocated. The structure's removal from 414 9th Avenue does not create a gap or void that would harm the streetscape, as the reunified lot will be restored as appropriate open yard space associated with 903 4th Street — consistent with the historic character of the block.

(d) The decision to pursue relocation was based on the professional assessment of Molly Richter, AIA, Hogan Richter Architects, Corp., who evaluated both the architectural significance of the structure at 414 9th Avenue and the preservation value of restoring the 903 4th Street lot. Her assessment concluded that the structure at 414 9th Avenue, while contributing to the district, is the less significant of the two buildings historically associated with the property, and that its relocation — rather than demolition — represents the most responsible preservation outcome.

(e) Adequate time has been devoted to the preparation of this application and the evaluation of alternatives. The project architect was engaged at the outset of the owner's planning process, and the alternatives described above were considered before this application was submitted. The owner and architect remain committed to an open and deliberate review process and welcome the opportunity to provide any additional information requested by the SHPO or the Brookings Historic Preservation Commission.

10) Is an addition or new construction proposed? If so, please describe and include drawing/schematics with proposal.

- ☐ Site plan drawn to scale showing the existing structure(s) and proposed improvements. The site plan should clearly create a graphic representation of the building footprint(s) and any other elements that are part of the request.
- ☐ Elevation sketches drawn to scale showing the proposed changes including description of materials to be used (materials plan).

N/A-Goal is to re-unify original corner site at 903 4th Street. Please refer to SHPO Case Report for more detailed information of this proposed relocation.

REFER TO State of South Dakota Administrative Rule 24:52:07:04, Standards for New Construction and Additions in historic districts, for additional guidance <http://sdlegislature.gov/rules/DisplayRule.aspx?Rule=24:52:07:04>.

Standard #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.

Standard #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.

HISTORIC STANDARDS

Secretary's Standards for Rehabilitation: The Standards apply to historic buildings of all periods, styles, types, materials, and sizes. They apply to both the exterior and the interior of historic buildings. The Standards also encompass related landscape features and the building's site and environment as well as attached, adjacent, or related new construction.

- 1) A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
- 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.
- 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.
- 4) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
- 5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
- 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.
- 7) Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- 8) Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
- 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.

SUBMIT THE FOLLOWING

- ☐ Completed Historic Preservation 11.1 Review application form and additional narrative, if needed.
- ☐ If historic materials are to be removed, email color digital photos of the existing structure/property that include:
 - Street frontage
 - All areas affected by the proposed project
 - Photos of rot or decay of element to be replaced or repaired
 - Photos of neighboring properties

Send to: Rmiller@cityofbrookings-sd.gov
- ☐ If an addition or new construction is planned, submit a site plan drawn to scale showing the existing structure(s) and proposed improvements. The site plan should clearly create a graphic representation of the building footprint(s) and any other elements that are part of the request.
- ☐ If new materials are proposed, submit sketches drawn to scale showing the proposed changes including description of materials to be used (materials plan).

(Attach additional sheets as necessary)



Applicant's Signature

6/25/2026

Date