

Requirement for Historic Reviews of FEMA Metal Roof Grant Structures

According to the FEMA Record of Environmental Consideration (REC) and the MN State Historic Preservation Office (SHPO) Consultation regarding Lake County FEMA 1982.7-R, 4131.11-R, and SHPO No. 2013-1517
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Structures that are over 47 years old (50 years old by the end of the grant period), or have no build date on record with the Lake County Assessor's Office, or are located within a "potentially historic district" (ie. White Iron Lake area) must undergo an historic review to determine whether they are potentially eligible for listing on the National Register of Historic Places.

The review is conducted by a qualified historian and includes a visit to the property with photos taken of the outside of the structure. Structures within the boundary of the potential White Iron Lake Historic District are assessed for "sufficient integrity of design, setting, materials and workmanship to serve as contributing resources in a potential historic district." For those structures outside that district, "the integrity of the building would be assessed, but further research to determine whether any of the properties included in this undertaking would be individually eligible for listing on the National Register would be outside the scope of the current project." (per FEMA REC. p.8)

If a structure is found to be "potentially historic," FEMA cannot fund a metal roof for that building, as they are not allowed to "alter a potentially historic structure." Instead FEMA can fund "alternative fire-resistant materials that preserve the historic integrity of 'National Register of Historic Places' eligible buildings. Alternate roofing materials approved for use in this project "are fire-rated asphalt, asphalt/fiberglass, or treated cedar shingles that match as closely as possible each building's extant roofing materials in terms of color, material and form." (FEMA REC, from 44 CFR, Part 10).

Determination by FEMA and/or the MN State Office of Historic Preservation (SHPO) that a structure is "potentially eligible" for listing on the National Register does not automatically include it on the Register. The homeowner would have to apply for that designation, which is a separate and complex process, and likely not desired since it would further restrict what modifications can be done to the structure in the future.

The FEMA/SHPO "potentially historic" designation places no restrictions on what the homeowner can do to their own building; it simply means that FEMA cannot fund a metal roof. Should a homeowner decide they want to install a metal roof on their "potentially historic" building, they are welcome to decline the FEMA roofing grant and install a metal roof at their own expense.