



**PARK CITY MUNICIPAL CORPORATION
HISTORIC PRESERVATION BOARD MEETING
MARSAC MUNICIPAL BUILDING
COUNCIL CHAMBERS
445 MARSAC AVENUE
PARK CITY, SUMMIT COUNTY, UTAH
MINUTES OF JUNE 4, 2025**

BOARD MEMBERS IN ATTENDANCE: Douglas Stephens – Chair, Randy Scott, Puggy Holmgren, Lola Beatlebrox, Katie Noble, John Hutchings, Dalton Gackle (arrived at 6:20)

EX OFFICIO MEMBERS: Rebecca Ward, Planning Director; Meredith Covey, Planner I; Dave Thacker, Chief Building Official; Mark Harrington, City Attorney

1. **MEETING CALLED TO ORDER AT 5:00 P.M.**

Chair Douglas Stephens called the meeting to order at approximately 5:00 p.m.

2. **ROLL CALL**

Chair Stephens conducted a roll call of the Board Members present. It was noted that Board Member Randy Scott is attending the Historic Preservation Board Meeting virtually.

3. **MINUTES APPROVAL**

A. **Consideration to Approve the Historic Preservation Board Meeting Minutes from May 7, 2025.**

MOTION: Board Member Holmgren moved to APPROVE the Historic Preservation Board Meeting Minutes from May 7, 2025. Board Member Scott seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

4. **STAFF AND BOARD COMMUNICATIONS AND DISCLOSURES**

There were no communications or disclosures.

5. PUBLIC COMMUNICATIONS

There were no public communications.

6. REGULAR AGENDA

A. General Plan – The Historic Preservation Board Will Review and Provide Input on the Historic Preservation Draft Recommendations for the Updated General Plan.

Planning Director, Rebecca Ward, noted that the consultant is delayed and suggested that Item 6B be heard ahead of Item 6A. A motion was made to amend the agenda order.

MOTION: Board Member Beatlebrox moved to REORDER the meeting agenda so Item 6B is the next item on the agenda. Board Member Scott seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

Following the presentation and discussion for Item 6B, the Historic Preservation Board heard Item 6A on the agenda. Susan Petheram with FFKR Architects introduced herself to the Board and explained that she is part of the Design Workshop team working with the City on the General Plan update. Since the last presentation to the Historic Preservation Board, the update process has continued. She will now review project information, which includes the outreach conducted and the Draft Plan recommendations.

Ms. Petheram explained that the General Plan process started with Values Identification. Ideas and Alternatives Development then occurred followed by the Draft Plan. The last step in the process is Final Plan Sharing. She noted that the Final Plan includes the steps to implement the established vision. The project timeline was reviewed. There are five phases in total and the General Plan process is currently on the cusp of the fifth phase.

There were three different engagement windows during the update process. The first engagement window was Project Awareness Building and Values Identification. The second phase of engagement was Ideas and Alternatives Development. The third and

final engagement window is the Draft and Final Plan Sharing. In this last engagement window, there will be more detailed workshops held with the different advisory committees, public presentations, and the Draft Plan will be released for public comment.

Ms. Petheram reviewed the engagement process so far, which included the following:

- Community Interaction:
 - Open House (3);
 - Project Website;
 - Statistically Valid Survey;
 - Online Questionnaire;
 - Focus Groups;
 - Youth Council Work Session.
- Advisory Committees:
 - Technical Advisory Committee (2);
 - General Plan Advisory Committee (2);
 - Neighborhood Advisory Committees (9 Neighborhoods and 2 Rounds of Meetings).
- Advisory Boards:
 - Historic Preservation Board;
 - Public Art Advisory Board;
 - Recreation Advisory Board.
- City Council and Planning Commission:
 - City Council Interviews and Presentation;
 - Planning Commission Presentation.

The Vision Statement and Plan Framework information was reviewed. Ms. Petheram noted that there has been some discussion about whether the small-town reference will remain. There was some consideration about that at the Planning Commission level.

The General Plan is structured around five themes, which includes the following:

- Transportation;
- Community Character;
- Moderate Housing;
- Water and Preservation;
- Sustainability.

Historic preservation is one of the focus areas in the Community Character theme. That also includes a small-town feel, sense of community, land use, and growth. Ms. Petheram shared some updates from the statistically valid survey that was conducted. She reported that it was sent out via email and text message. The survey was geared towards Park City residents, so different strategies were used to make sure only residents completed the survey. The responses were collected back in November and were weighted to reflect the demographic composition of the City as a whole. It was geocoded into City neighborhoods. Ms. Petheram noted that the Old Town neighborhood had one of the higher numbers of responses. There were 453 responses overall and 76 of those came from the Old Town neighborhood. Out of all the Old Town neighborhood responses, 36% of the respondents were part-time residents while the other 64% were full-time residents.

Residents were asked about the values that represent Park City. The top five values were: community, uniqueness, environmental, preservation, and authenticity. Some of the comments stated that Old Town provides a sense of community and there is a lot of love for Main Street and the small-town historic atmosphere. There are many ways that historic preservation shows up as a priority in the values that were identified.

Some of the challenges and concerns that the survey identified include the following:

- Traffic and congestion;
- Balancing tourism and local quality of life;
- Growth and change in the area;
- Affordable housing options;
- Fear that residents and their children will be unable to live in Park City.

Ms. Petheram explained that some of the challenges tied into the goals to focus on:

- Preserving a small-town feel;
- Preserving the natural setting;
- Making the town more affordable and equitable;
- Improving transportation options;
- Preserving historic character.

It was noted that preserving historic character was the key choice for respondents from the Lower Deer Valley, Old Town, Prospector, Thaynes, and Upper Deer Valley neighborhoods. Some of the key takeaways from the second engagement window were gathered from the focus group meetings, the open house, and the questionnaire. There are some worries about Park City losing its character and

becoming overly commercial. There is strong agreement with the vision statement from the community as a whole and there is strong support for preserving Park City's skiing, mountain resort, and 2002 Olympic heritage. The small-town character was highlighted as well as preserving open space and conservation. Ms. Petheram believes that dovetails with the preservation of historic structures. The third engagement window will include a review of the draft recommendations with the different advisory groups. There was a third and final open house held a few weeks ago where attendees examined the plan, themes, and strategies.

Ms. Petheram reported that the following items are scheduled as the next steps:

- June:
 - Historic Preservation Board Presentation - June 4;
 - Final Round of Technical Meetings - Week of June 16;
 - Plan Draft and Feedback Questionnaire Opens - June 18;
 - Joint Planning Commission and City Council Work Session - June 26.
- July:
 - Planning Commission Meeting for Plan Recommendation - July 9.
- August:
 - City Council Meeting for Adoption - August 14.

Ms. Petheram asked if there is any Board Member feedback on the Vision Statement and Plan Framework. She specifically wanted to hear comments about the small-town feel reference. Board Member Scott asked what the Planning Commission's reservations were about that language. Director Ward explained that in the 2014 General Plan, there was a reference to keeping Park City as Park City. There was a question about what that meant exactly, so a small-town feel was drafted. There was some discussion at the Planning Commission level about whether small-town feel captures that sentiment.

Board Member Puggy Holmgren noted that she has been here for almost 40 years and she does not believe there is a small-town feel. Board Member Lola Beatlebrox believes the idea of a small-town feel is that she can run into a friend at the grocery store, which is something that does happen. She still thinks there is a small-town feel overall. Board Member Katie Noble expressed concerns that there can be negative connotations with a small-town feel. She wondered whether a "welcoming feel" might be more accurate, as that would highlight that Park City is inviting and friendly. She agrees with Board Member Holmgren that Park City has not been a small town for some time. Board Member Beatlebrox noted that there can be a discussion about what small-town feel means.

Additional discussions were had about the small-town feel language. Board Member Holmgren reiterated that Park City does not have a small-town feel. Board Member Noble pointed out that Park City is a little more sophisticated. Board Member Dalton Gackle liked the word choice of small-town feel because it emphasizes the idea of walkable neighborhoods. Chair Stephens pointed out that this is a Vision Statement that is looking forward. He is not sure how the other values fit in with the small-town feel language. There is uncertainty about whether that language adds to the Vision Statement. Board Member Gackle suggested the term “neighborhood feel” instead of a small-town feel.

City Attorney, Mark Harrington, shared some history with the Board and a definition of a small-town feel. Board Members suggested removing the small-town feel reference entirely. Board Member Scott liked the previous suggestion about the word “authentic.” He suggested a reference to an authentic mountain community that preserves its unique character and history. Chair Stephens agreed that the word authentic or something similar makes sense. Ms. Petheram thanked the Board for providing feedback.

The Board was next asked about the five different themes and the fact that historic preservation falls into Community Character. The theme statement for Community Character is as follows: “We value our unique community, the quality of life, and the authentic character of Park City. We support a variety of housing options that include all groups within the community. We preserve our historic buildings and cultural elements and celebrate the original character of Park City.” Board Member Noble wondered whether the Water and Preservation theme should be separated so water is included with Sustainability. Ms. Petheram explained that the themes are a result of the State Code requirements. There is a requirement for cities to have a Water and Preservation element. Additional discussions were had about the themes and where preservation fits.

Ms. Petheram further reviewed the Community Character information. She shared examples where preservation is called out in the sections and associated action items. For historic preservation, the document states that Park City will protect and celebrate its historic resources from three historic eras. This includes the following:

- Settlement and Mining Boom Era (1868-1893);
- Mature Mining Era (1894-1930);
- Mining Decline and Emergence of Recreation Industry (1931-1962).

Ms. Petheram noted that the Board can think about the end date of 1962. For instance, whether the recreation industry era needs to have a later date or if there are additional eras the City wants to consider as significant. The recommendation topics were listed:

- Documentation;
- Mining Era;
- Celebration and Education;
- Incentives;
- Stewardship, Collaboration, and Innovation;
- Policy and Regulations;
- Main Street.

It was noted that the National Register document was updated to include 1982, so now it has the Treasure Mountain Inn. However, the Historic Sites Inventory for Park City only has three categories and ends in 1962. The strategies were reviewed:

- Documentation:
 - HP-1: Develop a clear understanding of the ski-era resources in Park City;
 - HP-2: Confirm the key resources and sites related to Park City's Olympic host legacy.
- Mining Era:
 - HP-3: Continue to document and monitor Mining Era resources, especially in Park City's residential and business districts, which provide the foundation of Park City's historic resources and character.
- Celebration and Education:
 - HP-4: Continue to recognize preservation projects, share success stories to inspire future efforts, and provide technical resources to property owners;
 - HP-5: Provide access to historic preservation best practices, recognizing the range of diversity of Park City's historic resources;
 - HP-6: Continue to educate the community and visitors about the history and evolution of Park City;
 - HP-7: Collaborate with the Park City Museum, Utah Historical Society, and other partners to help tell the story of less well-known aspects of Park City's history.
- Incentives:
 - HP-8: Continue to support the adaptive re-use of historic buildings through incentives;
 - HP-9: Establish options to incentivize the preservation of the documented historic resources associated with the ski era.
- Stewardship, Collaboration, and Innovation:

- HP-10: Continue to foster collaborative efforts to preserve, protect, and promote Park City's historic resources;
- HP-11: Proactively work to protect the historic mining sites and structures from both physical and environmental damage;
- HP-12: Continue to explore opportunities to integrate historic preservation with other initiatives, such as sustainability, workforce housing, arts/culture, and recreation/trails/open space;
- HP-13: Proactively work to protect Old Town's historic resources from wildfire damage.
- Policy and Regulations:
 - HP-14: Continue to regularly assess and evaluate the Regulations for Historic Districts and Historic Sites in the Land Management Code ("LMC") for consistency and potential modifications that further preservation efforts while supporting a degree of flexibility;
 - HP-15: Periodically review newly constructed infill projects for sustainability and compatibility of infill development within the Historic Districts.
- Main Street:
 - HP-16: Continue to promote and strengthen Main Street as the historic and cultural core of Park City;
 - HP-17: Support efforts for a pedestrian-first environment along Main Street and within Old Town.

The Board discussed the different strategies. Board Member Holmgren asked whether the A-frames are historic. Ms. Petheram explained that they could be. The Documentation items would find out what is out there and what would be considered historic in the ski era framework. Board Member John Hutchings asked if the pace of buildings disappearing has picked up in the last five years or so. Board Member Gackle was uncertain about the last five years, but since the Olympics, approximately 5% of those have been lost. There is a lot of information available at the Park City Museum about what is left, what has been lost, and the historical significance. The museum gives out historic ribbons each year to buildings around town and there are ribbons for the Mining Era and Skiing Era. Attorney Harrington shared information about the National Register and the Historic Sites Inventory. He noted that there are some limitations.

Board Member Gackle pointed out that Treasure Mountain Inn was recently added as part of the Main Street Historic District for the National Register. He asked whether that could be covered with demolition protection if it was added to the Historic Sites Inventory. Attorney Harrington explained that he would need to double check on the State Code, but he believes that is an accurate statement. Board Member Gackle

stated that two buildings on Main Street were added to the National Register when the update occurred.

The Celebration and Education strategies were discussed. Board Member Beatlebrox mentioned that only 28% of respondents felt that historic preservation was important. She believes that indicates there is a good job being done preserving history in Park City. The ribbons are an excellent advertisement of the work. Board Member Gackle reported that the ribbons will go out on June 10, 2025. The Board discussed books and resources that may be useful when it comes to education and communication. It was noted that having materials that are geared to all ages is a strategy that could be pursued in the future.

Ms. Petheram asked if there is anything that stands out as an overarching goal or strategy that has not been captured. Board Member Hutchings asked about HP-16 and the reference to the “historical and cultural core.” Board Member Gackle wondered whether better wording for that would be to restore Main Street as the historical and cultural core. He noted that the Kimball Art Center and others used to be on Main Street, but now it is just the museum that is there. It could be a strategy to have more arts and culture organizations in that core, which means “restore” might be a better word than “continue.”

Chair Stephens noted that early on in the presentation, there was a comment about trying to discourage sprawl. However, there are different neighborhoods that all have a different feel. Ms. Petheram noted that some of that is captured in the land use types and nodes portion of the General Plan, which is still being refined. Board Member Noble commented that there are a lot of houses being torn down, and that is a disaster from a carbon footprint perspective. She would like to see a Carbon Tax if something is torn down because that can help with sustainability and maintaining the community character. Board Member Gackle noted that a Carbon Tax could act as an incentive to not tear something down. Board Member Noble pointed out that it could also be a way to educate residents.

Ms. Petheram shared a table that shows how each strategy supports either the commercial structures, residential structures, or mining sites. 16 of the 17 strategies are related to commercial, 14 are associated with residential, and 11 are associated with the mining sites. The intention is to show that there is fairly equal consideration of each of the different types of sites, structures, and districts that are part of the Park City historic resources. She next shared a table that shows how each strategy supports the Mining Boom, Mature Mining, and Mining Decline. There is a bit of a push on the Mining Decline, which is where strategies are called out for the ski-era resources and

the Olympic host legacy. That is the reason there are more strategies highlighted in that section.

Board Member Gackle referenced the earlier comment about the 1962 end date. He feels that adding a fourth category would be the best option. It could be defined as Recreation and Tourism or something similar. That date could be from 1963 to whatever number is determined. For the Park City Museum, it was 1981 that was selected. Having a fourth category would make more sense than attempting to add years to the third era listed.

Ms. Petheram reviewed the strategies and actions for Documentation:

- HP-1: Develop a clear understanding of the ski-era resources in Park City:
 - Action 1.1 – Conduct a Reconnaissance Level Survey ("RLS") of ski-era resources by 2026;
 - Action 1.2 - Conduct an Intensive Level Survey ("ILS") of key clusters/areas identified during the RLS by 2027;
 - Action Item 1.3 - Establish an honorary designation for properties that are identified as contributing to this era of Park City's history.
- HP-2: Confirm the key resources and sites related to Park City's Olympic host legacy:
 - Action 2.1 - Create a GIS feature layer to document 2022 Olympic host-related sites and their key attributes;
 - Action 2.2 - Create an ArcGIS StoryMap or Web Experience page to provide information regarding Park City's Olympic host-related sites in a user-friendly format.

Director Ward noted that it is possible to continue this item to the June 30, 2025, meeting if there is a desire to further review the strategies and actions. Ms. Petheram explained that between now and then, there will be a meeting with the liaisons to go over these items as well. The idea is to have some discussions and add clarifying language, additional strategies, and additional actions. There has been some great feedback from the Historic Preservation Board already. If there is a desire to further review the information and come back on the June 30, 2025, meeting, then that is an option. Chair Stephens thought it made sense to review the materials further and discuss this again.

Board Member Gackle asked whether it would be useful to send the research that the Park City Museum has compiled. Ms. Petheram believed so and explained that there is a desire to include a summary of the historic resources and a brief description of the key

eras. Information and statistics about what has been lost could be beneficial. Chair Stephens noted that Main Street continues to be mentioned. It has changed a lot over the decades, so it would be meaningful to have a discussion about that area and how it has changed. Ms. Petheram noted that the intention is to be as specific as possible with the action statements, so if there is other language that can increase the specificity, she asked that this be communicated. She is interested in hearing Board feedback on that.

MOTION: Board Member Gackle moved to CONTINUE the General Plan discussion and public hearing to the June 30, 2025, meeting. Board Member Scott seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

B. 176 Main Street – Material Deconstruction – The Applicant Proposes to Deconstruct a Landmark Historic Structure in the Historic Residential - 2 Sub-Zone B Zoning District and Reconstruct the Structure with an Attached Addition. PL-25-06472.

Planner I, Meredith Covey, presented the Staff Report and explained that the application is for 176 Main Street. This was continued from the last Historic Preservation Board Meeting. She shared some photographs of the structure for reference. The Existing Conditions Survey was reviewed as well as the Floodplain Map. Both are included as exhibits in the Meeting Materials Packet. The approved Subdivision Plat was shared, which shows the setbacks. Planner Covey next shared photos of the existing conditions and reported that the applicant is proposing the following:

- Deconstructing the Landmark Historic Structure and salvaging as many historic materials as possible;
- Constructing a new foundation;
- Reconstructing the Landmark Historic Structure using salvaged and replacement material to restore the 1907 form;
- Constructing an addition on the secondary (north) and tertiary (east) facades as well as a basement addition.

Renderings were shared with the Historic Preservation Board to show the updated addition and the architectural elements that were removed. The proposed plans were reviewed. Planner Covey explained that on the left side of the presentation slide is the Sanborn Map that the applicant is proposing to restore the structure to, which is from 1907. This has the addition on the rear that the applicant is also proposing to

restore. On the right side is the proposed site plan that shows the 590-square-foot addition.

LMC Section 15-11-15 outlines the requirements for reconstruction. To approve reconstruction, the Board must find that the project complies with the following criteria:

- The Historic Structure is found by the Chief Building Official to be hazardous or dangerous, pursuant to Section 116.1 of the International Building Code;
- The Historic Structure cannot be made safe and/or serviceable through repair;
- The form, features, detailing, placement, orientation, and location of the Historic Structure will be accurately depicted by means of new construction based on as-built measured drawings, historical records, and/or current or historic photographs.

Planner Covey reported that the first and second criteria are addressed through items in the Meeting Materials Packet along with the 2007 Building Official determination. LMC Section 15-11-15(B) requires the Historic Preservation Board to review reconstruction pursuant to 15-11-12 - Historic District or Historic Site, which requires the proposal to be reviewed for compliance with 15-13-2 - Regulations for Historic Districts and Historic Sites. Planner Covey reviewed drawings of the proposed plans. She explained that the green is what the applicant is proposing to retain from the structure as it exists, the red is what is proposed to be removed, and the blue is proposed to be added on the addition. In the Meeting Materials Packet, it was shown that the door on the left hand side would be removed, but she clarified that the applicant is proposing to retain that. Images related to doors, windows, and porches were shared. Planner Covey noted that the porches are proposed to be retained, but will be brought up to current code regulations for safety.

The applicant is proposing to restore the structure to the 1907 form. That includes removing the ornamentation seen on the front of the structure as well as the dormers. Planner Covey shared a rendering of the proposed elevation when viewed from Main Street. The updated addition the applicant is proposing was shared, as viewed from different angles. The proposed addition is less than 50% of the historic structure and will not require a transitional element. The applicant has provided an image showing the historic material proposed to be removed in order to construct the new addition. Staff recommends that Condition of Approval #34 be added. She read the following language:

- Condition of Approval #34:

- To reduce the removal of Historic Materials on the north facade, the garage addition shall be reduced to one story and limited to the maximum dimensions required for a garage: 11 feet in width and 20 feet in depth with a garage door no more than nine feet wide and nine-feet-high. The garage addition shall be set back by more than half the width of the north facade.

Planner Covey reviewed some of the other proposed Conditions of Approval, including conditions with information about how the applicant will be required to handle historic material and ensure it is restored and retained on the structure. Conditions of Approval #28 through #33 include some of the requirements to maintain that historic material. She re-read the criteria that need to be met for the Board to approve the reconstruction.

As part of this application, the applicant must provide a financial guarantee to ensure that the Landmark Historic Structure is reconstructed and that as many historic materials as possible are salvaged, protected, and integrated into the reconstructed structure. The applicant must also obtain Historic District Design Review (“HDDR”) approval from the Planning Department. The applicant is also required to submit an Industrial Hygienist Report, which will be discussed during the applicant portion of the presentation. Planner Covey reviewed other Conditions of Approval related to the height of the addition.

Staff recommends the Historic Preservation Board review the proposed deconstruction, reconstruction, and material deconstruction of the Landmark Historic Structure at 176 Main Street, conduct a public hearing, and consider approving the proposal based on the Findings of Fact, Conclusions of Law, and Conditions of Approval outlined in the Draft Final Action Letter. The Board may approve, deny, or continue the proposal.

The applicant representative, Justin Keys, introduced himself to the Board. He reported that the applicant is Centennial House, LLC. There is excitement about the project and he expressed appreciation that Board Members walked the site and saw it in person. This is a prominent home that has been sitting vacant for nearly 20 years and has been condemned for much of that time. It is currently in a state of disrepair to the point that the Chief Building Official indicated that it is unsafe and deconstruction is appropriate. There is also a Certified Engineer who has looked at the structure and feels the same. Staff did an excellent job in the Staff Report showing compliance with the code and also examining some of the questions that the Historic Preservation Board raised previously.

Mr. Keys referenced Page 7 of the Staff Report and the bullet points related to deconstruction. The Historic Preservation Board requested a follow-up on the evaluation of the restoration to the early 1900s footprint and whether this could provide opportunities to lift the Landmark historic Structure or panelize it. Mr. Keys believes the question is whether choosing the 1900s footprint rather than the 1970s footprint results in the option to save the building in its current configuration and not have to deconstruct. He denied this and referenced the hazardous situation that currently exists on the site.

The Historic Preservation Board previously requested additional information about whether the structure can be made safe and serviceable. Mr. Keys noted that it was helpful to have the 2007 report included in the Meeting Materials Packet. It shows the state that the building was in back in 2007 when it was ultimately condemned. The building was condemned because it was unsafe. Fortunately, there were previously supports put in place, which has kept it in place to this day. However, that does not address the leaning. He pointed out that the leaning is a health and safety issue, as it is a risk to enter the building. In Old Town, the space is tight, so all risks to workers on site and the adjoining properties need to be considered. There have been discussions with qualified contractors who indicated that entering the building would be unsafe. Some would be unwilling to panelize the home because of the associated safety risks. Based on these facts, the appropriate path of action is to deconstruct and reconstruct.

Mike Bradbury introduced himself to the Board and stated that he has a passion for this kind of work. He was introduced to this building in 2022 while pursuing another project on Main Street. Early on, he knew that this was a project that he wanted to be involved with. There is a great team in place, but there have been a lot of challenges associated with this property. The building site and the building itself are difficult, but the intention is to preserve and revitalize. Mr. Bradbury stated that he is available to answer questions.

Mr. Keys continued to review the previous Board Member questions, including whether the Landmark Historic Structure should be restored to the early 1900s simple ornamentation or include the late 1970s ornamentation that modified the historic roof form with dormer windows, cupola, pediments, and other ornaments. He explained that there is an openness to either approach. There is some historic value in the Centennial House look from the 1970s, but he acknowledged that the 1970s version is not the version that was there in 1907. What is currently proposed, at the direction of Staff, is the 1907 version. There is an openness to either approach depending on the Board's preference.

The final question posed by the Historic Preservation Board at the last meeting had to do with the completion of an Industrial Hygienist Report to provide a more accurate account of the materials that can be salvaged, how the materials can be preserved and treated, and how the materials can be incorporated into the restored building. Mr. Keys explained that it was difficult to get the report turned around in time, but a 99-page Industrial Hygienist Report has been emailed. There are also some hard copies of the report.

Mr. Keys reviewed some information from the report, including the fact that the exterior siding has lead paint. Given the state it is in, the lead paint will need to be removed. It cannot simply be sanded off. There is a process that will need to be followed for that. The report indicates that this will need to be done around the entirety of the structure. Mr. Keys reported that there is also concern about black mold. Some mold testing has been done on the interior. If any of that has migrated, then the black mold will need to be removed as well. The goal is to reclaim as much of the historic siding as possible and the intention is to use that on the most highly visible components of the renovation. The Industrial Hygienist Report indicates how this can be done. He reiterated that the report is available for Board Member review. Mr. Keys stated that he is prepared to answer any questions the Historic Preservation Board has about the document and the project.

Board Member Scott noted that there was a mention of the 1907 version versus the 1970s version. He pointed out that the 1970s footprint is larger than the 1907 footprint. Chair Stephens clarified that what has been presented to the Board is a proposal for the 1907 version. Applicant representative, Bryan Markkanen, pointed out that the 1970s version is a little more confusing because it had elements of the new and old. Director Ward stated that the early 1900s footprint is what has been drafted. She informed the Board that the Chief Building Official, Dave Thacker, is participating in the meeting remotely.

Board Member Beatlebrox is pleased with what came back from the applicant. She believes the 1907 look is solid and does not have a problem with the proposal. Chair Stephens mentioned the Industrial Hygienist Report. He wants to understand how well the material will be maintained and preserved. Board Member Beatlebrox noted that there was some discussion about this during the site visit with Director Ward. She thought it would be helpful to provide Board Members with 15 minutes to review the Industrial Hygienist Report individually and then have someone walk through the report. The hard copies of the Industrial Hygienist Report were shared with the Board Members attending the meeting in person and a digital copy was shared with the virtual participant.

Chair Stephens would like to come to an agreement about the process before the review of the Industrial Hygienist Report takes place. He asked Planner Covey to share the criteria that the Board needs to address. There can be a discussion about each one. Planner Covey reiterated that to approve the reconstruction, the following criteria must be met:

- The Historic Structure is found by the Chief Building Official to be hazardous or dangerous, pursuant to Section 116.1 of the International Building Code;
- The Historic Structure cannot be made safe and/or serviceable through repair;
- The form, features, detailing, placement, orientation, and location of the Historic Structure will be accurately depicted by means of new construction based on as-built measured drawings, historical records, and/or current or historic photographs.

Chair Stephens had a question about the third item listed. He asked what safeguards there are to ensure there is not simply a building with new materials all the way around. Mr. Markkanen noted that this was addressed well in the Staff Report and is also addressed in the Industrial Hygienist Report. There is information about remediation as well as documentation. As an example, if the three windows on the north façade are removed, those will be pulled out and the conditions will be recorded to make sure everything is well documented. There is also a third-party requirement in this approval.

Planner Covey shared the proposed language for Condition of Approval #27. Chair Stephens wants to make sure there are strong safeguards in place to save historic material to be reused. However, he does not know that it is necessary to document material that will not be saved. Director Ward recommended the documentation take place to make it easier to track and account for all of the materials. The record will be helpful. It was noted that there can be clarifications made to the condition language.

Chair Stephens opened the public hearing.

Betsy Wallace gave her address as 158 Main Street, which is three houses south of the Centennial House. Ms. Wallace and her husband have been full-time residents for much of the time since 2003. She shared information about the flood that took place previously, which impacted the Centennial House. Since that time, the house has been vacant and has continued to slide into complete disrepair. In 2023, she thought the Centennial House might fall down, as there were a lot of snow storms. The porch had a

bit of a U-shape to it due to the snowfall. It is still in the same condition, if not worse than it was in 2023.

There is now a possible new owner, which Ms. Wallace is excited about because the applicant has a love of historic homes and has handled this kind of work in other areas. She cannot think of a better team to come in and maintain the integrity of the building. Ms. Wallace does not see an issue with converting it into one home as opposed to a boarding home. She expressed support for the plans that have been proposed by the applicant. Her fear is that if the Board does not approve the proposal, the deal will not close, and the current owners will remain. If that happens, the structure will continue to be in disrepair. It was reiterated that the transaction has not closed. She worries that if there is no approval granted, the applicant will decide to move on from the project.

During the last Historic Preservation Board Meeting, there was a discussion about the garage. Ms. Wallace thinks that not having a garage will be a detriment to the property. There are a few homes along the street that do not have garages and are always struggling to find parking. Ms. Wallace pointed out that the cost to rebuild this home is significant, so it is not unreasonable for the applicant to look into some additions. She wants to make sure the applicant is able to have additions that are fair for the site. Ms. Wallace reiterated that she is excited that the applicant has experience with historic home rebuilds and that there is a passion for this kind of work. Closing the transaction and moving forward with this proposal would be the best possible outcome for this site.

Willemina Yospe explained that she owns the home right next door to the Centennial House. If the building eventually falls down, it will fall down onto her home. She has a vested interest that this application be approved. Ms. Yospe cannot imagine the City would want to be liable for what might happen if that building falls onto her home. Listening to what the applicant wants to do on the site sounds positive and she believes the finished product will be beautiful. Ms. Yospe and her husband have been part-time residents since 2017, but are now full-time residents. They lost their home in the Pacific Palisades fires earlier this year and she is afraid that this home could also be lost with the Centennial House in the state of disrepair it is currently in. She is not sure when another buyer will be interested in this property or how long that process could take. It is obvious that the current owners will not do anything on that property. The applicant has an interest in improving the site, so she asked the Board to approve the current application.

Chase Winder stated that his family knows a lot about preservation and history. He pointed out that preservation and history take effort, resources, and working together. The proposed project will secure the future of that part of Main Street and the homes that surround the Centennial House structure. He expressed his support for the proposal and noted that this is an exciting opportunity as there is a solid team in place. He hopes this will be approved so there can be a new chapter of continued history and preservation.

There were no further comments. The public hearing was closed.

Director Ward discussed the proposed Conditions of Approval, including the recommendation to limit the addition on the north façade to one story. That is in the Draft Final Action Letter, so there would be the one-story garage addition, but on the north façade that can be panelized, the majority of that is preserved. Another condition is that as it goes through the design review process, the additions to the rear would need to be below the roof eaves. There are staff-recommended Conditions of Approval that the Board can consider in the Draft Final Action Letter. As drafted, the approval would restore the 1907 form and allow the 1900s addition to be counted in the footprint for the rear and side addition. Discussions were had about the conditions and design guidelines.

Chair Stephens stated that he is interested in how the Planning Staff and applicant team can work together to make sure most of the historic material can be saved. He believes everyone has the best intentions, but wants to think about how to address this in the approval process. Director Ward believes everyone has the same desired outcome, which is that this be restored with as much historic material as possible. She noted that the Historic Preservation Plan has been submitted. The applicant will also be required to submit a Restoration Plan. That will be in coordination with the Historic Preservation Consultant. That role has been expanded to include the availability to be on-site during documentation. Chair Stephens referenced the Conditions of Approval language that mentions the storage of materials. There have been situations in the past where materials stored on-site became more damaged and materials stored off-site were lost. Director Ward informed the Board that it is possible to clarify Condition of Approval #30 so it mentions the Historic Preservation Consultant. There was support for that amendment.

Board Member Beatlebrox stated that this is an important project for the community. She believes there will be a thorough process and has been very impressed with everything presented in the Meeting Materials Packet. Chair Stephens agreed but noted that the breakdown can happen after the Building Permit is issued and

the actual implementation takes place. The Historic Preservation Consultant can act as a safeguard. Board Member Beatlebrox wondered whether it would be possible to receive progress reports during the process since this is such an important building to the community. Director Ward stated that it is possible to provide updates during regular Staff Communications.

Board Member Scott referenced the north side of the building. The applicant had mentioned that as part of the preservation of historic material, the siding would continue on the inside of the garage so that would not be disposed of. He thought that was an interesting solution and he would like to discuss that further. Board Member Scott noted that on the north side, the recommendation is to potentially panelize that material. He wondered whether that is the safest way to take care of that because it is a large panel.

Mr. Keys reported that the recommendation from the Industrial Hygienist on the north side was to deconstruct it given the necessity of removing the lead paint on the siding. It will not be easy to remove if there is panelization there. Board Member Hutchings asked Official Thacker to comment on panelizing the north section versus reconstruction. Official Thacker stated that as far as the structural integrity, that side seems to be the most intact. That said, with the new information from the Industrial Hygienist Report, such as the concerns about black mold and lead paint, there are some additional challenges that may supersede the benefit of trying to panelize that wall. This is especially true with part of that wall being within the garage. Removing the black mold and lead is important. However, if it is panelized, there might be areas where that cannot take place.

Director Ward noted that the current Conditions of Approval take the Industrial Hygienist Report into consideration, but there could be additional clarification provided. It currently states that the report will be used to evaluate the secondary north façade to determine the scope of the panelization for that portion of the home. Discussions were had about panelization and whether it is appropriate in this location. Chair Stephens referenced the comment made by Official Thacker and pointed out that it will be hard to remediate the lead paint and mold. Given this, it would make sense for there to be a consistent technique used for all of the siding. Board Member Noble believes it is paramount for the historic materials to be on the visible side of the building. Board Member Scott thanked Staff for their work on the Meeting Materials Packet and drafted Conditions of Approval.

Mr. Keys likes the idea of using the material in the most highly visible locations but noted that Condition of Approval #14 would need to be modified to allow for that since

the condition currently states that it will be placed back in the same location. It is possible to change that language so the word "location" is removed and it states "in the original form, style, and orientation." He believes that will achieve a better result. Discussions were had about possible condition language. Condition of Approval #14 was amended to state: "The Historic Structure must be reassembled using the original materials that are safe and in serviceable condition in combination in the most visible locations." Director Ward asked that Finding of Fact #11 be clarified to reference the Industrial Hygienist Report.

Chair Stephens asked how the Industrial Hygienist Report proposes handling the lead paint on the siding after it has been removed. It was noted that the report was received shortly before the site visit, but the Industrial Hygienist, Claude Dahlk, is available to answer Board Member questions. Mr. Dahlk explained that typically there is a chemical removal process. Chair Stephens asked how this process would take place. He pointed out that there are some long pieces of siding. Mr. Dahlk reported that there are contractors who handle this kind of work. Chair Stephens believed the process would include chemical removal and then repainting of the material, which was confirmed.

It was noted that Board Member Gackle arrived at approximately 6:20 p.m.

Mr. Keys would like to encourage the Board to consider allowing a slightly larger garage rather than the minimum. Mr. Markkanen explained that 11x20 barely fits a larger vehicle. The hope is that there can be some further consideration of the garage size so it can be better used. Board Member Hutchings believed the Staff recommendation was to lower the roofline. This was confirmed. Chair Stephens asked whether this issue is in the purview of the Historic Preservation Board. Director Ward explained that because it is going to impact the historic materials that will be removed to allow for the garage, it does impact the dimensions. This is covered under Condition of Approval #34. The 11x20 recommendation is coming from the minimum garage size requirements in Old Town. An amendment was made to Condition of Approval #34 to remove the dimensions.

Additional discussions were had about the proposed Conditions of Approval. Mr. Markkanen asked to retain the flexibility to explore a second story on top of the garage. Chair Stephens does not believe that is part of the purview of the Historic Preservation Board and that is something that will need to be worked out with Planning Staff.

Director Ward reported that at 5:13 p.m. a public comment was received through an online submittal. That comment has been forwarded to Board Members and will be

included in the public record. Board Members asked to review the comment that was submitted. It was clarified that the person who submitted the comment is now present at the meeting. Board Member Beatlebrox suggested that there be time allotted for the comment to be shared. Attorney Harrington explained that Chair Stephens can reopen the public hearing and allow for additional public comment or Staff can read the submitted comment into the record. Chair Stephens determined that the public hearing will be reopened.

Chair Stephens reopened the public hearing.

Rich Wyman stated that he is a longtime Park City resident and an advocate for historic preservation. He is present to oppose the proposed deconstruction of the Centennial House at 176 Main Street. This building dates back to the 1900s and is listed on the National Register of Historic Places. It is a rare and irreplaceable piece of mining-era heritage and has stood as a testament to the history of the City. He understands that the building has suffered significant deterioration including damage from a previous flood and that it has been condemned since 2007. The Staff Report notes issues such as structural distress, black mold, and animal infestations. However, the proposed plan to deconstruct and reconstruct the building, even with the intention of using as many historic materials as possible, raises serious concerns. Deconstruction in this context effectively amounts to demolition. While the architect has revised the design to reflect the early 1900s appearance, the essence of the original structure will be lost through this process.

Mr. Wyman feels that the authenticity and historical integrity cannot be replicated through reconstruction. There are several alternatives that he believes should be considered, including stabilization and preservation in place, careful restoration, or adaptive reuse. The Historic Preservation Board exists to protect the history of Park City and not to approve the removal of historic buildings under different terminology. Mr. Wyman believes that approving the proposal could set a dangerous precedent for how valuable historic assets are treated. He asked the Board to reject the deconstruction proposal.

There were no further comments. The public hearing was closed.

Board Member Beatlebrox explained that the Historic Preservation Board has an incredible amount of information about why this building has been condemned, what the challenges are, and why reconstruction is necessary. She is still of the opinion that it is possible to create something memorable and expressed support for the proposal. Board Member Holmgren agreed. Board Member Noble stated that she is

new on the Board and has struggled with this decision. She had done a tremendous amount of due diligence. It is not possible to send people in to do the work as it would put workers at risk. There was a lot of information provided to explain why this cannot be made safe or serviceable. She has been convinced that the reconstruction is necessary.

Board Member Hutchings believes the applicant has met the criteria under the code. He made it clear that his decision is not based on whether or not there is an interested buyer. Chair Stephens appreciates that someone is stepping forward to do this work, but explained that the decisions of the Board are not based on whether a sale will close.

MOTION: Board Member Beatlebrox moved to APPROVE the Reconstruction and Material Deconstruction of 176 Main Street, based on the Findings of Fact, Conclusions of Law, and Conditions of Approval outlined in the Draft Final Action Letter, as amended:

Findings of Fact:

1. 176 Main Street is a Historic Landmark Site constructed circa 1901 and is also known as the Durkin Boarding House and the Centennial House.
2. The five-sided lot is in the Historic Residential – 2 Sub-Zone B and is accessed from Main Street.
3. 176 Main Street is a Landmark Historic Site on Park City's Historic Sites Inventory.
4. There is an existing 20-foot-wide Utility Easement (Entry No. 1167000), a 20-foot-wide Flume Easement (Entry No. 431129), and a five-foot-wide Trail Easement (Entry No. 431129) at the rear of the property.
5. The Structure at 176 Main Street has remained vacant for some time.
6. The Applicant submitted a Physical Conditions Report and Historic Preservation Plan outlining the condition of the Structure, which is poor due to damage from elements, animals, squatters, and lack of maintenance.
7. The Applicant proposes to deconstruct the Structure and reconstruct using salvaged material to restore the 1907 footprint and form of the Structure.

8. The Applicant proposes:
 - a. Deconstructing the Landmark Historic Structure and salvaging as many historic materials as possible.
 - b. Constructing a new foundation.
 - c. Reconstructing the Landmark Historic Structure using salvaged and replacement material to restore the 1907 form.
 - d. Constructing an addition on the secondary (north) and tertiary (east) façades, as well as a basement addition.
9. On May 7, 2025, the Historic Preservation Board (HPB) reviewed the Applicant's proposal and requested additional information. The HPB continued the item to the June 4, 2025, meeting and requested the following:
 - a. Evaluation of restoration to the early 1900s footprint and whether this could provide opportunities to lift the Landmark Historic Structure or panelize it.
 - b. Additional information regarding whether the structure can be made safe and serviceable.
 - c. Whether the Landmark Historic Structure should be restored to the early 1900s simple ornamentation or include the late 1970s ornamentation that modified the historic roof form with dormer windows, cupola, pediments, and other ornaments.
 - d. Completion of an Industrial Hygienist Report to provide a more accurate account of the materials that can be salvaged, how they can be preserved and treated, and how they can be incorporated into the restored building.
10. The Applicant updated the proposed plans to reflect the 1907 footprint. The determination from the structural engineer remains the same – lifting or panelizing the structure is not an option. As was indicated previously, Staff finds the north façade can be panelized.
11. The Applicant's Request to Reconstruct the Landmark Historic Structure complies with Land Management Code Section 15-11-15. Staff Recommends a Condition of Approval to preserve the material based on the findings in the Industrial Hygienist Report.
12. Land Management Code (LMC) Section 15-15-1 defines Reconstruction as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving Structure for the purpose of replicating its

appearance at a specific period of time and in its Historic location. LMC Section 15-11-15 outlines the requirements for Reconstruction. “It is the intent of this section to preserve the Historic and architectural resources of Park City through limitations on the Reconstruction of Historic Buildings . . .”

13. Goal 15 of the General Plan is to preserve the integrity, mass, scale, compatibility, and historic fabric of the nationally and locally designated historic resources and districts for future generations. Objective 15A is to maintain the integrity of historic resources within the City as a community asset for future generations, including historic resources locally designated on the Historic Sites Inventory.
14. Reconstruction is a last resort. In this case, Staff recommends the Board consider Reconstruction due to the condition of the Landmark Historic Structure and the opportunity to restore an important and highly visible Historic Structure at the top of Main Street.
15. To approve Reconstruction, the Board must find the project complies with LMC Section 15-11-15 which includes the three criteria listed below:
 - a. The Historic Structure is found by the Chief Building Official to be hazardous or dangerous pursuant to Section 116.1 of the International Building Code.
 - i. On April 10, 2025, the Chief Building Official visited the site, evaluated the Landmark Historic Structure, and found the Historic Structure to be hazardous or dangerous pursuant to Section 116.1 of the International Building Code.
 - ii. On February 21, 2007, the Chief Building Official issued a “NOTICE AND ORDER TO REPAIR, VACATE, OR DEMOLISH BUILDING” to the current property owner, Mountain Seas Development.
 - iii. The Chief Building Official determined that the property was “dangerous as defined in Section 302 of the Uniform Code for the Abatement of Dangerous Buildings, due to the following conditions:
 1. As per Section 202 of the 1997 Edition of the Uniform Code for the Abatement of Dangerous Buildings, [the building] as per Section 302, Items 1, 2, 3, 7, 8, 10, 12, 13, 14, 15, 16, 17 & 18 of the attached Definition of Unsafe Buildings
 - b. The Historic Structure cannot be made safe and/or serviceable through repair.
 - i. The Applicant submitted a report from a licensed structural engineer concluding the Structure cannot be made safe and/or serviceable through repair.
 - ii. Staff also finds the Historic Structure—except for the potential of panelizing the secondary (north) façade—cannot be made safe and/or serviceable through repair.

- iii. Based on initial evaluation, staff finds that in addition to salvaging as much historic material as possible to integrate in a Reconstructed Landmark Historic Structure, the secondary (north) façade may be panelized. However, staff recommends that panelization be conditioned. Due to elements found within the vacant structure, Condition of Approval 18 requires the Applicant to obtain an Industrial Hygiene Report. This report will be used to evaluate the secondary (north) façade materials proposed for panelization, as well as all other materials proposed to be salvaged and integrated into the Reconstructed project to ensure best practices are utilized for protection and preservation of historic materials, and that the process and project is completed in a way that meets the requirements of safety standards and regulations.
 - c. The form, features, detailing, placement, orientation, and location of the Historic Structure will be accurately depicted by means of new construction based on as-built measured drawings, historical records, and/or current or Historic photographs.
 - i. The Applicant proposes Reconstruction of the Landmark Historic Structure based on the as-built documentation. The Applicant completed a 3-D scan of the building to document the Structure and create as-built drawings. The Applicant provided photographs of the exterior of the Structure including details of the siding, windows, porch, doors, and elements of the Historic Structure.
 - ii. LMC § 15-11-15(B) requires the Board to review Reconstruction pursuant to § 15-11-12 Historic District or Historic Site Review.
 - iii. The Applicant proposes to restore the footprint of the Historic Structure to reflect its 1907 form. This includes the 1,185-square-foot footprint of the Historic Structure shown in the proposed plans. The Applicant has submitted a Sanborn Map from 1907 showing an addition that was constructed on the Structure and was removed sometime between 1907 and 1970. The Applicant proposes to restore the 108 square foot addition to restore the 1,293 square foot footprint of the Structure as it was built in 1907.
16. The proposal, as conditioned, complies with Land Management Code Sections 15-11-12 Historic District or Historic Site Review and 15-13-2 Regulations for Historic Districts and Historic Sites.
17. The Landmark Historic Structure encroaches in the Front Setback by 12 feet. However, pursuant to LMC § 15-2.3-4, existing Historic Structures that do not comply with current code are valid Non-Complying Structures. The Applicant proposes to Reconstruct the Landmark Historic Structure in the same location indicated on the Existing Conditions Survey.

18. There is a stone wall in front of the Landmark Historic Structure that is not a retaining wall. The Applicant proposes to remove this wall and replace it with a fence that reflects the conditions of the site in 1907, the year which the Applicant proposes to restore the site to.
19. The Applicant proposes to reconstruct the Structure to its 1907 form. This includes the removal of doors, windows, and porches that exist on the Structure currently. The elements proposed to be removed are not original to the Structure. All Historic materials and elements that are associated with the Structure and its 1907 form are proposed to be retained through repair or salvaging of materials.
20. Any additions are required to be compliant with the Setbacks established in LMC Chapter 15-2.3.
21. The Applicant does not propose any interior changes that affect the exterior appearance of primary façade. The Applicant proposes retaining the southern secondary façade and modifying the northern secondary façade to accommodate an addition.
22. Given the location within a FEMA designated floodplain, the Applicant proposes lifting the Historic Structure and constructing a new foundation as well as utilizing piers at the rear of the Structure to comply with floodplain regulations. The piers will not be visible from the front façade or primary public right-of-way.
23. The Applicant proposes maintaining door openings as seen on the 1907 form of the Structure. Condition of Approval 19 requires that the Applicant submit a report detailing the conditions of the doors and their salvageability and proposed repair or replacement.
24. The Applicant proposes to replace any windows that are not salvageable and to repair those that are able.
25. The Applicant notes that the gabled Structure that faces east (rear façade) was likely part of an addition to the Structure though the year is unknown. The Applicant proposes to remove the doors and windows on this previous addition and replace with openings that comply with current Historic District Design Regulations.

26. The Applicant proposes to repair the two historic porches on the front façade and to remove two porches on the rear façade.
27. The Applicant proposes to analyze the materials on the front porches to determine what can be salvaged and used to repair the porch. The existing railing on the second-story porch on the front façade does not meet current Building Code. The proposed replacement railing will be in the same form and style but will be increased in height to comply with current Building Code.
28. The Applicant proposes Reconstructing the Structure to the 1907 form. The Historic Site Form for the site suggests that the ornamental features such as the cupola, oval window, window pediments, dormers on the north roof, and architectural design elements on the front porch were added sometime between 1978 and 1983. The original Structure was simple in form with unadorned elements. The Applicant proposes removing the architectural elements and restoring the Structure to its original form.
29. The proposed addition is located on the secondary and tertiary facades. The Applicant also proposes a basement addition under the Historic Structure in the area located outside of the floodplain.
30. Due to the unique constraints of the easements and floodplain running through the site, the Applicant proposes a portion of the addition be located on the secondary façade.
31. The proposed addition is visually subordinate to the Historic Structure as the larger volume of the addition is located on the rear façade and is not visible from the primary public right-of-way. The proposed addition is smaller in height than the existing Historic Structure and is stepped back 14 feet from the front façade of the existing Historic Structure.
32. The proposed footprint of the addition is 590 square feet, and the footprint of the Historic Structure when retained to its 1907 Footprint, with the absent 1907 addition is 1,293 square feet. Pursuant to LMC § 15-13-2(B)(4)(b)(2) a transitional element is required not required as the proposed addition has a footprint of below 646.5 square feet.
33. The height of the addition on the secondary facade is no more than 23 feet above Existing Grade and is subordinate to the Historic Structure. The Applicant

proposes vertical wood siding on the addition to complement the horizontal visual and physical materials of the Historic Structure.

34. The Applicant proposes smaller windows on the addition with a 2:1 ratio with a similar solid-to-void ratio of façade and windows.
35. The Applicant proposes a single-car wide garage, which is set back 14 feet from the primary façade and is located on the secondary façade of the Structure, and is visually minimized from the primary public right-of-way.
36. The proposed deck is located on the rear façade and is not visible from the primary public right-of-way. The proposed deck is attached to the addition and is not impacting historic material.
37. Pursuant to LMC § 15-11-12.5 the HPB reviews any requests any removal of Historic material to accommodate new additions. The Applicant proposes removing 634 square feet of Historic siding material to construct the rear addition. The Applicant proposes removing 496 square feet of non-Historic Siding to construct the addition and salvaging 138 square feet of Historic material to be reused on the Structure. The Applicant provided a plan outlining the material proposed to be salvaged and integrated into the Landmark Historic Structure.
38. The Applicant must provide a Financial Guarantee to ensure the Landmark Historic Structure is Reconstructed and as many historic materials as possible are salvaged, protected, and integrated into the Reconstructed Structure.
39. In addition to the Board's Final Action, the Applicant will be required to obtain Historic District Design Review (HDDR) approval, subject to LMC Chapter 15-13 Design Guidelines for Historic Districts and Historic Sites and LMC § 15-11-9 Preservation Policy prior to submitting a Building Permit application.
40. Staff published notice on the City's website and the Utah Public Notice website, and posted notice to the property on April 24, 2025. Staff mailed courtesy notice to property owners within 300 feet on April 24, 2025. The Park Record published notice on April 24, 2025.

Conclusions of Law:

1. The proposal complies with the Land Management Code requirements pursuant to LMC § 15-11-12.5 *Historic Preservation Board Review for Material Deconstruction*.
2. The proposal complies with the Land Management Code requirements pursuant to LMC § LMC § 15-11-15 *Reconstruction of Historic Structures*.
3. The proposal, as conditioned, complies with Land Management Code Sections 15-11-12 *Historic District or Historic Site Review* and 15-13-2 *Regulations for Historic Districts and Historic Sites*.

Conditions of Approval:

1. Final building plans and construction details shall reflect substantial compliance with the Historic Preservation Board June 4, 2025 approval for Reconstruction and Material Deconstruction. Any changes, modifications, or deviations from the approved Material Deconstruction that have not been approved in advance by the Planning and Building Departments may result in a stop work order.
2. The applicant is responsible for notifying the Planning and Building Departments prior to making any changes to approved plans.
3. Any changes, modifications, or deviations from the approved scope of work shall be submitted in writing for review and approval/denial in accordance with the applicable standards by the Planning Director or their Designee prior to construction.
4. The applicant shall provide the City with a Financial Guarantee, in accordance with LMC § 15-11-9, to be recorded with the Summit County Recorder's Office prior to submitting a Building Permit application.
5. An encroachment agreement may be required prior to the issuance of a Building Permit for projects utilizing soils nails that encroach onto neighboring properties.
6. A Soils Report completed by a geotechnical engineer as well as a temporary shoring plan, if applicable, will be required at the time of Building Permit application.
7. The site shall be re-graded so that all water drains away from the Structure and does not enter the foundation.

8. Historic materials removed from the Structure that are salvageable or in otherwise good condition shall be used to repair/replace irreparable materials on the Site.
9. The basement addition shall not raise the Historic Structure more than two feet from its original floor elevation above grade.
10. A plinth or trim board at the base of the Historic Structure shall be added to visually anchor the Historic Structure to the new foundation.
11. No more than 6 inches of the foundation shall be visible on the primary or secondary facades.
12. The form, material, and detailing of a new foundation shall be similar to the foundations of nearby historic structures.
13. The Applicant shall record the plat with Summit County prior to Building Permit issuance.
14. The Historic Structure must be reassembled using the original materials that are safe and in serviceable condition in combination in the most visible locations.
15. The Applicant shall submit an Industrial Hygienist Report for the materials proposed to be re-used to determine they comply with current safety standards and regulations. This report will be used to evaluate the secondary (north) façade materials proposed for panelization, as well as all other materials proposed to be salvaged and integrated into the Reconstructed project to ensure best practices are utilized for protection and preservation of historic materials, and that the process and project is completed in a way that meets the requirements of safety standards and regulations.
16. The Applicant shall submit a third-party report detailing the conditions of the windows and doors and their salvageability and proposed repair or replacement.
17. Established vegetation should be protected, and removed vegetation shall be replaced with native vegetation away from the Historic Structure.
18. New retaining walls shall be consistent with historic retaining walls in design and shall comply with LMC § 15-3-2(B)(1)(d).

19. When historic exterior materials cannot be repaired, they shall be replaced with materials that match the historic in all respects: scale, dimension, profile, material, texture, and finish. The replacement of existing historic material is allowed only when it can be shown that the historic material is no longer safe and/or serviceable and cannot be repaired to a safe and/or serviceable condition.
20. Insulation added to increase energy efficiency shall not impact the exterior dimensions of the Structure.
21. The Applicant shall avoid changing the position, proportions, or dimensions of historic door openings and shall not create additional openings or remove historic openings on primary or secondary facades that are visible from the primary public right-of-way. Replacement doors shall be similar to those seen historically in Park City. New doors shall comply with the regulations outlined in LMC § 15-13-2(B)(2)(c).
22. The Applicant shall replace historic windows exactly, in size, dimension, glazing pattern, depth, profile, and material.
23. Replacement porch elements shall exactly match the historic elements in size, dimensions, form, profile, and material. All proposed new porches shall comply with LMC § 15-13-2(B)(2)(g).
24. All new mechanical equipment shall be located in a manner that is visually minimized from the primary public right-of-way. Existing mechanical equipment on the front façade shall be relocated to the rear.
25. All materials for the addition shall be compatible with those found on Historic Structures.
26. The Applicant shall obtain HDDR approval for the proposed new construction prior to submitting a Building Permit application.
27. Prior to submitting a Building Permit, the Applicant shall review the Historic Site and Historic Material and:
 - a. Complete a photographic survey of the exterior elevations and architectural details of the Landmark Historic Structure, including site and location views from

all compass points, exterior elevations, and elevations of each basement and attic wall.

- b. Submit a Restoration Plan detailing the disassembly and reassembly steps and procedures, including:
- c. Preservation of as much historic fabric as possible. The Landmark Historic Structure shall be disassembled in the largest workable pieces possible.
- d. The architectural features of the Landmark Historic Structure shall be removed, marked, and stored before the structure is disassembled.
- e. To ensure accurate reassembly, the Restoration Plan shall include all parts of the building, structure, or element. The Restoration Plan shall include details on how materials will be marked as they are systematically separated from the structure. Contrasting colors of paint or carpenter wax crayons shall be used to establish a marking code for each component. The markings shall be removable or shall be made on surfaces that will be hidden from view when the structure is reassembled.
- f. The Plan shall be reviewed by the City's Historic Preservation Consultant and Planning and Building Departments.

28. The Applicant shall schedule on-site inspections with the City's Historic Preservation Consultant and Planning and Building Departments when the process of disassembly of the Landmark Historic Structure is planned. The process of disassembly shall be recorded through photographs and videos.

29. The Applicant shall note the physical condition of each component of the Landmark Historic Structure. When a component is too deteriorated to remove, the City's Historic Preservation Consultant and Applicant shall carefully document through photographs and written notes its dimensions, finish, texture, color, etc. to facilitate accurate reproduction.

30. Disassembled components, including the trim, windows, doors, and wall panels, shall be securely stored on-site in a storage trailer or off-site in a temperature-controlled garage/warehouse to be approved by the Planning and Building Department, as well as reviewed by the Historic Preservation Consultant until needed for reassembly.

31. Reconstruction shall include recreating the documented design of exterior features, including the roof shape, architectural detailing, windows, entrances and porches, steps and doors, and the historic spatial relationships, incorporating all salvageable materials.

32. The reconstructed building shall accurately duplicate the appearance of the historic building in materials, design, color, and texture.
33. The reconstructed building shall duplicate the historic building and shall reconstruct the setting, placement, and orientation of the original structure.
34. To reduce the removal of Historic Materials on the north façade, the garage addition shall be reduced to one story. The garage addition shall be set back by more than half the width of the north façade.
35. The height of the rear addition shall not exceed the height of the Landmark Historic Structure and the shed roof additions shall be lower than the historic roof eaves.
36. In-line additions are prohibited. The rear addition shall be set in from the corner of the north Historic elevation by a minimum of two feet.

Board Member Holmgren seconded the motion.

VOTE: The motion passed unanimously. Board Member Gackle abstained from the vote.

Following the vote on Item 6B, the Historic Preservation Board took a short break before hearing Item 6A on the Historic Preservation Board Meeting agenda.

7. ADJOURN

MOTION: Board Member Holmgren moved to ADJOURN the Historic Preservation Board Meeting. Board Member Hutchings seconded the motion.

VOTE: The motion passed with the unanimous consent of the Board.

The Historic Preservation Board Meeting adjourned at approximately 7:53 p.m.

**PRE-DEMOLITION/RENOVATION INSPECTION
FOR ASBESTOS, LEAD, UNIVERSAL,
HAZARDOUS AND TOXIC WASTES**

**The Centennial House
176 Main Street
Park City, Utah 84060**



Submitted to:

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Windermer Real Estate

Prepared by:



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EXECUTIVE SUMMARY

On May 28, 2025, Hill West Environmental conducted an asbestos, lead, Universal, hazardous and toxic wastes inspection for the residential structure located at 176 Main Street, Park City, Utah. The 176 Main Street structure is a Historic Landmark Site constructed circa 1901 and is also known as the Durkin Boarding House and the Centennial House.

Ms. Makenzie Kink Winder, Real Estate Agent with Windermere Real Estate, requested this inspection to identify asbestos-containing materials (ACM); building components with lead-containing coatings; and universal, hazardous and toxic waste materials that need to be addressed before these areas are renovated and/or the building is demolished. Hill West identified the following materials during this inspection:

Asbestos-Containing Materials

Material Description/Location	Friability	Asbestos Content	Amount
Vermiculite Insulation/ Third Level Floor Joists and Basement Ceiling	Yes	2% Asbestiform amphibole suite mineral by Point Count	~ 5,000 ft ²
Textured Wall Material/ First Level NE Room	Yes	1.5% Chrysotile	~ 1,000 ft ²
Duct tape in basement furnace room.	Yes	Assumed	~ 20 linear feet
Sheet Vinyl Flooring – Flower Pattern/ First Level SW Room	No	<1% Chrysotile in black tar felt	~ 225 ft ²
Sheet Vinyl Flooring – Brick Pattern/North Basement Apartment	No	10% Chrysotile in black tar felt	~ 60 ft ²
All roofing products including tar paper under metal roof and caulking. ²	No	1.8% Asbestiform amphibole suite mineral 1% by Point Count	~ 4,000 ft ²

¹ This inspection was completed for a demolition; all roofing materials were assumed to contain asbestos. This material can be left in-place during demolition if wet methods are used during these activities.

Building Components with XRF Lead readings ≥ 0.4 mg/cm²

Building	Material Type	Reading (mg/cm ²)
176	All Exterior painted wood siding, window frames, doors, soffits, and trim.	1.06 – 13.83
176	All Interior painted wood doors, trim, stairwells, ceilings, and ceramic wall tile in bathrooms	1.62 – 10.5

Universal, Hazardous, and Toxic Wastes

Material	Location	Quantity
1) Refrigerators	Basement and first floor	2
2) Respiratory hazards including Mold/Dead Raccoons/Raccoon, mouse and other animal feces/old food and garbage	Basement of Building	2,000 ft ²

Conclusions

ACM – Asbestos materials were identified within the structure that included vermiculite insulation, textured wall material, duct tape, and sheet vinyl flooring that will require abatement prior to demolition or renovations. Hill West recommends that prior to any asbestos abatement, the basement shall first be remediated for respiratory hazards including mold, dead animals, feces, and all garbage to allow safe access into this area prior to asbestos abatement.

The second phase shall include removal of all safety hazards on the first, second and third floors including all garbage and other debris. Upon a visual inspection by the Consultant, the abatement contractor shall then set-up containments to manage the removal of all asbestos identified in the above table.

As EPA-regulated vermiculite is present within the third-floor joists and within the basement ceiling, the contractor shall open up all walls and ceilings at random locations to visually inspect within the ceiling/wall/floor joists on all levels of the structure to verify that vermiculite is not present within these areas.

If the contractor discovers additional materials that were not sampled during this inspection, they shall stop work and inform the building owner that these suspect materials should be sampled to determine if they are in fact regulated for asbestos.

Lead – Lead was detected within all exterior painted wood surfaces and within the interior wood doors, windows and trim. Depending on the project (deconstruction/renovation) costs for lead removal are not provided within this report as the project scope is unknown at this time. Any renovation work will require removal of lead hazards by an EPA-certified company with appropriately trained and certified workers.

If workers perform any construction activities that may create lead-containing dust or fumes, they must follow the requirements of the Occupational Safety and Health Administration (OSHA) Lead in Construction Standard, 29 Code of Federal Regulations (CFR) 1926.62. This standard requires, among other things, lead training, initial exposure assessment, respiratory protection and worker hygiene facilities.

Without exception, the painted exterior wood siding is in poor condition and due to the condition of the wood substrate may be difficult to refurbish and/or salvage for reuse on-site. Wood surfaces including walls, trim and window trim may also be difficult to refurbish and/or salvage, but should be assessed on a case-by-case basis.

Subtitle C of the Resource Conservation and Recovery Act (RCRA) requires the generator to determine if deconstruction waste is hazardous. Toxicity Characteristic Leaching Procedure (TCLP) testing is the preferred method for determining this. The deconstruction waste from this project should undergo TCLP testing prior to disposal to determine if they are hazardous.

Universal, Hazardous and Toxic Wastes – Hill West recommends that all projects follow the protocols for identification and disposal of hazardous materials developed by the Salt Lake Valley Health Department (SLVHD). These protocols require building owners to identify and remove all universal, hazardous and/or toxic waste from buildings before they are demolished. Disposition of these materials must follow Environmental Protection Agency (EPA) guidelines outlined in 40 CFR 173 (Shippers – General Requirements for Shipments and Packaging). As such, Hill West recommends that the materials identified during this inspection be removed and disposed of/recycled by properly trained and licensed contractors.

Cost Estimates

Hill West's cost estimates to remove the hazardous materials outlined above are:

- **Respiratory Hazard Removal in Basement:** \$ 35,000
- **Garbage Removal Floors 1 - 3:** \$ 25,000
- **Asbestos-containing Materials:** \$149,625
- **Hazardous Materials (Universal Wastes):** \$ 1,000

Total Project Abatement Costs \$210,625

The cost estimates above are provided for use in long-term budgeting and planning only and do not have a level of accuracy sufficient to be used as construction design cost estimates. The actual cost of asbestos removal is highly dependent on a number of factors such as the size of the job (single room or mechanical enclosure, or an entire floor or building); the required time frame for removal; the time of year the job is conducted; and travel time and distance to the job for the contractor. Therefore, actual removal costs could vary significantly from these estimates.

The cost estimates attempt to capture the costs associated with the removal of all asbestos-containing materials identified in this survey as part of one removal contract. Materials replacement, contractor mobilization cost and consultant abatement management costs are not included in these estimates and can substantially add to the project costs.

The estimated costs of removing lead-containing materials are not included here because there is no regulatory requirement to remove lead. Some lead-containing materials may not be disturbed during the renovation and may therefore remain in place. In addition, disposal costs of demolition waste may vary significantly, depending on TCLP testing. The report that follows this Executive Summary should be read in its entirety because it includes important information, such as material descriptions and locations, regulatory requirements, and building specific recommended response actions.

**The Centennial House
176 Main Street
Park City, Utah 84098**

1.0 INTRODUCTION

On May 28, 2025, Hill West Environmental conducted an asbestos survey of the Centennial House located at 176 Main Street, Park City, Utah. The purpose of this survey was to identify the existence, extent, and condition of both friable and non-friable asbestos-containing materials (ACM) within the facility. Bulk samples were collected from suspect materials and analyzed for asbestos content. Each occurrence of ACM was assessed for damage and friability. Appendix A contains Data Tables that have been prepared by the inspector based on the results of this inspection.

2.0 BUILDING DESCRIPTION

Building Identification

Facility Name..... Centennial House
Building Address..... 176 Main Street Park City, Utah

Building Construction

Building Construction Date..... 1901
Renovations..... Unknown
Building Type..... Apartments

Building Total Sq. Ft..... 5,092 ft²
Structural System..... Wood on slab concrete
Exterior Wall Construction..... Wood
Floor Deck Construction..... Reinforced concrete
Roof Construction..... Metal
Floors Above Grade..... 3
Floors Below Grade..... 1

Interior Finishes

Floors..... Concrete, carpet, Sheet Vinyl Flooring
Walls..... Concrete, brick, and sheetrock
Attic..... 1
Crawl space..... 0

Building Mechanical

Heating System.....	Natural gas with forced air.
Main Heating Distribution.....	Forced air
Cooling Plant.....	None
Main A/C Distribution.....	None

Appendix B contains the as-built drawings with sample locations.

3.0 INSPECTION PROCEDURES

3.1 Asbestos-Containing Materials (ACM)

All accessible areas of the facility were visually inspected to identify suspect asbestos containing materials (ACM.) All accessible surfaces, structures, and mechanical systems within these areas were examined and all suspected ACM was touched to determine friability.

Suspect ACM was identified and assessed in homogeneous areas. A homogeneous area is defined as a single material, uniform in texture and appearance, installed at one time, and unlikely to consist of more than one type, or formulation, of material. In cases where joint compound and / or tape has been applied to wallboard (gypsum board) and cannot be visually distinguished from the wallboard, it is considered an integral part of the wallboard and in effect becomes one material forming a wall or ceiling “system.”

Each homogeneous area was given a unique material identification number. Each ID number begins with a letter: “S” for surfacing materials, “T” for thermal system insulation, or “M” for miscellaneous materials. This letter is followed by a three-digit number, assigned in consecutive order. This number is used to identify the homogeneous area throughout the inspection report.

3.2 Bulk Sample Collection

Bulk samples were collected from all accessible homogeneous areas of suspect ACM for subsequent laboratory analysis to determine actual asbestos content. Sampling was conducted in a manner that minimized damage to the building, did not leave any unsightly marks, and did not create a health hazard for the inspectors.

The number of samples collected from each homogeneous area generally followed the EPA Asbestos Hazard Emergency Response Act (AHERA) regulations (40 CFR §763.86). Friable surfacing materials were sampled using the random sampling scheme given in the EPA publication 560 / 5-85-30a, titled "Asbestos in buildings: Simplified Sampling Scheme for Friable Surfacing Materials." Between three and seven samples were collected from friable surfacing materials, depending on the size of the homogeneous area. Bulk sample IDs collected during the inspection were entered on chain-of-custody forms for submittal to the analytical laboratory.

3.3 Bulk Sample Analysis

Bulk samples were analyzed using polarized light microscopy (PLM) and visual estimation in accordance with the EPA Interim Method for the Determination of Asbestos in Bulk Insulation Samples, EPA-600 / M4-82-020. Samples were analyzed by Dixon Information, Inc. 78 West 2400 South, South Salt Lake City, Utah 84115. The laboratory is accredited under the National Institute of Standards and Technology–National Voluntary Laboratory Accreditation Program (NIST-NVLAP) for bulk-asbestos sample analysis and is also accredited by the American Industrial Hygiene Association (AIHA).

Federal EPA's National Emissions Standards for Hazardous Air Pollutants (NESHAP) and AHERA regulations define ACM as material containing greater than 1% asbestos by weight; materials containing less than 1% asbestos are not considered regulated ACM.

Further, the NESHAP regulations state that any sample found to contain less than 10% asbestos but greater than "none detected," by visual estimation, must be assumed to contain greater than 1% asbestos unless confirmed to be less than 1.0% asbestos by point counting analysis.¹

Despite EPA and Utah Division of Air Quality (UDAQ) rules exempting building materials containing 1% or less asbestos from stringent regulation, OSHA regulations outline specific precautionary work practices when employees work with materials containing even trace amounts of asbestos.²

The laboratory reports can be found in **Appendix C** of this report.

¹ NESHAP point counting includes examining materials under a polarizing microscope using an eyepiece reticule that superimposes a grid of points over the field of view; 400 points are examined.

² OSHA regulations pertaining to asbestos in buildings include 29 DFR 1926.1001. OSHA has also issued interpretive letters that provide clarification about how materials containing less than 1% asbestos should be handled. (See www.osha.gov)

4.0 INSPECTION RESULTS

4.1 Asbestos-Containing Materials

The Executive Summary and **Table 1** in **Appendix A** list all homogeneous areas that contain asbestos. Each material is described by type of material, friability and visual appearance.

Friability is defined in accordance with EPA's NESHAP regulations.

"Friable ACM" is any material containing more than 1% asbestos (as determined by PLM) that, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure and also includes non-friable ACM that may become friable during building demolition.

"Non-friable ACM" is any material containing more 1% asbestos (as determined by PLM) that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

"Category I non-friable ACM" are asbestos-containing resilient floor coverings (commonly known as vinyl asbestos tile (VAT), asphalt roofing products, packings, and gaskets.

"Category II non-friable ACM" encompasses all other non-friable ACM.

"Non-friable RACM" is used to denote thermal system insulation that is in good condition but would become friable during renovation or demolition and therefore is "regulated asbestos containing material" (RACM).

4.2 Non-Asbestos-Containing Materials

Homogeneous areas of suspect ACM are identified as *non*-ACM if the laboratory analysis shows the material to contain no detectable asbestos. **Table 2**, located in **Appendix A** of this report, lists all homogeneous areas that were found to be non-ACM.

4.3 Bulk Sample Analytical Results

Table 3, located in **Appendix A**, lists all of the bulk samples in order by sample number, which were collected from homogeneous areas of suspect ACM, along with the laboratory analytical results. Each sample was given a unique sample number. There may be more than one sample number for the same homogeneous area of suspect ACM. The homogeneous areas of suspect ACM are identified on this table by their material identification numbers. The sample location listed on this table provides a brief, but specific, description of the location where the sample was collected. This is different than the

homogeneous area location provided on **Tables 1 and 2**. The sample locations listed in **Table 3** provide a short description of the location where the sample was collected. This is different from the homogeneous area location provided on **Tables 1 and 2**. Appendix D contains photographs of suspect ACM samples that were collected during this inspection.

4.4 Damage and Hazard Assessment

Each homogeneous area of ACM has been assessed for existing damage, accessibility, and potential for future damage and this information is presented in **Table 4**, located in **Appendix A** of this report. This table also lists the substrate present beneath each homogeneous area of ACM.

Each homogeneous area of friable ACM and asbestos-containing building material (ACBM) was classified into one of the following seven categories, as specified in EPA's AHERA regulations (40 CFR 763.88):

- (1) Damaged or significantly damaged thermal system insulation ACM.
- (2) Damaged friable surfacing ACM.
- (3) Significantly damaged friable surfacing ACM.
- (4) Damaged or significantly damaged friable miscellaneous ACM.
- (5) ACBM with potential for damage.
- (6) ACBM with potential for damage.
- (7) Any remaining friable ACBM or friable suspected ACBM.

The damage categories are defined as follows:

“Undamaged” means the material had no visible damage, or extremely minor damage or surface marring (i.e., a room full of floor tile with only two or three small corners chipped off on the tile).

“Damaged” means the material had visible damage evenly distributed over less than 10% of its surface or localized over less than 25% of its surface.

“Significantly Damaged” means the material had visible damage that is evenly distributed over 10% or more of its surface or localized over 25% or more of its surface.

Each homogeneous area of ACM was evaluated for accessibility to the building occupants and the general public, assuming the building was fully occupied, using the following assessment categories.

“Inaccessible” means the material was located in an area that people had no reason to enter and could not access without special measures. One example would be above a solid ceiling.

“Rarely Accessed” identifies a material that was in a location that could be accessed but wasn’t unless there was a specific need. An example would be a pipe tunnel. Another example would be a high ceiling that is out of reach and not subject to any specific disturbance.

“Periodic Access” identifies a material that was in a location that was accessible, was not occupied full time, but was accessed on a routine basis. An example would be a mechanical room or boiler room.

“Continuous Access” identifies a material that was in a location that was occupied full time and was within reach of the occupants or was frequently subject to direct disturbance. Examples would be exposed floor tile or a normal height ceiling.

4.5 Homogeneous Areas with Special Considerations

None.

4.6 Suspect Materials Presumed to be Asbestos-Containing Materials without Laboratory Analysis

Location	Asbestos Material	Quantity
All roofing products including tar paper and caulking. ¹	Assumed	~ 4,000 ft ²

¹ This inspection was completed for a demolition; all roofing materials were assumed to contain asbestos. This material can be left in-place during demolition if wet methods are used during these activities.

4.7 Inaccessible Areas

Some building structures may have been constructed after the application of ACM, and therefore may have obscured these materials from visual examination during this inspection. Typical scenarios include thermal system insulation inside hardened mechanical chases, floor tile, and mastic under walls, and sprayed on texturing and/or fireproofing behind structural supports or architectural features.

4.8 Material(s) assumed to contain >1.0% asbestos without subsequent TEM or Point Count Analysis

None.

5.0 RESPONSE ACTIONS

5.1 Applicable Rules and Regulations

In Utah, EPA asbestos regulations are administered by the UDAQ.³ Utah Occupational Safety and Health Administration (UOSHA) has adopted the Federal OSHA regulations.⁴ In addition, the SLVHD regulates demolition activities in Salt Lake County.⁵ The SLVHD regulations for pre-demolition building inspections require an asbestos inspection, but also required building owners to inspect the building for other hazardous materials such as universal wastes, hazardous and toxic wastes and lead-based paint. Similar to asbestos, these wastes, if present must be removed prior to demolition.

³ R307-801. Asbestos, Utah Division of Air Quality Rules, Implementation of Toxic Substances Control Act Title II, Asbestos Certification, Asbestos Training, notifications and Asbestos Work Practices for Renovations and Demolitions (See www.airquality.utah.gov).

⁴ Asbestos, Tremolite, Anthophyllite, and Actinolite Standards, Chapter D (Construction), Section 58; and Chapter Z (General Industry), Section 1001, Utah Occupational Safety and Health Rules and Regulations (Administered by Utah Occupational Safety and Health Division) (See www.uosh.utah.gov).

⁵ Salt Lake City – County Health Department, Health Regulation #1 Section 12 (See www.slvhealth.org).

5.2 Renovation and Demolition (EPA and OSHA)

A listing of ACM found during this inspection is presented in the Executive Summary at the front of this report and in **Appendix A, Table 1**.

NESHAP regulations require the removal of friable ACM and non-friable ACM that could become friable during demolition activities. Therefore, we recommend that all of the ACM in this building be removed and properly disposed of by a licensed asbestos abatement contractor before renovation activities begin which have the potential of disturbing areas where these materials are located.

Despite EPA and UDAQ rules exempting building materials containing 1% or less asbestos from stringent regulation, OSHA regulation outlines specific precautionary work practices when employees work with materials containing even trace amounts of asbestos. Strict compliance by building owners with OSHA asbestos regulations may result in response actions not required by EPA and Utah DAQ for certain unregulated materials⁶.

6.0 COST ESTIMATES

Details of the estimated removal costs by homogeneous area can be found in **Table 5, Appendix A**, and the Executive Summary table.

Cost Estimate Limitations

These cost estimates are provided for the use of long-term budgeting and planning only and do not have a level of accuracy sufficient to be used as construction design cost estimates. The actual cost of asbestos removal is highly dependent on the size of the project or quantity of materials removed in a single abatement enclosure. The unit costs associated with small-scale emergency projects will typically be significantly greater than the costs associated with larger, planned projects. The cost estimates attempt to capture the costs associated with the removal of all asbestos-containing materials identified in this survey as part of one removal contract.

Material replacement and consultant abatement management costs are not included in these estimates and can add significantly to the project costs.

The estimated costs of removing lead-containing materials are not included here because there is no regulatory requirement to remove lead. Some lead-containing materials may not be disturbed during the renovation and may therefore remain in place. In addition, disposal costs of demolition waste may vary significantly, depending on TCLP testing.

⁶ OSHA regulations pertaining to asbestos in buildings include 29 CFR 1926.1101 and 29 CFR 1910.1001. OSHA has also issued interpretive letters that provide clarification about how materials containing less than 1% asbestos should be handled. (See www.osha.gov).

7.0 LEAD-BASED PAINT INSPECTION

On May 28, 2025, Hill West Environmental conducted a limited lead-based paint inspection of the Centennial House located at 176 Main Street Park City, Utah. Direct measurement of lead in paint were made using a Niton XL2 X-ray Fluorescence (XRF) Spectrum Analyzer. The Niton XRF non-destructively measures lead concentrations of painted surfaces, regardless of the number of layers present.

According to the manufacturer, the detection limit (lower limit of reliable measurement) for this instrument is 0.1 milligrams per square centimeter (mg/cm^2) $\pm 0.3 \text{ mg}/\text{cm}^2$ with the instrument set on the “quick” measuring mode. The quick mode provides 95% confidence that the lead concentration in the paint is above or below the set point of the instrument which, for this survey is $0.4 \text{ mg}/\text{cm}^2$. For this survey, measurements below $0.4 \text{ mg}/\text{cm}^2$ were not reported as lead containing.

The Niton XRF sometimes reports negative values. According to the manufacturer, negative values should be expected and interpreted as zero lead content due to the statistical variability of XRF measurement technology. Both HUD and the EPA recognize the statistical variability of XRF technology and the possibility of obtaining negative values where the lead content is near zero.

Table 2 summarizes the lead-based paint inspection results. Measurements are reported in milligrams of lead per square centimeter (mg/cm^2). All the coatings tested during this inspection were in good to fair condition. Only positive readings ($>0.4 \text{ mg}/\text{cm}^2$) are summarized in Table 2. Appendix C contains all XRF readings for this survey.

Table 2 – Positive Lead-Based Paint Readings

Sample Locations	Material Description	Lead Content (mg/cm^2)
Exterior Surfaces	All Exterior painted wood siding, window frames, doors, soffits, and trim.	1.06 – 13.83
Interior Surfaces	All Interior painted wood doors, trim, stairwells, ceilings, and ceramic wall tile in bathrooms	1.62 – 10.5

Appendix A
Data Tables (Asbestos)

Approved 06.30.2025

Table 1
Asbestos-containing Materials by Homogeneous Area

Centennial House
176 Main Street, Park City, Utah

Homogeneous Area Number	Material Description/Location	Friability	Asbestos Content	Amount
T001	Vermiculite Insulation/ Third Level Floor Joists and Basement Ceiling	Yes	2% Asbestiform amphibole suite mineral by Point Count	~ 5,000 ft ²
S002	Textured Wall Material/ First Level NE Room	Yes	1.5% Chrysotile 1% by Point Count	~ 1,000 ft ²
T002	Duct tape in basement furnace room.	Yes	Assumed	~ 20 linear feet
M003	Sheet Vinyl Flooring – Flower Pattern/ First Level SW Room	No	<1% Chrysotile in black tar felt by Point Count	~ 225 ft ²
M004	Sheet Vinyl Flooring – Brick Pattern/North Basement Apartment	No	10% Chrysotile	~ 60 ft ²
M009	All roofing products including tar paper under metal roof and caulking. ¹	No	Assumed	~ 4,000 ft ²

¹ This inspection was completed for a demolition; all roofing materials were assumed to contain asbestos. This material can be left in-place during demolition if wet methods are used during these activities.

Table 2
Homogeneous Areas That Do Not Contain Asbestos

Centennial House
176 Main Street, Park City, Utah

Homogeneous Area Number	Material Description/Locaton	Amount
M001	Sheetrock Wall System – Third Floor	~ 5,000 ft ²
S001	Textured Wall/Ceiling Material	~ 5,000 ft ²
M002	Sheetrock Wall System – First Floor	~ 1,000 ft ²
S003	Textured Wall Material – First Floor	~ 1,000 ft ²

Approved 06.30.2025

Table 3
Bulk Sample Analytical Results by Sample Number

Centennial House
176 Main Street, Park City, Utah

Sample Number	Homogeneous Area Number	Material Sampled	Sample Location	Analytical Results
176 – 01A	M001	Sheetrock Wall System	Third Floor See Figures	None Detected
176 – 01B	M001	Sheetrock Wall System	Third Floor See Figures	None Detected
176 – 01C	M001	Sheetrock Wall System	Third Floor See Figures	None Detected
176 – 01D	M001	Sheetrock Wall System	Third Floor See Figures	None Detected
176 – 01E	M001	Sheetrock Wall System	Third Floor See Figures	None Detected
176 – 02A	S001	Textured Wall/Ceiling Material	Third Floor See Figures	None Detected
176 – 02B	S001	Textured Wall/Ceiling Material	Third Floor See Figures	None Detected
176 – 02C	S001	Textured Wall/Ceiling Material	Third Floor See Figures	None Detected
176 – 02D	S001	Textured Wall/Ceiling Material	Third Floor See Figures	None Detected
176 – 02E	S001	Textured Wall/Ceiling Material	Third Floor See Figures	None Detected
176 – 03A	T001	Vermiculite – Third Floor	Third Floor See Figures	1.40% Asbestiform amphibole suite mineral 1% by Point Count
176 – 03B	T001	Vermiculite – Third Floor	Third Floor See Figures	<1% Asbestiform amphibole suite mineral by Point Count
176 – 03C	T001	Vermiculite – Third Floor	Third Floor See Figures	2.62% Asbestiform amphibole suite mineral 2% by Point Count
176 – 03D	T001	Vermiculite – Basement	Basement North Apartment	0.73% Asbestiform amphibole suite mineral <1% by Point Count
176 – 03E	T001	Vermiculite – Basement	Basement North Apartment	1.67% Asbestiform amphibole suite mineral <1% by Point Count
176 – 04A	S002	Textured Wall Material	First Floor NE Room	1.5% Chrysotile 1% by Point Count

Sample Number	Homogeneous Area Number	Material Sampled	Sample Location	Analytical Results
176 – 04B	S002	Textured Wall Material	First Floor NE Room	1.5% Chrysotile 1% by Point Count
176 – 04C	S002	Textured Wall Material	First Floor NE Room	1.5% Chrysotile 1% by Point Count
176 – 05A	M002	Sheetrock Wall System	First Floor See Figures	None Detected
176 – 05B	M002	Sheetrock Wall System	First Floor See Figures	None Detected
176 – 05C	M002	Sheetrock Wall System	First Floor See Figures	None Detected
176 – 06A	S003	Textured Wall Material	First Floor SW Room	None Detected
176 – 06B	S003	Textured Wall Material	First Floor SW Room	None Detected
176 – 06C	S003	Textured Wall Material	First Floor SW Room	None Detected
176 – 07A	M003	Sheet Vinyl Flooring – Flower Pattern	First Floor SW Room	<1% Chrysotile Black Felt by Point Count
176 – 07B	M003	Sheet Vinyl Flooring – Flower Pattern	First Floor SW Room	<1% Chrysotile Black Felt by Point Count
176 – 07C	M003	Sheet Vinyl Flooring – Flower Pattern	First Floor SW Room	<1% Chrysotile Black Felt by Point Count
176 – 08A	M004	Sheet Vinyl Flooring – Brick Pattern	Basement North Apartment	10% Chrysotile
176 – 08B	M004	Sheet Vinyl Flooring – Brick Pattern	Basement North Apartment	10% Chrysotile
176 – 08C	M004	Sheet Vinyl Flooring – Brick Pattern	Basement North Apartment	10% Chrysotile

Table 4
Damage and Hazard Assessment by Homogeneous Area

Centennial House
176 Main Street, Park City, Utah

Homogeneous Area Number	Building/ Material Type	Substrate	Assessment Category	Damage	Accessibility	Disturbance Potential
T001	Vermiculite Insulation/ Third Floor Joists and Basement Ceiling	Wood	5	Slight Damage	Continuous	Low
S002	Textured Wall Material/ First Floor NE Room	Sheetrock	5	Slight Damaged	Inaccessible	Low
T002	Duct tape in basement furnace room.	Metal	5	Undamaged	Continuous	Low
M003	Sheet Vinyl Flooring – Flower Pattern/ First Floor SW Room	Wood	X	Undamaged	Inaccessible	Low
M004	Sheet Vinyl Flooring – Brick Pattern/North Basement Apartment	Concrete	X	Slight Damaged	Continuous	Low
M009	All roofing products including tar paper under metal roof and caulking. ²	Wood	X	Undamaged	Inaccessible	Low

Damage Categories

Each homogenous area of ACM was classified into one of the following seven categories, as specified in EPA's AHERA regulations (40 CFR §763.88):

- (1) Damaged or significantly damaged thermal system insulation ACM.
- (2) Damaged friable surfacing ACM.
- (3) Significantly damaged friable surfacing ACM.
- (4) Damaged or significantly damaged friable miscellaneous ACM.
- (5) ACBM with potential for damage.
- (6) ACBM with potential for significant damage.
- (7) Any remaining friable ACBM or friable suspected ACMB.
- (X) Not applicable (material is non-friable surfacing or miscellaneous material).

The damage categories are defined as follows:

- "Undamaged" means the material had no visible damage, or extremely minor damage or surface marring (i.e., a room full of floor tile with only two or three small corners chipped off of the tile).
- "Slight Damage" means the material had visible damage evenly distributed over less than 10% of its surface or localized over less than 25% of its surface.
- "Significantly Damaged" means the material had visible damage that is evenly distributed over 10% or more of its surface or localized over 25% or more of its surface.

Hazard Assessment Categories

Each homogeneous area of ACM was evaluated for accessibility and the hazard the material presents to building occupants and the general public. The assessment assumes a fully occupied building.

- "Inaccessible" means the material was located in an area that people had no reason to enter and could not access without special measures. One example would be above a solid ceiling.
- "Rarely-Accessed" identifies a material that was in a location that could be accessed but wasn't unless there was a specific need. An example would be a pipe tunnel. Another example would be a high ceiling that is out of reach and not subject to any specific disturbances.
- "Periodic Access" identifies a material that was in a location that was accessible, was not occupied full time, but was accessed on a routine basis. An example would be a mechanical room or boiler room.
- "Continuous Access" identifies a material that was in a location that was occupied full time and was within reach of the occupants, or was frequently subjected to direct disturbance. Examples would be exposed floor tile or normal height ceiling tile.

Approved 06.30.2015

Table 5
Estimated Abatement Costs by Homogeneous Area

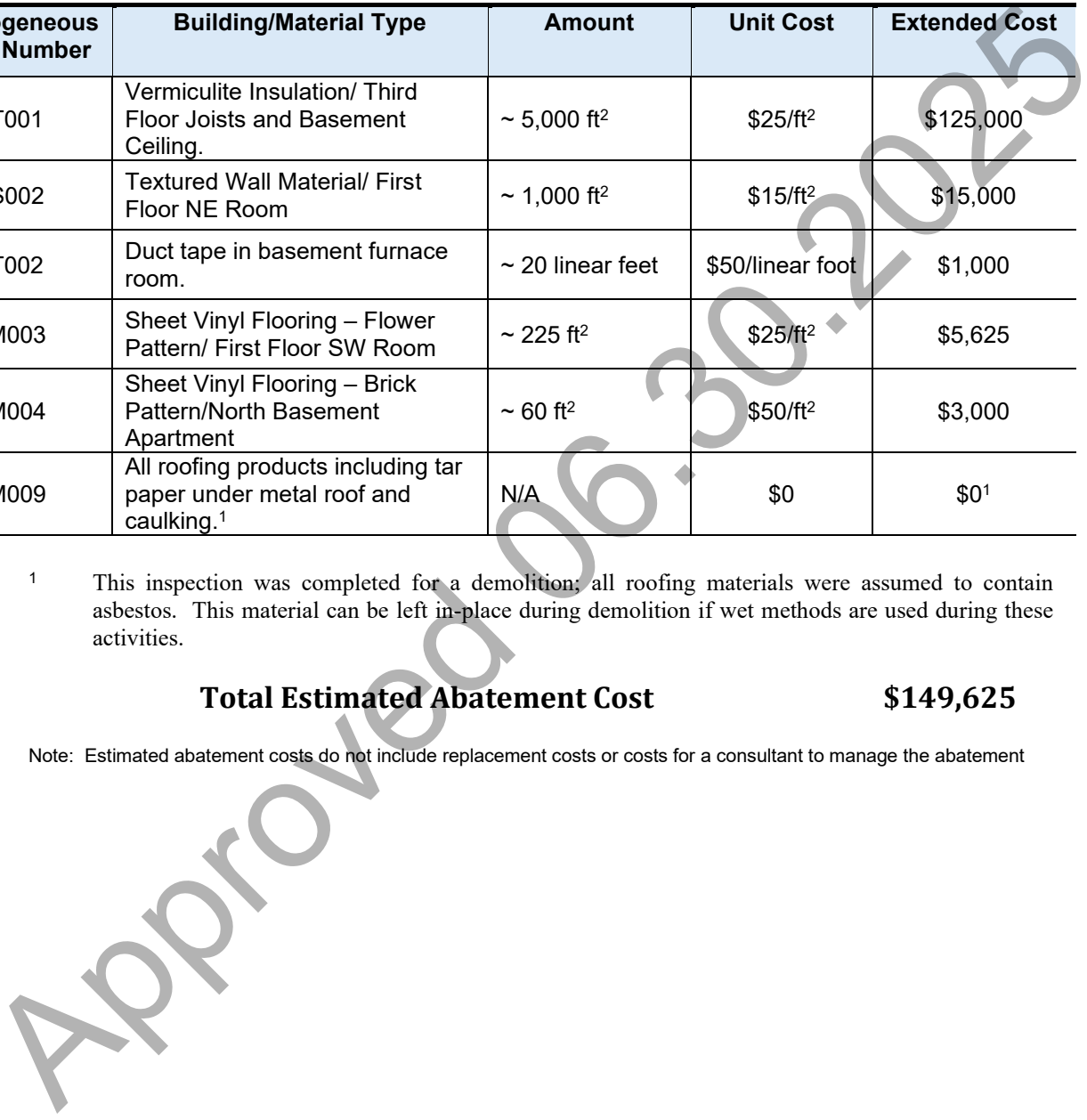
Centennial House
176 Main Street, Park City, Utah

Homogeneous Area Number	Building/Material Type	Amount	Unit Cost	Extended Cost
T001	Vermiculite Insulation/ Third Floor Joists and Basement Ceiling.	~ 5,000 ft ²	\$25/ft ²	\$125,000
S002	Textured Wall Material/ First Floor NE Room	~ 1,000 ft ²	\$15/ft ²	\$15,000
T002	Duct tape in basement furnace room.	~ 20 linear feet	\$50/linear foot	\$1,000
M003	Sheet Vinyl Flooring – Flower Pattern/ First Floor SW Room	~ 225 ft ²	\$25/ft ²	\$5,625
M004	Sheet Vinyl Flooring – Brick Pattern/North Basement Apartment	~ 60 ft ²	\$50/ft ²	\$3,000
M009	All roofing products including tar paper under metal roof and caulking. ¹	N/A	\$0	\$0 ¹

¹ This inspection was completed for a demolition; all roofing materials were assumed to contain asbestos. This material can be left in-place during demolition if wet methods are used during these activities.

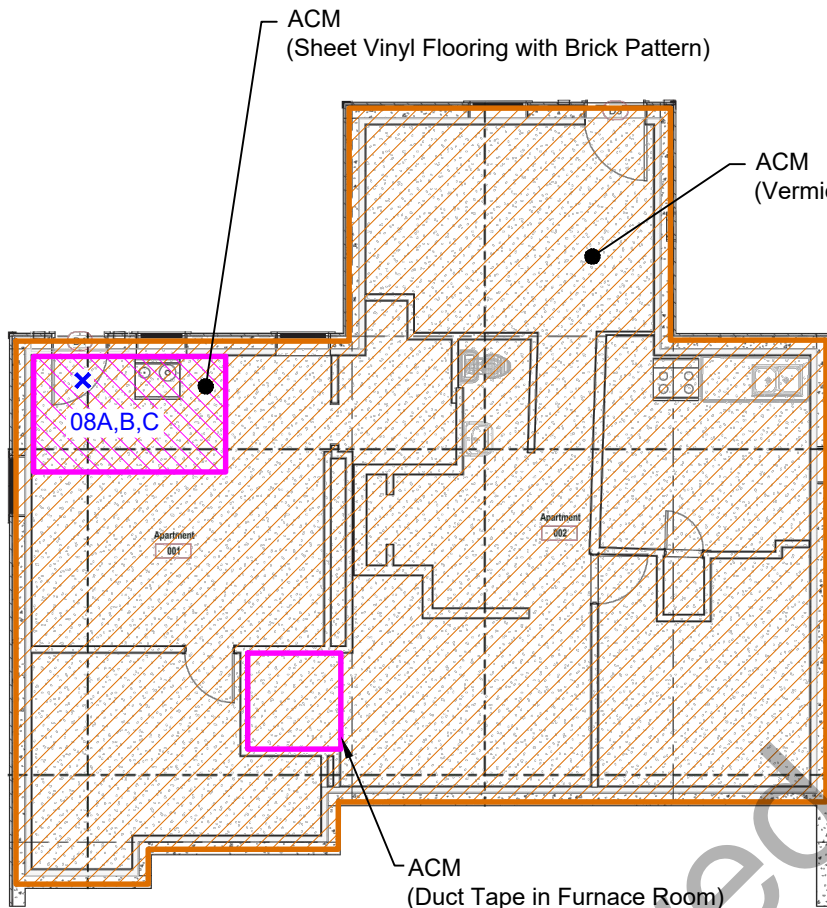
Total Estimated Abatement Cost **\$149,625**

Note: Estimated abatement costs do not include replacement costs or costs for a consultant to manage the abatement

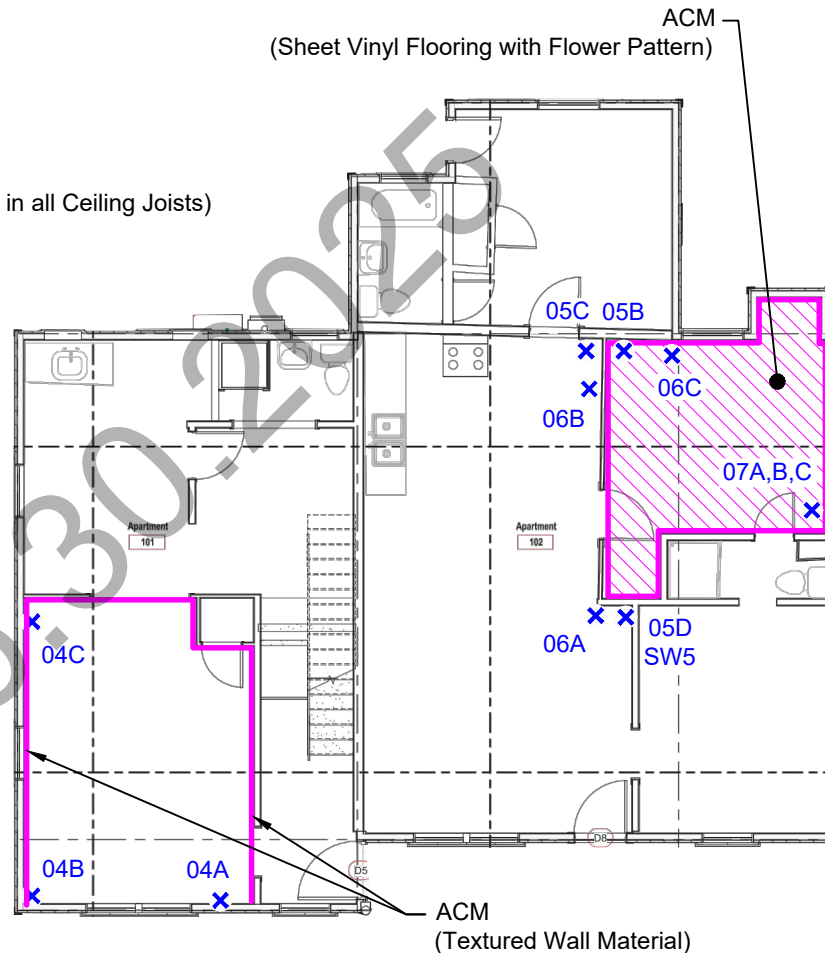


Appendix B
Building Floor Plans

Approved 06.30.2025



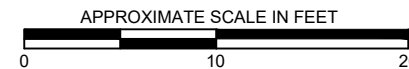
BASEMENT



1ST FLOOR

LEGEND

- ✕ Asbestos Sample Location
- ACM Asbestos Containing Material



BASE IMAGE SOURCE:

DRIFT STUDIO
1775 PROSPECTOR AVENUE, SUITE 300 #6
PARK CITY, UT 84060
FIGURE TITLE: EXISTING FLOOR PLANS (IDEALIZED)
DWG NO.: EX 11

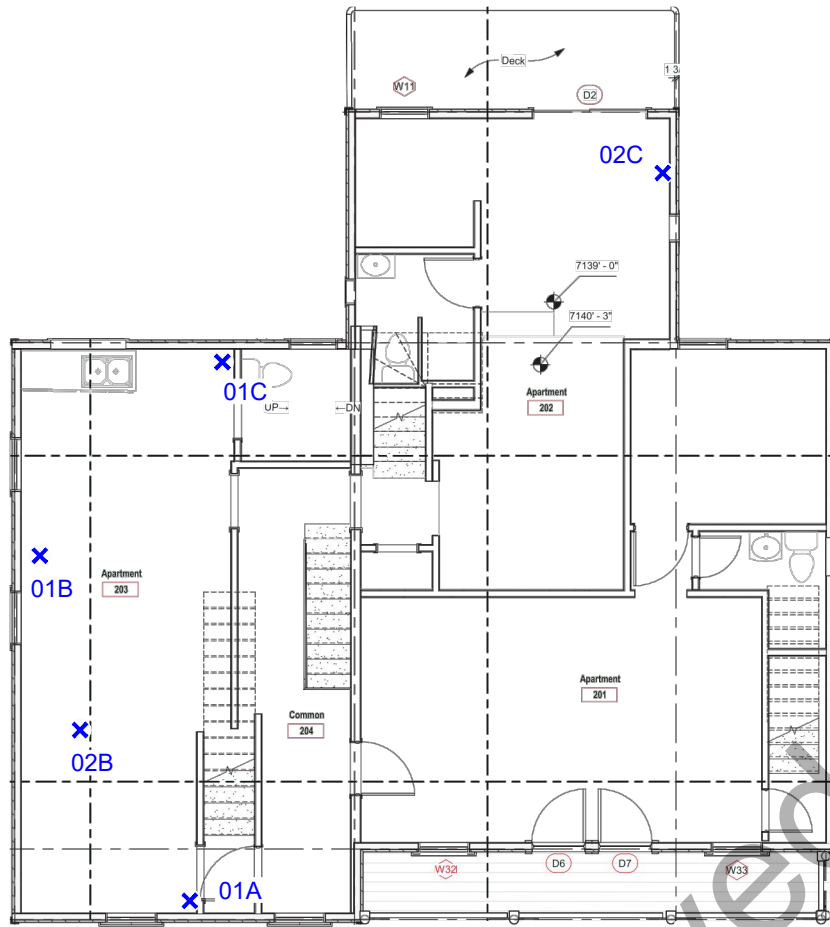


7963 Douglas Dr
Park City, UT 84098
Phone: 801-450-8060
www.hillwestut.com

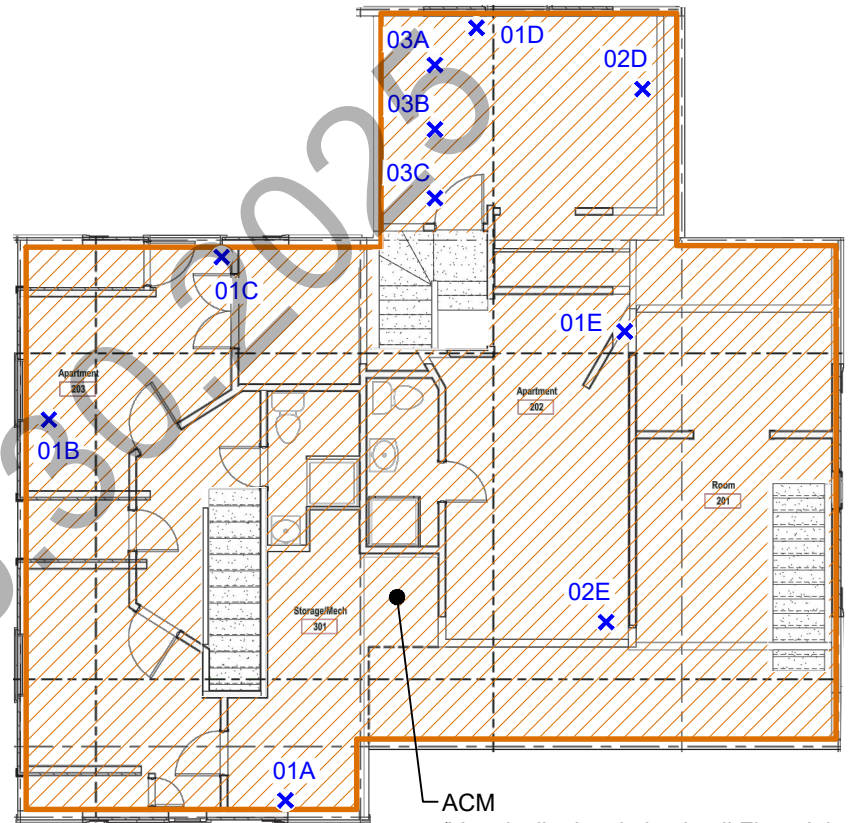
**ASBESTIS SAMPLE LOCATION MAP
BASEMENT AND FIRST FLOOR**

176 MAIN STREET
PARK CITY, UTAH

SCALE: AS SHOWN	DATE: 6/4/25	FIGURE NO. 1
APPROVED BY: CD	DRAWN BY: SRM	PROJECT NO. 2064-0007(9)



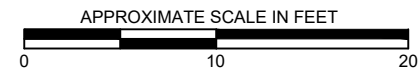
2ND FLOOR



3RD FLOOR

LEGEND

- X Asbestos Sample Location
- ACM Asbestos Containing Material



BASE IMAGE SOURCE:

DRIFT STUDIO
 1775 PROSPECTOR AVENUE, SUITE 300 #6
 PARK CITY, UT 84060
 FIGURE TITLE: EXISTING FLOOR PLANS (IDEALIZED)
 DWG NO.: EX 11



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 Park City, UT 84098
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**ASBESTOS SAMPLE LOCATION MAP
 SECOND FLOOR AND THIRD FLOOR**

176 MAIN STREET
 PARK CITY, UTAH

SCALE: AS SHOWN	DATE: 6/4/25	FIGURE NO. 2
APPROVED BY: CD	DRAWN BY: SRM	PROJECT NO. 2064-0007(9)

Appendix C
Analytical Results

Approved 06.30.2025

DIXON INFORMATION INC.

MICROSCOPY, ASBESTOS ANALYSIS & CONSULTING
AIHA-LAP LLC ACCREDITED LABORATORY #101579
NVLAP LAB CODE 101012-0

June 4, 2025

Mr. Claude Dahlk
Hill West Environmental
7963 Douglas Drive
Park City, UT 84098

Ref: Batch # 217296, Lab # HW4722 - HW4751
Received May 29, 2025
Test report, Page 1 of 11
176 Main St Park City UT
Centennial House
Sampled on 5/28/25

Dear Mr. Dahlk:

Samples HW4722 through HW4751 have been analyzed using the qualitative analysis of bulk samples by polarized light microscopy (PLM), and the quantitation of asbestos content by calibrated visual estimate (CVE) based on EPA -- 40 CFR Appendix E to Subpart E of Part 763 (EPA 600/M4-82-020), Interim Method of the Determination of Asbestos in Bulk Insulation Samples, and EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials, as well as guidance from the OSHA ID-191 method. Appendix "A" contains statements which an accredited laboratory must make to meet the requirements of accrediting agencies. It also contains additional information about the method of analysis. Appendix "A" must be included as an essential part of this test report. This analysis is accredited under NVLAP Lab Code: 101012-0. It does not contain data or calibrations for tests performed under AIHA-LAP LLC Lab Code: 101579.

This report may be reproduced but all reproduction must be in full unless written approval is received from the laboratory for partial reproduction. The results of analysis are as follows:

Lab HW4722, Field 176-01A Sheetrock Wall System

This sample contains four types of material: The first type is off-white paint; the second type is white limestone plaster with mica; the third type is brown and white plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 5% of the sample. The third type is 4% of the sample. The fourth type is 90% of the sample.

Batch # 217296

Lab # HW4722 - HW4751

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Lab HW4723, Field 176-01B Sheetrock Wall System

This sample contains four types of material: The first type is off-white paint; the second type is white limestone plaster with mica; the third type is brown and white plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 5% of the sample. The third type is 4% of the sample. The fourth type is 90% of the sample.

Lab HW4724, Field 176-01C Sheetrock Wall System

This sample contains four types of material: The first type is off-white paint; the second type is white limestone plaster with mica; the third type is brown and white plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 3% of the sample. The third type is 4% of the sample. The fourth type is 92% of the sample.

Lab HW4725, Field 176-01D Sheetrock Wall System

This sample contains four types of material: The first type is off-white paint; the second type is white limestone plaster with mica and sand; the third type is brown plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 3% of the sample. The third type is 4% of the sample. The fourth type is 92% of the sample.

Lab HW4726, Field 176-01E Sheetrock Wall System

This sample contains four types of material: The first type is off-white paint; the second type is white limestone plaster with mica; the third type is brown and white plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 3% of the sample. The third type is 4% of the sample. The fourth type is 92% of the sample.

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Lab HW4727, Field 176-02A Textured Wall / Ceiling Material

This sample contains four types of material: The first type is tan paint; the second type is white limestone plasters with mica; the third type is brown and white plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 75% of the sample. The third type is 9% of the sample. The fourth type is 15% of the sample.

Lab HW4728, Field 176-02B Textured Wall / Ceiling Material

This sample contains four types of material: The first type is tan paint; the second type is white limestone plaster with mica; the third type is brown plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 10% of the sample. The second type is 45% of the sample. The third type is 40% of the sample. The fourth type is 5% of the sample.

Lab HW4729, Field 176-02C Textured Wall / Ceiling Material

This sample contains four types of material: The first type is tan paint; the second type is white limestone plaster with mica; the third type is brown plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 3% of the sample. The second type is 75% of the sample. The third type is 17% of the sample. The fourth type is 5% of the sample.

Lab HW4730, Field 176-02D Textured Wall / Ceiling Material

This sample contains four types of material: The first type is tan paint; the second type is white limestone plaster with mica; the third type is brown plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 3% of the sample. The second type is 10% of the sample. The third type is 7% of the sample. The fourth type is 80% of the sample.

Lab HW4731, Field 176-02E Textured Wall / Ceiling Material

This sample contains four types of material: The first type is off-white paint; the second type is white limestone plaster with mica; the third type is brown plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 5% of the sample. The second type is 15% of the sample. The third type is 10% of the sample. The fourth type is 70% of the sample.

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Lab # HW4722 - HW4751
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Lab HW4732, Field 176-03A Vermiculite - Third Floor

By dry weight this is **1.40% asbestiform amphibole suite mineral** in brown vermiculite. The sample aliquot weighed 4.7438 grams. The asbestiform amphibole suite mineral weighed 0.0666 grams.

Note: The asbestiform amphibole suite mineral in this sample is typically formed in conjunction with vermiculite. It may include the regulated asbestiform amphibole minerals, tremolite asbestos and actinolite asbestos. This sample may also contain the asbestiform amphibole minerals, winchite, richterite, and others. Although some of these asbestiform minerals may not be regulated by some federal asbestos standards, they may be regulated under CERCLA (EPA Superfund). Transmission electron microscopy is recommended to determine the asbestiform amphibole mineral species. Please check with your local regulatory agency or agencies for the current status of asbestiform amphibole suite minerals. They are thought to be associated with the same diseases known to be caused by asbestos. Please exercise appropriate caution when handling this material.

By point count this is 1.17% asbestiform amphibole suite mineral. 343 asbestiform amphibole suite mineral points were counted. 68 non-asbestos particle points were counted. The slides were prepared from the 1.40% asbestiform amphibole suite mineral portion of the sample. Using standard rounding rules, as per the EPA-600/M4-82-020 method section 1.7.2.4, this is **1% asbestiform amphibole suite mineral**.

Lab HW4733, Field 176-03B Vermiculite - Third Floor

This is **less than 1% asbestiform amphibole suite mineral** in a non-homogenous debris including brown vermiculite, brown plant fiber, and organic debris.

Note: Due to the non-homogeneous nature of this sample, not every component may be identified and analyzed.

By point count this is 0.01% asbestos. 3 asbestos points were counted. 404 non-asbestos particle points were counted. The slides were prepared from a non-homogenous including vermiculite and asbestiform amphibole suite mineral. Using point count rounding rules as per the EPA-600/M4-82-020 method section 1.7.2.4 this is **less than 1% asbestos**.

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Lab # HW4722 - HW4751

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Lab HW4734, Field 176-03C Vermiculite - Third Floor

By dry weight this is **2.62% asbestiform amphibole suite mineral** in brown vermiculite. The sample aliquot weighed 6.4688 grams. The asbestiform amphibole suite mineral weighed 0.1695 grams.

Note: The asbestiform amphibole suite mineral in this sample is typically formed in conjunction with vermiculite. It may include the regulated asbestiform amphibole minerals, tremolite asbestos and actinolite asbestos. This sample may also contain the asbestiform amphibole minerals, winchite, richterite, and others. Although some of these asbestiform minerals may not be regulated by some federal asbestos standards, they may be regulated under CERCLA (EPA Superfund). Transmission electron microscopy is recommended to determine the asbestiform amphibole mineral species. Please check with your local regulatory agency or agencies for the current status of asbestiform amphibole suite minerals. They are thought to be associated with the same diseases known to be caused by asbestos. Please exercise appropriate caution when handling this material.

By point count this is 2.10% asbestiform amphibole suite mineral. 326 asbestiform amphibole suite mineral points were counted. 81 non-asbestos particle points were counted. The slides were prepared from the 2.62% asbestiform amphibole suite mineral portion of the sample. Using standard rounding rules, as per the EPA-600/M4-82-020 method section 1.7.2.4, this is **2% asbestiform amphibole suite mineral**.

Lab HW4735, Field 176-03E Vermiculite - Basement

By dry weight this is **0.73% asbestiform amphibole suite mineral** in brown vermiculite. The sample aliquot weighed 5.5516 grams. The asbestiform amphibole suite mineral weighed 0.0404 grams.

Note: The asbestiform amphibole suite mineral in this sample is typically formed in conjunction with vermiculite. It may include the regulated asbestiform amphibole minerals, tremolite asbestos and actinolite asbestos. This sample may also contain the asbestiform amphibole minerals, winchite, richterite, and others. Although some of these asbestiform minerals may not be regulated by some federal asbestos standards, they may be regulated under CERCLA (EPA Superfund). Transmission electron microscopy is recommended to determine the asbestiform amphibole mineral species. Please check with your local regulatory agency or agencies for the current status of asbestiform amphibole suite minerals. They are thought to be associated with the same diseases known to be caused by asbestos. Please exercise appropriate caution when handling this material.

By point count this is 0.29% asbestiform amphibole suite mineral. 164 asbestiform amphibole suite mineral points were counted. 243 non-asbestos particle points were counted. The slides were prepared from the 0.73% asbestiform amphibole suite mineral portion of the sample. Using standard rounding rules, as per the EPA-600/M4-82-020 method section 1.7.2.4, this is **less than 1% asbestiform amphibole suite mineral**.

Batch # 217296

Lab # HW4722 - HW4751

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Lab HW4736, Field 176-04A Textured Wall Material - First Floor NW Room

By visual estimation this sample contains four types of material: The first type is tan paint; the second type is **1.5% chrysotile asbestos** in white limestone plaster with mica; the third type is brown plant fiber paper; the fourth type is off-white resin mastic. This sample is non-homogeneous.

The first type is 10% of the sample. The second type is 45% of the sample. The third type is 43% of the sample. The fourth type is 2% of the sample.

By point count this is 0.94% asbestos. 17 asbestos points were counted. 383 non-asbestos particle points were counted. The slides were prepared from a 22.11% ash and dilute acid wash recovery of the second material type. Using point count rounding rules as per the EPA-600/M4-82-020 method section 1.7.2.4 this is **1% asbestos**.

Lab HW4737, Field 176-04B Textured Wall Material - First Floor NW Room

By visual estimation this sample contains three types of material: The first type is tan paint; the second type is **1.5% chrysotile asbestos** in white plaster with mica; the third type is brown plant fiber paper. This sample is non-homogeneous.

The first type is 40% of the sample. The second type is 40% of the sample. The third type is 20% of the sample.

By point count this is 0.90% asbestos. 15 asbestos points were counted. 412 non-asbestos particle points were counted. The slides were prepared from a 25.69% ash and dilute acid wash recovery of the second material type. Using point count rounding rules as per the EPA-600/M4-82-020 method section 1.7.2.4 this is **1% asbestos**.

Lab HW4738, Field 176-04C Textured Wall Material - First Floor NW Room

By visual estimation this sample contains three types of material: The first type is tan paint; the second type is **1.5% chrysotile asbestos** in white limestone plaster with mica; the third type is brown plant fiber paper. This sample is non-homogeneous.

The first type is 10% of the sample. The second type is 65% of the sample. The third type is 25% of the sample.

By point count this is 0.88% asbestos. 15 asbestos points were counted. 391 non-asbestos particle points were counted. The slides were prepared from a 23.88% ash and dilute acid wash recovery of the second material type. Using point count rounding rules as per the EPA-600/M4-82-020 method section 1.7.2.4 this is **1% asbestos**.

Batch # 217296

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Lab HW4739, Field 176-05A Sheetrock Wall System - First Floor

This sample contains four types of material: The first type is off-white paint; the second type is white gypsum plasters with mica; the third type is brown and white plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 10% of the sample. The third type is 4% of the sample. The fourth type is 85% of the sample.

Lab HW4740, Field 176-05B Sheetrock Wall System - First Floor

This sample contains five types of material: The first type is grey paint; the second type is white limestone plaster with perlite and mica; the third type is brown plant fiber paper; the fourth type is 85% brown wood fiber with resin; the fifth type is brown cross-woven plant fiber debris. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 3% of the sample. The second type is 27% of the sample. The third type is 15% of the sample. The fourth type is 50% of the sample. The fifth type is 5% of the sample.

Lab HW4741, Field 176-05C Sheetrock Wall System - First Floor

This sample contains four types of material: The first type is off-white paint; the second type is white gypsum plaster with mica; the third type is brown plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 5% of the sample. The third type is 4% of the sample. The fourth type is 90% of the sample.

Lab HW4742, Field 176-06A Textured Wall Material - First Floor

This sample contains three types of material: The first type is off-white paint; the second type is white limestone plaster with perlite and mica; the third type is white gypsum plaster with mica. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 5% of the sample. The second type is 85% of the sample. The third type is 10% of the sample.

Lab HW4743, Field 176-06B Textured Wall Material - First Floor

This sample contains four types of material: The first type is tan paint; the second type is white gypsum plaster with mica; the third type is brown plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 10% of the sample. The second type is 50% of the sample. The third type is 30% of the sample. The fourth type is 10% of the sample.

Batch # 217296

Lab # HW4722 - HW4751

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Lab HW4744, Field 176-06C Textured Wall / Ceiling Material

This sample contains four types of material: The first type is off-white paint; the second type is white gypsum plaster with mica; the third type is brown plant fiber paper; and the fourth type is white gypsum plaster with 1% plant fiber. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 15% of the sample. The second type is 45% of the sample. The third type is 30% of the sample. The fourth type is 10% of the sample.

Lab HW4745, Field 176-07A Sheet Vinyl Flooring - SE Bedroom

By visual estimation this sample contains four types of material: The first type is multicolored plastic with limestone; the second type is **less than 1% chrysotile asbestos** in black tar binder with 30% plant fiber; the third type is red resin binder; the fourth type is 70% plant fiber and 5% organic fiber with binder. This sample is non-homogeneous.

The first type is 7% of the sample. The second type is 50% of the sample. The third type is 3% of the sample. The fourth type is 40% of the sample.

By point count this is less than 1% asbestos. 1 asbestos points were counted. 402 non-asbestos particle points were counted. The slides were prepared from a 1.37% ash and dilute acid wash recovery of the second material type. Using point count rounding rules as per the EPA-600/M4-82-020 method section 1.7.2.4 this is **less than 1% asbestos.**

Lab HW4746, Field 176-07B Sheet Vinyl Flooring - SE Bedroom

By visual estimation this sample contains four types of material: The first type is multicolored plastic with limestone; the second type is **less than 1% chrysotile asbestos** in black tar binder with 30% plant fiber; the third type is red resin binder; the fourth type is 70% plant fiber and 5% organic fiber with binder. This sample is non-homogeneous.

The first type is 7% of the sample. The second type is 40% of the sample. The third type is 3% of the sample. The fourth type is 50% of the sample.

By point count this is less than 1% asbestos. 2 asbestos points were counted. 398 non-asbestos particle points were counted. The slides were prepared from a 1.26% ash and dilute acid wash recovery of the second material type. Using point count rounding rules as per the EPA-600/M4-82-020 method section 1.7.2.4 this is **less than 1% asbestos.**

Batch # 217296

Lab # HW4722 - HW4751

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Lab HW4747, Field 176-07C Sheet Vinyl Flooring - SE Bedroom

By visual estimation this sample contains four types of material: The first type is multicolored plastic with limestone; the second type is **less than 1% chrysotile asbestos** in black tar binder with 30% plant fiber; the third type is red resin binder; the fourth type is 70% plant fiber and 5% organic fiber with binder. This sample is non-homogeneous.

The first type is 7% of the sample. The second type is 50% of the sample. The third type is 3% of the sample. The fourth type is 40% of the sample.

By point count this is less than 1% asbestos. 1 asbestos points were counted. 399 non-asbestos particle points were counted. The slides were prepared from a 1.33% ash and dilute acid wash recovery of the second material type. Using point count rounding rules as per the EPA-600/M4-82-020 method section 1.7.2.4 this is **less than 1% asbestos**.

Lab HW4748, Field 176-08A Sheet Vinyl Flooring - North Basement Entry

This sample contains two types of material: The first type is **10% chrysotile asbestos** in red and brown plastic and limestone tile; the second type is tan mastic. This sample is non-homogeneous.

The first type is 98% of the sample. The second type is 2% of the sample.

Lab HW4749, Field 176-08B Sheet Vinyl Flooring - North Basement Entry

This sample contains two types of material: The first type is **10% chrysotile asbestos** in red and brown plastic and limestone tile; the second type is yellow resin mastic. This sample is non-homogeneous.

The first type is 98% of the sample. The second type is 2% of the sample.

Lab HW4750, Field 176-08C Sheet Vinyl Flooring - North Basement Entry

This sample contains two types of material: The first type is **10% chrysotile asbestos** in red and brown plastic and limestone tile; the second type is yellow resin mastic. This sample is non-homogeneous.

The first type is 98% of the sample. The second type is 2% of the sample.

Batch # 217296
Lab # HW4722 - HW4751
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Lab HW4751, Field 176-03D Vermiculite - Basement

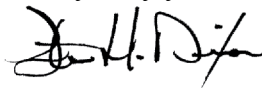
By dry weight this is **1.67% asbestiform amphibole suite mineral** in brown vermiculite. The sample aliquot weighed 5.9690 grams. The asbestiform amphibole suite mineral weighed 0.0994 grams.

Note: The asbestiform amphibole suite mineral in this sample is typically formed in conjunction with vermiculite. It may include the regulated asbestiform amphibole minerals, tremolite asbestos and actinolite asbestos. This sample may also contain the asbestiform amphibole minerals, winchite, richterite, and others. Although some of these asbestiform minerals may not be regulated by some federal asbestos standards, they may be regulated under CERCLA (EPA Superfund). Transmission electron microscopy is recommended to determine the asbestiform amphibole mineral species. Please check with your local regulatory agency or agencies for the current status of asbestiform amphibole suite minerals. They are thought to be associated with the same diseases known to be caused by asbestos. Please exercise appropriate caution when handling this material.

By point count this is 0.06% asbestiform amphibole suite mineral. 14 asbestiform amphibole suite mineral points were counted. 387 non-asbestos particle points were counted. The slides were prepared from the 1.67% asbestiform amphibole suite mineral portion of the sample. Using standard rounding rules, as per the EPA-600/M4-82-020 method section 1.7.2.4, this is **less than 1% asbestiform amphibole suite mineral**.

In order to be sure reagents and tools used for analysis are not contaminated with asbestos, blanks are tested. Asbestos was none detected in the blanks tested with this bulk sample set.

Very truly yours,



Steve H. Dixon, President

Analyzed by Anton N. Snow on May 30, 2025
Point count analysis by Anton N. Snow on June 3, 2025

APPENDIX "A"

This report relates only to the items tested. This report must not be used to claim product certification, approval or endorsement by NVLAP, NIST, AIHA-LAP, or any U.S. government agency.

NVLAP and AIHA-LAP require laboratories to report the condition of samples received for testing. The condition of these samples is considered acceptable for analysis unless otherwise noted. If a test item is unacceptable for analysis, requires a modification to the standard method, or has limited analysis sensitivity, this will be noted under the laboratory number for that specific test item in the final report. If the samples are non-homogeneous, a statement will be included with the sample result. Each component or sub-sample is analyzed separately. The reported results and percentages of each material type are based on the sample received by the laboratory and may not be representative of the parent material. Because the sample's orientation cannot always be determined, specifying top and bottom may not be possible.

METHODS OF ANALYSIS AND LIMIT OF DETECTION

For air count analysis, samples are not blank-corrected unless otherwise noted.

For air count analysis, results may be biased if interferences are present.

The accuracy of the *Qualitative Analysis of Bulk Samples by Polarized Light Microscopy* (PLM) improves as asbestos concentration increases. However factors such as inhomogeneities, coatings, small fibers, interfering compounds, pigments, binders, small sample sizes, and multiple layers, may limit this analysis.

There are two methods for the *Quantitation of Asbestos in Bulk Samples: Calibrated Visual Estimate (CVE)* and *Point Count*. CVE analysis with gravimetry is the most sensitive method. With a patient search, an analyst can detect asbestos at concentrations of 0.1% or lower in a bulk sample. Point Count analysis, on the other hand, uses a statistical approach.

Regulatory agencies classify materials as Asbestos-Containing Material (ACM) when asbestos content is greater than 1%. The EPA does not accept CVE to verify that trace amounts of asbestos are less than 1%. The EPA requires Point Count to verify that asbestos content is not greater than 1%. OSHA regulations apply to samples containing any amount of asbestos.

Due to the higher cost of Point Count analysis, Dixon Information, Inc. does not perform this analysis unless authorized by the client. When possible, a Point Count analysis includes various chemical and/or physical means to gravimetrically concentrate the asbestos in the sample. The EPA allows this as it increases the accuracy of the Point Count.

Inspector: Dominic Hobbs
 Date Inspected: 5-28-25
 PB-2781

Limited-Lead Based Paint Readings

Centinnal House
 176 Main Street
 Park City, Utah

Index	Time	Results	Component	Substrate	Condition	Color	Location	PbC
1	5/28/2025 12:25	Positive	CALIBRATE					1.06
2	5/28/2025 12:26	Positive	CALIBRATE					1.09
3	5/28/2025 12:26	Positive	CALIBRATE					0.88
4	5/28/2025 12:26	Positive	CALIBRATE					1.06
5	5/28/2025 12:30	Negative	WALL	WOOD	POOR	WHITE	EXTERIOR	<LOD
6	5/28/2025 12:33	Positive	WALL	WOOD	POOR	WHITE	EXTERIOR	2.74
7	5/28/2025 12:34	Positive	COLUMN	WOOD	POOR	WHITE	EXTERIOR	2.7
8	5/28/2025 12:34	Positive	COLUMN	WOOD	POOR	WHITE	EXTERIOR	4.96
9	5/28/2025 12:36	Positive	CEILING	WOOD	POOR	WHITE	EXTERIOR	1.06
10	5/28/2025 12:36	Positive	CEILING	WOOD	POOR	WHITE	EXTERIOR	1.87
11	5/28/2025 12:37	Positive	WINDOW	WOOD	POOR	BLUE	EXTERIOR	3.19
12	5/28/2025 12:39	Negative	DOOR FRAME	WOOD	POOR	BLUE	EXTERIOR	<LOD
13	5/28/2025 12:39	Negative	DOOR FRAME	WOOD	POOR	BLUE	EXTERIOR	<LOD
14	5/28/2025 12:40	Negative	TRIM	WOOD	POOR	BLUE	EXTERIOR	<LOD
15	5/28/2025 12:40	Positive	TRIM	WOOD	POOR	BLUE	EXTERIOR	4.94
16	5/28/2025 12:40	Negative	TRIM	WOOD	POOR	BLUE	EXTERIOR	0.03
17	5/28/2025 12:41	Negative	TRIM	WOOD	POOR	BLUE	EXTERIOR	<LOD
18	5/28/2025 12:41	Positive	TRIM	WOOD	POOR	BLUE	EXTERIOR	13.83
19	5/28/2025 12:42	Positive	DOOR	WOOD	POOR	WHITE	EXTERIOR	3.87
20	5/28/2025 12:42	Negative	DOOR	WOOD	POOR	WHITE	EXTERIOR	<LOD
21	5/28/2025 12:42	Negative	DOOR	WOOD	POOR	WHITE	EXTERIOR	0.07
22	5/28/2025 12:42	Positive	DOOR	WOOD	POOR	WHITE	EXTERIOR	6.18
23	5/28/2025 12:44	Positive	WALL	WOOD	POOR	WHITE	EXTERIOR	6.38
24	5/28/2025 12:45	Negative	WALL	WOOD	POOR	WHITE	EXTERIOR	<LOD
25	5/28/2025 12:45	Negative	WALL	WOOD	POOR	WHITE	EXTERIOR	<LOD
26	5/28/2025 12:45	Negative	WALL	WOOD	POOR	WHITE	EXTERIOR	<LOD

Inspector: Dominic Hobbs
 Date Inspected: 5-28-25
 PB-2781

Limited-Lead Based Paint Readings

Centinnal House
 176 Main Street
 Park City, Utah

Index	Time	Results	Component	Substrate	Condition	Color	Location	PbC
27	5/28/2025 12:45	Positive	WALL	WOOD	POOR	WHITE	EXTERIOR	4.74
28	5/28/2025 12:46	Positive	WALL	WOOD	POOR	WHITE	EXTERIOR	1.8
29	5/28/2025 12:47	Positive	TRIM	WOOD	POOR	BLUE	EXTERIOR	2.74
30	5/28/2025 12:48	Negative	LIGHT POLE	WOOD	POOR	BLUE	EXTERIOR	<LOD
31	5/28/2025 12:50	Negative	LIGHT POLE	METAL	POOR	BLACK	EXTERIOR	<LOD
32	5/28/2025 12:50	Negative	LIGHT POLE	METAL	POOR	BLACK	EXTERIOR	<LOD
33	5/28/2025 12:50	Negative	LIGHT POLE	METAL	POOR	BLACK	EXTERIOR	<LOD
34	5/28/2025 12:50	Negative	LIGHT POLE	METAL	POOR	BLACK	EXTERIOR	<LOD
35	5/28/2025 12:53	Positive	CEILING	WOOD	POOR	GREEN	FIRST FLOOR	5.72
36	5/28/2025 12:54	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
37	5/28/2025 12:54	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
38	5/28/2025 12:54	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
39	5/28/2025 12:54	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
40	5/28/2025 12:55	Negative	CEILING	METAL	POOR	WHITE	FIRST FLOOR	<LOD
41	5/28/2025 12:55	Negative	CEILING	METAL	POOR	WHITE	FIRST FLOOR	<LOD
42	5/28/2025 12:56	Positive	CEILING	WOOD	POOR	WHITE	FIRST FLOOR	4.63
43	5/28/2025 12:57	Negative	BASEBOARD	WOOD	POOR	BLACK	FIRST FLOOR	<LOD
44	5/28/2025 12:57	Negative	BASEBOARD	WOOD	POOR	BLACK	FIRST FLOOR	<LOD
45	5/28/2025 12:57	Negative	BASEBOARD	WOOD	POOR	BLACK	FIRST FLOOR	<LOD
46	5/28/2025 12:58	Positive	DOOR FRAME	WOOD	POOR	BLACK	FIRST FLOOR	2.5
47	5/28/2025 12:59	Negative	WALL	WOOD	POOR	WHITE	FIRST FLOOR	<LOD
48	5/28/2025 12:59	Negative	WALL	WOOD	POOR	WHITE	FIRST FLOOR	0.02
49	5/28/2025 13:00	Negative	WALL	WOOD	POOR	WHITE	FIRST FLOOR	<LOD
50	5/28/2025 13:00	Negative	WALL TRIM	WOOD	POOR	BLUE	FIRST FLOOR	<LOD
51	5/28/2025 13:00	Negative	WALL TRIM	WOOD	POOR	BLUE	FIRST FLOOR	<LOD
52	5/28/2025 13:01	Negative	DOOR TRIM	WOOD	POOR	WHITE	FIRST FLOOR	<LOD

Inspector: Dominic Hobbs
 Date Inspected: 5-28-25
 PB-2781

Limited-Lead Based Paint Readings

Centinnal House
 176 Main Street
 Park City, Utah

Index	Time	Results	Component	Substrate	Condition	Color	Location	PbC
53	5/28/2025 13:01	Positive	DOOR TRIM	WOOD	POOR	WHITE	FIRST FLOOR	2.82
54	5/28/2025 13:01	Positive	DOOR TRIM	WOOD	POOR	WHITE	FIRST FLOOR	2.14
55	5/28/2025 13:03	Negative	DOOR	WOOD	POOR	STAIN	FIRST FLOOR	<LOD
56	5/28/2025 13:05	Negative	WALL	TILE	POOR	YELLOW	FIRST FLOOR	<LOD
57	5/28/2025 13:05	Negative	WALL	TILE	POOR	YELLOW	FIRST FLOOR	<LOD
58	5/28/2025 13:05	Positive	WALL	TILE	POOR	YELLOW	FIRST FLOOR	2.55
59	5/28/2025 13:05	Negative	WINDOW	WOOD	POOR	WHITE	FIRST FLOOR	<LOD
60	5/28/2025 13:05	Positive	WINDOW	WOOD	POOR	WHITE	FIRST FLOOR	3.04
61	5/28/2025 13:07	Negative	DOOR	WOOD	POOR	WHITE	FIRST FLOOR	<LOD
62	5/28/2025 13:07	Negative	DOOR	WOOD	POOR	WHITE	FIRST FLOOR	<LOD
63	5/28/2025 13:07	Negative	DOOR	WOOD	POOR	WHITE	FIRST FLOOR	<LOD
64	5/28/2025 13:07	Negative	DOOR	WOOD	POOR	WHITE	FIRST FLOOR	<LOD
65	5/28/2025 13:08	Negative	DOOR F\$AME	WOOD	POOR	RED	FIRST FLOOR	<LOD
66	5/28/2025 13:08	Negative	DOOR F\$AME	WOOD	POOR	RED	FIRST FLOOR	<LOD
67	5/28/2025 13:08	Negative	DOOR F\$AME	WOOD	POOR	RED	FIRST FLOOR	<LOD
68	5/28/2025 13:08	Negative	DOOR F\$AME	WOOD	POOR	RED	FIRST FLOOR	<LOD
69	5/28/2025 13:09	Positive	NEWAL POST	WOOD	POOR	RED	FIRST FLOOR	10.5
70	5/28/2025 13:10	Positive	STAIR POST	WOOD	POOR	RED	FIRST FLOOR	1.62
71	5/28/2025 13:11	Positive	CEILING	WOOD	POOR	WHITE	FIRST FLOOR	7.94
72	5/28/2025 13:12	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
73	5/28/2025 13:12	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
74	5/28/2025 13:12	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
75	5/28/2025 13:12	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
76	5/28/2025 13:12	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
77	5/28/2025 13:12	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
78	5/28/2025 13:13	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD

Inspector: Dominic Hobbs
 Date Inspected: 5-28-25
 PB-2781

Limited-Lead Based Paint Readings

Centinnal House
 176 Main Street
 Park City, Utah

Index	Time	Results	Component	Substrate	Condition	Color	Location	PbC
79	5/28/2025 13:13	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
80	5/28/2025 13:13	Negative	DUCT	METAL	POOR	WHITE	FIRST FLOOR	<LOD
81	5/28/2025 13:13	Negative	DUCT	METAL	POOR	WHITE	FIRST FLOOR	<LOD
82	5/28/2025 13:15	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
83	5/28/2025 13:15	Negative	WALL	DRYWALL	POOR	WHITE	FIRST FLOOR	<LOD
84	5/28/2025 13:16	Negative	WALL	WOOD	POOR	WHITE	SECOND FLOOR	<LOD
85	5/28/2025 13:16	Negative	WALL	WOOD	POOR	WHITE	SECOND FLOOR	<LOD
86	5/28/2025 13:16	Negative	WALL	WOOD	POOR	WHITE	SECOND FLOOR	<LOD
87	5/28/2025 13:16	Negative	WALL	WOOD	POOR	WHITE	SECOND FLOOR	<LOD
88	5/28/2025 13:17	Negative	WALL	WOOD	POOR	WHITE	SECOND FLOOR	<LOD
89	5/28/2025 13:17	Negative	WALL	WOOD	POOR	WHITE	SECOND FLOOR	<LOD
90	5/28/2025 13:17	Positive	DOOR	WOOD	POOR	WHITE	SECOND FLOOR	10.18
91	5/28/2025 13:17	Negative	DOOR	WOOD	POOR	WHITE	SECOND FLOOR	<LOD
92	5/28/2025 13:18	Negative	DOOR	WOOD	POOR	WHITE	SECOND FLOOR	<LOD
93	5/28/2025 13:18	Negative	WALL	DRYWALL	POOR	WHITE	SECOND FLOOR	<LOD
94	5/28/2025 13:18	Negative	WALL	DRYWALL	POOR	WHITE	SECOND FLOOR	<LOD
95	5/28/2025 13:19	Negative	WALL	DRYWALL	POOR	WHITE	SECOND FLOOR	<LOD
96	5/28/2025 13:19	Negative	WALL	DRYWALL	POOR	WHITE	SECOND FLOOR	<LOD
97	5/28/2025 13:19	Negative	WALL	DRYWALL	POOR	WHITE	SECOND FLOOR	<LOD
98	5/28/2025 13:21	Negative	WALL	DRYWALL	POOR	PEACH	SECOND FLOOR	<LOD
99	5/28/2025 13:21	Negative	WALL	DRYWALL	POOR	PEACH	SECOND FLOOR	<LOD
100	5/28/2025 13:21	Negative	WALL	DRYWALL	POOR	PEACH	SECOND FLOOR	<LOD
101	5/28/2025 13:21	Negative	WALL	DRYWALL	POOR	BLUE	SECOND FLOOR	<LOD
102	5/28/2025 13:21	Negative	WALL	DRYWALL	POOR	BLUE	SECOND FLOOR	<LOD
103	5/28/2025 13:22	Positive	COLUMN	WOOD	POOR	GREEN	SECOND FLOOR	10.14
104	5/28/2025 13:25	Negative	CEILING	DRYWALL	POOR	WHITE	THIRD FLOOR	<LOD

Inspector: Dominic Hobbs
 Date Inspected: 5-28-25
 PB-2781

Limited-Lead Based Paint Readings

Centinnal House
 176 Main Street
 Park City, Utah

Index	Time	Results	Component	Substrate	Condition	Color	Location	PbC
105	5/28/2025 13:25	Negative	CEILING	DRYWALL	POOR	WHITE	THIRD FLOOR	<LOD
106	5/28/2025 13:25	Negative	CEILING	DRYWALL	POOR	WHITE	THIRD FLOOR	<LOD
107	5/28/2025 13:25	Negative	WALL	DRYWALL	POOR	WHITE	THIRD FLOOR	<LOD
108	5/28/2025 13:25	Negative	WALL	DRYWALL	POOR	WHITE	THIRD FLOOR	<LOD
109	5/28/2025 13:25	Negative	WALL	DRYWALL	POOR	WHITE	THIRD FLOOR	<LOD
110	5/28/2025 13:26	Negative	WALL	DRYWALL	POOR	WHITE	THIRD FLOOR	<LOD
111	5/28/2025 13:26	Negative	WALL	DRYWALL	POOR	WHITE	THIRD FLOOR	<LOD
112	5/28/2025 13:26	Negative	WINDOW	WOOD	POOR	BROWN	THIRD FLOOR	<LOD
113	5/28/2025 13:26	Negative	WINDOW	WOOD	POOR	BROWN	THIRD FLOOR	<LOD
114	5/28/2025 13:26	Negative	WINDOW	WOOD	POOR	BROWN	THIRD FLOOR	<LOD
115	5/28/2025 13:27	Negative	WINDOW	WOOD	POOR	BROWN	THIRD FLOOR	<LOD
116	5/28/2025 13:28	Negative	STAIR RAILING	WOOD	POOR	GREEN	THIRD FLOOR	<LOD
117	5/28/2025 13:28	Negative	STAIR RAILING	WOOD	POOR	GREEN	THIRD FLOOR	<LOD
118	5/28/2025 13:28	Negative	STAIR RAILING	WOOD	POOR	GREEN	THIRD FLOOR	<LOD
119	5/28/2025 13:46	Negative	CALIBRATE	WOOD	POOR	GREEN	THIRD FLOOR	<LOD
120	5/28/2025 13:46	Positive	CALIBRATE					0.88
121	5/28/2025 13:46	Positive	CALIBRATE					0.87
122	5/28/2025 13:47	Positive	CALIBRATE					0.87

Approved 5/30/2025

Appendix D
Photographs

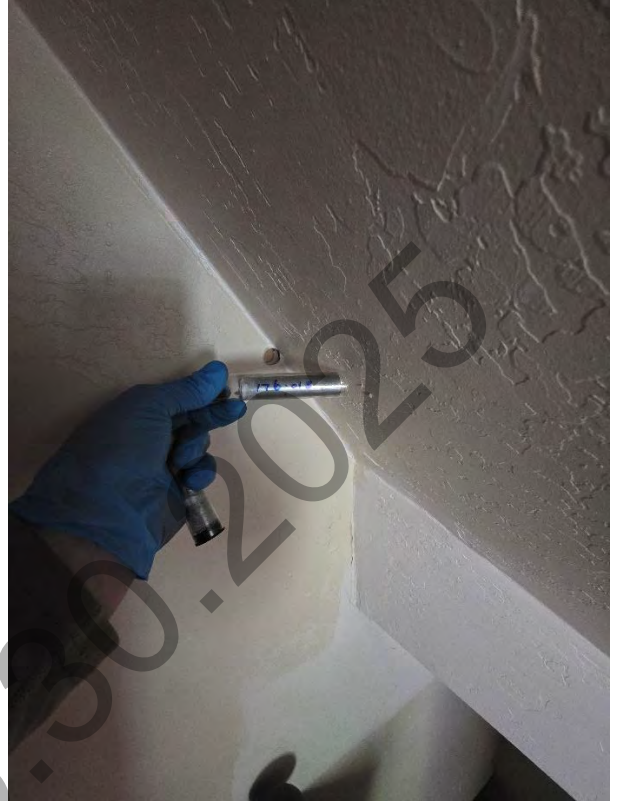
Approved 06.30.2025



Centennial House
176 Main Street
Park City, Utah



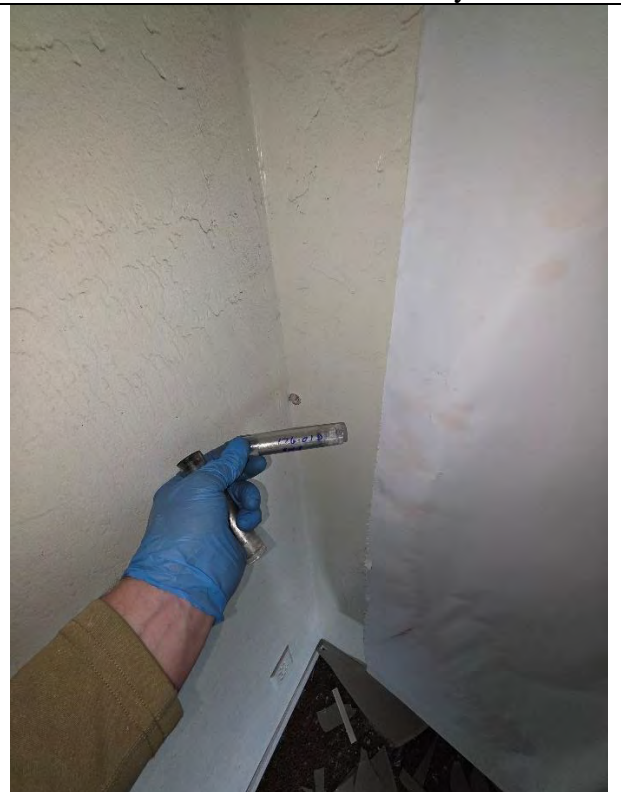
176 – 01A Sheetrock Wall System



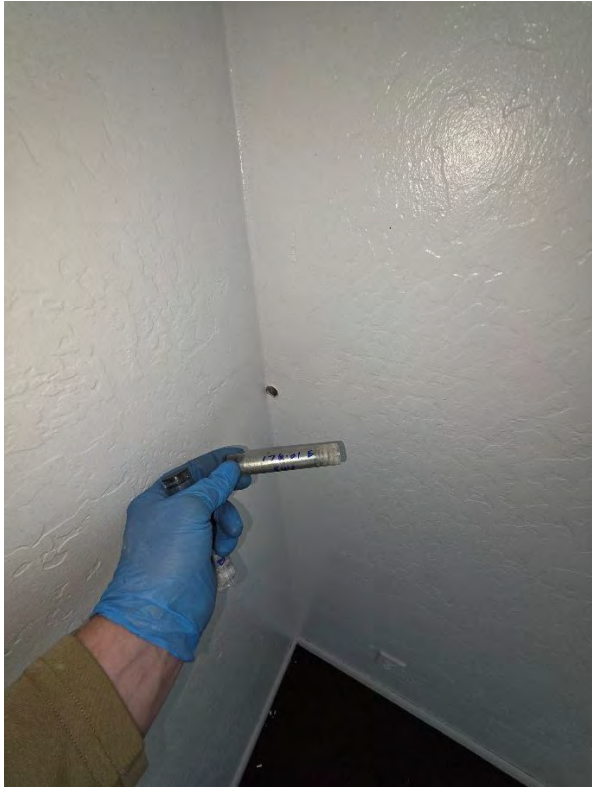
176 – 01B Sheetrock Wall System



176 – 01C Sheetrock Wall System



176 – 01D Sheetrock Wall System



176 – 01E Sheetrock Wall System



176 – 02A Textured Wall/Ceiling Material



176 – 02B Textured Wall/Ceiling Material



176 – 02C Textured Wall/Ceiling Material



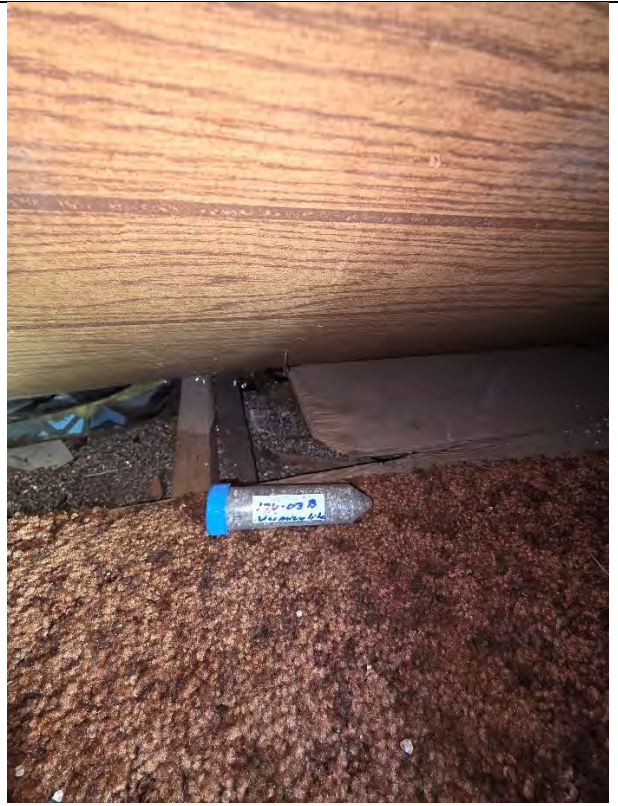
176 – 02D Textured Wall/Ceiling Material



176 – 02E Textured Wall/Ceiling Material



176 – 03A Vermiculite Insulation



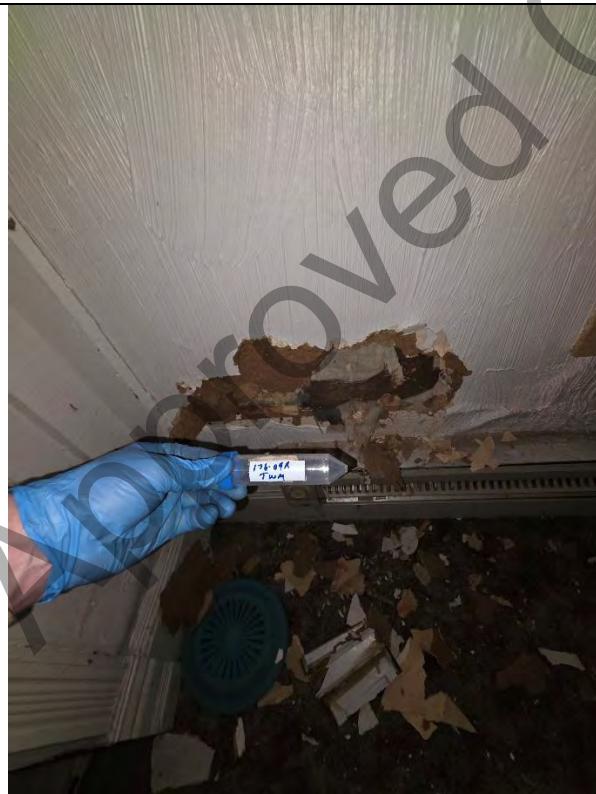
176 – 03B Vermiculite Insulation



176 - 03C Vermiculite Insulation



176 - 03D/03E Vermiculite Insulation



176 - 04A Textured Wall Material



176 - 04B Textured Wall Material



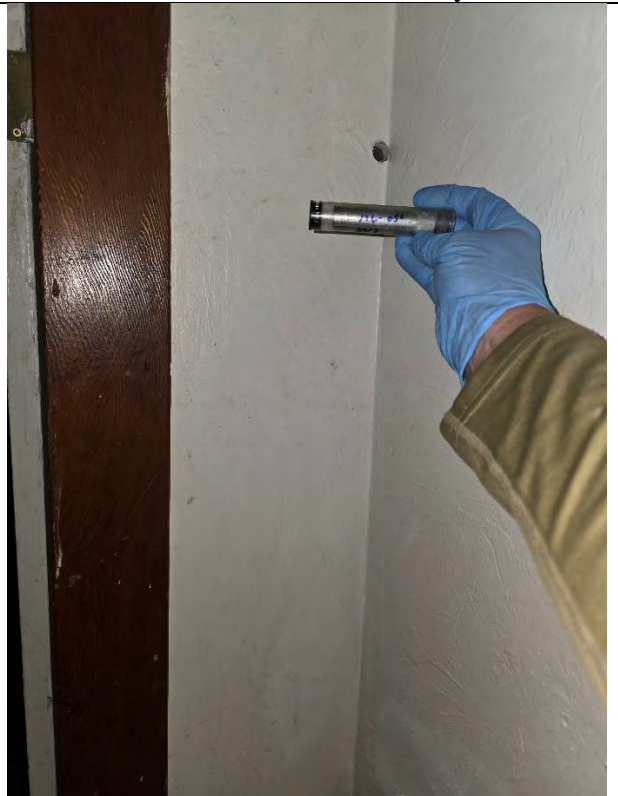
176 – 04C Textured Wall Material



176 – 05A Sheetrock Wall System



176 – 05B Sheetrock Wall System



176 – 05C Sheetrock Wall System



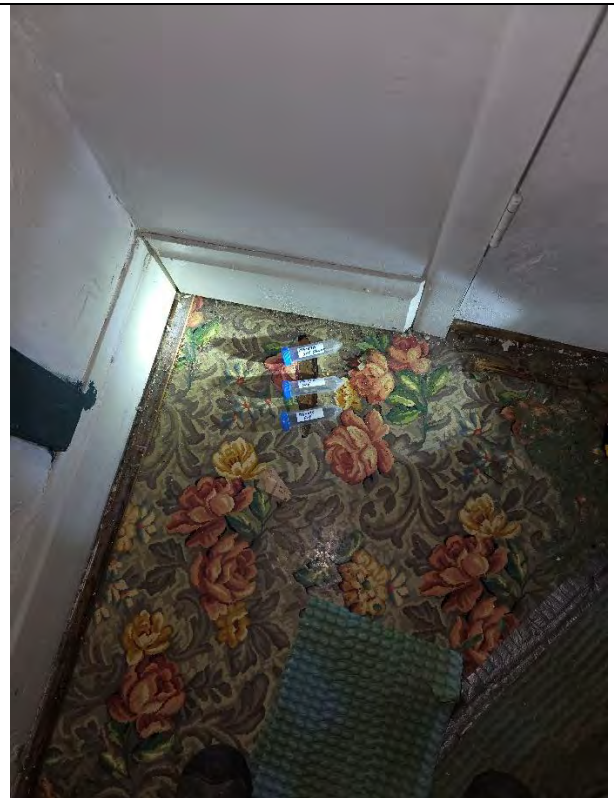
176 – 06A Textured Wall Material



176 – 06B Textured Wall Material



176 – 06C Textured Wall Material

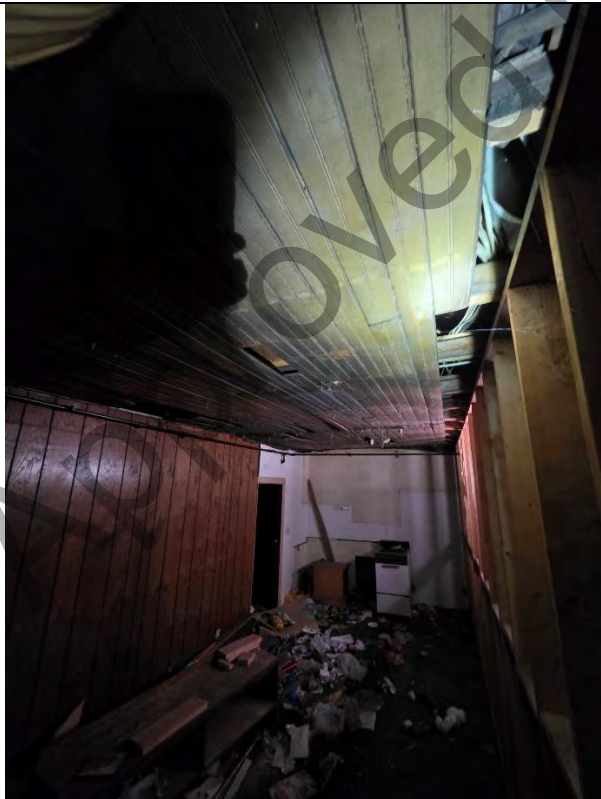


176 – 07A/B/C Sheet Vinyl Flooring Flower Pattern



176 – 08A, B and C Sheet Vinyl Flooring
Brick Pattern

End of Asbestos Sample Photographs



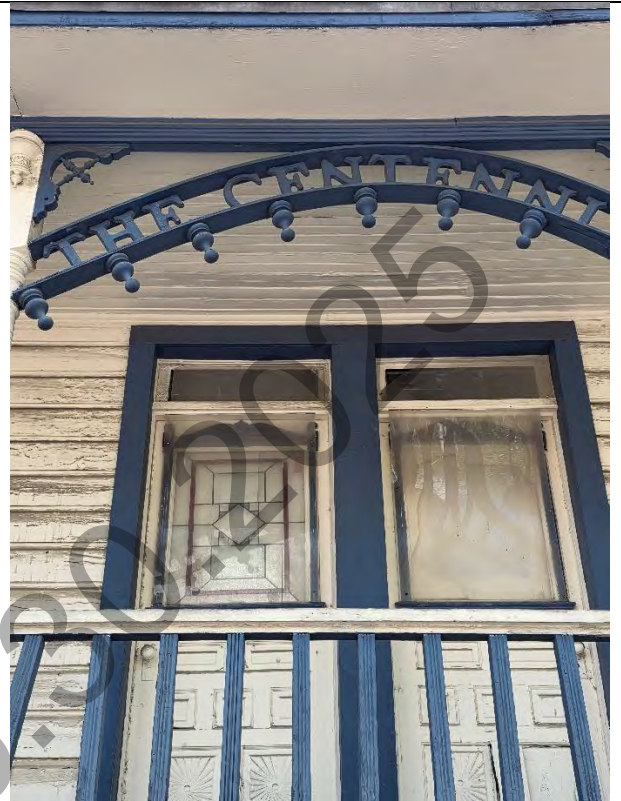
Green wood ceiling positive for lead



Lead exterior door, siding and door frame



Green wood ceiling positive for lead



Exterior window frame, stair stringers and trim



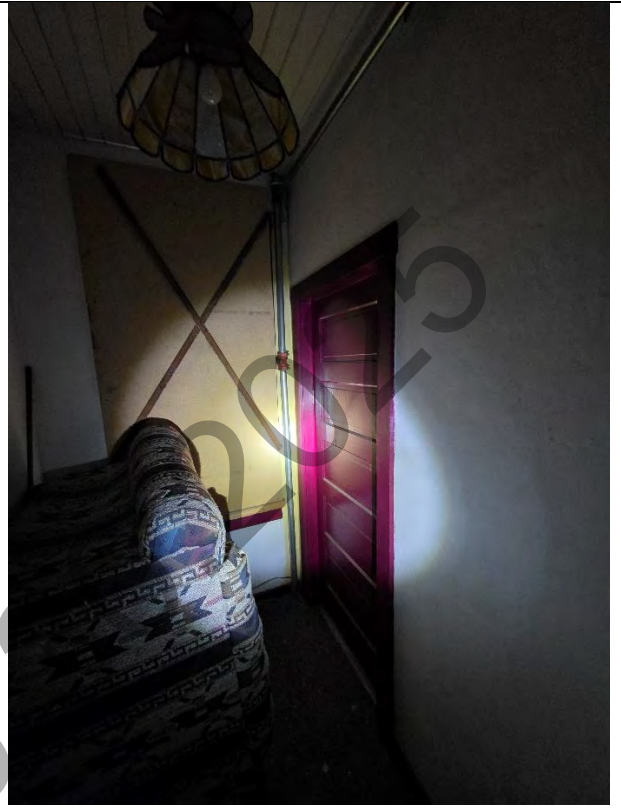
Lead exterior trim



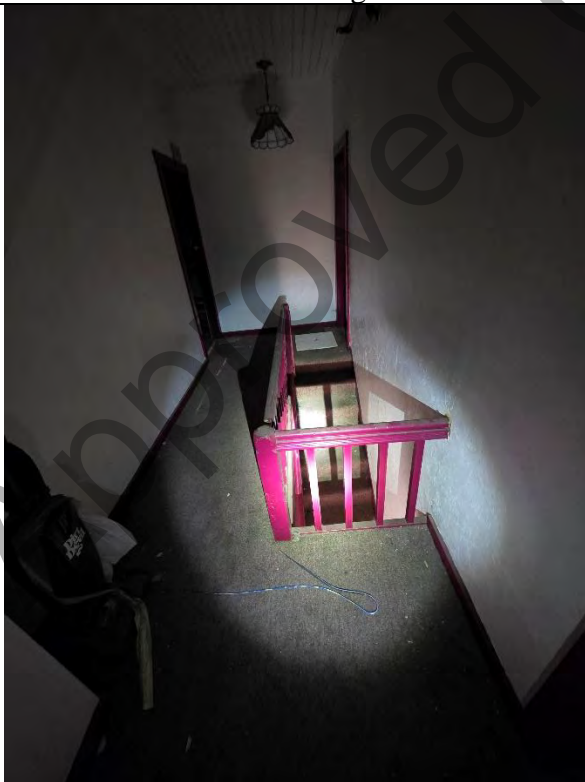
Lead exterior siding and trim



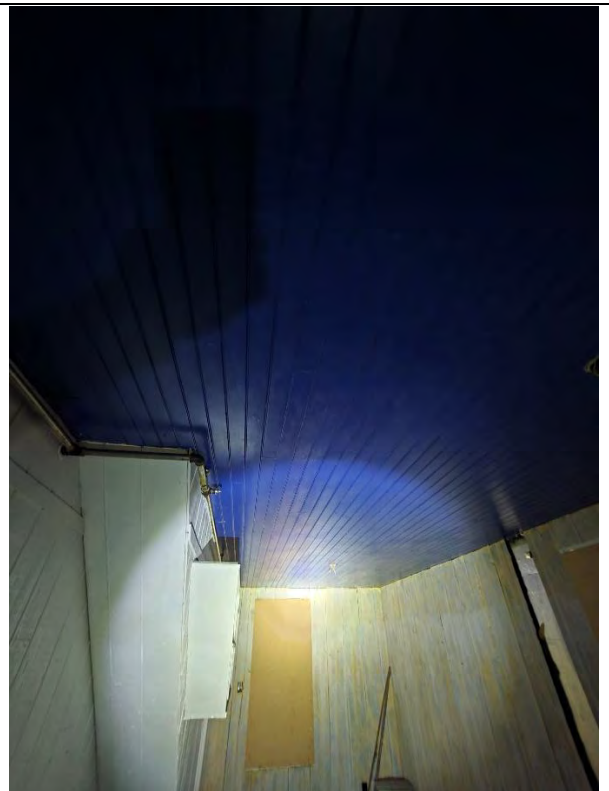
Lead exterior siding and trim



Lead interior door and frame

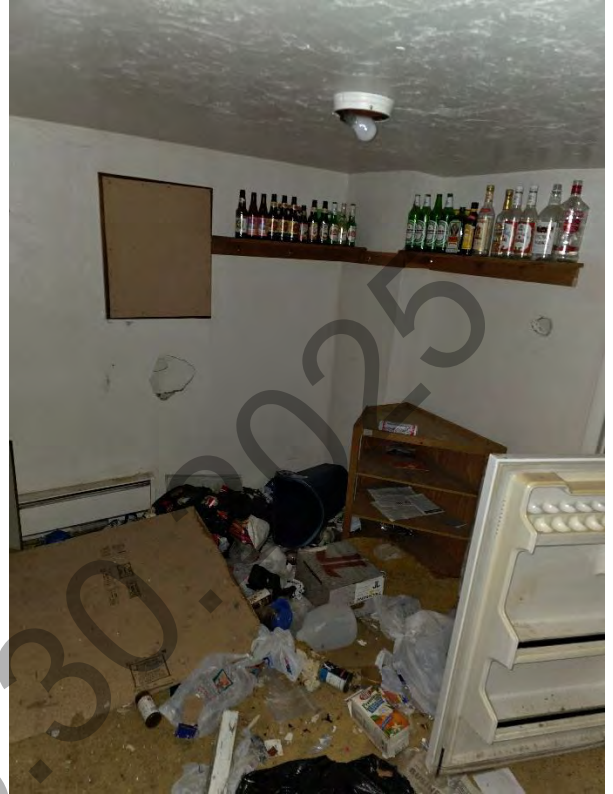


Lead stairwell components positive for lead

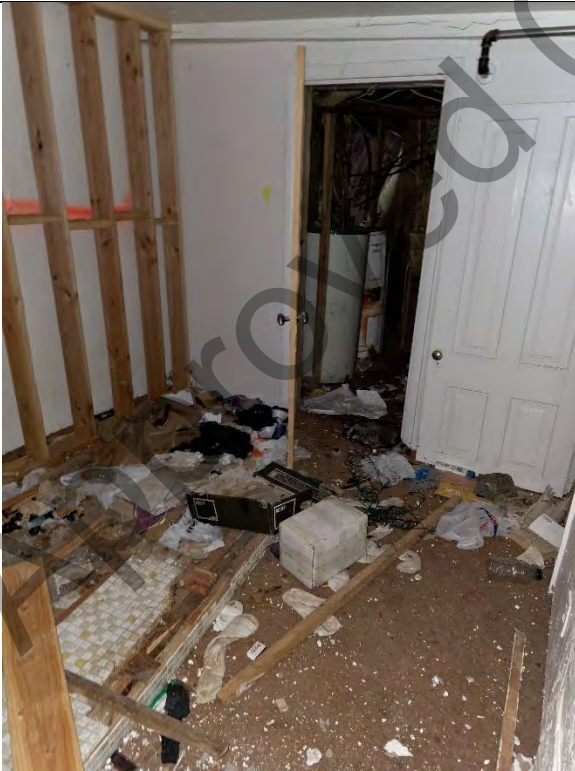


Blue wood ceiling positive for lead

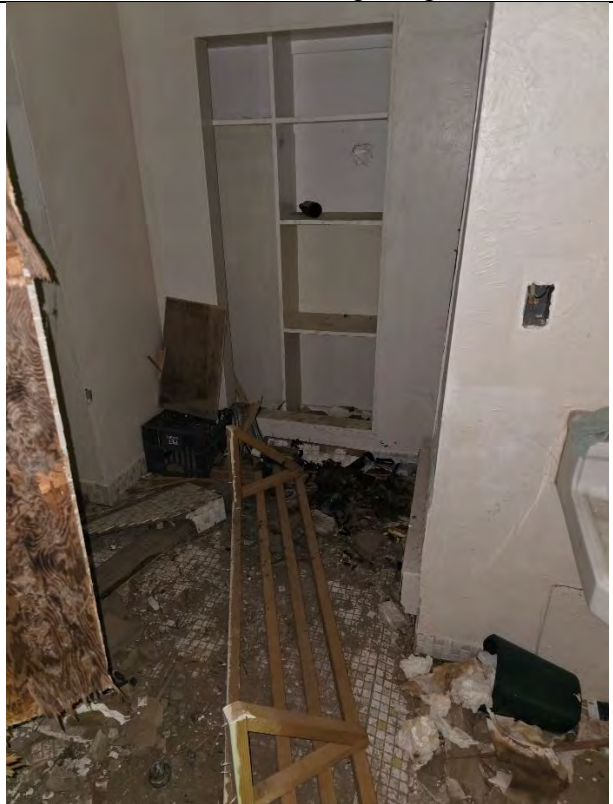
End of Lead Photographs



Basement Kitchen area garbage old food



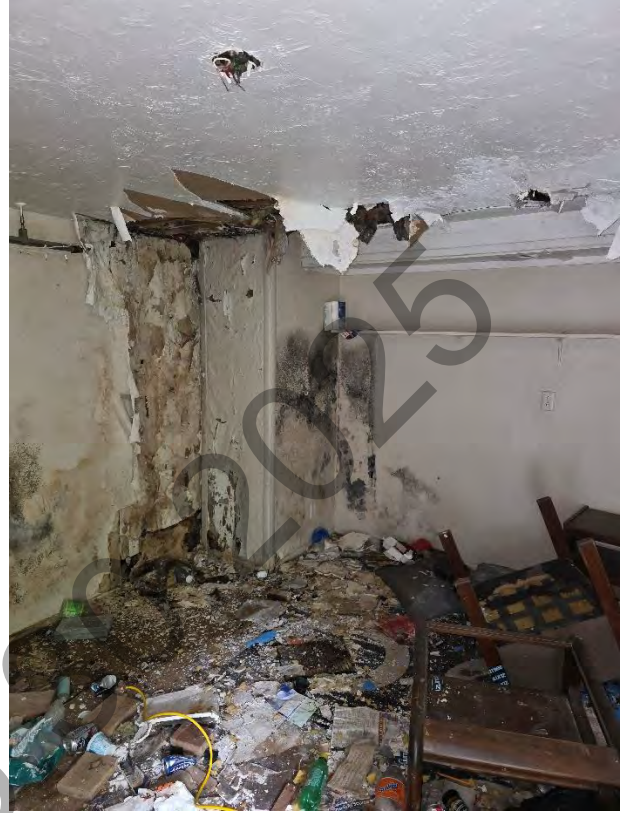
Basement South Apartment NW Bedroom with dead raccoon and garbage



Basement South Apartment bathroom



Basement South Apartment visible mold growth,
animal feces and garbage



Basement South Apartment visible mold growth,
animal feces, three dead raccoons and garbage

Approved 06/20/25

Appendix E
Mold Inspection Report

Approved 06.30.2025

MOLD INVESTIGATION AND SPECIFICATIONS REPORT

CENTENNIAL HOUSE
176 MAIN STREET
PARK CITY, UTAH 84060

Prepared for:

Ms. Makenzie Kink Winder
Windermer Real Estate

Prepared by:



Hill West Environmental, LLC
7963 Douglas Drive
Park City, Utah 84098

Contact: Claude Dahlk, CHMM
(801) 450-8060

June 4, 2025

1.0 SUMMARY

Hill West Environmental LLC (Hill West) was requested to conduct a mold assessment for the Centennial House located at 176 Main Street, Park City, Utah. Based on information provided by the Historic Preservation Board Staff Report dated May 7, 2025, the structure has been damaged from element, animals, squatters and lack of maintenance. The basement apartments in particular have dead raccoons, animal feces and extreme water damage from roof leaks and other water intrusions. The structure has been condemned by the City and has been boarded up to prevent access from the public and additional animal occupation.

The continued exposures to snow melt and rain events has contributed to the formation of mold growth within the basement area as well as areas on the upper floors primarily due to roof leaks. In addition, six (6) dead raccoons were observed within the basement apartment areas with all rooms having feces, old food containers and other garbage within these areas. Given the conditions, Hill West donned proper Personal Protective Equipment (PPE) which included a half-faced respirator equipped with both a HEPA filter and chemical cartridges to minimize bacteria, mold spore and other toxic chemicals that may be present within the basement prior to entry.

2.0 METHODS AND MATERIALS

On May 28, 2025 Hill West collected three (3) air samples from various locations within the basement areas of the building. In addition, Hill West collected two (2) tape lift samples from the South Apartment that had visible mold growth on the sheetrock walls as provided in the photographs that are attached to this report.

The air samples were collected to verify mold spore concentrations and mold types within various areas of the building. An additional air sample was collected outside to provide background spore levels for comparison. All air samples were collected using an Air-O-Cell cassette, a high volume pump with a set level of 15 liters of air per minute with a sampling duration of one to 10 minutes each. The samples were sent to Eurofins Aerotech Built Environment Testing, LLC (Eurofins) under proper chain-of-custody procedures for analysis.

Eurofins is accredited by the American Industrial Hygiene Association's Environmental Microbiology Laboratory Accreditation Program (EMLAP). The laboratory results for the mold samples are included in Appendix B and also summarized in Table 1. The samples were analyzed using light microscopy at 600X magnification, with the entire slide (100% of the sample) being analyzed. The results are reported as **Total**, meaning they include both viable and non-viable fungal spores.

Samples were collected following the procedures outlined in the Indoor Environmental Standards Organization (IESO): *Standards of Practice for the Assessment of Indoor Environmental Quality - Volume I: Mold Sampling; Assessment of Mold Contamination.*

3.0 RESULTS

Table 1 summarizes the results of the air samples collected within each area tested. Results listed in **Bold Font** are above “Outside” concentrations.

Table 1 – Air Sample Results

Air Samples collected on May 28, 2025			
Sample Identification Number	Description	Identification	Results (Count/M ³)
176 - 01 Exterior	Outside	Ascospores Basidiospores Cladosporium Other brown Penicillium/Aspergillus types Smuts, Periconia, Myxomycetes Total Fungal Spores	27 53 610 13 53 27 790
176 - 02 Interior	Basement South Apartment	Ascospores Basidiospores Chaetomium Cladosporium Penicillium/Aspergillus types Stachybotrys Ulocladium Total Fungal Spores	1,800 1,200 290 9,700 2,700 40 2,300 18,000
176 - 03 Interior	Basement South Apartment	Ascospores Chaetomium Cladosporium Other brown Penicillium/Aspergillus types Smuts, Periconia, Myxomycetes Stachybotrys Ulocladium Total Fungal Spores	2,200 130 2,400 13 15,000 40 13 130 20,000
176 - 04 Interior	Basement North Apartment	Ascospores Basidiospores Chaetomium Cladosporium Other brown Penicillium/Aspergillus types Smuts, Periconia, Myxomycetes Total Fungal Spores	210 850 27 850 67 2,000 13 4,000

Bulk Sample collected on May 28, 2025			
Sample Identification Number	Description	Identification	Count/Unit
176 - 05 Bulk	Basement Sheetrock Wall System	Cladosporium Ulocladium Total Fungal Spores	600,000 190,000 790,000
176 - 06 Bulk	Basement Sheetrock Wall System	Cladosporium Penicillium/Aspergillus types Ulocladium Total Fungal Spores	4,600 4,900 160,000 170,000

4.0 RECOMMENDATIONS

Based on the analytical results and visual inspection of the basement area, Hill West recommends that the entire basement area be remediated for the respiratory hazards including mold growth, dead animals, feces, and garbage that is present within the entire basement area. In addition, the HVAC ducts within the building should be cleaned to remove any settled spores within the HVAC system. Hill West recommends that the project be completed by qualified individuals experienced in decontamination and remediation of the various building components for mold contamination. All areas should be remediated using protocols established by the *IICRC S520 Standard and Reference Guide for Professional Mold Remediation*.

Mold spores are known to cause various illnesses, mostly related to allergy-like symptoms. Some mold spores can produce mycotoxins, which are extremely toxic. Exposure to these toxins can occur through inhalation, ingestion or dermal exposure and can cause allergy-like responses including: dermatitis, cough, rhinitis, nose bleeds, cold and flu symptoms, headache, general malaise, and fever.¹

Prior to any abatement activities, typical treatment for the areas includes construction of critical barriers (6 mil. poly sheeting) to seal-off the contaminated areas, placement of the containment under negative pressure (- 0.2 inches of water column) with a minimum of four (4) air exchanges within the containment area. All exhaust must be ventilated to the exterior of the building. Hill West recommends that the contractor seal off the north section of the building as one containment from boiler room to the east bathrooms and remediate the area as outlined below.

¹IAQ Microbiology Reference Guide, Aerotech • Kalmar Laboratories

Access to the project area should be restricted to authorized personnel only. Access into the work area will require the use of proper Personal Protective Equipment (PPE) including steel toed shoes, hard hat, half-faced respirator with HEPA/Chemical filters, Tyvek clothing and work gloves.

- Prior to setting up the containment, all personal items shall be removed from the proposed containment area. All water damaged materials should be removed from the containment. Any visible mold contaminated building materials should be removed as well, this includes wood paneling, sheetrock wall systems and wood framing.
- The contractor shall seal-off the basement from the areas to minimize mold cross contamination.
- Sufficient number of negative air machines will need to be set within the containment with all exhaust venting outside the building. Hill West recommends that up to six (6) negative air machines maybe required to achieve proper negative pressure within the containment.
- Isolate the HVAC system within the building to prevent mold spores being transported into other non-affected areas of the building.
- The contractor should then begin remediation by placing the HVAC system under negative pressure and cleaning all ducts within the building that service the residence.
- After all sheetrock walls and ceilings have been removed, the contractor shall inspect the interior wall studs and foundation building components for visible mold growth and remediate these areas accordingly.
- Due to the extensive water leaks throughout the years, all wood braces, wall studs and other building components may be compromised and will either need to be replaced or remediated if feasible.
- All wood joists and sheeting shall then be treated using dry ice bead blaster to remove all mold growth on the wood joists and sheeting.
- All visibly mold contaminated building components including sheetrock walls, wood paneling and wood framing should be removed from the containment area.
- All remaining visible mold areas such as interior wall cavities should first be cleaned by first HEPA vacuuming the area and then applying a 10% - 15% concentration of bleach to water (or equivalent) on the affected contaminated areas.
- The contractor shall then spray a biocide product within the entire crawl space and basement containment area to further clean the areas. The areas should then be left to dry to the maximum extent possible to inhibit the reformation of the mold.
- All visibly stained areas such as the joists and sheeting within each affected area should then be sanded and HEPA vacuumed again.

- Any stained areas remaining after the above procedure has been followed should then be encapsulated with an anti-fungicide product such as Fosters 4020 including the foundation walls.

Upon completion of the remediation, Hill West recommends that an on-site visual inspection of the remediated areas be completed. If these areas pass the visual inspection, post remediation verification air samples shall be collected from each containment work area. In addition to the interior samples, an exterior air sample shall be collected to obtain outdoor mold spore levels.

The information gathered by the background samples (prior to remediation), in conjunction with the clearance samples, can then be used to determine the success of the remediation. The samples will serve as clearance results that will allow Hill West to determine whether additional remediation is required within the areas tested. If the air sample results are at or below the outside/background samples, dependent upon the mold types identified, the areas will be given clearance status and no further remediation will be recommended for these areas.

Due to the poor condition of the structure, a certified engineering firm shall make the determination whether the structure is safe for re-occupancy. Mold growth and continued water damage can impact the wood braces/foundations to a point that the structure is not safe for re-occupancy.

Consulting services for collection of mold samples to verify that mold, fungus, and other allergens are present, is only valid at the time services are performed as mold, fungus, and other allergens are always naturally occurring. Reformation of mold may occur if water is re-introduced into any areas of the structure from any water source. Hill West does not warranty any work conducted by any remediation contractors or subcontractors chosen by the insured or insurance company to repair the moisture problem or remediate the mold within the structure.

If you have any questions or require additional information, please feel free to call me at (801) 450-8060.

Sincerely,



Claude Dahlk, CHMM, CIEC
Project Manager

Appendix A

Photographs

Analytical Results

Approved 06.30.2025



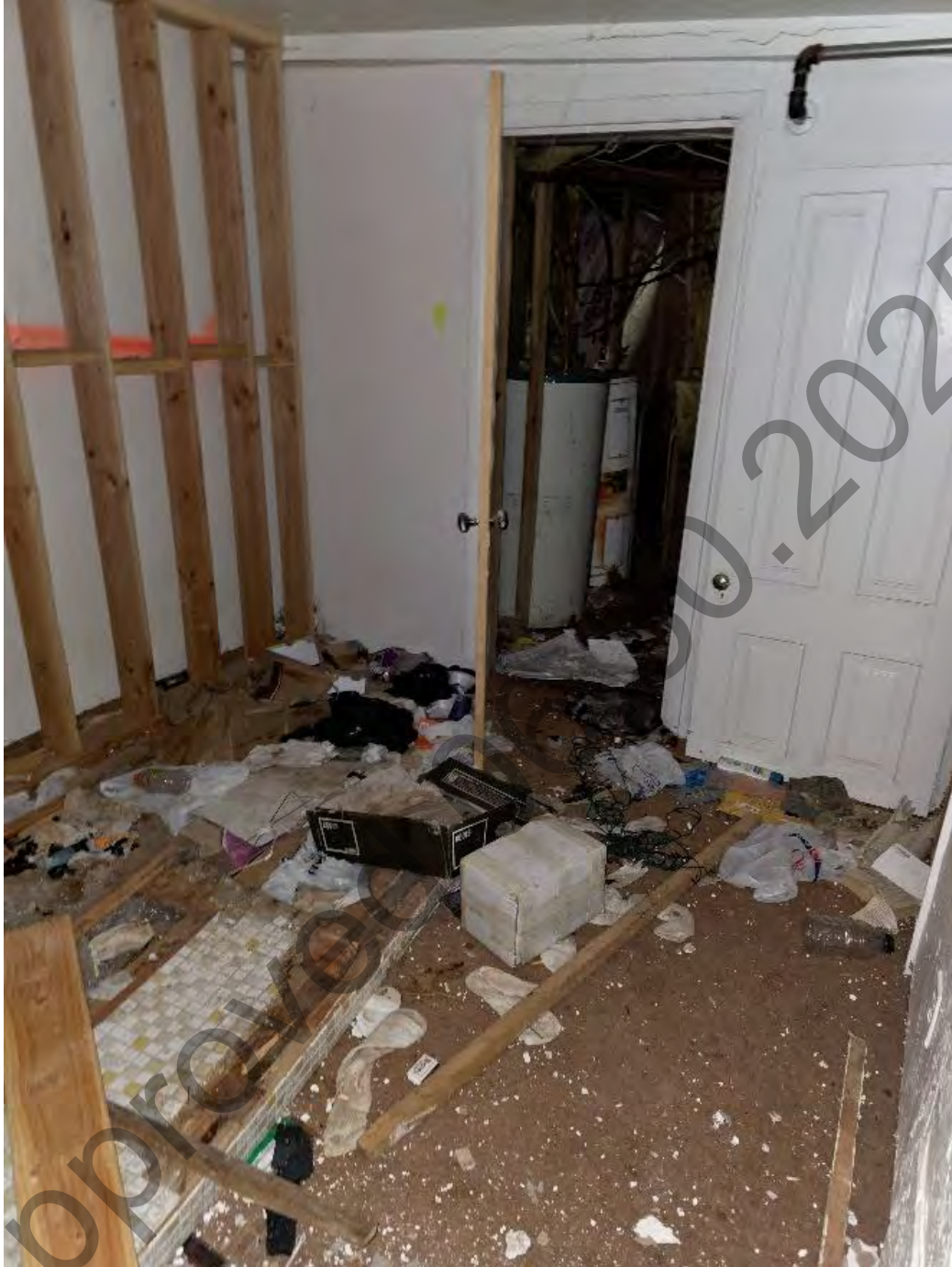
South Basement Apartment Living Room – Three (3) dead raccoons, feces, visible mold on all walls within the basement area.



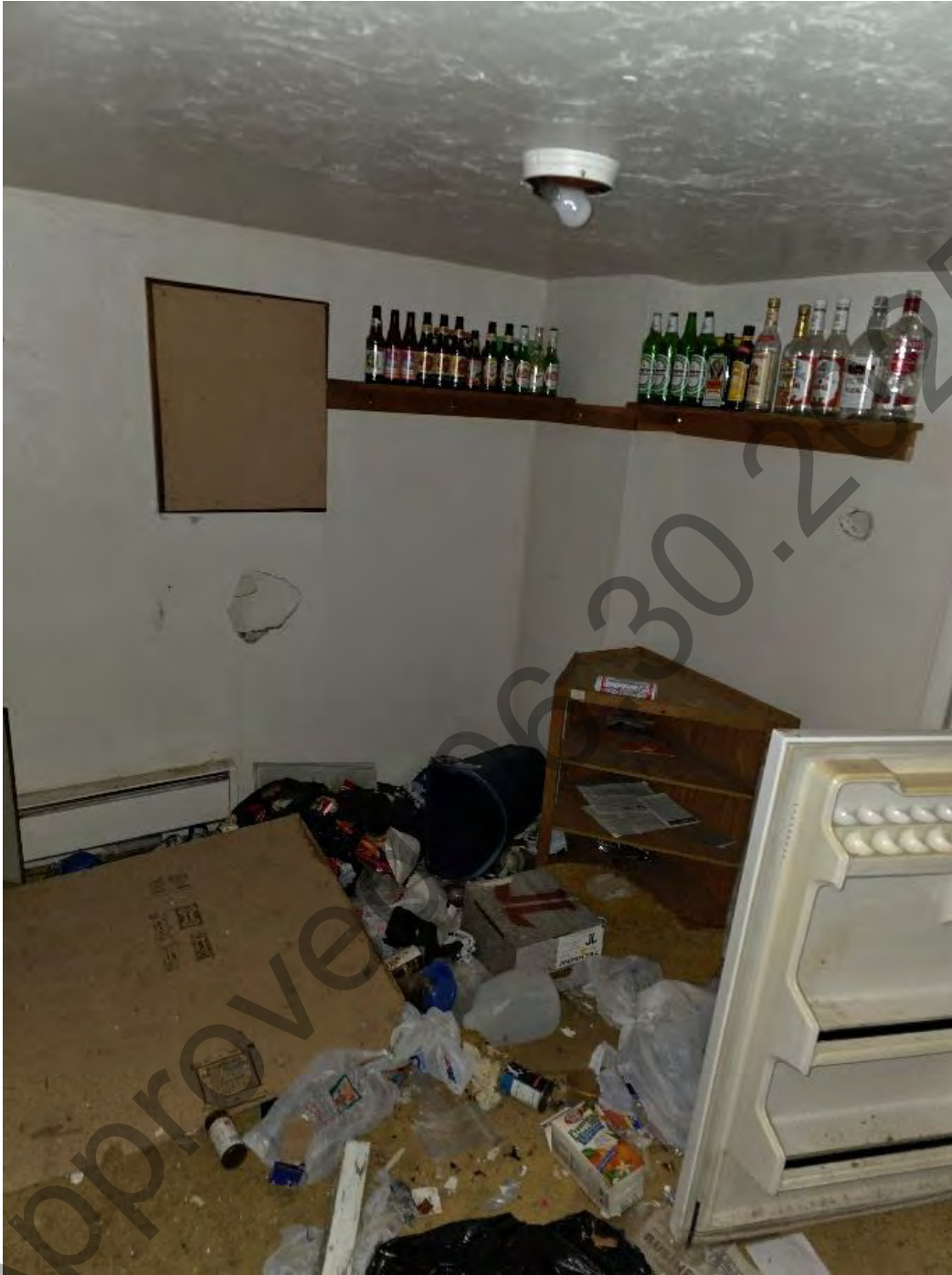
Visible mold growth on wood paneling Office 103/104.



Visible mold growth on sheetrock wall Basement South Apartment Bathroom.



Visible mold growth with dead raccoon and feces throughout room.



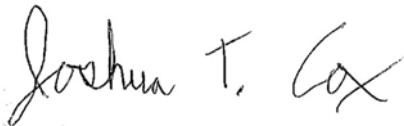
Basement South Apartment Kitchen with visible mold growth and feces.

Report for:

Claude Dahlk
Hill West Environmental, LLC
7963 Douglas Drive
Park City, UT 84098

Regarding: Eurofins Aerotech Built Environment Testing, LLC
Project: Centennial House; 176 Main Street Park City UT
EML ID: 4091590

Approved by:



Business Unit Manager
Joshua Cox

Dates of Analysis:
Spore trap analysis: 05-30-2025

Service SOPs: Spore trap analysis (EB-MY-S-1038)
AIHA LAP, LLC accredited service, Lab ID #102297

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. Due to the nature of the analyses performed, field blank correction of results is not applied. The results relate only to the samples as received and tested. Information supplied by the client which can affect the validity of results: sample air volume.

Eurofins Aerotech Built Environment Testing, LLC ("the Company"), a member of the Eurofins Built Environment Testing group of companies, shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Eurofins Aerotech Built Environment Testing, LLC's LabServe® reporting system includes automated fail-safes to ensure that all AIHA LAP, LLC quality requirements are met and notifications are added to reports when any quality steps remain pending.

Client: Hill West Environmental, LLC
 C/O: Claude Dahlk
 Re: Centennial House; 176 Main Street Park City UT

Date of Sampling: 05-28-2025
 Date of Receipt: 05-30-2025
 Date of Report: 05-30-2025

SPORE TRAP REPORT: NON-VIABLE METHODOLOGY

Location:	176-01: Outside				176-02: South Basement				176-03: South Basement				176-04: North Basement			
Comments (see below)	None				None				None				None			
Lab ID-Version‡:	20407339-1				20407340-1				20407341-1				20407342-1			
Analysis Date:	05/30/2025				05/30/2025				05/30/2025				05/30/2025			
Sample volume (liters)	150				75				75				75			
Background debris (1-4+)	3+				3+				4+				4+			
	raw ct.	Count/m3	DL/m3*	%	raw ct.	Count/m3	DL/m3*	%	raw ct.	Count/m3	DL/m3*	%	raw ct.	Count/m3	DL/m3*	%
Hyphal fragments	4	27	7	n/a	6	80	13	n/a	31	410	13	n/a	12	160	13	n/a
Pollen	28	190	7	n/a	8	110	13	n/a					2	27	13	n/a
§ TOTAL FUNGAL SPORES	34	790	n/a	100	485	18,000	n/a	100	398	20,000	n/a	100	81	4,000	n/a	100
Ascospores	1	27	27	3	34	1,800	53	10	42	2,200	53	11	4	210	53	5
Basidiospores	2	53	27	7	23	1,200	53	7					16	850	53	21
Chaetomium					22	290	13	2	10	130	13	1	2	27	13	1
Cladosporium	23	610	27	78	182	9,700	53	54	45	2,400	53	12	16	850	53	21
Other brown	2	13	7	2					1	13	13	<1	5	67	13	2
Penicillium/Aspergillus types	2	53	27	7	50	2,700	53	15	286	15,000	53	75	37	2,000	53	49
Smuts, Periconia, Myxomycetes	4	27	7	3					3	40	13	<1	1	13	13	<1
Stachybotrys					3	40	13	<1	1	13	13	<1				
Stemphylium																
Torula																
Ulocladium					171	2,300	13	13	10	130	13	1				
Zygomycetes																

Comments:

Spore types listed without a count or data entry were not detected during the course of the analysis for the respective sample, indicating a raw count of <1 spore.

The analytical sensitivity is the spores/m³ divided by the raw count, expressed in spores/m³, per spore and per sample.

*The detection limit/limit of detection (DL) per cubic meter (m³) has been rounded to two significant figures to reflect analytical precision.

‡Background debris indicates the amount of non-biological particulate matter present on the trace (dust in the air) and the resulting visibility for the analyst. It is rated from 1+ (low) to 4+ (high). Counts from areas with 4+ background debris should be regarded as minimal counts and may be higher than reported. It is important to account for samples volumes when evaluating dust levels.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

§ Total Fungal Spores has been rounded to two significant figures to reflect analytical precision.

Client: Hill West Environmental, LLC

C/O: Claude Dahlk

Re: Centennial House; 176 Main Street Park City UT

Date of Sampling: 05-28-2025

Date of Receipt: 05-30-2025

Date of Report: 05-30-2025

SPORE TRAP REPORT: NON-VIABLE METHODOLOGY

PROJECT ANALYST AND SIGNATORY REPORT

Project Analyst



Analyst: Fernando Fernandez

Approved 06.30.2025

The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by AIHA LAP, LLC, or any agency of the federal government. The Company reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

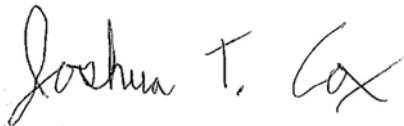
‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Report for:

Claude Dahlk
Hill West Environmental, LLC
7963 Douglas Drive
Park City, UT 84098

Regarding: Eurofins Aerotech Built Environment Testing, LLC
Project: Centennial House; 176 Main Street Park City UT
EML ID: 4091590

Approved by:



Business Unit Manager
Joshua Cox

Dates of Analysis:

Quantitative spore count direct exam: 05-30-2025

Service SOPs: Quantitative spore count direct exam (EM-MY-S-1041)
AIHA LAP, LLC accredited service, Lab ID #102297

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. Due to the nature of the analyses performed, field blank correction of results is not applied. The results relate only to the samples as received and tested.

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Client: Hill West Environmental, LLC
 C/O: Claude Dahlk
 Re: Centennial House; 176 Main Street Park City UT

Date of Sampling: 05-28-2025
 Date of Receipt: 05-30-2025
 Date of Report: 05-30-2025

QUANTITATIVE SPORE COUNT REPORT

Location:	176-05: North Basement West Wall				176-06: North Basement West Wall			
Comments (see below)	None				None			
Sample type	Bulk sample				Bulk sample			
Lab ID-Version‡:	20407337-1				20407338-1			
Analysis Date:	05/30/2025				05/30/2025			
Background debris (1-4+)	N/A				N/A			
Sample size	1 cm2				1 cm2			
Reporting unit	1 cm2				1 cm2			
Dilution	1:1				1:1			
	Count	Count/sample	Count/unit	%	Count	Count/sample	Count/unit	%
Hyphal fragments	11	11,000	11,000	n/a	3	3,000	3,000	n/a
§ TOTAL FUNGAL SPORES	790	790,000	790,000	100	370	170,000	170,000	100
Cladosporium	600	600,000	600,000	76	102	4,600	4,600	3
Myrothecium								
Nigrospora								
Other colorless								
Penicillium/Aspergillus types					108	4,900	4,900	3
Pithomyces								
Rusts								
Smuts, Periconia, Myxomycetes								
Stachybotrys								
Stemphylium								
Torula								
Ulocladium	189	190,000	190,000	24	156	160,000	160,000	94
Zygomycetes								

Comments:

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

§ Total Fungal Spores has been rounded to two significant figures to reflect analytical precision.

Spore types listed without a count or data entry were not detected during the course of the analysis for the respective sample, indicating a raw count of <1 spore.

The limit of detection is 1 spore per area analyzed; Analytical Sensitivity is 1 spore per unit times the dilution factor.

Where tape lifts are performed for bulk sample analysis, the unit reported is specific to the area of tape analyzed. Where swabs are performed, the unit reported is specific to the swab analyzed.

Due to the inherent inhomogeneity and variable recovery rates of surface fungal samples, all reported spore counts are extrapolated estimates. Counts of fewer than 400 spores or greater than 40,000 spores are considered imprecise and not reproducible due to limitations in the counting method and equipment sensitivity.

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. Due to the nature of the analyses performed, field blank correction of results is not applied. The results relate only to the samples as received and tested.

Client: Hill West Environmental, LLC
C/O: Claude Dahlk
Re: Centennial House; 176 Main Street Park City UT

Date of Sampling: 05-28-2025
Date of Receipt: 05-30-2025
Date of Report: 05-30-2025

QUANTITATIVE SPORE COUNT REPORT
PROJECT ANALYST AND SIGNATORY REPORT

Project Analyst



Analyst: Fernando Fernandez

Approved 06.30.2025

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‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Introduction

Molds are a natural and important part of our environment. They are ubiquitous and are found virtually everywhere. Molds produce tiny spores to reproduce. These spores can be found in both indoor and outdoor air and on indoor and outdoor surfaces. When mold spores land on a damp spot, they may begin growing and digesting whatever they are growing on in order to survive, leading to adverse conditions. In response to increasing public concern, a number of government authorities, including the United States EPA, California Department of Health Services and New York City Department of Health, have developed recommendations and guidelines for assessment and remediation of mold. Websites for these organizations can be found at the end of this report.

While it is generally accepted that molds can be allergenic and can lead to adverse health conditions in susceptible people, unfortunately there are no widely accepted or regulated interpretive standards or numerical guidelines for the interpretation of microbial data. The absence of standards often makes interpretation of microbial data difficult and controversial. This report has been designed to provide some basic interpretive information using certain assumptions and facts that have been extracted from a number of peer reviewed texts, such as the American Conference of Governmental Industrial Hygienists (ACGIH). In the absence of standards, the user must determine the appropriateness and applicability of this report to any given situation. Identification of the presence of a particular fungus in an indoor environment does not necessarily mean that the building occupants are or are not being exposed to antigenic or toxic agents.

None of the information contained herein should be construed as medical advice or a call to action for evacuation or remediation. Only a qualified physician should make any decision relative to medical significance.

EMLab P&K did not conduct the site investigation, provide consulting or collect the samples referenced in this report. EMLab P&K's primary involvement in this project is to provide analytical results for the samples submitted. The data presented in this report are based on the samples and accompanying information provided and represents concentrations at a point in time under the conditions sampled.

EMLab P&K's standard terms and conditions govern all aspects of this report.

Materials

Please refer to the chain of custody included with this report.

Methods

1. Surface Samples – Swab, Dust, Tape and Bulk Samples

Swab, Dust and Tape samples are mounted on a glass slide and observed under a bright field microscope for either Qualitative or Quantitative Examination. A bulk sample is also simultaneously observed under a stereomicroscope to look for signs of any visible discoloration or fungal growth, which is then mounted and observed under a bright field microscope for either Qualitative or Quantitative Examination. The samples are analyzed at a minimum of 200X magnification and up to a 1000X magnification. In the qualitative

examination, the prepared samples are observed for the presence of any structures or skewing of spore distribution that may indicate growth in the sample being analyzed. In the quantitative examination, the mold spores detected in the sample are counted and reported as spores per cm², spores per gram (or 1000mg), or spores per swab/wipe, etc depending on the sample type. These methodologies do not differentiate between viable and non-viable fungal spores.

2. Air Samples- Spore Trap Device

Spore traps are a unique sampling device designed for the rapid collection and analysis of a wide range of airborne particulates, including fungal spores. While analyzing the sample, the analyst takes a number of variables into account to select the proper analytical method to accurately determine the densities of the various spores on the trace. The densities of the debris and the spores on the trace will determine the approach to analyzing the sample. In general, the sample is directly mounted under the microscope and the various airborne particles detected are counted at a minimum of 200X magnification and up to 1000X magnification, with the entire trace (100% of the sample) being analyzed at 200X or 600X. This method does not differentiate between viable and non-viable fungal spores. This technique does not allow for the differentiation between *Aspergillus* and *Penicillium* spores. Additionally, depending on morphology, other non-distinctive spores are reported in categories such as ascospores or basidiospores. All slides are graded with the following debris scale for data qualification.

Debris Rating	Description	Interpretation
None	No particles detected.	No particulates on slide. The absence of particulates could indicate improper sampling as most air samples typically capture some particles.
<1+	Good visibility. A few particles detected.	Reported values are not affected by debris.
1+	Good visibility. No crowding of particles.	
2+	Decent visibility. Particles beginning to crowd.	Non-microbial particulates can mask the presence of fungal spores. As a result, actual values could be higher than the numbers reported. Higher debris ratings increase the probability of this bias.
3+	Decent visibility. Particles beginning to crowd.	
4+	Poor visibility. Particles beginning to overlap.	Excessive debris detected in the sample. Counts reported may vary drastically and actual values could be higher than the numbers reported. The sample should be collected at a shorter time interval, or other measures taken to reduce the collection of non-microbial debris. In addition, a >4+ rating will only allow for a count from the perimeter of the slide.
>4+	Poor visibility. Particles overlapping.	

3. Comments

Comments identify issues or events that are relevant to your analytical results. A comment includes information about any peculiar observation or situation encountered while analyzing the sample. In each case, the comments provide significant information vital to the interpretation of the laboratory data.

4. Data Interpretation

According to ACGIH, "Data from individual sampling episodes is often interpreted with respect to baseline data from other environments or the same environment under anticipated low exposure conditions." In the absence of established acceptable exposure limits, it is often necessary to use a comparison standard when interpreting data. In this instance, it will be necessary to sample the suspect area as well as a non-suspect area.

According to ACGIH, "...active fungal growth in indoor environments is inappropriate and may lead to exposure and adverse health effects."

a. Total Fungal Spores

According to ACGIH, "... differences that can detected with manageable sample sizes are likely to be in 10- fold multiplicative steps (e.g., 100 versus 1000...)". Following this logic, if total fungal spores are ten (10) times greater in the sample from a suspect area than in the negative control sample collected from a non-suspect area, then that sample area may be a fungal amplification site.

b. Mycelial Fragments

Mycelium is a fungal mass that constitutes the vegetative or living body of a fungus. Following the same logic above, if total mycelial fragments are ten (10) times greater in the suspect sample than in the negative control, then the sample area is considered to be a fungal amplification site. The presence of mycelial fragments provides evidence of microbial growth.

c. Mycotoxins

Molds can produce toxic substances called mycotoxins. More than 200 mycotoxins have been identified from common molds, and many more remain to be identified. Some of the molds that are known to produce mycotoxins are commonly found in moisture-damaged buildings. Exposure pathways for mycotoxins can include inhalation, ingestion, or skin contact. Although some mycotoxins are well known to affect humans and have been shown to be responsible for human health effects, for many mycotoxins, little information is available, and in some cases research is ongoing. Some molds can produce several toxins, and some molds produce mycotoxins only under certain environmental conditions. The presence of mold in a building does not necessarily mean that mycotoxins are present or that they are present in large quantities.

d. Water Indicator Molds

Certain authorities identify certain molds whose presence indicates excessive moisture. The presence of a few spores of indicator mold should be interpreted with caution. Additionally, it should be recognized that these named molds are not necessarily the only ones of potential significance.

e. Mold Glossary

Specific characteristics of the individual molds listed in the report are presented in Table 1.








f. Useful Resources






- i. Guidelines on Assessment and Remediation of Fungi in Indoor Environments, New York City Department of Health.
www1.nyc.gov/assets/doh/downloads/pdf/epi/epi-mold-guidelines.pdf
- ii. Facts about Mold, New York City Department of Health.
www1.nyc.gov/assets/doh/downloads/pdf/epi/mold-brochure.pdf

www.emlabpk.com • info@emlabpk.com

- iii. Mold Resources, United States Environmental Protection Agency.
<http://www.epa.gov/mold/moldresources.html>
- iv. Mold in My Home, What do I do? California Department of Health Services.
<http://www.lapublichealth.org/eh/docs/housing/brochure/moldhome.pdf>

Table 1: Summary of Specific Mold Characteristics

Fungi	Environmental Indicator		Typically Found
<i>Alternaria</i>			<i>Alternaria</i> is one of the more common fungi found in nature. It is found growing indoors on a variety of substrates including wallboards, painted walls, etc.
<i>Arthrinium</i>			<i>Arthrinium</i> is a saprobe and is found on plants. It is rarely found growing indoors.
Ascospores			Ascospores are ubiquitous in nature and are commonly found in the outdoor environment. Some fungi that belong to the ascomycete family include the sexual forms of <i>Penicillium/Aspergillus</i> , <i>Chaetomium</i> , etc that may be frequently found growing on damp substrates.
<i>Aureobasidium</i>			<i>Aureobasidium</i> is commonly found in a variety of soils. Indoors, it is commonly found where moisture accumulates, especially bathrooms, and kitchens, on shower curtains, tile grout, windowsills, textiles, and liquid waste materials.
Basidiospores			Basidiospores are Saprophytes and plant pathogens and are commonly found in gardens, forests, and woodlands. They also include organisms that are the agent of "dry rot," and other fungi that cause white and brown wood rot, which may grow and destroy the structural wood of buildings.
<i>Bipolaris/ Dreschlera</i>			<i>Bipolaris</i> and <i>Dreschlera</i> are usually found associated with plant debris, and soil. They are plant pathogens of numerous plants, particularly grasses. <i>Bipolaris</i> and <i>Dreschlera</i> can grow indoors on a variety of substrates.
<i>Botrytis</i>			<i>Botrytis</i> is commonly found in tropical and temperate climates growing on vegetative matter. They may be found indoors in conjugation with indoor plants, fruits and vegetables.
<i>Chaetomium</i>			<i>Chaetomium</i> is often found on materials containing cellulose such as sheetrock paper, or other wet materials.
<i>Cladosporium</i>			<i>Cladosporium</i> is a common outdoor mold. They are commonly found on dead plants, food, textiles, and a variety of other surfaces. Indoors, they can grow on a variety of substrates including textiles, wood, moist windowsills, etc. It can grow at 0°C and is associated with refrigerated foods.
<i>Curvularia</i>			<i>Curvularia</i> is found on plant materials and is considered a saprobe. Indoors, they can grow on a variety of substrates.
<i>Epicoccum</i>			<i>Epicoccum</i> is a saprophyte and considered a weekly parasitic secondary invader of plants. They tend to colonize continuously damp materials such as damp wallboard and fabrics.
<i>Fusarium</i>			<i>Fusarium</i> requires very wet conditions and is frequently isolated from plants and grains. They colonize continuously damp materials such as damp wallboard and water reservoirs for humidifiers and drip pans.

<i>Memnoniella</i>			<i>Memnoniella</i> can be found growing on a variety of cellulose-containing materials.
<i>Nigrospora</i>			<i>Nigrospora</i> is especially abundant in warm climates and is rarely found growing indoors.
<i>Oidium/Peronospora</i>			<i>Oidium</i> and <i>Peronospora</i> are plant pathogens and are not found growing indoors.
<i>Penicillium/Aspergillus</i>			<i>Penicillium</i> and <i>Aspergillus</i> are ubiquitous in environment. <i>Aspergillus</i> tends to colonize continuously damp materials such as damp wallboard and fabrics. <i>Penicillium</i> is commonly found in house dusts, wallpaper, decaying fabrics, moist clipboards, etc.
<i>Pithomyces/Ulocladium</i>			<i>Pithomyces</i> is commonly found on grass and decaying plant material and are rarely found growing indoors. <i>Ulocladium</i> has a high water requirement and therefore colonizes continuously damp materials such as damp wallboard and fabrics.
Rusts			Rusts are plant pathogens and only grow on host plants.
Smuts/Periconial/Myxomycetes			Smuts and Myxomycetes are parasitic plant pathogens that require a living host. Smuts do not usually grow indoors. <i>Periconia</i> are rarely found growing indoors. Myxomycetes are occasionally found indoors, but rarely growing.
<i>Stachybotrys</i>			<i>Stachybotrys</i> are commonly found indoors on wet materials containing cellulose, such as wallboard, jute, wicker, straw baskets, and other paper materials.
<i>Stemphylium</i>			<i>Stemphylium</i> is either parasitic or saprophytic and is rarely found growing indoors.
<i>Torula</i>			<i>Torula</i> can grow indoors on cellulose containing materials such as wallboard, jute, wicker, straw baskets, and other paper materials.
Other brown/colorless			An uncharacteristic fungal spore that does not lend itself to classification via direct microscopy.



Potential Water Intrusion/Indicator Mold Capable of Mycotoxin Production



Potential Water Intrusion/Indicator Mold

Quality Programs

The EMLab P&K's laboratory network is staffed with highly trained analysts, the majority of which hold advanced degrees. The reliability of test results depends on many factors such as the personnel performing the tests, environmental conditions, selection and validation of test methods, equipment functioning, as well as the sampling, storage and handling of test items, all of which are a reflection of the overall quality system of the laboratory.

EMLab P&K has modeled its quality system after ISO 17025, General Requirements for the Competence of Testing and Calibration Laboratories, one of the most stringent sets of standards in the industry, to ensure that its customers receive the highest standard of accuracy, reliability, and impartiality that they have come to expect from the leader in the environmental industry. EMLab P&K's laboratories adherence to the standards set forth in ISO 17025 has been validated and formally recognized through accreditations granted by an independent outside agency, American Industrial Hygiene Association Laboratory Accreditation Program, LLC (AIHA-LAP, LLC), on a site by site basis. As an additional measure to demonstrate its competency to perform the analyses it offers to its clients, EMLab P&K laboratories

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also participate in a variety of different proficiency testing programs, including the Environmental Microbiology Proficiency Analytical Testing Program (EMPAT) sponsored by the American Industrial Hygiene Association Proficiency Analytical Testing Programs.

As part of our continuous commitment to excellence, EMLab P&K laboratories are also inspected, licensed and/or accredited by a number of governmental agencies and independent associations in addition to those already mentioned above. The scope of services, accreditation certificates, and proficiency results can all be accessed at www.emlabpk.com.

References

1. Bioaerosols: Assessment and Control. Janet Macher, Ed., American Conference of Government Industrial Hygienists, Cincinnati, OH (1999).
2. EPA: The Inside Story. A Guide to Indoor Air Quality, United States Environmental Protection Agency and the United States Consumer Product Safety Commission, Washington DC (1995).
3. Health Canada: Exposure Guidelines for Residential Indoor Air Quality. Environmental Health Directorate. Health Protection Branch, Health Canada, Ottawa, Ontario (1989).
4. IIRC: Standard and Reference Guide for Professional Water Damage Restoration, 2nd Ed. Institute of Inspection, Cleaning and Restoration, Vancouver, WA (1999).
5. Field Guide for the Determination of Biological Contaminants in Environmental Samples. American Industrial Hygiene Association, Fairfax, VA (1996).
6. Standards of Practice for the Assessment of Indoor Environmental Quality, Volume I: Mold Sampling, Assessment of Mold Contamination. Indoor Environmental Standards Organization (2002).

Client: Hill West Environmental, LLC
 C/O: Claude Dahlk
 Re: Centennial House; 176 Main Street Park City UT

Date of Sampling: 05-28-2025
 Date of Receipt: 05-30-2025
 Date of Report: 05-30-2025

MoldRANGE™, Local Climate; Extended Outdoor Comparison
Outdoor Location: 176-01, Outside

Fungi Identified	Outdoor data	Typical Outdoor Data for: May in Southwest† EMLab Regional Climate code¹						Typical Outdoor Data for: The entire year in Southwest† EMLab Regional Climate code¹					
		B Annual Temp, A Elev., A Rain, A Temp. Range (n‡=485)						B Annual Temp, A Elev., A Rain, A Temp. Range (n‡=5430)					
Project zip code 84098	spores/m3	very low	low	med	high	very high	freq %	very low	low	med	high	very high	freq %
Generally able to grow indoors*													
Alternaria	-	13	19	53	110	160	40	13	20	53	130	210	38
Bipolaris/Drechslera group	-	-	-	-	-	-	2	7	7	13	53	53	4
Chaetomium	-	8	13	13	13	48	6	7	7	13	13	27	4
Cladosporium	610	53	110	370	1,100	2,100	95	53	110	270	960	1,900	89
Curvularia	-	-	-	-	-	-	1	7	13	27	53	53	3
Nigrospora	-	-	-	-	-	-	2	7	13	27	53	53	3
Other brown	13	7	7	18	48	79	10	7	13	27	53	80	13
Penicillium/Aspergillus types	53	53	53	110	270	390	48	53	53	130	320	480	48
Stachybotrys	-	-	-	-	-	-	< 1	7	10	13	27	53	< 1
Torula	-	-	-	-	-	-	2	11	13	27	53	110	3
Ulocladium	-	-	-	-	-	-	< 1	7	7	13	27	40	1
Seldom found growing indoors**													
Ascospores	27	27	53	110	370	530	69	27	53	110	350	640	56
Basidiospores	53	53	53	200	480	790	84	53	53	210	640	1,300	72
Rusts	-	-	-	-	-	-	2	7	13	27	53	110	8
Smuts, Periconia, Myxomycetes	27	13	27	53	130	220	51	13	27	110	430	940	63
§ TOTAL SPORES/m3	790												

¹EMLab Regional Climate codes are a climate classification scheme for regional geographic areas containing multiple states. The MoldRANGE™ Local Climate report uses the sampling location zip code to identify the EMLab Regional Climate code in that area. Using information available from the NOAA weather database, the EMLab Regional Climate code sharpens the precision of the MoldRANGE™ reporting system, providing more reliable estimates of the range and average concentrations of the different airborne fungal spore types for each region. Additional information on the EMLab Regional Climate code system can be found on the last page of this report.

†The Typical Outdoor Data represents the typical outdoor spore levels across the region's group of states for the time period and EMLab Regional Climate code indicated. The last column represents the frequency of occurrence. The very low, low, med, high, and very high values represent the 10, 20, 50, 80, and 90 percentile values of the spore type when it is detected. For example, if the frequency of occurrence is 63% and the low value is 53, it would mean that the given spore type is detected 63% of the time and, when detected, 20% of the time it is present in levels above the detection limit and below 53 spores/m3. These values are updated periodically and if not enough data is available to make a statistically meaningful assessment, it is indicated with a dash.

‡ n is the sample size used to calculate the MoldRANGE™ Local Climate data summarized in the table.

* The spores in this category are generally capable of growing on wet building materials in addition to growing outdoors. Building related growth is dependent upon the fungal type, moisture level, type of material, and other factors. *Cladosporium* is one of the predominant spore types worldwide and is frequently present in high numbers. *Penicillium/Aspergillus* species colonize both outdoor and indoor wet surfaces rapidly and are very easily dispersed. Other genera are usually present in lesser numbers.

** These fungi are generally not found growing on wet building materials. For example, the rusts and smuts are obligate plant pathogens. However, in each group there are notable exceptions. For example, agents of wood decay are members of the basidiomycetes and high counts of a single morphological type of basidiospore on an inside sample should be considered significant.

§ Total Spores/m3 has been rounded to two significant figures to reflect analytical precision.

Client: Hill West Environmental, LLC

Date of Sampling: 05-28-2025

C/O: Claude Dahlk

Date of Receipt: 05-30-2025

Re: Centennial House; 176 Main Street Park City UT Date of Report: 05-30-2025

Understanding EMLab Regional Climate Codes

Outdoor airborne spore concentrations are strongly influenced by climate and weather patterns, often resulting in pronounced seasonal and diurnal cycles (Burge 1995). The seasonal climatic changes directly affect the growth cycle of plants, thereby influencing fungal growth, spore maturation, and release cycles. By evaluating outdoor spore concentrations across similar climatic zones rather than for the state as a whole, it is possible to provide a more representative estimate of typical outdoor spore levels and frequency of occurrence for different airborne fungal spore types in a given area.

The EMLab Regional Climate code system is a novel classification system that uses data from the NOAA - National Oceanic and Atmospheric Administration database to define unique climate zones. The following climate variables, for each regional zip code, are obtained from NOAA and assigned a letter code of A (above the regional average for that variable) or B (below the regional average for that variable):

1. Annual High Temperature
2. Elevation
3. Rainfall/Precipitation
4. Monthly Temperature Range

The result is a 4-character code assigned to each statewide zip code, referred to as the Regional Climate Code. Below are some examples of decoded Regional Climate Codes:

AAAA = Above avg. Annual High Temperature, Above avg. Elevation, Above avg. Rainfall/Precipitation, Above avg. Monthly Temperature Range

AABB = Above avg. Annual High Temperature, Above avg. Elevation, Below avg. Rainfall/Precipitation, Below avg. Monthly Temperature Range

BBA = Below avg. Annual High Temperature, Below avg. Elevation, Above avg. Rainfall/Precipitation, Above avg. Monthly Temperature Range

The actual outdoor air sample data from matching regional climate codes in each group of states are then compiled in a manner relating typical spore concentrations and frequency of occurrence.

The data presented in this report is from the Southwest Region which includes the states of: AZ, CO, NM, and UT

The NOAA regional climate variables were selected by mapping data points from a subset of approximately 145,000 weather and geographic database entries to over 80,000 outdoor spore trap samples with known zip codes and assessing them using orthogonal array experimental design techniques. The results were then compared to the typical ranges of spore types found when grouping zip codes using the Koppen-Geiger climatic classification system; a commonly used climatic system that provides an objective numerical definition in terms of climatic elements such as temperature, rainfall, and other seasonal characteristics. The EMLab Regional Climate codes showed improved granularity and refinement of the zip code groupings, implying a better representation of the expected range of spore types to be found within an individual zip code.

The values on this report were calculated by obtaining the four variables listed above from the over 585 million data points of weather and geographic information available in the NOAA database, and determining the frequencies and percentile values of spore types by utilizing over 180,000 Eurofins Built Environment Testing outdoor spore trap samples with known zip codes.

This report groups regional zip codes in relation to these EMLab Regional Climate codes and summarizes MoldRANGE™ data by month and year within each EMLab Regional Climate code.

References:

Burge, Harriet, A. Bioaerosols: Boca Raton: Lewis Publishers, pp. 163-171, 1995.

Interpretation of the data contained in this report is left to the client or the persons who conducted the field work. This report is provided for informational and comparative purposes only and should not be relied upon for any other purpose. "Typical outdoor data" are based on the results of the analysis of samples delivered to and analyzed by Eurofins Built Environment Testing and assumptions regarding the origins of those samples. Sampling techniques, contaminants infecting samples, unrepresentative samples and other similar or dissimilar factors may affect these results. In addition, Eurofins Built Environment Testing may not have received and tested a representative number of samples for every region or time period. Eurofins Built Environment Testing hereby disclaims any liability for any and all direct, indirect, punitive, incidental, special or consequential damages arising out of the use or interpretation of the data contained in, or any actions taken or omitted in reliance upon, this report.

Client: Hill West Environmental, LLC
C/O: Claude Dahlk
Re: Centennial House; 176 Main Street Park City UT

Date of Sampling: 05-28-2025
Date of Receipt: 05-30-2025
Date of Report: 05-30-2025

MoldRANGE™, Local Climate; Extended Outdoor Comparison

PROJECT ANALYST AND SIGNATORY REPORT

Project Analyst



Analyst: Fernando Fernandez

Approved 06.30.2025

The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by any agency of the federal government. The Company reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".



State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Kimberly D. Shelley
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

Utah Asbestos Certification



Claude Dahlk

ASB-0433

Inspector (Exp. 12/23/2025)

Project Designer (Exp. 12/27/2025)

Bryce C Bird
Director, Utah Division of Air Quality

January 9, 2025

DAQA-001-25

Claude W. Dahlk
Hill West Environmental, LLC
7963 Douglas Drive
Park City, UT 84098

Dear Mr. Dahlk:

Re: Utah Asbestos Program Individual Certification Card

The Utah Division of Air Quality (DAQ) has reviewed your Utah Asbestos Program Certification Application for Individuals and we are pleased to inform you that your application has been approved. Your new asbestos program individual certification card is enclosed with this letter and this card is the sole method of individual certification documentation that you will receive from the DAQ.

Please check the information on your asbestos program certification card carefully. Please confirm that the photograph, name, and certification discipline(s) are correct. Also, please remember to keep your current asbestos program certification card with you at all times when you are performing regulated asbestos work activities.

Please contact Barbara Perkins at (801) 536-0221 or at bperkins@utah.gov if you have any questions regarding this letter or the enclosed asbestos program certification card.

Sincerely,

Leonard Wright
Leonard Wright (Jan 8, 2025 14:05 MST)

Leonard Wright, Manager
Air Toxics, Lead-Based Paint, and Asbestos Section

LW:BP:lr

195 North 1950 West, 4th Floor • Salt Lake City, UT
Mailing Address: P.O. Box 144820 • Salt Lake City, UT 84114-4820
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Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

Utah Asbestos Certification



Dominic Hobbs

ASB-6840

Inspector (Exp. 12/11/2025)



Bryce C Bird
Director, Utah Division of Air Quality

January 2, 2025

DAQA-001-25

Dominic Hobbs
Hill West Environmental, LLC
7963 Douglas Drive
Park City, UT 84098

Dear Mr. Hobbs:

Re: Utah Asbestos Program Individual Certification Card

The Utah Division of Air Quality (DAQ) has reviewed your Utah Asbestos Program Certification Application for Individuals and we are pleased to inform you that your application has been approved. Your new asbestos program individual certification card is enclosed with this letter and this card is the sole method of individual certification documentation that you will receive from the DAQ.

Please check the information on your asbestos program certification card carefully. Please confirm that the photograph, name, and certification discipline(s) are correct. Also, please remember to keep your current asbestos program certification card with you at all times when you are performing regulated asbestos work activities.

Please contact Barbara Perkins at (801) 536-0221 or at bperkins@utah.gov if you have any questions regarding this letter or the enclosed asbestos program certification card.

Sincerely,

Leonard Wright

Leonard Wright (Dec 31, 2024 10:10 MST)

Leonard Wright, Manager
Air Toxics, Lead-Based Paint, and Asbestos Section

LW:BP:lr

195 North 1950 West, 4th Floor • Salt Lake City, UT
Mailing Address: P.O. Box 144820 • Salt Lake City, UT 84114-4820
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Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director



January 26, 2024

DAQA-003-24

Claude Dahlk
Hill West Environmental, LLC
7963 Douglas Drive
Park City, UT 84098

Dear Mr. Dahlk:

Re: Utah Asbestos Company Certification Card

The Utah Division of Air Quality (DAQ) has received your Certification Application for Asbestos Company and we are pleased to inform you that your application has been approved. Your new Asbestos company certification card is enclosed with this letter and this card is the sole method of Asbestos company certification documentation that you will receive from the DAQ. Please check the information on your asbestos company certification card carefully and please confirm that the company name and certification expiration date are correct.

Please be aware that your company is certified to perform asbestos projects in accordance with applicable state and federal rules and the use of Utah certified individuals is mandatory. Also, your certification may be revoked or suspended if the Utah certified individual or company are found to be in violation of the asbestos certification and work practices standards found in Utah Administrative Code R307-801 or the National Emission Standard for Asbestos found in Title 40 Code of Federal Regulations Part 61 Subpart M.

Please contact Barbara Perkins at (801) 536-0221 or at bperkins@utah.gov if you have any questions about this letter or the enclosed asbestos company certification card.

Sincerely,

Leonard Wright (Jan 25, 2024 09:38 MST)

Leonard Wright, Manager
Air Toxics, Lead-Based Paint, and Asbestos Section

LW:BP:lr



State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Kimberly D. Shelley
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director



March 16, 2021

DAQA-004-21

Claude W. Dahlk
Hill West Environmental, LLC
7963 Douglas Drive
Park City, UT 84098

Dear Mr. Dahlk:

Re: Utah Lead-Based Paint Firm Certification Card

The Utah Division of Air Quality (DAQ) has received your Lead-Based Paint (LBP) Certification Application for Firms and we are pleased to inform you that your application has been approved. Your new LBP firm certification card is enclosed with this letter and this card is the sole method of LBP firm certification documentation that you will receive from the DAQ. Please check the information on your LBP firm certification card carefully and please confirm that the LBP firm name and certification expiration date are correct.

Please be aware that your LBP firm is certified to perform regulated LBP projects in accordance with applicable state administrative rules and federal regulations and the use of Utah certified individuals is mandatory. Also, your LBP firm certification may be revoked or suspended if the Utah certified individual or LBP firm are found to be in violation of the LBP certification and work practice standards found in Utah Administrative Code R307-841 and R307-842 or the federal LBP regulations found in Title 40 Code of Federal Regulations Part 745.

Please contact Tamie Call at (385) 227-1055 or at twcall@utah.gov if you have any questions regarding this letter or the enclosed LBP firm certification card.

Sincerely,

Leonard Wright (Apr 5, 2021 12:56 MDT)

Leonard Wright, Manager
Air Toxics, Lead-Based Paint, and Asbestos Section

LW:TC:lr

Appendix F
Project Limitations

Approved 06.30.2025

Project Limitations

This Project was performed using, a minimum, and practices consistent with standards acceptable within the industry at this time, and a level of diligence typically exercised by EH&S consultants performing similar services.

The procedures used attempt to establish a balance between the competing goals of limiting investigative and reporting costs and time, and reducing the uncertainty about unknown conditions. Therefore, because the findings of this report were derived from the scope, costs, time and other limitations, the conclusions should not be construed as a guarantee that all universal, toxic and/or hazardous wastes have been identified and fully evaluated. Furthermore, Hill West Environmental assumes no responsibility for omissions or errors resulting from inaccurate information, or data, provided by sources outside of Hill West Environmental or from omissions or errors in public records.

It is emphasized that the final decision on how much risk to accept always remains with the client since Hill West Environmental is not in a position to fully understand all of the client's needs. Clients with a greater aversion to risk may want to take additional actions while others, with less aversion to risk, may want to take no further action.

Approved 06.25.2019

From: public_comments <Public_Comments@parkcity.org>
Sent: Wednesday, June 4, 2025 6:09 PM
To: randylscott513@gmail.com; Lola Beatlebrox; John Hutchings; Douglas Stephens; Katie Noble; Puggy Holmgren; dagackle@gmail.com
Cc: Mark Harrington; Rebecca Ward; Meredith Covey
Subject: FW: [External] Public Comment Submission

From: No Reply <noreply@civicplus.com>
Sent: Wednesday, June 4, 2025 5:13 PM
To: public_comments <Public_Comments@parkcity.org>
Subject: [External] Public Comment Submission

Warning: Replies to this message will go to 010f01973d37dc57-70b5527c-a4ce-488e-b8f9-ab5891dac483-000000@us-east-2.amazonaws.com. If you are unsure this is correct please contact the helpdesk.

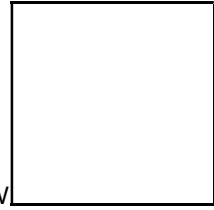
[CAUTION] This is an external email.

Submitted by: Rich Wyman
Email Address: richwyman1@gmail.com

Commented on event: <https://parkcityut.portal.civicclerk.com/event/2493/overview>
If you are having trouble viewing the URL above, cut and paste the string into your browser window.

User comment: Good evening, Chair and Board Members, My name is Rich Wyman, I am a long-time Park City resident and advocate for historic preservation. I'm here tonight to strongly oppose the proposed deconstruction of the Centennial House at 176 Main Street. This building, dating back to around 1901 and listed on the National Register of Historic Places, is a rare and irreplaceable piece of our mining-era heritage. It has stood as a testament to our city's history for over a century. I understand that the building has suffered significant deterioration, including damage from the 2003 Poison Creek flood, and has been condemned since 2007. The staff report notes issues such as structural distress, black mold, and animal infestations. However, the proposed plan to deconstruct and reconstruct the building, even with the intention of using as many historic materials as possible, raises serious concerns. Deconstruction, in this context, effectively amounts to demolition. While the architect has revised the design to reflect the home's early 1900s appearance, the essence of the original structure would be lost. The building's authenticity and historical integrity cannot be replicated through reconstruction. There are alternative approaches that should be considered: 1. Stabilization and Preservation In Place: Strengthen the existing structure without dismantling it, as has been successfully done with other historic buildings. 2. Careful Restoration: Repair and restore the original materials where possible, maintaining the building's integrity. 3. Adaptive Reuse: Integrate the building into a new use without sacrificing its historic character. For example, the ground floor of the Centennial House could be converted into a small commercial space—like a cafe, while the second floor could be adapted for residential use. This kind of thoughtful reuse keeps the building functional, relevant, and alive—without erasing its past. The Historic Preservation Board exists to protect Park City's history, not to approve the removal of historic buildings under different terminology. Approving this proposal could set a dangerous precedent for how we treat our most valuable historic assets. The Centennial House has survived for over a century. Let's not be the generation that allows it to disappear. Please

vote to reject this deconstruction proposal and continue your important work preserving the irreplaceable. Thank you. P.S.



Please don't forget The lamp, Blue and white colors, and "The Centennial" sign. Thank you. RW

Approved 06.30.2025