

# Staff Report

**Date:** October 24, 2023  
**To:** **Devens Enterprise Commission**  
**From:** Neil Angus, DEC Director  
**RE:** **34 Walnut Request for Certificate of Hardship for Roof Replacement - Update**

Since the last meeting, DEC Staff have met with our Historic Peer Review Consultant, Counsel, and MassHistoric (MHC) to review potential roofing options for the existing ranch homes along Walnut. Our Historic Consultant researched alternative options and reached out to a number of historic experts for alternative roof treatments for tar and gravel roofs in a Historic District. An alternative that came up was rolled asphalt roofing:



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**Residential Roll Roofing**

**Self-Adhered** -



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BASE/PLY SHEET**

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Self-adhering granule-surfaced roofing  
membrane.

GAF is the largest roofing product manufacturer in North America and most, if not all roofing companies carry or install their product. Staff reviewed this product with MHC and our Historic Peer Review Consultant. The building elements, including the roof materials, contribute to the uniformity of Fort Devens as a historic planned development. MHC has agreed that a rolled asphalt shingle roof product would be an acceptable alternative roofing option to the existing tar and gravel roof, as well as the previously approved EPDM rubber roof alternative roof treatment previously approved by MHC. While asphalt is a lower quality material than rubber, the increased width of the rolled asphalt roofing product is more appropriate for these lower-pitch roofs than three-tab shingles – helping to maintain the flatter appearance (lower profile). The product also has less seams/overlaps, which helps reduce potential for ice and water damage. The “slate” or “weathered wood” color would more closely match the original tar and gravel roof color.



*Photo: example of rolled asphalt roofing on a low-pitch roof vs traditional asphalt shingles*

Staff reviewed the rolled asphalt roof option with the DEC Building Commissioner and he was familiar with the product and said as long as it is installed to the manufacturers specification, it would be suitable for these low-sloped roofs. Staff also reached out to local roofing companies to see if the product was available and used in this region (and that they had experience installing). The product website lists a number of local roofing contractors that have experience installing this product.

**Summary/Recommended Action:**

In discussions with MHC, if the Applicant re-submits their request to MassHistoric with this product and specifies the appropriate color, MHC has indicated they would be able to make a finding of no adverse impact which would in-turn avoid the need for any Certificate of Hardship and allow the Applicant to simply apply for a building permit for the roof replacement. This rolled asphalt roofing would then become an alternative roofing option for all ranches, in addition to the EPDM rubber roof.