circulated a request for proposals to historic preservation planning consultants throughout the Midwest in June 1990. Proposals were received from 17 firms, and, in February 1991, interviews were conducted with three finalist firms by members of an ad hoc committee consisting of the chairperson of the historic preservation commission, two additional commissioners, a representative of the University of Iowa, the city's neighborhood services coordinator, and the city's historic preservation planner. A consultant was selected and a contract between the city and the consultant was approved by the state historical society in June 1991.

Personal interviews with individuals active in early preservation activities and urban renewal comprised the basis for research concerning the history of the local historic preservation movement. To give the consulting team and the city a broad context on the historic preservation movement in Iowa City, other material was also reviewed. The material included city records and historical survey files, historic preservation commission minutes, comprehensive planning publications, newspaper clippings, urban renewal publications, the records of Project: GREEN and Friends of Old Brick (local preservation organizations), and historical survey work and copies of nominations to the National Register of Historic Places from Iowa's Bureau of Historic Preservation. A chronology of past local historic preservation activities and events was prepared for review by the preservation commission and was later included in the appendix to the preservation plan.

During the same period, documentary research on Iowa City's history was begun for use in establishing a framework for future nominations to the National Register and as an important feature of the preservation plan. Material was gathered on historical themes, such as settlement patterns and ethnic groups, government and politics, local industry and commerce, the University of Iowa, transportation systems, and social movements. Additional information about existing historic districts and other previously surveyed neighborhoods was also collected and reviewed.

In August 1991, a questionnaire was prepared and distributed to single-family, two-family, and three-family residences in Iowa City's older neighborhoods. Reportedly, nearly 1,800 surveys were distributed with an overall response rate of 39 percent. Response rates in individual neighborhoods ranged from approximately 29 percent to 62 percent. The questionnaire contained nearly 100 questions concerning demographics, community resources, problems in neighborhoods, and opinions about the work of the historic preservation commission.

The strategic planning process began with a plenary session in September 1991. The strategic planning process, like the questionnaire, was designed to gather opinions about the community and to provide a forum for the interchange of concerns and ideas for the purposes of developing a comprehensive and practical plan to guide future historic preservation activities in the community. During the following two months, planning sessions were held on the subjects of residential neighborhoods, municipal preservation legislation, economic incentives, and Iowa City's downtown.

Following these sessions, the consultant team prepared a draft historic preservation plan. During the strategic planning process, the consultants conducted personal and telephone interviews with many community stakeholders, including historic preservation activists, members of private preservation groups, downtown business owners, individual property owners, bankers, tourism representatives, real estate professionals and developers, University of Iowa representatives, members of the historic preservation commission, and city staff and elected officials. The purpose of the interviews was to identify major preservation problems and opportunities, and to assess the potential for succeeding with various types of proposals.

In March 1992, a plenary session was held to obtain input on the draft plan. After additional review by the historic preservation commission, portions of the preservation plan were redrafted and refined. The final draft of the plan was submitted to the Iowa Historic Preservation Bureau and the Iowa State National Register Nominations Review Committee for review and comment.

Information obtained from the questionnaires, strategic planning sessions, personal interviews, and planning research related to specific issues was evaluated by the consultants. An overall mission statement was developed along with short- and long-term goals (see Appendix D.) Objectives were identified to accomplish each goal. An overall work plan form identifying the individual, organization, or governmental agency responsible for carrying out the objective was developed. In addition, the goals and objectives were prioritized within the overall work plan, divided into measurable tasks, and given a recommended time line for completion.

The final step in the strategic planning process was adoption of the plan. Public hearings on the plan were held by the historic preservation commission. Revisions proposed by the commission were incorporated into the final draft prior to submission to the Iowa City City Council. Subsequently, the city council held public hearings and adopted the preservation plan. The historic preservation planning process was successful in Iowa City because of the extensive strategic planning process that was designed to include as many of the city's stakeholders as possible. This process provided the foundation for consensus that resulted in adoption of the plan.

PRESERVATION AND ZONING: ROANOKE, DENVER, AND ELSAH

In recent years, the preservation community has come to realize the close relationship between zoning and historic preservation. A community can have a strong historic preservation ordinance, but if the zoning code allows high-density development in lower-density historic districts or low density in higher-density historic districts, or does not allow flexibility in the types of uses to which historic structures can be put, the economic marketplace will create threats to historic resources that can overpower all but the strongest preservation protections.
In response, more and more cities and towns are adjusting their zoning codes to ensure compatibility with historic preservation planning objectives. This is focused on a few historic districts, typically in or near a major downtown, and one or two zoning classifications. However, even some midsize cities, such as Roanoke, Virginia, and even small towns, such as Elsah, Illinois, have come to understand the important connection between planning, zoning, and historic preservation.

The Roanoke Vision

Roanoke, Virginia, is a city of more than 100,000 people located in the Blue Ridge Mountains of western Virginia, and part of a metropolitan area of almost a quarter-million inhabitants. Founded as a railroad town in the 1880s, Roanoke experienced a number of booms during its first century that resulted in a fine stock of historic residential, commercial, and even industrial structures.

A period of center-city decline in the first three decades following World War II was followed by a period of downtown revitalization beginning in the mid-1970s. Renovation and reuse of historic structures played a key role in Roanoke’s downtown renewal. A downtown overlay historic district was adopted to protect the historic City Market and Warehouse districts. The city came slowly to realize that the following was true:

Even with new zoning rules, historic buildings in Roanoke are vulnerable to economic pressure. These Campbell Avenue buildings (right) had to be acquired by the city in 1988 to prevent them from being demolished to make way for surface parking.
engaged in a comprehensive year-long process, called Roanoke Vision, to identify and deal with those conflicts between zoning and preservation. And when they looked at their existing ordinance, they found a host of problems including the following:

- Incompatible office, commercial, or industrial uses allowed in residential neighborhoods
- Increased allowable residential densities in older historic neighborhoods
- Minimum lot-size provisions larger than actual lot sizes in historic neighborhoods created many nonconforming, vacant lots, too small to be developed without applying for a zoning variance
- Multifamily densities so generous that they encourage demolition of historic structures for redevelopment of new medium- and high-density residential projects
- Transition zoning allowing encroachment of “inappropriately scaled multifamily and commercial uses in established residential areas”
  An overly broad list of allowable uses and no design provisions to ensure that potentially incompatible uses could be reconciled

There were a number of regulatory and administrative problems as well:

- A lack of flexible provisions for developing new “infill” housing on vacant lots
- A lack of innovative preservation techniques, such as allowing additional or specialty uses, including “bed and breakfast” accommodations, art studios and professional occupations in historic structures to make their restoration and reuse more economically feasible;
- A lack of appropriate design guidelines and site development controls to encourage quality rehabilitation and compatible new construction worthy of preservation in the future
- A lack of effective procedures to discourage demolition of significant structures.

When the process of revising the zoning ordinance was completed, there were 18 districts. Several new districts were established specifically to achieve neighborhood preservation and conservation objectives. Residential zoning district changes included the following:

- Reduction of minimum lot sizes in two new single-family residential districts
- Broadening the duplex multifamily zone to make townhomes more feasible
- Creation of new RM-2 zoning district with a density of 17 dwelling units per acre, corresponding to the historic development pattern in some neighborhoods, substantially lower than in the two previous multifamily districts (24 dwelling units and 43 dwelling units per acre)

Allowable new uses (e.g., day care) and accessory apartments by right in some residential districts

A variety of community service facilities allowed by special exception in some districts

The existing historic overlay districts were designated as H-1 Historic Districts, and a new H-2 Neighborhood Preservation District classification was created. Demolition and alteration controls are not as stringent in the H-2 district as in the H-1 district:

- The H-2 District is designed to encourage the conservation and revitalization of older neighborhoods through the use of a flexible overlay zone which includes design guidelines to protect the neighborhood context (scale, setback, height) but does not impose the same level of design review as the more detailed H-1 district. This district is intended to guide both the private maintenance and investment of homeowners and the public/nonprofit rehabilitation of residential and commercial structures in older neighborhoods, many of which are primarily low and moderate income areas. The Architectural Review Board will review new construction, reconstruction, additions or deletions of floor area and demolitions in the H-2 Districts and can provide design assistance to applicants. The district’s provisions, however, do not impose overly strict requirements on the homeowners for routine maintenance or minor changes such as window or roof repairs. The emphasis is on conserving the neighborhood context rather than regulating all design details.

To ensure that there are a variety of possible uses that can be put in historic buildings in the H-2 zone, alternative uses, such as bed and breakfast accommodations, art galleries, and other specialty uses, are allowed.
Commercial zoning categories were also changed to enhance conservation of historic and architecturally interesting neighborhoods. A CN Neighborhood Commercial District designation was created to allow:

...neighborhood-oriented retail and service uses. It is designed to support surrounding residential areas and will have a direct preservation intent when it is mapped in existing neighborhood commercial centers. The revised regulations encourage the scale and orientation of the older, successful commercial centers in many neighborhoods.

Substantial revisions were made to the C-1 Office District, a classification formerly “applied to many older, stately residential areas as a means of shifting from residential to commercial use.” Among the changes are the following:

...the proposed new requirements are designed to make the commercial uses more compatible with their residential context. The new focus is also on preserving the remaining residential uses in these areas. At the same time, the proposed ordinance very carefully expands the kinds of commercial or office uses allowed to make the preservation of the significant historic structures located in these areas more economically feasible. The C-1 District includes a floor area ratio (FAR), yard requirement and lot coverage which approximate the RM-2 [a new medium-density multifamily district] residential district. Even though the allowed commercial uses are ones which are compatible with residential areas, separation between commercial and residential uses is required through landscaping or other buffers. Parking must also be carefully screened.

Changes were also made to the existing industrial zoning standards to encourage preservation of the oldest industrial areas of the city. Heightened scrutiny of design and landscaping in both the LM Light Manufacturing and the HM Heavy Manufacturing Districts was intended to make industrial uses be better neighbors. The new standards included criteria for minimum lot sizes, site coverage, setbacks, landscaping, and buffering.

Lower Downtown Denver: TDRs, Historic Preservation, and Zoning

Perhaps no city in the country has been as innovative as Denver in trying to create zoning incentives to encourage preservation and reuse of historic buildings. The 1986 Denver Comprehensive Plan recognizes the importance of “overzoning” as a threat to Denver’s historic resources:

When the uses, densities and heights allowed by the zone district are significantly greater in range and magnitude than those which actually exist in a neighborhood, it is overzoned. Overzoning encourages speculation which creates psychological and economic barriers to preservation. With their proximity to the city core, the vast majority of Denver’s historical and architecturally important areas are located in its most intensely zoned areas.
Long before adoption of the 1986 comprehensive plan, Denver had considerable success with downzoning and zoning incentives:

The use of downzoning as a preservation tool has succeeded in a few neighborhoods, such as Curtis Park, City Park South, West University, and Capitol Hill, though only after a great deal of effort. Historic districts and landmark designation have been used to alleviate the impacts of overzoning, balancing development pressures in those areas where downzoning is not appropriate or feasible.

In 1973, the Denver Zoning Ordinance was amended to provide “use exceptions” for locally designated historic structures in a few specific residential districts. The Zoning Board of Adjustment may grant a permit to allow office use or gallery use in historic structures in these residential districts. Office is defined as “any office in which chattels or goods, wares or merchandise are not commercially created, displayed, exchanged or sold.” A gallery is defined as a “fine arts gallery in which are displayed and sold individual works of art.”

To minimize the impact of the office or gallery use on the residential character of the districts, strict occupancy limits, sign restrictions, and off-street parking requirements were imposed. In the R-3 district, the number of persons residing and/or working in the structure is limited to one person for each 300 square feet of gross floor area. No structure can have more than two wall signs of no more than one square foot each. Signs cannot be illuminated or animated. One off-street parking space for each 600 square feet of gross floor area is required, but the Zoning Board of Adjustment can waive the requirement.

The use exception provisions for historic structures encouraged the renovation of a number of historic buildings, especially in the Capitol Hill residential area of Denver.

Despite past successes, the 1986 Comprehensive Plan recommends additional revisions to the zoning code to encourage even more zoning incentives for historic preservation:

UDA-A-57. Revise the Zoning Code to:
require the consideration of compatibility between new and existing development as a criterion in development review and special exceptions brought before the Board of Adjustment;
adopt criteria for use exceptions that protect historic features and areas;
provide for transitional bulk, height and scale requirements around low-scale historic commercial and residential areas;
provide for improved design standards and site development review for new commercial, industrial and higher density residential developments in historic areas.

The recommendations will be implemented in zoning ordinance revisions currently being considered by the City of Denver.

Denver is best known, however, for its innovative efforts to preserve historic buildings in its downtown B-5 commercial district and its Lower Downtown B-7 warehouse district. The principal tool in both districts has been transfer of development rights (TDRs).

Construction of Denver’s 16th Street mall in the early 1980s combined with the oil exploration boom in the Rocky Mountain states put severe pressure on downtown Denver’s historic landmarks. Owner consent to landmark designation has long been a fixture of Denver’s historic preservation program. Denver preservationists and development interests joined in an unofficial effort to find an incentive that might make historic designation more palatable to downtown property owners. With the help of a Critical Issues Fund grant from the National Trust for Historic Preservation, a collaborative planning process was undertaken.

The result was enactment of a TDR program for locally designated historic structures in Denver’s downtown. The B-5 TDR district covers 40 square blocks of downtown Denver. A second TDR district was later created in the 23-square-block B-7 warehouse district in Denver’s Lower Downtown area adjacent to the historic Union Station.

The TDR provisions in both districts share the following features:

Only landmark buildings individually designated by the Denver Landmark Commission are qualified sending sites.
Before it is eligible to sell development rights, the sending building must be rehabilitated to the standards of the Denver Landmarks Commission.
Transfers may occur only within each zone.
The TDR amount that can be transferred from a site is calculated by deducting the density of the landmark from the base FAR allowed.
The receiving site cannot increase its density more than 2.5:1 FAR beyond the base zoning.
In order to limit the burden of paperwork on the city,
the landmark structure can make no more than four transfers.

Once density is transferred, future development on the sending site is permanently reduced by the number of TDRs sold. In the event the building is destroyed by fire or other casualty, the FAR of any new project would be limited to the density allowance after the transfer. There is no requirement to impose an easement on the sending site ensuring the preservation of the historic building. The committee that drafted the ordinance felt that such a provision would be politically unacceptable and might threaten potential income tax benefits to donors of preservation easements.¹

The TDR provisions for historic landmarks in the B-7 warehouse district were linked with another planning goal for that area—fostering residential development in this former industrial neighborhood near the train station—and with other zoning incentives designed to encourage renovation rather than demolition of the district's historic warehouse buildings. To encourage historic preservation, the following were added to the zoning scheme for Lower Downtown:

A waiver/reduction of the on-site parking requirement when historic structures are renovated for residential use—the historic warehouses in the neighborhood typically were built from lot line to lot line.

Zoning incentives to encourage new buildings to be built out to the front lot line (matching the typical pattern for historic buildings) and to encourage step-backs of the building facade elevation line between the second and sixth floor (again to match the smaller scale of the existing historic buildings).

An additional TDR transfer (over and above the one available simply for historic structures) equal to one square foot of transferable density for every square foot of residential floor area provided in historic buildings.

Elsah, Illinois: Historical Significance of Past Zoning Patterns in a Small Town

Elsah, Illinois, is a village of approximately 200 residents nestled between the limestone bluffs in a narrow valley along the Mississippi River nearly 40 miles north of St. Louis. Settlement began in the 1840s; construction of a flour mill, warehouse, and school were begun in 1857. In 1873, Elsah was incorporated. Elsah currently has more than 25 pre-Civil War structures and approximately 20 structures constructed between 1865 and 1900. Long a well-kept secret, the village has been discovered in recent years and first-time visitors are struck by its New England rural village character. Because of this unique character and the large number of buildings still in existence from Elsah’s early development, visitors often treat the village and its buildings as a living history museum. It is not unusual for residents to find tourists walking through their backyards looking at the architecture; some have even returned from errands to find tourists in their homes. The visitors are surprised to learn that the houses are occupied.

As tourism has grown in the village, so too have tourist services, such as restaurants and bed and breakfasts. One rave review in a St. Louis newspaper for a new restaurant can cause traffic snarls the next weekend in Elsah. With these businesses and the influx of tourists in general, local residents encountered the problems that plague many successful communities—lack of parking, too much traffic (particularly on weekends), a mix of uses that may not enhance a predominantly residential area, and the need for compatible new construction in an area of excellent historic resources.

Elsah’s growth potential is limited by its geography. Its narrow valley offers no place for the community to expand. Streets are narrow, and parking is limited. Residents and community leaders recognized that many important issues needed to be addressed. But the community already had a zoning ordinance and a historic preservation ordinance—What more was there to do?
A crisis precipitated community action. A St. Louis couple bought one of the few vacant lots in town and constructed a bed and breakfast in a design motif that echoed the historic architectural character of the community. Some residents, however, did not think the structure fit in well at all. When the owners applied for permits to expand and another St. Louis resident bought one of the other vacant lots in the small commercial portion of the town (rumors were that he too planned to build a bed and breakfast), many in town began to carefully read the zoning ordinance and historic preservation laws. They found alarming loopholes that made it difficult to control these new uses.

A task force was established to address the variety of land-use and planning issues that had suddenly emerged. Planning professionals were retained and work began on putting together a plan for the preservation of the community. This was not going to be the traditional preservation plan; the preservation plan would be part of the zoning ordinance and the historic preservation ordinance.

A series of individual interviews and group meetings were held by the planning professionals to find out what the residents perceived to be the zoning, planning, and
historic preservation problems facing the community. From these interviews, the task force and consultant learned the following:

- Traffic is of four types: residents, tourists, local college, and restaurant customers. Many residents pointed out that vehicular traffic peaked on weekends from late March to late October.
- Many residents must use on-street parking because they lack garages and driveways. Those residents living along the boundaries of the commercial district have the most difficult time finding on-street parking. The residents on-street parking needs and a local restaurant contributed to most of the congestion and parking problems in the village.
- Residents expressed interest in having a varying degree of control over new construction in the village. Many wanted the design of new construction to be not only sympathetic to the surrounding structures but to be replicas of buildings that no longer existed in the village.
- Signage, lighting, and uses were also identified as community concerns.
- Residents were concerned about expansion of the business district beyond its traditional historic boundaries.
- Some owners of historic structures wanted the opportunity to put professional businesses in historic structures, especially barns and coach houses.

To address these and other issues, the historic development of Elsah was compared to the existing zoning pattern. Based on a survey of historic resources and other information provided by the village, it was found that the zoning pattern was not in keeping with the original development pattern of the community. Traditionally, all commercial development in the village occurred along the east side of one of the two major streets running through the village. All other areas of the village were developed for residential or public use. The zoning ordinance and map did not reflect the historical development pattern. The zoning ordinance included only four types of districts—three residential zones and one business district. The business district extended well beyond the traditional and historical business district identified in the research.

Recommendations for addressing the issues of concern to the residents were guided by four objectives and principles:

- The historic character of the village is as much evidenced in the historic pattern of residential and commercial development as it is in the buildings and landscapes of the village.
- Zoning classifications and the zoning map should reflect the historic development pattern of Elsah as much as possible.
- Long-established uses different from the original or historic use of a property or lot should be respected but not necessarily recognized as part of commercial zoning districts if that would violate land-use planning objectives.
- Future development of currently vacant lots should reflect previous historic uses of those lots, and new buildings constructed on such lots should be in keeping with the historic character of the previous buildings or structures as much as possible.

Changes to the zoning ordinance and the historic preservation ordinance were consistent with the above objectives and principles and helped to create, in the aggregate, a historic preservation plan. Some of the work that is required for a successful historic preservation plan, such as a survey of historic resources, had been previously completed. The zoning ordinance was amended to reflect historic development patterns and uses. The business district was scaled back to two small nodes, each with a separate list of commercial uses. In addition, the “whereas” clauses of the zoning ordinance were rewritten to reflect Elsah’s historic and architectural importance, its importance as a tourist site, its economic development potential, and the recognition that the community was in need of special protection. The zoning ordinance was amended to include standards that reflected the historic character of the village for approvals of variations and special uses. Other changes to the zoning ordinance included:

- Making home occupations in some residential districts a special use requiring a hearing before the zoning board for approval
- Defining terms such as “restaurant,” “bed and breakfast,” and “historic inn.”
- Creating a cultural and public use zoning category
- Developing new criteria, including consideration of historic character and historic development patterns for review of variation requests
- Requiring that new construction be compatible with existing historic structures

In addition to amendments to the zoning ordinance, the historic preservation ordinance was amended to add a purpose section, specific definitions of key terms, process and criteria for review of changes to structures, criteria for review of new construction, sign review provisions, and an economic hardship provision. The addition of a purpose section to the ordinance also helped define the preservation plan for the village:

The purpose of this ordinance is to promote the educational, cultural, economic and general welfare of the community as follows:

a. To provide a mechanism to identify and preserve the distinctive historic, architectural, and/or landscaping characteristics of Elsah which represent elements of the Village’s cultural, social, economic, political, and architectural history and character;

b. To balance and improve the interests of commercial business and homeowners by assuring that alteration of any improvements is performed in a manner that is consistent with the Village’s historic
and architectural character, and to protect past and future investments by businessmen and property owners;

c. To stabilize and improve property values within Historic Elsah;

d. To create an atmosphere and character consistent with the historic development of the Village;

e. To foster civic understanding and pride in Elsah's history and architecture;

f. To foster and encourage preservation, restoration, and rehabilitation.

LAWRENCE, KANSAS: DOWNTOWN PLANNING TO DIRECT DEVELOPMENT

Lawrence, Kansas, revised its comprehensive downtown plan in 1984. The development plan enacted pursuant to state law included as a policy “to support the central business district of Lawrence as the region’s only retail center.” The plan identified the following opportunities, among others:

1. The historic legacy of Downtown and adjacent neighborhoods as the focal point of community vitality is fundamentally sound and continuous.

2. Plan ‘95 clearly establishes city policy directed toward maintaining Downtown as “the primary commercial center” in the Lawrence area.

3. It is estimated that 544,000 square feet of retail space can be added to the Lawrence area by 1995; 381,164 square feet of which could be located Downtown. It is anticipated that at least one department store, new to the city, can be supported, as well as the expansion (or reconstruction) of two existing department stores.

4. The established rectangular form of the business district, approximately 3,300 x 1,300 feet, and the type and conditions of land use provide an excellent physical and functional framework for future development.

5. The environmental character and retail continuity of Massachusetts Street merit conservation and support.

As a result of the downtown plan’s policies and objectives, the downtown improvement committee recommended denial of the developer’s rezoning application. Based on this recommendation and the potential negative effect on the downtown retail area, the planning commission issued a report opposing the rezoning applications. Subsequently, it voted unanimously to recommend denial of the applications to the city commission.

The proposed developers of the regional mall challenged the city’s decision, alleging the denial of due process and a taking. The city was successful in defending the challenge because the court concluded, among other things, that “retaining the vitality of the downtown area was a legitimate interest of the city commission.”

The importance of the downtown plan in this decision cannot be understated. The court reviewed the policies enunciated in the plan and concluded that they furthered a legitimate government interest. The downtown plan clearly detailed the direction of the city with regards to retail development—preservation of the downtown retail core. As evidenced by the court’s decision, limiting retail development outside of this core was a reasonable means to achieve the goal.

IMPLEMENTING THE HISTORIC PRESERVATION PLAN

Preparing a historic preservation plan is relatively simple, once the appropriate components are recognized and the planning process is started. Ensuring effective implementation of the plan, once adopted, is a more difficult challenge.

The process for preparation and adoption of the preservation plan is nearly as important as the plan itself in ensuring successful implementation of the plan and its ongoing use. For example, Iowa City, Iowa, undertook an 18-month planning process for drafting and adoption of its historic preservation plan. (Refer to case study above.) The process began with a comprehensive survey of the community’s historic resources and a series of public meetings. The early public meetings were designed to identify the issues relating to historic preservation that were important to the community and raise the level of knowledge of the participants about the community’s historic resources. With this information, the drafting of the preservation plan began. It involved lengthy review by the public, city staff, and elected officials. Throughout this process, meetings were held with local business owners, bankers, retailers, neighborhood representatives, and university officials to discuss the impact of the plan and historic preservation, in general, on the interests they represented. By the time the final draft of the preservation plan was presented to the city council, any opposition had been effectively addressed. In addition, the results of the public process indicated to the elected officials that historic preservation was an important issue to the community that needed to be addressed through adoption of the plan.

Preservation plans, not unlike preservation ordinances, are often drafted in response to the loss or potential loss of an important historic resource; that is,
in reaction to a preservation crisis. For example, the University of Illinois agreed to prepare a preservation plan for its Champaign campus as mitigation for demolition of some historic buildings. In other communities, local nonprofit groups and residents have been successful in convincing local government representatives that a preservation plan is a proactive way to deal with conflicting governmental policies regarding development. In both of these cases, implementation of the plan is expected from the beginning of the process, and local stakeholders will be more willing to participate in a process that will result in action rather than a lengthy desktop tome.

In any case, successful implementation of a preservation plan will depend on a great deal on the planning process. Local stakeholders must be brought into the process early on and their concerns must be addressed. In addition, those running the planning process must look at this as an educational process for the community. What are historic and architectural resources? Which structures, sites, and landscapes in the community are important resources? Why are these resources important? What techniques can be used to preserve and protect the resources? And what are the benefits to the private owners and the community? All of these questions must be answered.

Robert Stipe, Emeritus Professor of Design at North Carolina State University, identifies nine steps to effective implementation of a preservation plan after its preparation:

1) Make sure that the plan is officially adopted by resolution or ordinance of the local governing body, and specify that, in the event of a conflict between the preservation plan and other elements or ordinances, the preservation plan takes precedence.

2) Follow adoption of the plan with an Executive Order of the mayor or city manager requiring each city department and agency “to give special attention to the needs of any historic resource under its jurisdiction.”

3) Make sure that the resolution adopting the plan states that all public projects undertaken by federal, state, or local government bodies that might adversely affect historic resources will be subject to review and comment by an appropriate entity, such as the local preservation commission.

4) Ensure that the planning agency systematically considers the possible adverse impact on historic resources of all private projects reviewed by it for zoning approvals.

5) Work to include capital appropriations in the annual local government budget for the preservation incentives or programs specified in the preservation plan, effectively ensuring that “preservation projects become part of the long-term capital budget.”

6) Work to include annual maintenance appropriations in the annual local government budget for significant public and private historic resources, including such basic items as street paving in historic districts, to improve the general quality of life in historic districts and neighborhoods, again effectively ensuring that specific recommendations in the preservation plan will be implemented.

7) Be certain that money is budgeted for public purchase of those historic resources that cannot be saved by private efforts alone.

8) Make sure that the preservation ordinance is effectively enforced but try to go beyond the mere review of actions directly affecting historic resources. Work preservation review into such activities as “area zoning (intensity, use, off-street parking, etc.); health and sanitation; building construction and housing maintenance; the maintenance of vacant lots; the care and maintenance of trees; undesirable land uses; earth moving and disturbance; and other activities directly affecting the quality of life in every neighborhood.”

9) Be certain that the city gives special attention to areas and neighborhoods not yet qualifying as “historic” but which someday might be so considered.

Some entity must have the mandate to accomplish the plan’s objectives and to ensure compliance with the preservation plan. The most effective way to implement the preservation plan is to make sure that both the local preservation ordinance and the preservation plan give the appointed preservation commission clear authority to become involved in such city activities as the budget process and the zoning review process, and to work with city agencies to implement the policies in the plan.

In some states, such as New Jersey, the state land-use enabling legislation clearly envisions that such responsibility be given to the local preservation commission. Amendments adopted to the New Jersey Municipal Land Use Law in 1986 state that each local historic preservation commission shall have the responsibility to:

a. Prepare a survey of historic sites of the municipality pursuant to criteria identified in the survey report;

b. Make recommendations to the planning board on the historic preservation plan element of the master plan and on the implications for preservation of historic sites of any other master plan elements;

c. Advise the planning board on the inclusion of historic sites in the recommended capital improvement program;

d. Advise the planning board and board of adjustment on applications for development . . . ;

e. Provide written reports . . . on the application of the zoning ordinance provisions concerning historic preservation; and

f. Carry out such other advisory, educational and information functions as will promote historic preservation in the municipality.

CONCLUSION

A 1983 Planning Advisory Service Report, Preparing a Historic Preservation Ordinance, predicted that the next 10 years would see the following:

The relationship between a historic preservation ordinance and a community’s comprehensive plan will also receive greater attention. Many more communities
will adopt formal preservation plans or add a preservation component to an existing land-use plan. More communities will understand the relationship between historic preservation and real property tax assessment policies and building codes, and adopt new programs to encourage the renovation of designated landmarks by modifying stringent building codes and providing property tax incentives to owners of landmark structures. More communities too will develop financing incentives to encourage the rehabilitation of designated landmarks.¹¹

That prediction has come to pass. Historic preservation has begun to work its way into the land-use planning process. The relationship between historic preservation and planning is still only in its infancy. It will continue to be nurtured as more and more states require comprehensive local land-use planning, usually with mandated or optional historic preservation elements.

Historic preservation planning will also be nurtured by organizations like the National Trust for Historic Preservation and state and local preservation groups who have become intimately aware of the need for a close connection between preservation, planning, zoning, and growth management. Historic Preservation Forum magazine recently put it as follows:

Would anyone be so foolish as to try to fill a swimming pool with a garden hose if the pool has a huge hole in the bottom? Of course not. But this, in effect, is what we in the preservation movement are doing when we overlook growth-management issues and rely exclusively on narrowly focused preservation laws as a means of protecting historic buildings and landscapes. To suggest that preservationists pay more attention to growth management is not to suggest that they pay less attention to traditional preservation laws. Such laws are and will remain critically important. But if the protection given to historic resources through the traditional preservation law is undercut by land-use, planning, or growth-management policies, that is tantamount to filling the swimming pool with the bottom uncorked.¹²

Some in the preservation movement resist this close relationship, especially as it links historic preservation with zoning. They fear that, if plan commissions and zoning boards get involved in preservation decisions, it will weaken the authority of those who understand historic preservation best—members of local historic preservation commissions. They fear that planning boards and zoning boards are too pro-development, trying too hard to make projects happen and not suited for the tough task of saying No when development threatens a key historic resource. However, that is now a rearguard movement in preservation, outflanked by the strong alliance of preservationists and planners who see the overriding benefits of linking preservation to sound land-use planning.

Professional planners too have a much better understanding of historic preservation than they did 20 or even 10 years ago. Younger planners in particular come to the profession with coursework that more likely than not includes at least a seminar on historic preservation, and some with much more preservation training than that. They know firsthand that historic preservation can be a catalyst for community revitalization and that the character of a community as expressed in its history and architecture is an economic as well as societal asset.

Preservation lawyers will also push for a closer linkage between historic preservation and land-use planning and growth management. Historic preservation is now clearly connected to the practical and theoretical structure of land-use planning, and must be securely fastened to the principal tenets of legal support for zoning and planning in federal and state case law. Opponents of historic preservation will have a harder time in court if preservation is based on traditional principles of planning, including establishment of community goals and the balancing of benefits and burdens typified by the zoning and planning process.
Appendix A. Growth Management Laws, Comprehensive Planning, and Historic Preservation Planning

Growth management laws are in effect in 11 states—Delaware, Florida, Georgia, Hawaii, Maine, Maryland, New Jersey, Oregon, Rhode Island, Vermont, and Washington. The underlying principle of these laws is to balance resource protection and economic development in a way that maintains quality of life and improves community livability. Whether the state has mandated inclusion of preservation plan elements in comprehensive plans at the local level or made them optional parts of the comprehensive plan, these growth management laws provide a framework for incorporating historic and architectural preservation goals and policies into community comprehensive plans.

A number of planning policies are becoming increasingly common in comprehensive planning legislation, in addition to specific historic and architectural preservation planning requirements, that have a direct impact on preservation goals. For example, Florida, Oregon, Washington, and New Jersey have included policies in the state legislation to encourage that communities plan and develop for a compact urban form rather than allowing sprawl. Such a policy, from the perspective of historic preservation, influences efforts to preserve the rural character of many communities and encourages the continued use and rehabilitation of older buildings in downtowns and urban neighborhoods. Other increasingly popular planning tools, such as the establishment of urban growth boundaries, balancing jobs and housing, and promoting housing and neighborhood revitalization, have similar impacts on historic and architectural preservation.

A summary of state growth management laws and how they address historic preservation issues follows.

Delaware

The Quality of Life Act was adopted in Delaware in 1988. The purpose of the law is to strengthen the "existing role, process, and powers of comprehensive planning programs to guide and control future development." The law requires counties and municipalities to prepare comprehensive plans and specifies mandatory and optional elements that the plan must include. Mandatory elements include:

- Future land use
- Recreation and open space
- Environmental conservation
- Intergovernmental coordination
- Circulation
- Water and sewage
- Housing

Optional elements include:

- Community design
- General area redevelopment
- Public facilities
- Historic and scenic preservation
- Safety
- Economics
- Mass transportation

As indicated above, historic and scenic preservation may be included as an optional plan element in local comprehensive plans. Even though historic preservation is not a mandatory plan element, the state act requires that historic preservation issues be addressed, where appropriate, in mandatory plan elements. Therefore, when preparing the recreation and open space plan element, which is mandatory under the act, communities are obligated to take into account historic and scenic resources that are located in existing or future parks. In addition, a major component of the future land-use element is preparation of a land-use map for the community. The element and the map are required to "identify and depict historic district boundaries and shall designate historically significant properties meriting protection." The act describes requirements for an optional historic preservation plan element as including "plans and programs for those structures of lands in the area having historical, archaeological, architectural, scenic, or similar significance." No further guidance for preparation of a preservation element is provided in the act.

Historic preservation plan elements in local comprehensive plans are reviewed by the state Division of Historical and Cultural Affairs.

Florida

In 1985, Florida passed the Local Government Comprehensive Planning and Land Development Regulations Act (Omnibus Growth Management Act) that set forth requirements for a state comprehensive plan and mandates planning at the local level. The following objectives are included in the act:

- Promote fiscally responsible growth
- Prevent sprawl by delineating urban service boundaries and promoting compact urban development
- Develop only where and when infrastructure is available or can be expanded to meet increased demand
- Preserve environmentally sensitive areas, with particular attention to coastal zone management

The state comprehensive plan includes historic preservation as one of its 25 goals and in the policies of several other goals. The state act requires that local governments plan for the preservation of historic resources; however, separate preservation elements in local comprehensive plans are optional. Historic preservation must be addressed in the community’s future land-use, housing, and coastal zone management elements, or in a separate preservation plan element. For example, under the future land-use element, historic district boundaries must be mapped and historic properties meriting protection must be identified. The housing element requires identification of historically significant houses for the purposes of conservation, rehabilitation, and replacement. The coastal zone management element also contains policies that guide redevelopment and historic preservation near coastal areas.

County and municipal plans may also include historic preservation in their overarching goals. One such goal in the Broward County, Florida, comprehensive plan is "to protect Broward County’s natural and historic resources through well-planned patterns of growth and development." This goal has 10 underlying objectives, one of which is to "protect historic resources within Broward County from deterioration and loss." Five specific directives are set forth to reach the stated objective:

- The Broward County Land Use Plan and local land-use plans shall map and maintain a current list of historically, architecturally, and archaeologically significant properties, and address the protection of these historic resources.
Local land-use plans shall ensure the protection of historic resources.

Local government entities with historic resources should implement programs that preserve and/or rehabilitate historic resources through techniques such as historic preservation ordinances, building code provisions, and tax incentives.

Local government entities shall coordinate their historic resource protection with applicable state and federal laws.

Broward County and its local government entities shall consider the impacts of land-use plan amendments on historic resources.

Local comprehensive plans were reviewed by the state Department of Community Affairs and other agencies from 1988 to 1992. The Division of Historical Resources reviewed all 457 local comprehensive plans to ensure that preservation was being adequately addressed in the future land-use, housing, and coastal zone elements. According to the division staff, of the 457 plans reviewed, just 39 had separate historic preservation elements. Of these, the most thorough are Brevard County, Sarasota County, Cedar Key, Coral Gables, Ocala, Sarasota, and St. Augustine.

The ongoing task of the Division of Historical Resources is to review all formal amendments to local comprehensive plans for text changes that address historic preservation. Based on the local plan, the state reviews land-use plan amendments for consistency: Is the proposed development density consistent with the preservation of significant historic or archaeological resources? Also, the division is responsible for closely reviewing land-use amendments affecting areas that have never been surveyed for historic, architectural, archaeological, and cultural resources to help identify the possible locations and extent of such resources in the affected area.

Georgia

A statewide planning law was passed in Georgia in 1989. Pursuant to a requirement of the law, the Governor’s Development Council, which coordinates state-level planning, and the Department of Community Affairs (DCA), which oversees local and regional planning, were established. As part of its responsibilities, DCA drafts all procedural and substantive requirements for local comprehensive plans. Under the law, the state is divided into 17 regions, each with a Regional Development Center (RDC). Each RDC is required to create a regional comprehensive plan and to review local plans for compliance with minimum planning standards created by the state. Local governments, under the planning law, were given the option of either preparing their own plan or having the RDC prepare one. Since few local governments have the staff or financial capacity to prepare comprehensive plans, RDCs have been frequently called upon to prepare them.

The state’s standards and procedures require that local comprehensive plans, at a minimum, address the following issues:

- Land Use
- Economic Development
- Community Facilities
- Population
- Housing
- Natural and Historic Resources

The standards established by DCA for the natural and cultural resources element were prepared in conjunction with the Georgia Office of Historic Preservation. While the Office of Historic Preservation has no formal role in the planning process, it does provide technical assistance to RDCs and local governments preparing plans.

Under the planning standards and procedures established by DCA for the natural and historic resources element of the comprehensive plan, the plan element must, at a minimum, identify significant resources. The Office of Historic Preservation has also encouraged local governments to examine the effects that decisions concerning transportation, land use, and housing, and the real estate market in general have on historic resources to enable the local government to plan for resource protection and preservation. In addition, local governments have been encouraged to examine the impacts of the protection and preservation of historic resources can be used to meet and promote other planning goals, such as economic development, housing, and neighborhood revitalization.

According to DCA, the primary purpose of the natural and historic resources plan element is intended to assist communities in identifying resources that are important and merit special consideration in the planning process. DCA recommends that local plans include an assessment of the vulnerability of the identified resources to the impacts of development and the potential need for local protection, management, and enhancement.

DCA has provided the following recommendations for preparation of a natural and historic resources element in its Local Plan Review Guide:

- Inventory and assessment of historic resources
- Generalized location map of resources
- Strategies for the preservation, redevelopment, use, and/or protection of any significant resources
- Significant or historic resources that should warrant consideration in the plan may include, but are not limited to, the following items:
  - All landmark buildings and structures that are registered as historic as well as others that may exhibit a unique construction type or are illustrative of certain periods of development
  - Commercial districts and CBDs that have historical or architectural significance
  - Residential districts that have historical or architectural significance to a community
  - Rural resources that are present within jurisdictional boundaries (e.g., old general stores, barns, and covered bridges)
  - Archaeological and cultural resources, such as Indian burial grounds, that are present within jurisdictional boundaries
  - Other resources, including institutional or industrial buildings and historic landscapes

Hawaii

Hawaii adopted a state land-use law in 1961 in response to concerns about premature subdivision of large tracts of agriculture land and a perceived lack of competence on the part of the state’s counties. Under the law, a state land-use commission was created to classify all land in the state into one of four categories—urban, agricultural, low-density rural, and conservation. The conservation classification was added by amendment in 1975. Once classified, boundary areas may be changed only by the state land-use commission. Local powers are severely limited in agricultural and conservation areas.

The land-use law required the state to prepare functional plan elements in the areas of agriculture, conservation lands, energy, higher education, health, historic preservation, housing, recreation, tourism, and transportation. Under the
law, counties are required to prepare general plans that “address the unique problems and needs of each county” and that “further define the overall themes, goals, objectives, policies, and priority guidelines” contained in the state planning law. County general plans must address, at a minimum, the issues addressed in the state functional plan. However, separate plan elements on each of the issues identified are not required.

Maine

In 1988, Maine adopted the Comprehensive Planning and Land Use Regulation Act creating 10 state land-use objectives relating to the environment, economic development, and uncontrolled growth. Incorporation of the state objectives in local comprehensive plans and zoning is voluntary. The following objectives are included in the state act:

- Encourage sustainable growth where appropriate in each community while preventing sprawl and protecting the state’s rural growth
- Accommodate growth through efficient and timely provision of public services
- Promote the economy so as to enhance job opportunities and economic well-being
- Promote decent and affordable housing
- Protect natural, historical, and recreational resources and related economic activities

Pursuant to the act, the Office of Comprehensive Planning was established to review and certify local plans for conformity with state planning goals. Regional councils were also established to provide technical assistance to local planners.

The state historic preservation commission is responsible for reviewing comprehensive plans to ensure consistency with the state’s preservation goal. Reportedly, most Maine communities do not have a detailed historic preservation plan element or historic preservation ordinance. Several years ago, the state historic preservation commission developed comprehensive planning guidelines for consideration of archaeological resources. Included in these guidelines was the recommendation that local preservation plan elements contain a requirement that developers contact the state historic preservation commission for assistance with an archaeological survey if development may affect sensitive archaeological sites.

In reviewing local comprehensive plans, state representatives have noticed little linkage between the state’s preservation planning goals and other planning goals. For example, many communities do not acknowledge historic preservation considerations in elements concerning agricultural preservation, even though issues relating to the preservation of farm structures and rural character are important to both historic preservation and rural preservation.

Maryland

The Economic Growth, Resource Protection, and Planning Act of 1992 amended earlier planning statutes. The amendments were primarily aimed at protecting the natural environment and limiting the growth of urban areas to prevent sprawl. Under the act, county and municipal plans must be amended to address the following “visions” developed in the legislation:

1) Development is concentrated in suitable areas.
2) Sensitive areas are protected.
3) In rural areas, growth is directed to existing population centers and resource areas are protected.
4) Stewardship of the Chesapeake Bay and the land is a universal ethic.
5) Conservation of resources, including a reduction in resource consumption, is practiced.
6) To ensure the achievement of (1) through (5) above, economic growth is encouraged and regulatory mechanisms are streamlined.
7) Funding mechanisms are addressed to achieve these visions.

The planning act requires local governments to prepare the following elements to address the above-described visions:

- Statement of goals and objectives, principles, policies, and standards that shall serve as a guide for the development and economic and social well-being of the jurisdiction
- A land-use plan element showing proposals for the most appropriate and desirable patterns for the general location, character, extent, and interrelationship of the manner in which the community should use its public and private land in the future
- A transportation plan element showing the most appropriate and desirable patterns for future transportation development, including channels, routes, and terminals for transportation facilities
- A community facilities plan element, which shows proposals for development of public and semipublic buildings, land, and facilities
- A mineral resources plan element identifying undeveloped land that should be preserved in its current state until it can be used to provide minerals, appropriate post-extraction uses for land, and regulations that prevent preemption of mineral resource extraction by other land uses
- An element identifying appropriate regulations to provide for streamlining of the regulatory process for development within areas designated for growth in the plan, that promotes innovative and cost-saving site design and environmental protection, promotes economic development
- Recommendation for determination, identification, and designation of areas that are of critical state concern
- A sensitive area element designed to protect, from adverse effects of development, sensitive areas, including streams and their buffers, 100-year floodplains, habitats of threatened and endangered species, and steep slopes

Preservation of historic resources is not specifically identified in the act. However, to the extent that urban boundaries are maintained, the pressure on rural resources will be limited. In addition, historic resources survey information should be incorporated into the plan element concerning identification and designation of areas of state concern.

New Jersey

In New Jersey, the state established a state plan, including a land-use map and goals for land use, economic development, and environmental protection. Under the state plan legislation, county and municipal governments have an opportunity to suggest modifications to the plan. The first state plan, Communities of Place, was approved in June 1992. Local and county comprehensive plans are required to be consistent with the state plan.

The state plan is to be revised every three years; based on the revised state plan, local and county comprehensive plans must also be revised. The purpose of the state plan is to redirect growth to urban centers and into transportation corridors. The state has identified the following goals to attain this purpose.
Future development will occur:
at densities that support efficient transportation, thus
helping to meet federal air-quality standards;
in locations with sufficient infrastructure capacity;
in ways that will not threaten agricultural, environmentally
sensitive, ecologically important or historically significant
areas; and
in ways that will encourage compact development forms,
specifically mixed land uses.

The objective of the state plan is to accommodate full
growth in population and employment (as projected by state
demographers) in a way that promotes efficient means and
modes of transportation; helps revitalize urban areas; ensures
adequate and affordable housing and public services; and
preserves natural and historic resources.
The state plan sets forth 12 policies concerning preservation
of scenic, cultural, and historic resources. Several of the
policies necessitate direct local action, including the following:

Policy 1: Identification and Registration. Coordinate the
identification of historic areas, sites, landscapes,
archaeological sites and scenic corridors for inclusion in
registers and planning documents

Policy 2: Municipal Programs. Include historic surveys and
scenic corridors in local master plans

Policy 4: Historic Resources and Development Regulations.
Protect the character of historic sites, landscapes, and
structures through flexible application of zoning
ordinances, construction codes, and other development
regulations to such resources

Policy 7: Main Street Programs. Promote "Main Street"
programs to aid in protecting historic sites and structures
during the revitalization of traditional downtown areas

Oregon
Oregon’s Land Conservation Act was adopted in 1973.
The program that was implemented as a result of the act is
regarded, by many, as the preeminent state-mandated growth
management program in the U.S. The program is based on
mandatory comprehensive planning by counties and
municipalities in accordance with 19 state goals.
Municipalities are also required to adopt ordinances to
implement comprehensive plans. By 1986, all Oregon
communities implemented comprehensive plans that were
approved by the Land Conservation and Development
Commission. The objectives of the state planning program are to:

protect natural resources and related economic activities;
provide adequate, affordable housing;
prevent sprawl through delineation of urban growth
boundaries and application of different development
regulations inside and outside those boundaries; and
conserves river and coastal resources.

The local historic preservation planning requirement
included in the Land Conservation Act is more specific and
proactive than most of the other states with comprehensive
planning requirements. According to the act, a comprehensive
plan must examine conflicts that may result in the alteration or
demolition of historic resources. The examination process
includes a review of applicable plans and policies, existing
zoning, planned public and private improvements, the
condition of the historic resource, and other local factors.
Typically, the conflicts revealed in this process include current
threats, such as historic buildings in an advanced state of
disrepair, and future threats, such as road improvements.

When there are potential conflicts, the local community is
required to assess the likelihood that the conflict will actually
occur. For example, to assess the threat to local historic
resources from future demolition and redevelopment, the City
of Eugene examined the ratio of the value of the improvements
to the value of the land for each historic resource identified.
When the value of the improvements was less than the value of
the land on which it was located, the properties were
considered likely candidates for demolition. The city also
compared land values of areas that included a high percentage
of historic resources to areas that had few, if any, historic
resources. This analysis revealed that a large percentage
of historic resources were located in areas with lower land values
than surrounding areas. In these situations, the historic
resources were considered to be threatened with demolition
because the properties could be acquired at a lower cost than
surrounding properties.

As part of the community planning process, communities
are required to analyze the economic, social, environmental,
and energy consequences of allowing conflicting land uses.
This analysis considers the public consequences and not the
consequences faced by individual property owners. The
results of the analysis help provide guidance to local
governments on how to proceed in addressing the preservation
and protection of historic resources. Following the analysis,
the community may choose to design a program to protect the
threatened resource, design a program that balances protection
of the resource while allowing the conflicting use, or allow the
conflicting use and allow the resource to be lost.
The decision-making process includes provisions for public
workshops to assess the value of the resource to the
community. The results of the entire process—identifying
resources and scenarios to protect them, balancing their
protection with other uses, or leaving protection up to the
property owner—become part of the community’s
comprehensive plan.

Rhode Island
The Rhode Island Comprehensive Planning and Land Use
Regulation Act of 1988 mandates that local plans comply with
the State Guide Plan. The state plan emphasizes housing,
employment, recreation, transportation, and natural and
historic resources. The act requires that communities include a
natural and cultural resources element in their comprehensive
plan and create an implementation program for the element.
The implementation program for all elements defines the
specific public actions to be undertaken to achieve the goals of
the element, and an implementation schedule for those actions.

According to the state planning law concerning
preservation plan elements, "The element shall include policies
for the protection of the historic and cultural resources of the
municipality and the state." In addition, the policies and
implementation techniques must be identified and included in
the implementation program. The planning requirements
place particular emphasis on the impact of new development
on the rural historic areas that surround the jurisdiction and
historic districts of towns. It suggests that open space
acquisition programs be created to provide buffers between
urban, suburban, and rural zones, with the goal of preventing
sprawl into the surrounding countryside. While urban growth
boundaries are not required under the planning law, the state
planning policies advocate a physical limit to new
development.

Rhode Island’s Historical Preservation Commission is
charged with reviewing and approving 39 comprehensive
plans. As of October 1993, 25 comprehensive plans had been
reviewed by the commission. According to commission staff,
many of the communities reviewed incorporated preservation
planning into other comprehensive plan elements, including
land use, housing, and economic development, in addition to the preservation element.

Under the state planning law, local governments are also required to revise the local zoning ordinance for consistency with the comprehensive plan. The state’s Historical Preservation Commission has authority to review local zoning ordinances for consistency with the preservation element and other elements addressing historic preservation included in local comprehensive plans.

**Vermont**

The Vermont Growth Management Act (Act 200) as adopted in 1988, sets forth 32 growth-management-related goals for municipalities, regional planning commissions, and state agencies. The goals address policy areas, such as the planning process, quality and use of resources, public and private investment, planning for growth, economic development, agriculture, housing, transportation, and utilities. The number of state goals was reduced by statute in 1990. The objective of Act 200 is to foster growth and development that will:

- preserve the character of Vermont communities;
- support agriculture;
- protect environmental quality; and
- afford Vermont residents the opportunity to obtain quality education, employment, and affordable housing.

Vermont local governments are encouraged but not mandated to develop comprehensive plans that include the elements and goals specified in the act. Most communities have done so since the adoption of Act 200. Technical assistance and financial incentives are provided to local governments that prepare comprehensive plans. Regional plans, which are prepared by regional planning commissions (RPCs), are mandated under Act 200. RPCs must also review and approve local plans.

Local governments preparing comprehensive plans are required to take into consideration historic resources. Under the provisions of Act 200, “consideration” means that the community will take an inventory of the resources and develop a plan for their protection. The loose structure that has been developed gives no direction to local communities concerning identification of historic resources. Many communities have relied solely on the state historic resource survey, which provides a very broad inventory of historic resources. Other communities simply prepare a short list of known historic resources. The lack of the requirement for comprehensive identification of historic resources limits the applicability and effectiveness of the comprehensive plans and preservation plan elements.

**Washington**

The State of Washington adopted its Growth Management Act in 1990. The law requires the largest and fastest-growing cities and counties (those communities with a population greater than 50,000 and a growth rate of 10 percent or more over the past 10 years, or population rate increases of greater than 20 percent over the past 10 years, regardless of the size of the community) to prepare comprehensive plans that address 13 statewide goals. The goals address the following topics:

- Urban growth
- Efficient multimodal transportation systems
- Affordable housing
- Economic development
- Protection of private property rights
- Streamlined permitting procedures
- Maintaining and enhancing natural resource-based industries
- Open space protection, including wildlife habitat conservation
- Environmental protection
- Citizen participation and services
- Historic preservation

As listed above, historic preservation is designated as a statewide goal. However, it is not a mandatory comprehensive plan element, nor is it listed as an optional element in the act. Since local plans are currently being prepared for state review, there is limited experience with Washington’s Growth Management Act.

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**Appendix B. The Secretary of the Interior’s Standards for Preservation Planning, Identification, Evaluation, and Registration**

**Standards for Preservation Planning:**

- **Standard I.** Preservation planning establishes historic contexts.
- **Standard II.** Preservation planning uses historic contexts to develop goals and priorities for the identification, evaluation, registration, and treatment of historic properties.
- **Standard III.** The results of preservation planning are made available for integration into broader planning processes.

**Standards for Identification:**

- **Standard I.** Identification of historic properties is undertaken to the degree required to make decisions.
- **Standard II.** Results of identification activities are integrated into the preservation planning process.
- **Standard III.** Identification activities include explicit procedures for record-keeping and information distribution.

**Standards for Evaluation:**

- **Standard I.** Evaluation of the significance of historic properties uses established criteria.
- **Standard II.** Evaluation of significance applies the criteria within historic contexts.
- **Standard III.** Evaluation results in a list or inventory of significant properties that is consulted in assigning registration and treatment of properties.
- **Standard IV.** Evaluation results are made available to the public.

**Standards for Registration:**

- **Standard I.** Registration is conducted according to stated procedures.
- **Standard II.** Registration information locates, describes, and justifies the significance and physical integrity of a historic property.
- **Standard III.** Registration information is accessible to the public.
Appendix C. Boston Landmarks Commission System for Evaluating Significance

I. Highest Significance
Buildings in Group I are considered to have to have national significance:
• as buildings associated with Boston history, particularly the Colonial and Revolutionary War periods,
• as nationally known examples of the work of Boston architects,
• as examples of particular building styles or types which became prototypes for similar buildings throughout the nation or which are rare throughout the nation.

All buildings in this category merit designation as Boston Landmarks and as individual listings in the National Register of Historic Places, and in the State Register of Historic Places. Designation as a Boston Landmark involves protection against demolition and involves design review of proposed exterior alterations. Outstanding interior spaces can also be specifically designated as landmarks. Listing in the National Register provides more limited protection against demolition or adverse impact from federal action and allows to take advantage of federal income tax incentives for rehabilitation. Listing in the State Register provides a building with similar protections from state action, but it carries no incentives.

II. Major Significance
Buildings in this category are considered to have highest significance to the City of Boston, the Commonwealth, and the New England Region:
• as the city’s most outstanding examples of their style or building type, distinguished for high architectural quality and high degree of intactness,
• as early or rare examples of the use of a particular style or building technology in Boston,
• as the best examples of the work of major Boston architects,
• as buildings outstanding in their setting, with particular urban design value, or
• as buildings of the highest regional or local historical significance.

Although often less well known than buildings in Group I, these buildings are considered to meet the criteria for designation as Boston Landmarks, as well as being potentially eligible for individual listing in the National Register of Historic Places and the State Register of Historic Places. Designation as a Boston Landmark involves protection against demolition and involves design review of proposed exterior alterations. Outstanding interior spaces can also be specifically designated as landmarks. Listing in the National Register provides more limited protection against demolition or adverse impact from federal action and allows to take advantage of federal income tax incentives for rehabilitation. Listing in the State Register provides a building with similar protections from state action, but it carries no incentives.

III. Significant
All buildings in Group III are considered to be of significance to the City of Boston:
• as fine examples of the work of Boston architects,
• as buildings which make an important contribution to the character of a street or area,
• as buildings with strong historical associations with major industries, organizations, institutions, or events, or
• as fine examples of a particular style or building type.

There are a large number of buildings in this group. Some may meet the criteria for designation as Boston Landmarks, and these have been subcategorized as Group III, Further Study. If finding after further study that buildings are significant to the Commonwealth or the New England region, as well as to the City of Boston, they may be designated as landmarks.

All buildings in Group III are considered eligible for individual or district listing in the National Register of Historic Places and as such would also be eligible for listing in the State Register of Historic Places. Listing in the National Register provides more limited protection against demolition or adverse impact from federal action and allows to take advantage of federal income tax incentives for rehabilitation. Listing in the State Register provides a building with similar protections from state action, but it carries no incentives.

IV. Notable
Buildings in Group IV are considered important to the character of their particular street, neighborhood, or area:
• as an integral part of a visually cohesive streetscape or integral element within a district,
• as buildings with some individual architectural distinction, whether because of their materials, craftsmanship, or detailing,
• as the best examples in their area of a particular style or building type, or
• as buildings with some local historical significance.

Buildings in Group IV are not considered significant enough to be designated as Boston Landmarks or to be listed individually in the National Register of Historic Places, or State Register of Historic Places. If they are located within a National Register District, the building owner is allowed to take advantage of federal tax incentives for rehabilitation. The property is protected from adverse impacts as a result of federal or state action through an environmental review process.

V. Minor
Buildings in Group V are of little architectural or historical interest but may be considered to make a minor contribution to the streetscape:
• as buildings which are compatible with surrounding structures in scale, style, materials, or fenestration patterns, or
• as buildings with some architectural interest or integrity.

Buildings in Group V are not considered eligible for designation as Boston Landmarks or for individual listing on the National Register of Historic Places. If they fall within a National Register District and the buildings are considered to have enough integrity and relate sufficiently to the significance of the demand of the nominated district, the building owner is allowed to take advantage of federal tax incentives for rehabilitation. The property is protected from adverse impacts as a result of federal or state action through an environmental review process.

VI. Noncontributing
Buildings in Group VI are considered to be visual intrusions, incompatible with the surrounding urban fabric. If these buildings are located within National Register districts, they can be exempted from tax penalties for demolition, and they are not eligible for tax incentives for rehabilitation.
Appendix D. Iowa City, Iowa: Mission and Summary of Goals

The following is the mission statement and summary of goals included in the Iowa City, Iowa, Historic Preservation Plan.

Historic Preservation Mission

The mission statement adopted for Iowa City’s Historic Preservation Plan states that the overall purpose for historic preservation in the community is as follows:

Iowa City and its citizens seek to identify, protect, and preserve the community’s historic resources in order to enhance the quality of life and economic well-being of current and future generations.

Summary of Goals

The 10 goals summarized below identify the major elements of the historic preservation plan. The ordering of the goals is not meant to indicate a hierarchy of priorities. Instead, it suggests a logical sequencing in order to accomplish the preservation mission. The first nine goals outline efforts to be undertaken on a citywide basis to carry out systematic identification, necessary protection, and appropriate preservation of Iowa City’s historic resources. The last goal identifies a series of strategies for responsible historic preservation planning in 12 separate neighborhoods in Iowa City. Because of the importance of this goal and the objectives outlined, it is included as a separate chapter in the Iowa City Historic Preservation Plan.

Goal 1: Identify historic resources significant to Iowa City’s past.

Goal 2: Make protection of historic resources a municipal policy and implement this policy through effective and efficient legislation and regulatory measures.

Goal 3: Establish economic incentives to encourage the preservation of historic buildings and neighborhoods.

Goal 4: Provide the technical assistance necessary to preserve and improve historic properties.

Goal 5: Heighten public awareness of historic preservation in the community and improve preservation education efforts for various audiences.

Goal 6: Maintain and strengthen preservation partnerships between municipal government, state government, and federal agencies.

Goal 7: Maintain and strengthen support for historic preservation from individuals, not-for-profit preservation groups, neighborhood organizations, and downtown interests.

Goal 8: Establish and support heritage tourism efforts appropriate to Iowa City’s historic resources and community needs.

Goal 9: Conduct regular review and evaluation of historic preservation initiatives by the historic preservation community.

Goal 10: Adopt strategies to conserve historic neighborhoods which reflect their organic development, historical roles and traditions, modern needs, and economic health and stability.

Appendix E. Kane County, Illinois: Goals and Objectives

The following is a summary of the goals and objectives of the Kane County, Illinois, Historic Preservation Plan.

Goal 1: Locate, designate, and then protect and maintain the County’s most important historic and natural sites, districts, and landscapes.

Objectives

1. Continue to improve the County’s inventories and knowledge of historic and natural resources.
2. Encourage nominations to the County Register of Historic Places.
3. Afford an appropriate level of protection to all the County’s historic and natural resources.
4. Encourage the highest standards of maintenance and restoration of the exteriors of historic structures.
5. Encourage the restoration and preservation of the interiors of designated historic structures.
6. Preserve as much as possible the contexts of designated landmark sites, districts, landscapes, and natural features.
7. Incorporate the preservation of important historic and archaeological resources into all planning and development.
8. Preserve natural resources that are individually significant or are important in combination with historic structural resources to the understanding or appreciation of the landscape.
9. Encourage the appropriate maintenance by the private sector of the County’s historic and natural resources.

Goal 2: Maintain the elements of the landscape that contribute to the attractiveness and historic character of the suburbanizing and urban fringe areas of the County.

Objectives

1. Encourage the retention of older structural features, such as houses, outbuildings, bridges, and fences, to provide visual relief and architectural diversity.
2. Retain existing buildings, such as barns and creameries, by facilitating their reuse in ways appropriate to their new environments.
3. Preserve older and historic structures, landscapes, and features when they help to define or maintain the sense of identity of new or existing communities.
4. Incorporate natural features and archaeological sites into new developments in ways that will insure their protection and enjoyment.
5. Encourage surface collection of artifacts at archaeological sites if disruption is inevitable due to development.

Goal 3: Retain as working group those elements of the County’s farm landscape, such as farmsteads, fencing rows, and cropland, that contribute to the aesthetics, historic character, and economy of agricultural areas.

Objectives

1. Encourage the retention of older housing in rural and agricultural areas to provide for housing options in those areas.
2. Encourage the appropriate adaptive reuse of older and
3. Conserve natural resources such as land and water when they are important in combination with historic structural resources to the understanding or appreciation of the agricultural landscape.

4. Plan public expenditures so as to complement the existing landscape and economy.

**Goal 4:** Maintain the historic character of the County's rural towns and villages while encouraging their development as commercial and cultural centers.

**Objectives**

1. Help to define communities and provide or maintain a sense of identity by preserving older and historic structures, landscapes, and features.

2. Encourage the maintenance, rehabilitation, and appropriate adaptive reuse of older and historic structures in the community.

3. Revitalize, maintain, and allow for the limited expansion of the older commercial core of the community.

4. Permit new construction in village centers that is compatible in design and placement with existing structures and contributes to the historic character of the community.

5. Encourage collection of artifacts at archaeological sites during excavation for new construction.

6. Separate the historic village from surrounding new development through the use of open space and landscaping.

7. Improve vehicular and pedestrian access routes to the village center from surrounding new development without compromising the historic character of the community.

**Goal 5:** Improve the economy of Kane County by encouraging expenditures for restoration work, adaptively reusing buildings to improve local economies, and promoting tourism related to historic resources.

**Objectives**

1. Protect the value of properties and neighborhoods by working to prevent the deterioration of structures.

2. Encourage continued high levels of construction employment by promoting and facilitating rehabilitation projects.

3. Encourage the appropriate adaptive reuse of older and historic structures to conserve construction materials and reduce disposal expenditures.

4. Promote tourism associated with historic sites, districts, landscapes, and natural features.

5. Revitalize and/or maintain older and historic commercial and industrial areas.

**Goal 6:** Foster public education and greater appreciation and understanding of historic and archaeological resources, and public support for preservation in Kane County.

**Objectives**

1. Provide opportunities for education and appreciation of historic and archaeological resources.

2. Encourage the study of the history of Kane County and its architectural and historic resources.

3. Encourage the preservation and study of the archaeological resources of Kane County.

4. Assist historical societies and museums in Kane County in their public education and preservation efforts.

5. Promote the dissemination of technical information that could assist property owners in their research and restoration efforts.

**Appendix F. Providence, Rhode Island: Action Strategy for Preservation**

The following pages contain the action strategy included in the Providence, Rhode Island, Preservation Plan. This is an excellent example of a way to provide an agenda for historic preservation in a community. This provision of the plan clearly states the actions necessary to meet the desired goals, provides a means to complete those actions, provides measurable time frames, and identifies responsible parties. The definitions for the various acronyms used in Figure A.F.1. are provided at the end of the table.
### Figure A.F.1. Providence, Rhode Island, Action Strategy for Preservation

<table>
<thead>
<tr>
<th>Goals</th>
<th>Actions</th>
<th>First Steps</th>
<th>Timeframe</th>
<th>Participants</th>
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<tbody>
<tr>
<td><strong>Citywide</strong></td>
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</table>
| Make preservation a priority in Providence | 1. Establish subcommittee/advisory board to City Plan Commission to oversee implementation of this plan | a. Draft legislation  
b. Establish mission, rules, and procedures  
c. Submit list of nominees to Mayor | immediate and ongoing | DPD, CPC, City Council, Mayor, Preservation Plan Steering Committee |
| | 2. Promote heritage tourism as a form of economic development | a. Create central visitors' center  
b. Create self-guided tours in historic neighborhoods/downtown  
c. Solicit coverage from national/foreign travel writers, local media  
d. Promote attractions in conjunction with other Rhode Island destinations  
e. Plan/promote heritage festivals | immediate and ongoing | RIDED, DPD, Convention and Visitors Bureau, Convention Center, Johnson & Wales Tourism Program |
| | 3. Recognize and protect more of Providence’s historic resources | a. Target new NFR districts: Smith Hill, 20th c.  
resources  
b. Target new local districts: Doyle Ave., Smith Hill  
c. Maintain PHDC, staff levels, increase as needed | short term | RIHPC, DPD, City Council, Mayor, neighborhood groups |
| | 4. Prepare/Implement citywide demolition delay ordinance | a. Revise model ordinance to include current National Register listed/eligible properties  
b. Solicit City Council and community support | short term | PPS, DPD, DIS, City Council, Mayor, neighborhood groups |
| | 5. Establish interdepartmental review process for city projects affecting historical resources | a. Executive mandate creating the process  
b. Establish working group, build support among key personnel  
c. Improve enforcement of zoning ordinance regarding variances for historic properties | short term | Mayor, department heads, key administration personnel |
| | 6. Establish local property tax credits for rehabilitation | a. Research use of credits in other Rhode Island communities  
b. Inform city and state officials of the benefits of credits, solicit their support  
c. Draft legislation for submittal when local economy improves | long term | General Assembly, Mayor, DPD, Tax Assessor |
| | 7. Strengthen technical skills of city staff and board/commission members involved in the city's physical development | a. Perform organizational analysis, determine needed skills  
b. Update job descriptions/qualifications  
c. Educate employees | short term | DPD, DIS, DPW, municipal unions |
| | 8. Promote protection of natural features (parks, open spaces, scenic views, street trees) | a. Identify features to preserve  
b. Establish street tree ordinance, plant trees where appropriate  
c. Establish overlay zones to protect views  
d. Plan public open spaces for positive impact on streetscapes | short term | DPD, Sharpe Tree Fund, neighborhood groups |
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<tr>
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<th>Timeframe</th>
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<tr>
<td><strong>Institutional Buildings</strong></td>
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| Balance institutional expansion with the preservation of neighborhoods/city tax base. | 1. Require institutional master plans to include inventory of historic properties, statement of intended use, regular maintenance program and enforcement mechanisms | a. Amend the zoning ordinance regarding institutional master plans  
b. Increase community involvement in institutional planning | Immediate and ongoing | DPD, City Council, institutions, neighborhood groups |
| | 2. Prepare an inventory and maintenance program for city-owned historic properties | a. Develop inventory database; update regularly  
b. Develop city policy/programs for preservation and maintenance of historic public properties | Short term and ongoing | RIHPC, PPS, PHDC, City departments responsible for properties |
| | 3. Establish site plan review process for institutional expansion/alteration/renovating, especially adjacent to local historic districts and in/adjacent to National Register districts | a. Establish criteria for evaluating institutional expansion, timeframes, and review process  
b. Draft ordinance with input from institutions | Short term | DPD, City Council, institutions |
| **Local Historic Districts** | | | | |
| Strengthen the mechanism for designation and administration of local historic districts | 1. Maintain at least 2 full-time preservation planning staff positions in DPD | a. Tighten job descriptions/qualifications to ensure hiring of preservation professionals  
b. Maintain positions in budget | Immediate and ongoing | DPD, municipal unions |
| | 2. Prepare Historic Districts Handbook and other educational materials for PHDC and property owners | a. Edit draft handbook; distribute to PHDC and staff as interim training manual  
b. Seek grant funding for handbook publication  
c. Publish PHDC brochure in English and Spanish; seek grants for translating to other languages as needed  
d. Provide annual notice to historic district property owners about review process | Short to mid-term | PHDC staff |
| | 3. Clarify designation process through public meetings and direct contact with property owners | a. Amend zoning ordinance to include designation criteria  
b. Develop official petition form for designation proponents  
c. Hold early informal public information meetings in neighborhoods where districts are proposed  
d. Invite residents in prospective districts to attend PHDC meetings  
e. Improve direct contact with property owners | Short term | DPD, PHDC, City Council, neighborhood groups, individual property owners |
| | 4. Devise signage program for city gateways and local historic districts | a. Identify funding sources, begin fundraising  
b. Determine appropriate locations for signs  
c. Design sign prototypes (design competition) | Long term | DPD, DPW, RIDOT, local artists/art students |
<table>
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<tr>
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<th>Participants</th>
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</table>
| Neighborhood Conservation | 1. Establish a neighborhood conservation overlay zone, with review procedures for alterations, demolition, and new construction | a. Survey National Register districts and other areas to determine locations for neighborhood conservation zoning  
b. Draft zoning amendment and design regulations (less restrictive than for local historic districts)  
c. Encourage neighborhood self-help repair training programs, tool lending shops  
d. Add conservation zoning to PHDC Handbook | short term | DPD, City Council, Mayor, neighborhood groups |
| | 2. Target code enforcement to specified neighborhoods on a rotating basis, while providing technical and financial assistance for home improvement | a. Identify local and National Register districts with the most code violations; prioritize for enforcement  
b. Restructure code enforcement program to include referrals to PHDC where necessary, and retrain staff accordingly  
c. Include preservation standards in minimum housing code standards | immediate | DPD, DIS/Code Enforcement |
| | 3. Initiate vacant lot clean-up program and review process for new development on vacant lots in NR districts | a. Secure additional funding for PRA Special Vacant Lot Program  
b. Develop site plan review standards for new development on vacant lots in NR districts | short term | DPD, PRA |
| | 4. Amend zoning ordinance to require DPD comment on development proposals in NR districts | a. Define kinds of projects to be reviewed and establish trigger to notify DPD of proposals  
b. Establish time frames and review guidelines  
c. Prepare zoning amendment | short term | DPD |
| | 5. Prepare neighborhood plans for each city neighborhood | a. Establish citywide neighborhood planning process  
b. Initiate prototype plans in four priority neighborhoods | long term | DPD, neighborhood groups, preservation groups, local residents |
| | 6. Make rehab loan funds available (revolving funds) for National Register properties | a. Identify neighborhoods with active organizations experienced in loan administration  
b. Establish revolving fund(s) as nonprofits | long term | DPD, neighborhood groups, local banks |

Downtown

<table>
<thead>
<tr>
<th>Goals</th>
<th>Actions</th>
<th>First Steps</th>
<th>Timeframe</th>
<th>Participants</th>
</tr>
</thead>
</table>
| Revitalize the downtown core and promote its historic, architectural, and cultural character | 1. Implement the Downcity Plan | a. Adopt the Downcity District overlay zone  
b. Create design review process  
c. Identify contributing and noncontributing buildings  
d. Compile inventory of historic buildings suitable for reuse as residential and arts-related space  
e. Explore financing options for adaptive reuse of historic buildings | immediate | DPD |
<table>
<thead>
<tr>
<th>Goals</th>
<th>Actions</th>
<th>First Steps</th>
<th>Timeframe</th>
<th>Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Industrial Buildings</strong></td>
<td>1. Survey industrial buildings for reuse potential</td>
<td>a. Seek grant funding for survey</td>
<td>short term</td>
<td>RIHPC, PPS</td>
</tr>
<tr>
<td></td>
<td></td>
<td>b. Create data base for survey information</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>c. Use survey data to market industrial facilities for new uses</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2. Update building codes to facilitate adaptive reuse of industrial facilities</td>
<td>a. Draft state and local code revisions.</td>
<td>long term</td>
<td>state and local building officials, RIHPC</td>
</tr>
<tr>
<td></td>
<td></td>
<td>b. Educate and train officials responsible for interpretation and enforcement of new regulations</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Waterfront</strong></td>
<td>1. Prepare/Implement design guidelines for the waterfront, in conjunction with Downcity and Old Harbor Plans</td>
<td>a. Update PPS draft waterfront guidelines, including heights, street patterns, views, and public access</td>
<td>short term</td>
<td>DPD, PPS, City Council, neighborhood groups</td>
</tr>
<tr>
<td></td>
<td></td>
<td>b. Draft zoning amendment</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

DPD: Dept. of Planning and Development  
DIS: Dept. of Inspection and Standards  
DPW: Dept. of Public Works  
CPC: City Plan Commission  
PHDC: Providence Historic District Commission  
PRA: Providence Redevelopment Agency  
RIDOT: Rhode Island Dept. of Transportation  
RIHPC: Rhode Island Historic Preservation Commission  
RIDED: Rhode Island Dept. of Economic Development  
PPS: Providence Preservation  
SWAP: Stop Wasting Abandoned Property
## Appendix G. Methodology Used to Rank Buildings in San Francisco’s Downtown Survey

<table>
<thead>
<tr>
<th>CRITERION</th>
<th>RATINGS:</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>E - Excellent</td>
</tr>
<tr>
<td>A. ARCHITECTURE</td>
<td></td>
</tr>
<tr>
<td>1. Style/Type</td>
<td>Especially fine or extremely early example if many survive; excellent example if few survive</td>
</tr>
<tr>
<td>Significance as an example of a particular architectural style, type, or convention</td>
<td></td>
</tr>
<tr>
<td>2. Construction</td>
<td>Especially fine or extremely early example if many survive; excellent example if few survive</td>
</tr>
<tr>
<td>Significance as an example of a particular material or method of construction</td>
<td></td>
</tr>
<tr>
<td>3. Age</td>
<td>Built before April 18, 1906</td>
</tr>
<tr>
<td>Of particular age in relationship to the periods of development of buildings in the area</td>
<td></td>
</tr>
<tr>
<td>4. Architect</td>
<td>Of particular importance to the history of the community, state, or nation</td>
</tr>
<tr>
<td>Designed or built by an architect or builder who has made a significant contribution to the community, state, or nation</td>
<td></td>
</tr>
<tr>
<td>5. Design</td>
<td>Excellent</td>
</tr>
<tr>
<td>Architectural quality of composition, detailing, and ornament measured, in part in originality, quality as urban architecture, craftsmanship, and uniqueness</td>
<td></td>
</tr>
<tr>
<td>6. Interior</td>
<td>Excellent</td>
</tr>
<tr>
<td>Interior arrangement, finish, craftsmanship, and/or detail is/are particularly attractive or unique</td>
<td></td>
</tr>
</tbody>
</table>

## B. HISTORY

<p>| 7. Person | Person of primary importance intimately connected with the building | Person of primary importance loosely connected, or person of secondary importance intimately connected | Person of secondary importance loosely | No connection with person(s) of importance |
| Associated with the life or activities of a person, group, organization, or institution that has made a significant contribution to the community, state, or nation | | | | |</p>
<table>
<thead>
<tr>
<th>CRITERION</th>
<th>RATINGS:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>6. Event</strong> &lt;br&gt;Associated with an event that has made a significant contribution to the community, state, or nation</td>
<td><strong>E</strong> Event of primary importance intimately connected with the building&lt;br&gt;<strong>VG</strong> Event of primary importance loosely connected, or event of secondary importance intimately connected&lt;br&gt;<strong>G</strong> Event of secondary importance loosely connected&lt;br&gt;<strong>FP</strong> No connections with event of importance</td>
</tr>
<tr>
<td><strong>9. Patterns</strong> &lt;br&gt;Associated with, and effectively illustrative of broad patterns of cultural, social, political, economic, or industrial history, of the urban development of the city</td>
<td><strong>E</strong> Patterns of primary importance intimately connected with the building&lt;br&gt;<strong>VG</strong> Patterns of primary importance loosely connected, or patterns of secondary importance intimately connected&lt;br&gt;<strong>G</strong> Patterns of secondary importance loosely connected&lt;br&gt;<strong>FP</strong> No connections with patterns of importance</td>
</tr>
</tbody>
</table>

### C. ENVIRONMENT

| **10. Continuity** <br>Contributes to the continuity or character of the street, neighborhood, or area | **E** Of particular importance in establishing the character of a distinguished area<br>**VG** Of importance in establishing or maintaining the character of a distinguished area<br>**G** Compatible with the character of a distinguished area<br>**FP** Incompatible with the character of an area |
| **11. Setting** <br>Setting and/or landscaping contributes to the continuity or character of the street, neighborhood, or area | **E** Of particular importance in establishing the character of the area<br>**VG** Of importance in establishing or maintaining the dominant character of the area<br>**G** Compatible with the dominant character of the area<br>**FP** |
| **12. Landmark** <br>Significance as a visual landmark | **E** A structure which may be taken as symbol for the city or region as a whole<br>**VG** A conspicuous and familiar structure in the context of the city or region<br>**G** A conspicuous and familiar structure in the context of the neighborhood<br>**FP** Not particularly conspicuous or familiar |

### D. INTEGRITY

| **13. Alterations** <br>Has suffered little alteration and retains most of its original materials and design features | **E** No changes or very minor changes<br>**VG** Ground floor remodeled, cornice removed, or minor alterations which do not destroy the overall character<br>**G** Overall character changed, but recognizable through removal of major cornice/parapet, alteration of upper floors, or gross alteration of any major elements<br>**FP** Altered beyond recognition |