

BALANCING STICKS & CARROTS: LOCAL PRESERVATION INCENTIVES FOR HOMEOWNERS

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1. Introduction

Context & Problem

In the U.S. the federal, state, and local governments have initiated various regulations and incentives (“sticks” and “carrots”) to encourage and implement historic preservation. Yet preservation at the local level holds the greatest regulatory strengths and plays the largest role, especially with regard to private property and private funding sources. Because zoning and other policies regarding development and planning fall to local governments, local historical commissions hold the greatest power to implement restrictions on locally designated historic resources and to best understand the incentives, if any, that would have the desired impacts. Although federal incentives, especially the Rehabilitation Tax Credit, are available only to income-producing properties, many states now offer tax credits to include owner-occupied properties. Local governments, however, have struggled to find the right balance of “sticks” and “carrots” to manage historic properties. Local preservation is now and likely will always be primarily a “stick,” given that its primary mechanism for accomplishing preservation is granting or withdrawing permits for alterations, and, to varying degrees, demolition and new construction. This thesis explores ways that municipalities have devised to mitigate the “stick” but not replace it.

To date, many Certified Local Governments (CLG) have implemented various preservation incentives directed toward owners of designated historic homes.¹ The effectiveness of these incentives has yet to be fully evaluated. Such an evaluation could confirm how homeowner incentives can be an effective preservation tool and what differences might

¹ Note that this term refers to local historical commissions that have been “certified” by the National Park Service to manage historic preservation, and will be further explored in the Limitations below.

account for their relative success or failure for the CLGs, homeowners, and the public. This thesis identifies and evaluates local preservation incentives that are directed towards owners of historic houses in order to evaluate their range and effectiveness. Based on the analysis, this thesis provides a list of recommendations for “successful” incentives that can be evaluated and adopted by CLGs or uncertified historical commissions. The methodology consists of three parts:

1. Conduct online research, compile an admittedly incomplete list of what incentives CLGs offer,
2. Submit and compile surveys to the National Alliance of Preservation Commissions (NAPC) and CLG State Coordinators,
3. Conduct interviews to elaborate on some of this information. Incentives are evaluated for their success qualitatively and quantitatively based on the results from each part, and serve as a basis for the recommendations at the end of this thesis.

CLGs may evaluate for themselves how the incentives fit their individual preservation goals. By making its content understandable to a wider audience of preservation professionals, policy makers, homeowners, and the public, this thesis demonstrates how appropriate and well-tailored preservation incentives can decrease the burden of or compensate for historic preservation regulations upon homeowners.

The results of the research will reveal concerns but also the strengths of the CLGs who responded to the surveys. These results have confirmed some strategies in the literature for implementing successful and effective incentives. After discussing the biggest hurdles facing CLGs now, this thesis will recommend strategies supported in the literature and through success stories to implement successful incentive programs. This thesis will also propose at least one

other incentive strategy based on the online research, surveys, and interviews conducted during the author's research.

Limitations

This thesis is not intended to be an exhaustive or systematic analysis of the effectiveness of all incentives implemented by all CLGs. The analysis and research are limited by time and other factors listed below. Where necessary, areas in need of further research are acknowledged and summarized further in the final section.

Although many local governments may have historical commissions with varying degrees of regulatory oversight within their community, this thesis restricts research only to Certified Local Governments. Established by an amendment to the National Historic Preservation Act in 1980, these local governments are "certified" by the State Historic Preservation Office (SHPO) and the National Park Service (NPS) based on their commitment and professionalism regarding historic preservation and demonstrate "readiness to take on successful preservation projects".² As such, their regulatory processes are subject to review by the SHPO and/or NPS to ensure they uphold the Secretary of the Interior Standards ("the Standards") and are granted power to participate in the review of State and National Historic Register nominations. However, the most advantageous part of becoming a CLG is the eligibility for funding, technical assistance, and other sources, such as sustainability information from the SHPO. States are required to give at least 10% of the federal funding they received from the

² The National Historic Preservation Act, 54 U.S.C. §§ 300301-32505 (1980), amended in Pub. L. 96-515, title II, §201(a), Dec. 12, 1980, 94 Stat. 2991.; "Certified Local Government Program," National Park Service, accessed November 11, 2020, <https://www.nps.gov/clg/index.html>.

Historic Preservation Fund (HPF) to CLGs as subgrants to put towards their preservation goals.³ CLGs have direct access to SHPO staff for assistance with their commission, ordinance, resource surveys, and more. SHPOs and NPS also provide training opportunities to CLG staff. For these reasons of accountability, demonstrated commitment, regular training opportunities, and a certified level of professionalism, this thesis limits the scope of study to CLGs. However, it should be noted that many local preservation organizations that do not have CLG status promote preservation with regulations and incentives.

This thesis also limits its focus only on incentives implemented by CLGs. State or federal preservation incentive programs are discussed only as they affect a CLG's ability to implement their own incentives. Research over the course of this thesis found that state enabling legislation can have a significant effect on a CLG's ability to offer incentives, and what they include. Types of incentives are discussed in Section 4 and cover more than just financial incentives and non-financial incentives; both play a significant part in the evaluation of "success" and in the final list of recommendations.

Finally, few incentives are aimed at owner-occupied single-occupancy houses, focusing instead on encouraging developers and other income producing properties to use historic preservation. Many CLGs, however, do offer incentives intended for both commercial and residential (that is, income-producing and non-income producing) historic properties. As such, this thesis evaluates any incentive made available to the owner of a non-income producing, single-occupancy, owner-occupied property. This thesis looks at incentives from the perspective of the property owner, in particular the owner and occupant of historically designated homes. It

³ "State Historic Preservation Office Grant Opportunity," National Park Service, accessed March 30, 2021, <https://www.nps.gov/articles/000/state-historic-preservation-office-grant-opportunity.htm>.

is worth noting that what homeowners see as disincentives could in many instances be seen as incentives by the preservation community. The recommendations of this thesis identify strategies to expand tools for homeowners.

Furthermore, this thesis is grounded in the following assumptions:

1. Historic preservation is a beneficial public good that the United States governments (federal, state, and local) are required to provide, as declared in the opening of the Historic Sites Act of 1935 and the National Historic Preservation Act of 1966 (author's emphasis added):⁴

Historic Sites Act of 1935: "It is declared that it is a national policy to preserve *for public use* historic sites, buildings, and objects of national significance *for the inspiration and benefit of the people of the United States.*"

National Historic Preservation Act of 1966: "It is the policy of the Federal Government, in cooperation with other nations and in partnership with States, local governments, Indian tribes, Native Hawaiian organizations, and private organizations and individuals, to—

(1) use measures, including financial and technical assistance, to foster conditions under which our modern society and our historic property can exist in *productive harmony and fulfill the social, economic, and other requirements of present and future generations*; ...

(3) administer federally owned, administered, or controlled historic property in a spirit of stewardship *for the inspiration and benefit of present and future generations*;..."

⁴ § 461 of Historic Sites Act, 16 U.S.C. §§ 461-467 (1935), <https://www.nps.gov/history/local-law/hsact35.htm#:~:text=It%20is%20declared%20that%20it,people%20of%20the%20United%20States.>; The National Historic Preservation Act, 54 U.S.C. §§ 300101-307108 (1966), <https://www.nps.gov/history/local-law/nhpa1966.htm>. Also, the critical "Penn Central" case established that designating a building as historic and does not restrict Fifth Amendment rights and that any restrictions imposed are "substantially related to the promotion of the general welfare and ... beneficial use of the landmark site", Penn Central Transportation Company v. City of New York, 438 U.S. 104 (1978).

2. Some homeowners feel historic preservation is a burden or infringement of their property rights. As discussed in Section 2, this is more apparent for local preservation, which in turn reflects its relative regulatory power – its “sticks” – and the scarcity of incentives to mitigate that power.

3. The government should incentivize participation in historic preservation by private property owners and compensate them for the perceived “taking” of property rights:⁵

National Historic Preservation Act of 1966: “It is the policy of the Federal Government, in cooperation with other nations and in partnership with States, local governments, Indian tribes, Native Hawaiian organizations, and private organizations and individuals, to— ...

(4) contribute to the preservation of non-federally owned historic property and *give maximum encouragement* to organizations and individuals undertaking preservation by private means;

(5) *encourage the public and private preservation* and utilization of all usable elements of the Nation's historic built environment; and

(6) *assist State and local governments, Indian tribes and Native Hawaiian organizations, and the National Trust* to expand and accelerate their historic preservation programs and activities.”

The remainder of this thesis is organized such that the importance of the study and summary of perceptions, barriers, and court cases are discussed in Sections 2 and 3; a summary

⁵ The National Historic Preservation Act, 54 U.S.C. §§ 300101-307108 (1966). Cases around “takings” are discussed in Section 3s.

of local preservation incentives is presented in Section 4; an in-depth discussion of the methodology and analysis of results are in Section 5; the meaning of those results are discussed in Section 6; and the proposed recommendations are in Section 7. The final section discusses future research considerations. Raw data on the research is provided in the appendices.

2. Importance: Perceived Barriers to Homeowners

It is often observed that “all preservation is local.” Indeed, the benefits of historic preservation at the local level is a growing area of research in recent decades, much of which has focused on federal and state tax credits, commercial corridors (such as Main Street Programs), or larger-scale development. The difficulty in evaluating local preservation programs is that a property or district can be on local, state, and/or national historic registers, making it difficult to tease out the effects of local regulations, which can vary greatly, even within one state.⁶ Additionally, tax incentives are frequently geared towards income-producing properties that offset income tax, excluding availability to owner-occupied properties and low-income homeowners.⁷ Outside the issues associated with gentrification and property values, little research has delved into quantitative or qualitative criteria to demonstrate benefits for homeowners.

In short, the most powerful government control over historic preservation regulations affecting private property exists at the local level, relying on an array of disincentives (“sticks”) with few or no offsetting incentives (“carrots”). As a result, some homeowners, development advocates, and municipal officials claim that preservation infringes on property rights, stagnates development and city growth, increases property values to a point of unaffordability, and/or hinders environmental sustainability efforts.⁸ It should be noted, however, that a great many residents do want to preserve the physical and cultural history of their municipality. Indeed,

⁶ Paul K. Asabere, Forrest E Huffman, and Seyed Mehdian, “The Adverse Impacts of Local Historic Designation: The Case of Small Apartment Buildings in Philadelphia,” *Journal of Real Estate and Economics* 8 (1994): 225–34.

⁷ Several large state do not have a state income tax, which limits even the ability to offer incentives for commercial properties.

⁸ For the preservation-minded, local preservation as a “stick” could arguably be seen as an incentive, since the end goal is to achieve preservation for as many historic buildings as possible.

historic preservation enjoys bipartisan support in Congress and the Senate, as is illustrated by the steady increase of allocations for the Historic Preservation Fund, which saw its highest funding level ever for the 2021 Fiscal Year at \$144 .3 million.⁹ Despite the political and residential support for preservation, local governments still need – and want – to counteract the burdens of historical designation.

The literature around negative impacts of preservation includes opinion pieces, academic research, economic studies, and legal cases.¹⁰ The conclusion can be drawn from the regular appearance of such pieces that preservationists continually fail to demonstrate the benefits of preservation beyond the public good argument.¹¹ The sources present four categories of perceived barriers and burdens historic designation places upon individual homeowners):

1. Heavy restrictions upon homeowners result in financial burdens or infringement of property rights
2. Prevention of new development

⁹ Preservation Action, “Historic Preservation Fund Request,” National Historic Preservation Advocacy Week 2021 Materials (Preservation Action, 2021).

¹⁰ Adam Millsap, “Historic Designations Are Ruining Cities,” *Forbes*, December 23, 2019, <https://www.forbes.com/sites/adammillsap/2019/12/23/historic-designations-are-ruining-cities/?sh=30cf3d4f57af>; David J. Kohtz, “Improving Tax Incentives for Historic Preservation,” *Texas Law Review* 90, no. 4 (2012): 1041–64; Michaelle Bond, “Preservation Can Promote Equity for Black Communities, Report Says,” <https://www.inquirer.com>, accessed January 28, 2021, <https://www.inquirer.com/real-estate/preservation-philadelphia-national-trust-historic-equity-20210127.html>; L.M. Schwartz, “Six Reasons to Say No to Local Historic Districts,” The Virginia Land Rights Coalition, n.d.; Paul K. Asabere, Forrest E Huffman, and Seyed Mehdian, “The Adverse Impacts of Local Historic Designation: The Case of Small Apartment Buildings in Philadelphia,” *Journal of Real Estate and Economics* 8 (1994): 225–34; Binyamin Appelbaum, “When Historic Preservation Hurts Cities,” *The New York Times*, January 26, 2020, Online edition, <https://www.nytimes.com/2020/01/26/opinion/historic-preservation-solar-panels.html>; Allen Seeber et al., “Why a Chevy Chase Historic District Would Be a Bad Idea...and What You Can Do to Prevent It and Support a Better Idea,” petition, August 2008; Scott Beyer, “Historic Preservation Is Great, Except When It Isn’t,” *Urban Issues*, September 28, 2020, <https://www.governing.com/community/Historic-Preservation-Is-Great-Except-When-It-Isn't.html>.

¹¹ The public good argument can itself be used to criticize the “stick” aspect.

3. Higher housing costs and faster appreciation rates
4. Elitism

Local designation, as opposed to state or national designation, comes with the strongest forms of regulations. Their reliance is on granting or withholding building permits, which means the regulation is direct. Such building permits include exterior alterations, new construction or demolition in historic districts; costly material replacements; prevention of changes of land-use;¹² and restriction of modern technological improvements. Adam Millsap argues in “Historic Designations Are Ruining Cities” that approval processes are time-consuming and therefore a financial burden to homeowners for even the simplest alterations.¹³ Many historical commissions require that homeowners use historically accurate materials for alterations, which are frequently more expensive, limited in options, and sometimes require specialists, who are also more expensive or are difficult to find. These restrictions can also mean that green technologies (such as solar panels or energy efficient windows) can be difficult or impossible to incorporate, based on a commission’s strictness. Binyamin Appelbaum’s inflammatory opinion piece in the *New York Times* last year criticized historical commissions specifically for their rejection of solar panels on historic houses due to their unsightliness. Not only does each argument demonstrate the financial burdens preservation can place upon an individual homeowner, many have also argued that these regulations unconstitutionally restrict one’s property rights, taking the issue to court on multiple occasions, as will be discussed in the next

¹² Land-use is usually controlled by zoning laws, though historic overlay districts can play a role in this.

¹³ Such claims are not always supported by data, and frequently permit applications are approved “over the counter” with little or no changes required. Adam Millsap, “Historic Designations Are Ruining Cities,” *Forbes*, December 23, 2019, <https://www.forbes.com/sites/adammillsap/2019/12/23/historic-designations-are-ruining-cities/?sh=30cf3d4f57af>.

section. These restrictions expand beyond an individual homeowner's property and affect the overall neighborhood through development restrictions.¹⁴

Appelbaum's second argument is that historic preservation "obstructs change for the better."¹⁵ Appelbaum and other critics of preservation see it as a tool to restrict new development and prevent a city's economic growth. While this can be seen as detrimental to the city at large, it could also detrimentally affect property and/or values through less demand for property.¹⁶ Beyer explains, "[preservation restrictions] may suppress land values by limiting parcels from their optimum use," thereby reducing the potential tax base. This argument has been taken to court many times and those legal ramifications will be discussed in the next section. However, real estate appraisals consider the highest and best *likely* use of two values, the property and the land as if vacant. The appraiser takes into account any and all regulatory restrictions applied to the property, , recognizing that a property can be subject to multiple layers of regulation, not just historic, such as zoning, design guidelines, and use; the appraiser does not consider what the optimum value might be if no restrictions were in place.¹⁷ However, the next argument against preservation is inconsistent with the perceived detrimental effects of restricted development.

Preservationists frequently cite an increase in property values associated with historic designation of individual owner-occupied houses and historic districts, where preservation regulations are applied to all properties within it. Those against preservation, however, argue

¹⁴ As any good realtor would say, buying and selling houses is all about "Location, Location, Location!"

¹⁵ Binyamin Appelbaum, "When Historic Preservation Hurts Cities."

¹⁶ Adam Millsap, "Historic Designations Are Ruining Cities," February 2, 2019.

¹⁷ If the value of the land as if vacant is greater than the property value, then an economic hardship case could be made to the historical commission for an alternative solution. Every historic preservation ordinance must have an Economic Hardship Clause to address these kinds of situations.

that the higher housing prices and faster appreciation can be considered as a negative effect. Beyer's claim is that, "Rather than letting neighborhoods develop a nice blend of old and new buildings, [preservation] keeps them stuck in time."¹⁸ Millsap also argues that historic districts lead to a (perhaps feigned) neighborhood stability (physically, socially, and financially) because the prevention of new development or demolition keeps the district "frozen in time."¹⁹ In reality, studies have demonstrated mixed results.²⁰ There are those willing to pay extra for these "benefits" of stability, character, and higher property values and housing costs. Many supporters of preservation use this same argument *for* preservation to manage the impact of alterations and new construction and prevent the demolition of historic buildings. Those who support preservation believe that the cultural and aesthetic benefits are a public good that outweigh the costs imposed on owners, while others perceive, and some studies have opined, that the costs outweigh the cultural benefit.²¹

Beyer believes that to combat this frozen effect, designation should be limited to individual buildings, not districts, because of the restrictions placed upon them at the local level. The residents of Chevy Chase, a neighborhood in Washington, D.C., felt similarly when their

¹⁸ Beyer, "Historic Preservation Is Great, Except When It Isn't," September 28, 2020. Appelbaum also argues against the "frozen in time" mentality of preservation, "When Historic Preservation Hurts Cities," January 26, 2020.

¹⁹ Of course, Millsap missed the point that the regulations are meant to manage change, not halt it completely.

²⁰ Clarion Associates of Colorado, LLC, "The Economic Power of Heritage and Place" (Colorado Historical Foundation, October 2011); PlaceEconomics for the Los Angeles Conservancy, "Preservation Positive Los Angeles" (Los Angeles: PlaceEconomics, 2020); Donovan Rypkema and Caroline Cheong, "The Delaware Historic Preservation Tax Credit Program: Good for the Economy, Good for the Environment, Good for Delaware's Future" (Washington, D.C: PlaceEconomics, January 2010); Donovan Rypkema et al., "An Analysis of the Baltimore Historic Preservation Tax Credit," *PlaceEconomics*, October 5, 2020, <https://doi.org/10.21428/9545a395.bc0e85d5>.

²¹ Millsap mentions a study by Sevrin Waights in the *Journal of Economic Geography* where he found that in English cities, where the cost associated with the restrictions burdened homeowners beyond the cultural benefits associated with the historic designation. Adam Millsap, "Historic Designations Are Ruining Cities."

homes were to be included in a proposed historic district. Despite their worry that a historic district nomination would impose too many constraints, the residents did want to control and retain the overall character of their neighborhood. The residents instead proposed to create a Neighborhood Conservation District (NCD) rather than designate a Historic District.²² NCDs create their own design guidelines for alterations and new construction that fit their view of the neighborhood character. NCD guidelines can be more flexible than city-wide preservation regulations for Historic Districts. This kind of flexibility may provide an alternative regulatory tool on a neighborhood scale. NCDs can also help fight gentrification, which is the strategy that the Strawberry Mansion neighborhood in Philadelphia used to halt unfettered and unwanted rapid development of luxury apartment buildings.²³ In any case, the outcomes of preservation can hinder affordable housing and lead to displacement and gentrification. If preservation regulations are not implemented thoughtfully, they can further the evidence for the final argument that preservation is elitist.²⁴

²² Allen Seeber et al., “Why a Chevy Chase Historic District Would Be a Bad Idea...and What You Can Do to Prevent It and Support a Better Idea.”

²³ Darryl C. Murphy, “City Council Creates Strawberry Mansion Conservation District — a First for an ‘Underrepresented’ Community,” *WHYY*, December 10, 2020, sec. Plan Philly; “Support for the Creation of a Neighborhood Conservation Overlay District in Strawberry Mansion,” *Design Advocacy Group* (blog), January 20, 2021, <https://designadvocacy.org/advocacy/support-for-the-creation-of-a-neighborhood-conservation-overlay-district-in-strawberry-mansion>.

²⁴ Although this thesis does not address affordable housing, per se, the argument that the increase in property values, and therefore property taxes, is critical to homeowner perception of preservation and furthers the need for incentives. See Gretchen Brown, “How Discussions of ‘Neighborhood Character’ Reinforce Structural Racism,” *Rewire*, July 17, 2020, https://www.rewire.org/how-discussions-of-neighborhood-character-reinforce-structural-racism/?fbclid=IwAR0wyagpQA-cX6W_0juo5u3xwxKByK2QOPltwdQBH1yqcCySo7padBtpwAl; Emily Dowdall, “Philadelphia’s Changing Neighborhoods: Gentrification and Other Shifts since 2000” (Philadelphia: The Pew Charitable Trusts, May 2016); Michaelle Bond, “Preservation Can Promote Equity for Black Communities, Report Says,” <https://www.inquirer.com>, accessed January 28, 2021, <https://www.inquirer.com/real-estate/preservation-philadelphia-national-trust-historic-equity-20210127.html>; L.M. Schwartz, “Six Reasons to Say No to Local Historic Districts,” *The Virginia Land Rights Coalition*, n.d.; Elizabeth M. Tisher, “Historic Housing For All: Historic Preservation as the New Inclusionary Zoning,” *Vermont Law Review* 41, no. 603 (2017): 603–34; Alyssa M. Frystack, “Small But Mighty: Combating the Affordable Housing Crisis Through Small-Scale Historic Rehabilitation” (Chicago, The School of Art Institute of Chicago, 2019).

The traditional domination of the rich, white, male narrative in preservation, and indeed the very origins of preservation, has been hard-set in public perception of preservation. Since the field of historical preservation became a "profession," it is sometimes used as an expression of authoritative superiority where pro-preservationists simply "know better" than non-preservationists. Now that preservation is working to be more inclusive of marginalized narratives and social histories in addition to individual figures or architecturally exceptional buildings, those who still see the older face of preservation are confused why suddenly their "ordinary" house is considered historic. Appelbaum mentions Rem Koolhaas' criticism that truly preserving history means keeping the "pretty and ugly houses; grande olde theaters and strip malls." Appelbaum goes on to express that preservation is not currently practiced that way, which is simply not the case. Clearly, many people do think preservation is only concerned about the best examples of the wealthiest histories. As Beyer states, these types of historical preservation mandates, "regardless of the merits of individual buildings, [are] straight out of the top-down-planning playbook." The tax benefits of preservation are seen as profitable only for the wealthy, and the tax burden is passed on to other homeowners to make up for the loss of tax revenue, further supporting the arguments that preservation is a financial burden, though this time in a less direct manner.²⁵ Preservationists are failing to inform the public that all history matters. The focus on wealthy narratives and benefits only for the wealthy has led to the idea that preservation is a powerful tool in gentrification and displacement.

²⁵ For Example, Kohtz mentions a case in Austin, Texas where tax exemptions for historic properties were seen as a loss of investment to the city that had to be made up in other ways. Kohtz, "Improving Tax Incentives for Historic Preservation."

One argument rarely made in these and like articles, however, is that frequently local historic designation does not require the owner's approval.²⁶ One would expect that this fact alone would support all of the above arguments of over-burdening owners of historic buildings, especially homeowners. As will be demonstrated later, however, some CLGs, like Fort Collins, Colorado, do require owner approval for designation. Research on how owner approval affects available incentives or public perception of preservation could prove illuminating.

Boiled down, these arguments illustrate that many see preservation as unduly expensive, restrictive, exclusive, elitist, and a hindrance to environmental sustainability. For preservation to succeed, especially at the local level, appropriate compensation and exemptions must be made. However, as will be explored in the next section, the courts have ruled that historic designation is an appropriate use of "police power." Many arguments against preservation assume that "ordinary" buildings are not "worthy" of historic designation (see Glaeser's article in *Preservation Follies*), and expect that only the best and most beautiful examples, those designed by the most famous architects, lived in by the most famous people, or places where the nation's forefathers once slept should be designated historic.²⁷ Again, this is a major failing of preservation. Despite designation criteria including very broad categories that include larger social and cultural histories and broad architectural themes, applied regulations are very often rigid and inflexible, which, has created this conflict with those who are unfamiliar with preservation. As will be seen in the survey results in the Methodology section, the question

²⁶ Unlike the National Register of Historic Places, which does require owner approval for designation, and has almost no regulatory control over the maintenance of the property.

²⁷ Edward L. Glaeser, "Excessive Landmarking Threatens to Make Manhattan a Refuge for the Rich.," *Preservation Follies*, Spring 2010, <https://www.city-journal.org/html/preservation-follies-13279.html>.

from homeowners of why their house is historically significant is commonly asked to historical commissions.

Preservation has a responsibility to correct false perceptions that once were the mode of practice. Flexibility, updated criteria, and appropriate compensation could be ways to move forward to preserve our history and be less burdensome for homeowners. These solutions will be investigated in the research, surveys, and interviews of this thesis. Appropriate compensation, however, can take the form of various incentives, not just financial compensation, as will be discussed in Section 4 and in the final recommendations.

3. Brief History of Relevant Court Cases

Some of the above barriers demonstrate a perceived conflict – inherent to the regulation of private property by government, for many social purposes, not only historic preservation – between individual’s private property rights and the constitutionality of government power. The 10th Amendment grants authority to the states to establish and enforce laws that protect the welfare, safety, and health of the public, and that they can delegate that power to their political subdivisions, known as “police power.”²⁸ Historic preservation regulations have been understood to fall under the “general welfare.” However, local ordinances have been challenged for infringement on private property rights, excessive use of authority, and improper procedural due process. Frequently, preservation cases such as those described in this section claim that the government has committed an unconstitutional “taking,” the government’s seizure of private property for public use without just compensation (in these cases, for the public good of historic preservation). As already demonstrated in the Introduction, historic preservation is characterized in federal, state, and local legislation as a beneficial public good that the government (federal, state, and local) is required to provide.²⁹ The 5th and 14th Amendments require federal and state governments to provide payment of just compensation for a taking:³⁰

²⁸ “The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States, respectively, or to the people.” U.S. Const. amend. XIV. For an older review of the federal government and states’ exercise of police power, see Sarah Goss, “Propriety of Using the Police Power for Aesthetic Regulation: A Comprehensive State-by-State Analysis as of May 1990,” prepared for the Department of the Interior, National Park Service and The Center for Preservation Law (Washington, D.C., 1992).

²⁹ § 461 of Historic Sites Act, 16 U.S.C. §§ 461-467 (1935); the National Historic Preservation Act, 54 U.S.C. §§ 300101-307108 (1966). Also, the critical “Penn Central” case established that designating a building as historic and does not restrict Fifth Amendment rights and that any restrictions imposed are “substantially related to the promotion of the general welfare and ... beneficial use of the landmark site”, Penn Central Transportation Company v. City of New York, 438 U.S. 104 (1978).

³⁰ U.S. Const. amend. V & XIV. § 1

Fifth Amendment: "...nor shall private property be taken for public use, without just compensation."

Fourteenth Amendment: "...private property [shall not] be taken for public use, without just compensation."

The most famous court case where the takings clause was invoked against historic preservation is *Penn Central Transportation Company v. City of New York* in 1978, which established that designating a building as historic does not in and of itself restrict 5th Amendment rights.³¹ The case tried whether a city, as part of a comprehensive program to preserve historic landmarks and historic districts, may place restrictions on the development of individual historic landmarks - in addition to those imposed by applicable zoning ordinances - without effecting a "taking" and requiring the payment of "just compensation." The court ruled that historic designation in and of itself does not constitute a "taking" of private property as the restrictions imposed are substantially related to the promotion of the general public welfare and permit "reasonable" beneficial use and "reasonable" profit for the owner. It also validated the use of historic preservation as a basis for exercising police power and established the principal that an owner is entitled to a "reasonable" but not unlimited profit. The ruling established a test by which to evaluate takings as related to historic preservation. Similarly, the cases *Maher v. City of New Orleans* and *Agins v. City of Tiburon* established that a taking is not unconstitutional so long as the owner receives a reasonable return, or the property maintains a viable economic use.³² The *United Artists Theater Circuit v. City of Philadelphia* determined that the mere act of designation was not in and of itself a taking. It also addressed issues of procedural due process

³¹ *Penn Central Transportation Company v. City of New York*, 438 U.S. 104 (1978).

³² *Maher v. City of New Orleans*, 516 F2d 1051 (5th Cir. 1975); *Agins v City of Tiburon*, 447 US 164 (1980).

by a neutral third-party during designation hearings.³³ The issue of vagueness has been addressed in the case of *Hanna v. City of Chicago*, where the designation of a historic district found the criteria to be too vague. These are all overly simplified summaries of the cases and their conclusions, but they collectively demonstrate that private owners perceive a lack of compensation for restrictions placed on historically designated properties. Therefore, the need for flexible and varied incentives are necessary to broaden acceptance for preservation.

³³ *United Artists Theater Circuit v. City of Philadelphia*, 535 Pa. 370 (1993).

4. Local Preservation Incentives Literature Review

Why Do We Need Incentives?

Incentives are intended to mitigate the perceived burdens to owners of the “sticks” of preservation regulation, reduce costs to the owner, reduce the cash required to fulfill historic preservation requirements, reduce the expenses of adhering to said requirements, improve financing for projects, and improve information for owners of historic properties.³⁴ CLGs may want to use preservation incentives for multiple reasons, more than just compensating owners of historic properties. J.M. Shuster and PlaceEconomics have provided the following reasons to create preservation incentives:³⁵

- Make preservation more desirable in financial terms.³⁶
- Leverage other sources of support for preservation.
- Counteract forces that threaten historic resources.
- Provide a level playing field in the private marketplace.
- Compensate owners who may be burdened by preservation regulations and costs.
- Influence the timing, scale, use, or character of a neighborhood.

This list acknowledges more than just the need for financial incentives and recognizes that preservation regulations can be burdensome or unfair. By providing certain “carrots,” CLGs can make preservation easier, fairer, and more desirable. The need for local incentives comes from a few different factors. First, what is surely preservation’s major and most powerful

³⁴ Donovan Rypkema and Briana Grosicki, “Preservation Incentives, Tools, and Strategies: What We’ve Learned,” <https://tinyurl.com/PlaceEconomicsIncentives>

³⁵ Donovan Rypkema and Briana Grosicki, “Preservation Incentives, Tools, and Strategies”; J. Mark Schuster, “Chapter 4: Inciting Preservation” in *Preserving the Built Heritage: Tools for Implementation*, ed. John de Monchaux and Charles A. Riley II, 1st ed. (London: Salzburg Seminar, 1997).

³⁶ Randall Mason, “Incentives and Urban Conservation,” in *Building the Future: The Role of Heritage in the Sustainable Development of Yangon* (International Conference, Yangon, Myanmar, 2015), 65.

financial incentive, the Federal Historic Preservation Tax Credit (FHPTC) applies to federal income tax but is only available for income-producing properties that reach a certain threshold of cost and comply with the *Secretary's Standards for Rehabilitation* ("the *Standards*").³⁷ Many states (approximately 35) also provide a tax credit for historic preservation projects, but not all of them expand the credit to homeowners. Since 1993, Congress has tried unsuccessfully to introduce homeowner tax credits through the Historic Homeownership Assistance Act amendment to the FHPTC bill.³⁸

Another source of federal funding is the Historic Preservation Fund (HPF), established in 1976, which is distributed to SHPOs. At least 10% of the funding is required to pass through to CLGs. Despite the \$150 million allocated in the budget for the HPF, Congress has never fully appropriated that amount.³⁹ Once the HPF is distributed to each state, depending on the competition, CLGs can see very little of that money.⁴⁰ With a small chance of acquiring federal assistance and inconsistent assistance across states, local governments are left to manage the bulk of preservation incentives for homeowners. As the primary "stick" for preservation regulations, local governments are on the front lines of the challenges to provide incentives that cater to their locality and policies, and are best suited to understand them.

Recent literature on incentives has focused mostly on quantifying the economic viability of preservation and incentives, though these studies look almost exclusively at tax credits and

³⁷ Prior to 1986, the FHPTC did include tax credits for homeowners who substantially rehabilitate their historic property. "Tax Incentives," National Park Service, accessed March 20, 2021, <https://www.nps.gov/tps/tax-incentives.htm>. Also important to note that all building projects on historically designated buildings at any government level must adhere to "the *Standards*".

³⁸ H.R.5249 — 103rd Congress (1993-1994); H.R.1172 — 106th Congress (1999-2000); S.496 — 105th Congress (1997-1998); H.R.1172 — 107th Congress (2001-2002).

³⁹ "Historic Preservation Fund - Brief Overview," National Conference of State Historic Preservation Officers, 2020, <https://ncshpo.org/issues/historic-preservation-fund/>.

⁴⁰ Despite the small amount of funding, SHPOs and CLGs alike have admitted that any funding, no matter how small, can make a huge difference for preservation projects.

Main Street Programs. Mason’s literature review “Economics and Historic Preservation” from 2005 covers a lot of ground on the available economic studies of preservation projects, and PlaceEconomics in particular has added since then a large number of individual city-wide, and other analytical reports.⁴¹ Most recently, the Preservation Alliance of Greater Philadelphia’s virtual discussion of three case studies of incentives in Baltimore, Chicago, and New Orleans, which covers some of the most popular or successful types of local incentives for historic preservation.⁴² These will be discussed separately according to their incentive type below.

Types of Government Incentive Tools

In 1985, the first Certified Local Governments were established, and with them questions about how preservation could be incentivized. One of the earliest summaries of local incentives came in 1991 from an article in the National Park Service’s journal *CRM* by Constance Beaumont.⁴³ The *CRM* journal “provided information for parks, Federal agencies, Indian tribes, States, local governments, and the private sector to promote and maintain high standards for preserving and managing cultural resources.”⁴⁴ Beaumont’s article, “Local Incentives for Historic Preservation” briefly discusses 5 types of incentives with examples of how they were used in a handful of cities:

⁴¹ Randall Mason, “Economics and Historic Preservation: A Guide and Review of the Literature,” Discussion Paper (The Brookings Institution Metropolitan Policy Program, September 2005); “Resources,” PlaceEconomics, n.d., <https://www.placeeconomics.com/resources/>.

⁴² Preservation Alliance for Greater Philadelphia, “Historic Preservation Incentives in Other Cities” (Philadelphia, PA, November 18, 2020). Landmarks Illinois’s presentation focused on Cook County’s Class L Property Tax Incentives, which are geared towards commercial, not residential, ownership and therefore will not be discussed further.

⁴³ Constance E. Beaumont, “Local Incentives for Historic Preservation,” *CRM, Supplement* 14, no. 7 (1991): 1–8.

⁴⁴ “CRM: The Journal of Heritage Stewardship,” National Park Service, accessed March 20, 2021, <https://www.nps.gov/crmjournal/>.

1. Tax incentives
2. Financial assistance (grants and loans)
3. Regulatory relief (exemptions)
4. Zoning incentives
5. Technical assistance

This list has remained largely unchanged over the decades, though recent scholarship and expert testimony have added a couple more.⁴⁵ J.M Shuster *et al's* book *Preserving the Built Heritage: Tools for Implementation* focuses more directly on incentives for owner-occupied properties than Beaumont's article.⁴⁶ Shuster states that there are 5 *tools* that the government utilizes for historic preservation:

1. Ownership & Operation – when the government is the owner and/or operator of a heritage resource
2. Regulation – through laws, policies, and provisions
3. Incentives & Disincentives – to bring owner action “into line with a desired policy”⁴⁷
4. Establishment, Allocation, & Enforcement of Property Rights – such as easements
5. Information – disseminate information “to influence the actions” of those acting on the part of preservation

⁴⁵ Donovan Rypkema and Briana Grosicki, “Preservation Incentives, Tools, and Strategies: What We’ve Learned,” <https://tinyurl.com/PlaceEconomicsIncentives>; Randall Mason, “Incentives and Urban Conservation.” In *Building the Future: The Role of Heritage in the Sustainable Development of Yangon*, 64–69. Yangon, Myanmar, 2015; Preservation Alliance for Greater Philadelphia, “Historic Preservation Incentives in Other Cities” (Philadelphia, PA, November 18, 2020). National Trust for Historic Preservation and Urban Land Institute, “Retrofitting Philadelphia: The Partnership for Building Reuse” (Philadelphia: The Partnership for Building Reuse, September 2014).

⁴⁶ J. Mark Schuster, *Preserving the Built Heritage: Tools for Implementation*, ed. John de Monchaux and Charles A. Riley II, 1st ed. (London: Salzburg Seminar, 1997).

⁴⁷ *Ibid.* 5.

In chapter 4 of the book, Shuster discusses a survey of different kinds of incentives and where and how they are used.⁴⁸ He covered a wide range of incentive types that focus on individual citizens, nonprofit groups, various levels of government, and others. He categorized incentives as direct or indirect incentives to private owners:

1. Direct Incentives
 - a. Grants or other tax-free payments
2. Indirect Incentives
 - a. Tax-based
 - b. Loans
 - c. Regulatory exemptions
 - d. Public purchase and resale
 - e. Recognition
 - f. Training programs
 - g. Design assistance
3. Disincentives – penalties for failure to comply

Most recently, a Donovan Rypkema and Briana Grosicki of PlaceEconomics in a presentation on Preservation Incentives, Tools, and Strategies on May 27, 2020, in which they categorized incentives into 7 categories, elaborating upon the literature to date:⁴⁹

1. Direct financial assistance – such as grants and fee mitigation
2. Tax-based – tax credits, tax freezes, alterations on use value assessments
3. Debt-based – low-interest loans

⁴⁸ Ibid. 49-77.

⁴⁹ Donovan Rypkema and Briana Grosicki, “Preservation Incentives, Tools, and Strategies: What We’ve Learned,” <https://tinyurl.com/PlaceEconomicsIncentives>.

4. Transaction – donations, subordinate equity, first right of refusal
5. Regulatory – fees for illegal demolition, streamline permit process, waive regulations
6. Technical assistance – design assistance, regulation process assistance
7. Public investment – infrastructure improvements, targeted investment zones, public space improvements, parking, priority to lease policies, city-wide community-based surveys, Historic Districts as Affordable Housing Districts, media campaigns

Randall Mason condenses incentives into two types: financial incentives and process incentives, which is how this thesis will address each incentive in turn.⁵⁰

a. Financial Incentives

The financial incentives discussed in this section will focus only on these that are intended directly for homeowners. They include Shuster’s first three categories (grants, tax-based, loans), and revolving loan funds.

Tax-based Incentives

Tax-based incentives can be applied to property taxes, income taxes, sales taxes, or fee waiver. They can come in the form of tax credits, tax deductions, tax freezes, and alterations on use value assessments. Tax credits are a dollar-for-dollar reduction to offset the amount of taxes, applied to the adjusted gross income. Tax deductions, however, are applied to income before taxes. Tax freezes keep a tax rate locked in for a set amount of time. In the Preservation Alliance of Philadelphia’s presentation on incentives, Johns W. Hopkins, Executive Director of

⁵⁰ Randall Mason, “Incentives and Urban Conservation,” in *Building the Future: The Role of Heritage in the Sustainable Development of Yangon* (International Conference, Yangon, Myanmar, 2015), 64–69.

Baltimore Heritage, discussed Baltimore’s City Historic Tax Credit Program, which was enacted in 1994.⁵¹ This 10-year property tax credit is eligible for both homeowner and commercial building owners, with a goal to revitalize the city’s distressed neighborhoods.⁵² A 2020 evaluation of the program has shown that since 1996, the city claims that the program has leveraged \$1.2 billion through tax credits for about 3,500 projects. Over half of all projects were small projects and the vast majority of all projects were managed by small developers and 96% in residential areas. They have seen an increase in property values and an increase in ownership rates as a result, particularly in distressed neighborhoods.

Grants

Grants are typically provided as a tax-free payment to the recipient or applicant. Some grants require a match from the applicant, while others can be geared towards specific types of projects or outcomes or awarded on the basis of demonstrable need, like New Orleans’ Revival Grants Program.⁵³ This grant is mostly funded by the non-profit Preservation Resource Center (PRC) and supported by City funds when possible. The Historical Commission promotes the grant and help PRC identify eligible candidates. Houses that have been cited for violations by the New Orleans Historic District Landmarks Commission are eligible, though the grant only covers eligible repairs to the exterior of the property, limited to \$12,000. Many homeowners do not

⁵¹ “Baltimore City Historic Tax Credit for Historic Rehabilitations and Restorations (CHAP Tax Credit),” Baltimore City: Historical and Architectural Preservation, December 14, 2020, <https://chap.baltimorecity.gov/tax-credits>.

⁵² Donovan Rypkema et al., “An Analysis of the Baltimore Historic Preservation Tax Credit,” *PlaceEconomics*, October 5, 2020, <https://doi.org/10.21428/9545a395.bc0e85d5>; “Baltimore City Historic Tax Credit for Historic Rehabilitations and Restorations (CHAP Tax Credit),” Baltimore City: Historical and Architectural Preservation, December 14, 2020, <https://chap.baltimorecity.gov/tax-credits>.

⁵³ A discussion of the role of partnerships between CLGs and advocacy groups will be discussed in Section 5. “Resources,” *Preservation Resource Center of New Orleans* (blog), 2021, <https://prcno.org/resources/>.

realize their property is located within a historic district and need to comply with the regulations – such as maintenance – and then struggle to handle the fines from their citations. Given New Orleans’s primary source of income is on tourism, the city is concerned about its image. However, the city also has a very high rate of poverty with increasing property values, stagnated wages, and is still facing the aftermath of damage from hurricanes. Frequently, HUD funding for hurricane damage repairs will not apply to architectural or historic details. Therefore, PRC designed the program to assist low-to-moderate income homeowners living within historic districts so that their houses can remain in the family and can be passed onto future generations. The city will also waive the citation with on the condition that the issues are addressed.

Loans

Loans can be a more financially viable option for CLGs as the recipient is required to pay back the loan. Revolving loan funds in particular are a sustainable method, since repayment funds are used to finance new ones. Low-interest – or even no-interest – loans are more likely to incentivize homeowners, who likely already manage mortgage payments.⁵⁴ A more in depth look at a loan program will be discussed in Section 5 in the interview discussion with Maren Bzdek.

⁵⁴ For an evaluation of revolving loan programs, see Olivia Mitchell, “An Evaluation of Historic Preservation Revolving Loan Funds, and Recommendations for the Establishment of Future” (Master’s Thesis), Philadelphia, PA, University of Pennsylvania, 2011).

b. Regulatory Incentives

Regulatory or process incentives cover a wide-range of non-financial processes. The categories below are taken and combined from Shuster, Mason, and PlaceEconomics; examples will be introduced in Section 5 in the discussion of interviews.

Streamlined Permit Process

As discussed in Section 2, homeowners often see preservation regulations as time consuming, but frequently this isn't the case. For homeowners with simple alterations or project proposals, their applications can be reviewed "over the counter" by supporting staff rather than presenting to the full commission board. This is a standard practice for many Historical Commissions, but should be considered for CLGs who do not.

Regulation Exemptions

Many historically designated properties are grandfathered into new regulations, or are exempt from compliance, so long as they do not compromise health and safety. Despite Appelbaum and other's complaints of historical commissions refusing modern technologies, like solar panels, these kinds of projects can and do frequently comply with historic guidelines. Strict compliance or outdated guidelines may cause greater conflict, and therefore regular review of codes and guidelines is crucial.

Recognition

Recognizing a homeowner's willingness to comply with guidelines can make a huge difference to the individual. Recognition could come in the form of a plaque, mention on the

CLG website or social media, or even with a simple group celebration for completed projects each year. This kind of public recognition often encourages other homeowners to participate.

Design & Technical Assistance

As will be discussed in the results of the surveys in Section 5, many homeowners simply do not know how to begin their preservation project or who to go to for assistance. Offering early project design guidance can help homeowners save time and money. Technical assistance may come in the form of lists of contractors or resources for appropriate and compatible materials.

Issues with Financial and Process Incentives & Primed for Success

Mason claims that for preservation to be successful, it must be integrated with other policies to balance incentives and regulations. According to Mason, the most effective balancing of policies and incentives includes: ⁵⁵

- high-quality, culturally and architecturally significant heritage assets
- governance capacity to manage incentives and regulations
- transparent and fair legal frameworks; and viable markets

This acknowledgement is critical to understanding how one incentive could work in one CLG but completely fail for another. PlaceEconomics' presentation says that for incentives to work, they must meet the stakeholders' – in this case, homeowners – *actual* needs, not their *perceived* needs. ⁵⁶ Therefore, gaining an intimate understanding of homeowners' needs and

⁵⁵ Randall Mason, "Incentives and Urban Conservation," 66.

⁵⁶ Donovan Rypkema and Briana Grosicki, "Preservation Incentives, Tools, and Strategies: What We've Learned," <https://tinyurl.com/PlaceEconomicsIncentives>.

concerns is the first step to implementing the right incentives. Successful implementation means:

- They are directed to a particular need (like the New Orleans Revival Grant).
- They should be paired with appropriate regulations.
- They need to be clearly communicated to the intended users.
- They should be actively marketed through various sources.
- They must be simple to implement (by the homeowner and municipality).
- They must meet other public policy objectives (i.e. integration with overall city planning).
- They must be de-politicized.

State Enabling Legislation

Additionally, state level legislation may play a crucial factor in a CLG's ability to use incentives. Every state is different in its application of taxes and distribution of funding. Some states' tax structures may focus solely on property tax or may not have an income tax, such as Texas or Delaware. In Texas, for instance, the county oversees appraisals for property taxes, but also city taxes and education taxes. Other states' constitutions may interfere with the power of individual municipalities to offer tax incentives, like Pennsylvania's Uniformity Clause.

Still other states have state level legislation specific to preservation incentives that are funded by the state, but they must be individually adopted on the municipal level and managed by the CLG – for example, Washington's Special Valuation program, South Carolina's Bailey Bill,

and California's Mills Act.⁵⁷ This thesis will not analyze such state level legislation, but not recognizing their existence would be remiss as they can wield great influence over local governing practice.

⁵⁷ "The Power Behind Pennsylvania's Uniformity Clause," *Pennsylvania CPA Journal*, December 20, 2019, <https://www.picpa.org/articles/picpa-news/2019/12/20/pa-cpa-journal-the-power-behind-pennsylvania-s-uniformity-clause>; "Local Property Tax," South Carolina Department of Archives and History, accessed March 20, 2021, <https://scdah.sc.gov/historic-preservation/programs/tax-incentives/local-property-tax>; "Mills Act Program," California Office of Historic Preservation, accessed March 5, 2021, https://ohp.parks.ca.gov/?page_id=21412; "Special Tax Valuation," Department of Archaeology + Historic Preservation, n.d., [March 20, 2021](#).

5. Methodology

The approach to evaluating the effectiveness of local incentives consists of three parts: (1) chart a list of incentives employed by Certified Local Governments⁵⁸ based on list of local preservation incentives discussed in Section 4, (2) submit surveys to the National Alliance of Preservation Commissions (NAPC) and CLG State Coordinators, and compile and analyze results,⁵⁹ and (3) conduct interviews to elaborate on some of this information. The initial strategy was to conduct a comparative case study of 3-5 CLGs selected in response to the results of part 1. However, an interview with Cory Kegerise, Community Preservation Coordinator for the Pennsylvania State Historical and Museum Commission/State Historic Preservation Office and Chair of the National Alliance of Preservation Commission, influenced a methodological pivot: the introduction of two surveys sent to the National Alliance of Preservation Commissions listserv (NAPC-L)⁶⁰ and the State CLG Coordinators. Both surveys were designed so as to supplement my online research in part 1 with more first-hand, qualitative data.

Online research provides the bulk of the research. Nearly all information about CLGs is available online or in a digital format. All interviews were held virtually, due in part to COVID restrictions but mostly because of the distance between the author and those who participated in the interviews. Video conference platforms are more accessible and acceptable at this time and they made for a cost-effective approach while providing a level of visual connection not always available via voice only calls. The decision to conduct two surveys allowed for insights

⁵⁸ This research focused only on CLGs for reasons noted in Section 1. Many local preservation organizations promote preservation with various incentives that do not have CLG status, but they are outside the scope of this thesis.

⁵⁹ See Appendix B for survey questions and Appendices C and D for a full chart of the results.

⁶⁰ "NAPC-L is a Google Group managed by the National Alliance of Preservation Commissions to provide a professional network for preservation commission members and staff to ask questions, exchange ideas and share information." NAPC-L. Accessed 25 January 2021. <https://napcommissions.org/napc-l/>

from those on the ground at the local level for the NAPC Survey, and to cast a wider net from the knowledge CLG Coordinators have about their CLGs. Interviews were selected based on results of the surveys to gather deeper insights about programs and strategies that assist homeowners.

The results of the surveys proved far more fruitful than expected and comparative case studies no longer seemed to be the right approach. The results provided insight into the strengths and weaknesses of various incentives, approaches by CLGs to incentivize preservation for homeowners, and other emulated CLG programs. The author grouped these results into themes and conducted further interviews to gather deeper information about surprising or fruitful responses. The themes of the surveys and lessons gleaned from interviews became focal points of the recommendations at the end of this thesis.

1. Matrix A – Online Research (Appendix A)

In its initial iteration, Matrix A began as a data collection tool in which CLGs were selected based on their appearance in literature from the National Trust, NPS, and other sources discussed in Section 4. The survey was not intended to be exhaustive or deeply analytical, given that there are over two thousand CLGs in the United State and not enough time or available resources to examine them all, including the NAPC itself. Beyond the extent of the research conducted for this thesis, no such exhaustive comparative study exists, and further analysis would surely prove beneficial.

Matrix A was intended to identify criteria to categorize broadly used incentives and any unusual incentives that an individual CLG might have devised, and from that, to generate a list of representative municipalities to serve as case studies. Instead, the findings from Matrix A

support responses from the subsequent surveys, which will be explored below. Matrix A explores 35 CLGs across 22 states, with data gathered primarily from CLG and SHPO websites. A geographical representation of states covered in the list are in Figure 1. Local advocacy or preservation nonprofit group websites, as well as discussion in the literature and studies of preservation incentives from Section 4 supplemented this research, and the National Trust’s recommendations for the Philadelphia Preservation Task Force.⁶¹ In addition, the recently completed Philadelphia Historic Preservation Task Force’s Final Report included an extensive list of proposed incentives – financial and procedural – which served as a useful supplement to those described in Section 4.⁶²

Matrix A covers five areas: Incentive Types; Preservation Ordinance Information; Outreach, Education, Communication; Economic Studies; and City Revitalization Plans. Matrix A is included in its entirety in Appendix A. An initial reaction to the research is to note a varying

⁶¹ Michaelle Bond, “Preservation Can Promote Equity for Black Communities, Report Says,” <https://www.inquirer.com>, accessed January 28, 2021, <https://www.inquirer.com/real-estate/preservation-philadelphia-national-trust-historic-equity-20210127.html>; Will Cook, “Examples of Preservation Laws That Employ Tiered Designation & Review,” Memo (Washington, D.C: National Trust for Historic Preservation, January 25, 2018); David J. Kohtz, “Improving Tax Incentives for Historic Preservation,” *Texas Law Review* 90, no. 4 (2012): 1041–64; National Trust for Historic Preservation and Urban Land Institute, “Retrofitting Philadelphia: The Partnership for Building Reuse” (Philadelphia: The Partnership for Building Reuse, September 2014); Philadelphia Historic Preservation Task Force, “Key Recommendations of the Philadelphia Historic Preservation Task Force: Executive Summary,” Executive Summary (Philadelphia, PA: The City of Philadelphia, March 2019); Philadelphia Historic Preservation Task Force, “Key Recommendations of the Philadelphia Historic Preservation Task Force: Final Report,” Executive Summary (Philadelphia, PA: The City of Philadelphia, March 2019); PlaceEconomics, “Opportunity At Risk: San Antonio’s Older Affordable Housing Stock” (San Antonio, TX: San Antonio Office of Historic Preservation, 2019); Mike Powe, Ph.D. and Reina Murray, “Historic / Cultural Resource Survey: Best Practices Research,” Memo (Washington, D.C: National Trust for Historic Preservation, January 18, 2018); Donovan Rypkema and Caroline Cheong, *Public-Private Partnerships and Heritage: A Practitioner’s Guide* (Washington, D.C: Heritage Strategies International, 2011); Anthony Veerkamp and Di Gao, “Incentives for Building Reuse Best Practices Research,” Memo (Washington, D.C: National Trust for Historic Preservation, January 24, 2018).

⁶² The National Trust’s recommendations served as the basis for the Philadelphia Historic Preservation Task Force’s “Key Recommendations of the Philadelphia Historic Preservation Task Force: Final Report,” Executive Summary (Philadelphia, PA: The City of Philadelphia, March 2019).

degree of accessibility and ease of use between websites. Nearly all websites directing users to local government management of historic preservation are housed on the local government websites, which have broadly varied degrees of user-friendliness. At one extreme, some websites include only the most basic information, such as historic preservation commission meetings, minutes, commission members, and the preservation ordinance. At the other are websites that contain mountains of easy-to-find information for FAQs, incentive offerings, advocacy partnerships, success stories, resource surveys, and other such resources. These latter websites typically provide critical information for homeowners about maintenance, assistance, guidelines, and recommendations. The most useful websites typically come from within the same states, which typically have more robust SHPOs, state funding, or state level education for preservation. This, however, does not necessarily equate with more designated buildings or the age of the CLG. Some of the most robust CLG programs, however, seem to exist alongside strong advocacy groups or historical societies that support the historical commissions.

It is also important to note that the CLGs in Matrix A are nearly all large cities. Previous studies on the effectiveness of incentives and summary literature of incentives focus heavily on large cities for models of CLG incentives and since this matrix gathered data based on this literature, there is a noted lack of smaller municipalities. However, as will be discussed in the next section, the survey respondents typically were much smaller municipalities, which are somewhat more overlooked in the literature. For this analysis, Large Cities are categorized as having a population of over 250,000; Midsized Cities as having a population of 100,000 to

249,999; and Small Cities as having a population less than 100,000.⁶³ This distinction is expanded upon in the discussion section below.

2a. Matrix B - National Alliance of Preservation Commissions Survey Results (Appendix C)

Matrix B compiles the results of the anonymous survey sent to the National Alliance of Preservation Commissions listserv (NAPC-L), which was intended to deepen the understanding of the information gathered in Matrix A through first-hand knowledge from preservation professionals working closely with or as a part of historical commissions. Respondents were not asked to provide their names or contact information, but many not only chose to do so but also offered further assistance. Their names are removed from Matrix B to keep them anonymous.

The survey results are based on the respondents' understanding of preservation within their municipalities. Follow up questions and interviews were conducted for more information where needed, as discussed below. The survey and resulting analysis are not meant to be exhaustive, and an extended evaluation of these and other municipalities should be made to gather more information about the topics covered in the survey. The questions in the survey are listed in Appendix B and Matrix B results are in Appendix C. The survey was sent on January 28, 2021 and closed February 20, 2021.

⁶³ City size population criteria are based on the National Center for Education Statistics, which relies on standard urban and rural definitions developed by the U.S. Census Bureau. National Center for Education Statistics, "NCES Locale Classifications and Criteria," n.d., https://nces.ed.gov/programs/edge/docs/LOCALE_CLASSIFICATIONS.pdf. Population size determined from U.S. Census Bureau information.

The NACP-L survey questions focused on:

- Resident perception of preservation in general
- Incentives offered by the municipality to assist homeowners, including non-preservation related incentives
- Existence of Public-Private Partnerships
- Inclusion of preservation goals in city development plans
- Common questions received from residents about their historic houses
- Strengths and weaknesses of the local preservation program
- Other CLG programs they wish to emulate and why⁶⁴

Results of the survey were coded to identify themes from the responses to the broad questions, while multiple choice selections were analyzed in graphs.

Participants

In total, 39 respondents participated, representing 41 different municipalities from 21 states. A geographical visualization of the represented states can be seen in Figure 2. For comparison, the survey generated a 2% response rate as the listserv has 739 members. Only two municipalities were not CLGs. Seventeen respondents are either current or former members of a historic preservation commission, and two-thirds identified themselves as preservation professionals.

⁶⁴ Responses to this question led to some particularly rich incentives practices explored in the interviews described in section 5-3 below.

Public Perception

As far as preservation perception is concerned, 51% (29) of respondents perceived that residents of their municipalities have mixed feelings regarding preservation; and 29% (12) believe residents see preservation positively, and 20% (8) with a negative perception. The respondent from Amherst, New Hampshire noted a clearly positive perception of preservation, despite not knowing whether there were any incentives for homeowners. In St. Albans, Vermont, Kennebunk, Maine, and Strafford, Vermont said that some residents see historic properties as restrictive on property rights, commercial development, and modern code compliance but that there are groups who support preservation. Likely, a lack of incentives does little to help improve those sentiments.

Offered Incentives

Figure 3 illustrates which incentives the respondents have in their CLG. Four options were provided in the survey: Financial Incentives, Educational Material, Technical Assistance, or Other. Technical Assistance and Other covered the breadth that regulatory incentives can cover, as discussed in section 4. Based on Matrix A, technical assistance was common and therefore selected as an option for the survey. The Other response allowed respondents to describe incentives that did not fall under any of the provided categories. Ten respondents had 3 out of 4 incentives: financial, educational, and technical assistance. None of the respondents utilized 4 or more types of incentives. Four respondents claim not to have any incentives. Eighteen respondents say their CLG has a mix of 2 kinds of incentives and eight have only 1 incentive. Financial assistance is the most common incentive used (35%), followed by technical assistance

(32%), then educational materials (28%) (Figure 4). This almost follows the trends of most common questions CLGs receive from residents, which will be addressed below.

Non-Preservation Incentives

Seventeen respondents claim their municipality offers other incentives that are not directly preservation-related but which can be used to support preservation goals for homeowners, whether their home is officially designated or not. Many commissions often overlook such programs and focus more, if not solely, on preservation-specific incentives. Non-preservation incentives included Community Development Block Grants (CDBG), building code amendments and zoning variances, easements and façade grants, weatherization and utilities update assistance, low-income forgivable loans, maintenance funding, rehabilitation funds for single family homes or seniors, small project improvement grants, tax stabilization plans, and lists of trained contractors.

Partnerships

Twenty-one respondents claim that some kind of relationship or partnership exists between the historic preservation office and an advocacy group to support preservation. Eighty-one percent claim they have a working relationship, while the remaining mention that while there may be a robust advocacy group in their area, the commission has little to no working partnership with them. To a certain degree, this reflects the entities' respective emphasis on regulation itself and advocacy.

Common Resident Questions

Respondents reported that by far the most common questions from homeowners pertain to regulatory and restrictive issues (47%), followed by financial queries (30%), and then questions around technical assistance (18%) (Figure 5). Other common questions ask why their house was designated or where they can find trained contractors. These results somewhat align with the offered incentives. That is, a high percentage of questions are aimed at finding financial assistance. However, the highest number of questions center around regulatory restrictions that affect their property, while educational materials are at the lower end of provided incentives. This could suggest a correlation between lack of communication or educational materials and the frequency with which residents need to ask for information. The most common questions could be solved by providing easily accessible materials, freeing up staff time for other projects.

CLGs to Emulate

Only 29 respondents answered the question of whether there were other CLGs they look to for guidance. Four said they do not look to other places because: 1. their CLG is already established, 2. because they just started looking, or 3. because they do not have the time to find any. Three respondents noted that their CLG serves as a model to others, and another three said they would look towards any city that was successful. Four other respondents answered differently: that they were only looking within their own state; they didn't want to look at large cities since they were a township-wide CLG; that it would depend on multiple factors; or that their issues had more to do with political support than issues with their program itself.

However, for those who answered this question directly, two CLGs were repeatedly named as exemplary in the results: San Antonio, Texas and Fort Collins, Colorado. Fort Collins

was named only by respondents within Colorado, who admired Fort Collin’s no-interest loan program, website, and preservation code. One of the respondents who mentioned San Antonio admired their “solid balance of programs from incentives, to outreach, to education in addition to their regulatory role to preserve places.” These responses led to interviews with individuals working in Fort Collins and San Antonio to further explore their success. Those interviews are discussed below.

Analysis of population size

Nearly two-thirds of the participating municipalities in the NAPC-L Survey have populations less than 100,000. Of the remaining one-third, 18% had a population between 100,000 and 250,000, and 17% had a population size greater than 250,000. This is nearly opposite the size of the CLGs in Matrix A. A more detailed discussion is in the *Initial Thoughts* section below.

Initial Thoughts

What stood out from these results was that many of the locations were small towns or rural areas that illustrated a desire for a version of the creative incentives that many big cities are able to offer, presumably with larger staff and more funding. Comparing population sizes of the CLGs in Matrix B to Matrix A revealed important differences. The literature that served as the basis for Matrix A favors study of “Large Cities” (55%) whereas the respondents shown in Matrix B were predominantly from “Small Cities” (65%) and “Midsized Cities” (18%) (see figs. 4

and 5).⁶⁵ This demonstrates that, firstly, studies tend to favor Big City programs over smaller regions, which are limited by less funding and fewer staff. This favoritism, however, may reflect more of the range, ability, and prevalence of incentive programs that larger cities are able to manage. The responses to the NAPC-L survey, however, demonstrate a real necessity and indeed craving for ideas for small municipalities that can be implemented with fewer resources. More than once, respondents commented on their inability to “keep up” with the larger cities’ programs. This demonstrates a real need for flexibility, creativity, and alternative funding sources for these smaller regions. This also calls for more studies of midsized and small cities and rural areas.

Future Considerations

Future iterations of this survey should ask respondents to provide more detail on the incentives they offer rather than simply classify them into financial, regulatory, zoning, or other. The term “city” should also be replaced with a broader term. Use of the word “city” was intended to be a catch-all phrase for a locality but some responses mentioned they were not interested in what cities were doing and wanted to find small town or rural areas for information or relationships. Also, the large discrepancy in the size and population of municipalities covered in Matrix A and Matrix B demonstrates the need for a more nuanced study of smaller CLGs. A greater response to the survey could further support these results, contradict them, or provide even more wide-ranging answers. A greater time for response with multiple emails could have boosted the response rate.

⁶⁵ The breakdown of population sizes were as follows: Large Cities >250,000; Midsized Cities 100,000-249,999; Small Cities <100,000. These divisions were based on definitions from the U.S. Census Bureau.

2b. State CLG Coordinators Survey Results, Matrix C (Appendix D)

Matrix C compiles the results of the second anonymous survey, directed to State CLG Coordinators and emailed on my behalf by Cory Kegerise. Again, respondents were not asked to provide their names or contact information, but a few did provide this information voluntarily and offered further assistance. Their names are removed from the results in Matrix C to keep them anonymous.

The intent of this survey was to gather a state-level understanding about the questions, needs, and shortcomings of CLGs, and to allow the CLG Coordinators to identify exemplary CLGs within their state. These responses also served to help fill gaps for any other CLGs that may have been missed from Matrices A and B. The questions for the survey are listed in Appendix D and the analyzed results in Matrix C are in Appendix D. The survey was sent on January 28, 2021 and closed February 20, 2021.

The State CLG Coordinator survey questions focused on:

- Identifying CLGs that offer incentives for owner-occupied historic residences
- Identifying any CLGs that are successful at such incentives
- Common questions from local historical commissions about assistance for homeowners
- Impediments to local historical commissions
- Aspirations to assist historical commissions
- Any other states that they emulate

Respondents

There were 12 respondents, 2 of which worked for individual CLGs rather than as state-wide CLG Coordinators. Since those two responses do not necessarily overlap with the NAPC-L Survey, their responses were left out of the analysis, but they remain in Matrix B for their valuable answers and are highlighted in the geographical map in Figure 6 with a patterned fill. The states that responded were Arizona, Colorado, Kansas, Nebraska, New Mexico, Oregon, South Carolina, Washington, and two from Iowa.

Successful CLG Applied Incentives

Only the respondents from Iowa and the respondent from Nebraska specified CLGs that are successfully implementing incentives for homeowners, but most respondents did summarize the kinds of incentives implemented (see Figure 7 for graph). Notably, the New Mexico respondent claimed they did not know of any financial incentives offered by CLGs, only some educational and technical assistance training.

Common Questions from CLGs

The most common question the respondents say they receive is about funding, such as questions about state tax credits, state grants, or how to access other sources of funding. There is also interest in finding non-financial incentives to implement and technical assistance. These questions parallel what the CLGs receive themselves from their residents. Since there are so few incentives on the federal or state level, as established in Section 4, it is not surprising that CLGs would pass these up to the SHPO level to see what other resources are available they can pass on to homeowners.

Successful CLGs

Over half the respondents did name CLGs they believed had successful incentives programs, nearly all of them having financial incentives of some kind. In Washington, the Special Valuation program, which reduces property taxes on substantial improvements made to eligible properties for 10 years, is enabled by the state but individual CLGs opt into it and manage the applications.⁶⁶ Spokane was specifically called out for its use. Louisville, Colorado utilizes the typical grants and loans but also has a landmarking bonus of \$5,000 for owners who voluntarily submit their homes for designation and are approved by the historical commission. Iowa City was identified as having a no-interest loan program. Other financial incentives mentioned include local grants and matching grants, local tax rebates, and special property tax assessment. Two respondents mentioned non-financial incentives: design assistance in Astoria, Oregon and education and training programs in some CLGs in New Mexico.

Impediments to CLG Preservation Goals

Lack of support, funding, and education are the highest-ranking impediments that the respondents hear from the CLGs within their states. Lack of support comes from various stakeholders, developers, local government, and the residents themselves. This concern about funding parallels the most common questions the respondents receive from CLGs. Clearly the lack of funding is the most crucial piece to successfully implementing preservation goals. CLGs would also like to better educate their staff and residents, with one response specifically mentioning a lack of interest from younger generations. This desire for more education for all parties is crucial to stemming the other issues CLGs are facing, like the lack of support. Other

⁶⁶ "Special Tax Valuation," Department of Archaeology + Historic Preservation, n.d., [March 20, 2021](#).

impediments that could be resolved through education are development pressures from developers, political groups, and YIMBY (Yes In My Back Yard) groups,⁶⁷ apathy, and property rights and high property value concerns.

Training and education could also provide more skilled contractors, the scarcity of which is also seen as an impediment to proper preservation. A limited number of properly trained contractors could result in poor practices. A lack of options for homeowners could mean long waits for availability, and also lack of competition resulting in higher costs.

Also, the lack of staffing for CLGs reduces the time staff can commit to achieving preservation goals. This can be aggravated by the weak programs and outdated guidelines also mentioned, and the pressures already mentioned above. Lastly, one respondent wanted to find a solution to COVID restrictions on in-person gatherings. Though the Nebraska respondent was the only one to mention this issue, no doubt many other CLGs and SHPOs are finding it difficult to implement preferable solutions.

Assistance Wish List

When asked what SHPOs wish they could do to help their CLGs achieve their preservation goals, by far the highest response was for staff training and providing more funding. Since this is one of the benefits SHPOs are meant to provide to CLGs, the respondents clearly find there isn't enough. Funding is a much more difficult issue to resolve. They'd also like

⁶⁷ YIMBYism is a pro-development group that formed as a reaction to the affordable housing crisis and NIMBYism (Not In My Back Yard), an anti-development group. The issues surrounding both contexts are complex and highly polarizing. For some nuance around the issues, see Fernando Marti, "YIMBY, White Privilege, and the Soul of Our Cities," *Shelterforce* (blog), February 19, 2019, <https://shelterforce.org/2019/02/19/yimby-white-privilege-and-the-soul-of-our-cities/> and Will Imbrie-Moore, "A Call for Intersectional YIMBYism," *Harvard Political Review*, March 17, 2020, <https://harvardpolitics.com/a-call-for-intersectional-yimbyism/>.

to bring more empowerment to the staffs of their state's CLGs by encouraging inspiration and innovative solutions and demonstrating validity within the local government. One respondent also wants more studies to demonstrate the value of preservation in Oregon.

Other State Strategies

Knowing that there are meaningful differences between states, the last question asks whether there are any other state-level strategies they would like to implement. Those who responded to this question express a wide range of interests, from disaster planning and climate change strategies to ways to convince other historical commissions to become CLGs. Education and training programs are still a major theme, specifically mentioning how to encourage participation in training sessions, promoting tourism benefits, and educating businesses to participate in preservation. No specific states are named as sources of inspiration.

Other Comments

One comment mentions that, "It is difficult for homeowners to see long-term benefit of appropriate repairs over short-term utility of inappropriate replacements," specifically, that state income tax incentives are not so helpful for small repair or rehab projects. Some kind of incentive that offers a small amount of financial assistance would likely be more beneficial.

The only other comment is from the Nebraska respondent, echoing the desire to know how to increase the number of CLGs.

Future Considerations

Since the survey to SHPO offices had so few respondents, this analysis can hardly claim to be definitive. Of note is that most of the respondents are from less populated states, paralleling the trend in responses to the NAPC Survey. This could demonstrate that SHPOs are eager to participate to learn new/more innovative ways to assist their CLGs. One additional field of comparison could be to research exactly what funding support and regular training programs the SHPOs offer the CLGs. This could connect the level of available resources from SHPOs and the needs of CLGs. Also, the responses do not clarify whether the SHPOs are lacking in training opportunities or that CLG staff are not participating in what is offered. Regardless, there may be some kind of disconnect that should be resolved to make that work.

2c. Survey Lessons Learned

Firstly, these surveys have provided a necessary broad glimpse into a small spread of CLGs that would never have been seen through online research only. Without the qualitative analysis from the surveys, this rich passion for the field and desire to help homeowners would never have been uncovered.

Four main themes radiate throughout every response in these two surveys:

- The need for more funding to provide financial assistance to homeowners
- A solution to getting more support for preservation from residents, businesses, city departments, and developers
- Creating and providing more training for CLG staff
- Educational materials for residents and other governmental departments

While these issues are not unknown in the preservation profession, smaller CLGs appear more eager for solutions. From a state level, CLG Coordinators want to provide as much support as possible to make their CLGs successful, but it is clear more resources are needed to sustain the programs. These observations, however, are only based on the responses and information provided in the surveys and more research is warranted that is more evenly distributed across the size and sophistication of CLGs to see if this assumption holds true.

3. Interviews

Interviews were conducted with various individuals to gather deeper insight about specific survey responses about matters such as incentives, strategies, or composition of CLG programs. The interviews with William Dupont and Shanon Miller in San Antonio and Maren Bzdek in Fort Collins were conducted because these CLGs were specifically named in the survey responses.

3a. Cory Kegerise, Pennsylvania

I first spoke with Cory Kegerise, Community Preservation Coordinator for the Pennsylvania Historical and Museum Commission and Chair of the National Alliance of Preservation Commissions, on January 12, 2021. During that interview, Mr. Kegerise suggested creating the surveys, which proved to be invaluable, as was his assistance with their distribution. He also discussed the difficulties facing Pennsylvania CLGs, specifically. In particular, he noted the state constitution's "Uniformity Clause," which states: "All taxes shall be uniform, upon the same class of subjects, within the territorial limits of the authority levying the tax, and shall be

levied and collected under general laws.”⁶⁸ This means that financial incentives that take the form of tax credits, abatements, or deductions for historically designated property and that are specific to a municipality are extremely difficult to initiate.⁶⁹ Pennsylvania’s Uniformity Clause wields tremendous restrictive power bolstered by some crucial rulings in Pennsylvania Supreme Court cases.⁷⁰ As a result, Pennsylvania’s smaller CLGs typically do not, or really cannot, offer tax incentives and must rely on other financial and non-financial motivations.⁷¹ This demonstrates the constraints state enabling legislation can have on a CLG’s ability to initiate incentives, especially financial incentives.

3b. William Dupont & Shanon Shea Miller, San Antonio, Texas

William Dupont, the Director of the Center for Cultural Sustainability and Conservation Society of San Antonio Endowed Professor at the University of Texas San Antonio, and Shanon Shea Miller, Historic Preservation Director for the City of San Antonio, provided extremely useful and detailed information about the process and development of San Antonio’s preservation incentives program. I spoke with William Dupont on March 5, 2021 and Shanon Miller on March 12, 2021. The success of San Antonio’s Office of Historic Preservation is not just the results of

⁶⁸ Penn. Const. art. VIII. § 1.

⁶⁹ It is worth noting that the U.S. Constitution (U.S. Const. art. I. Clause 1.) and many other state constitutions include a “Uniformity Clause” in some measure, but the strict interpretation of the clause in Pennsylvania is the reason tax incentives are difficult. Additional research is needed on the balance between municipality incentives and state or federal constitutions’ Uniformity Clauses.

⁷⁰ To see a succinct summary of how and why Pennsylvania’s Uniformity Clause restricts unequal taxation of similarly classed entities, see “The Power Behind Pennsylvania’s Uniformity Clause,” *Pennsylvania CPA Journal*, December 20, 2019, <https://www.picpa.org/articles/picpa-news/2019/12/20/pa-cpa-journal-the-power-behind-pennsylvania-s-uniformity-clause>.

⁷¹ Pennsylvania’s only first class city (Philadelphia) and only second class city (Pittsburgh) are able to skirt around the restrictions of the Uniformity Clause due their more powerful home rule charters granted by the State. Irina Zhorov, “Explainer: Cities, Boroughs, and Townships, Oh My! Pa. Municipalities Clarified,” *WHYY*, April 4, 2016, <https://whyy.org/articles/explainer-cities-boroughs-and-townships-oh-my-pa-municipalities-clarified/>.

the various financial and regulatory incentives they offer to homeowners, but the creativity applied to establish educational opportunities to help owners maintain their historic houses.

When Ms. Miller joined San Antonio's Office of Historic Preservation (OHP) in 2008, the historical commission was already motivated to provide resources to residents to help them with their historic properties and alter the perspective of the commission as purely an enforcing agency. Together with Mr. Dupont, they worked to create one of the first programs, window repair workshops. and. Ms. Miller and the OHP also initiated many creative and robust education and outreach programs, such as building rehabilitation pilot projects, many of which are intended to be fun, family friendly, and mostly free.

San Antonio's Incentive Programs

San Antonio's OHP initiated a broad array of programs specifically for owners of historically designated houses or houses within Historic Districts. These range from the more common incentives, such as local tax exemptions for individually designated houses and houses within a newly designated Historic District, and design and technical assistance. What makes San Antonio stand out from other CLGs, however, are the recently initiated fun and creative programs that build on relationships, partnerships, and support from advocates, businesses, volunteers, and universities.

The OHP started the Power of Preservation Foundation (PoP) in 2012 to promote preservation in the community. PoP was set up as a non-profit coalition that includes advocates, businesses, neighborhoods, and agencies that initiate and support preservation programs.⁷² It helps to support financially other education and outreach activities of OHP. Each year, PoP hosts

⁷² "About," Power of Preservation, accessed March 12, 2021, <https://www.popsatx.org>.

PROM, the largest fund-raising event and a popular one, according to Ms. Miller.⁷³ PROM is a one-night celebration that takes place in a highlighted historic building, themed on the era of the building's construction.

To celebrate Preservation Month, OHP also plans preservation races for adults and kids, among other fun activities. In the fall, OHP puts on the Historic Homeowner Fair, which exhibits realtors, contractors, and others who provide services to owners with historic houses.⁷⁴ Outside of Preservation Month, Learning Labs provides an opportunity for hands-on training for students and community members through partnerships with local colleges and universities, and the Living Heritage Trades Academy, a program started by OHP that provides apprenticeships, training, and sources of traditional crafts and skills. The began the Rehabber Club, a support “network of do-it-yourselfers, craftsmen, contractors, historic homeowners, realtors, and everyday citizens” who hold training and certification events.⁷⁵ Another annual event, REHABARAMA, brings together local contractors, volunteer groups, and students to repair and perform basic maintenance on historic houses and in affordable housing areas.⁷⁶

Another program is Students Together Achieving Revitalization (S.T.A.R.), an annual service project which the OHP coordinates with students from the University of Texas San Antonio College of Architecture and San Antonio College.⁷⁷ The students are led by volunteer

⁷³ “About PROM,” Power of Preservation, accessed March 12, 2021, <https://www.popsatx.org/prom>.

⁷⁴ “Historic Homeowner Fair,” Rehabber Club, 2020, <https://www.sarehabberclub.com/hhf>.

⁷⁵ Rehabber Club, 2020, <https://www.sarehabberclub.com>.

⁷⁶ “Rehabarama,” City of San Antonio Office of Historic Preservation, accessed March 12, 2021, <https://www.sanantonio.gov/historic/Events/Rehabarama>.

⁷⁷ “Students Together Achieving Revitalization (S.T.A.R.),” City of San Antonio Office of Historic Preservation, accessed March 12, 2021, <https://www.sanantonio.gov/historic/LivingHeritage/Education/STAR>

professionals to design and perform minor repairs and exterior work on qualified houses, which helps moderate-income homeowners maintain their homes.

One more of OHP's responsibilities is managing the Vacant Building Program (VBP), which addresses the consequences of vacancy and encourages owners of vacant buildings to bring them back into productive use.⁷⁸ The pilot program was created in partnership with the City's Development Services Department, the Center City Development and Operations Department, and the Planning Department in 2014 and focused on the Central Business District, local historic districts and landmarks, and a half mile buffer around active military installations, which affected hundreds of buildings. Through the program, owners of vacant buildings must register their buildings and bring them into compliance with a standard of care, or face the possibility of a class C misdemeanor charge; citizens are also encouraged to report vacant buildings. The program staff help the owners "to find long-term solutions to vacancy" like addressing code violations or providing small grants for repairs and rehabilitation.⁷⁹ The pilot was so successful that the program expanded in 2016-2017 to include Neighborhood Conservation Districts, Eastpoint and Choice Neighborhoods, Port SA and Brooks City Base, city-initiated Tax Increment Reinvestment Zones; the expansion also included a half mile buffer around each targeted area.⁸⁰ While the VBP is not directly a historic preservation incentive, it does focus on rehabilitating the existing building stock of the city through punitive and incentivized means geared towards the owners of vacant buildings.

⁷⁸ "Vacant Buildings," City of San Antonio Office of Historic Preservation, accessed March 12, 2021, <https://www.sanantonio.gov/historic/VacantBuildings>. Ms. Miller noted that the OHP volunteered to manage the program but it could have been under any of the city office's purview.

⁷⁹ Ibid.

⁸⁰ "About the Program," City of San Antonio Office of Historic Preservation, accessed March 12, 2021, <https://www.sanantonio.gov/historic/VacantBuildings/About>.

The San Antonio OHP also offers incentive programs more common to CLGs. The Design Assistance Program helps homeowners who need basic architectural drawings. The OHP has a contract with an architecture firm to use student interns to create these drawings for homeowners.

Perhaps the most significant incentive is San Antonio's local tax exemption for substantial rehabilitation, which started about the same time the city became a CLG in 1993, and which is offered for designated landmarks and properties within local historic districts that undergo substantial rehabilitation.⁸¹ The owners can choose between two options: (1) a 10 year assessment freeze, which keeps the City property tax at its assessed value prior to rehabilitation, or (2) a 5 Zero/5 Fifty tax exemption, which offers no City property tax for the first 5 years, and 50% of the City property tax assessed post-rehabilitation for the next 5 years.⁸² In 2011, the incentive was changed so that the City property tax reduction remained with the property rather than moving with the owner in the event of a sale. This change allowed owners to use it as a selling point and encouraged people to buy historic houses. The OHP also began to encourage homeowners applying for construction permits to take advantage of the tax exemption, which also boosted its use. Mr. Dupont explained that Texas is a "property tax" state, and does not have an income tax, and so this incentive could only apply to property taxes. However, the City property tax is just one line item of many on a homeowner's property taxes.

⁸¹ No exact date for its initiate has been located, but the approximate date was confirmed by Shanon Miller.

⁸² "Tax Incentives," City of San Antonio Office of Historic Preservation, accessed March 12, 2021, <https://www.sanantonio.gov/historic/About-Us/WhyPreserve/incentives#:~:text=Substantially%20rehabilitated%20commercial%20properties%20are, appraisal%20after%20the%205th%20year.>

Despite what may seem a relatively small element of a large property tax bill, it is nevertheless now a widely utilized incentive.

Another incentive applies to properties in newly designated Historic Districts, where the owners receive an automatic 20% exemption on their City property taxes for 10 years, with the option to extend it up to 15 years.⁸³ This incentive encourages district nominations and reduces the reasons owners may be against designation. It also offsets any costs to the owners should property taxes increase in the newly designated Historic Districts, a strong counter to the concern that historical commissions overburden homeowners with blanket designations. With both the Substantial Rehabilitation Tax Credit and the Historic District Tax Credit, local historic designation means the owner can automatically receive a reduced local property tax, should the owner choose. This financial incentive offsets the objections to designation and its perceived financial burdens to homeowners.

The OHP also actively encourages homeowners to apply for the San Antonio Conservation Society Grants Program, which awards small grants for restoration or rehabilitation of residential or commercial structures.⁸⁴ This award is significant, though modest, and can provide help to owners of historic properties.

The OHP also provides technical assistance through the Historic and Design Review Commission (HDRC). The HDRC consists of 11 members appointed by the City Council and may informally review any plan brought to them no matter how developed for advice, recommendation, and review.⁸⁵ The HDRC encourages owners to bring the plans to them as

⁸³ Ibid.

⁸⁴ Ibid.

⁸⁵ "Historic and Design Review Commission," *City of San Antonio*, Accessed March 20, 2021. <https://www.sanantonio.gov/historic/HDRC>.

early as possible to avoid major changes that may cost the owner more money. The reviews take place in a non-binding, informal meeting, not a public meeting, which residents have viewed as non-threatening and very helpful.⁸⁶ The OHP may sit on the HDRC but OHP is also given the authority to issue a Certificate of Appropriateness for routine and minor repair applications.

San Antonio CLG Organization

The San Antonio OHP sits distinctly within the city government organization as far as power and responsibility are concerned. Ms. Miller explained that just before she joined the OHP in 2008, the City Planning office reorganized and the OHP was made its own department that reports to the Director of City Planning, rather than acting as a subdivision of another department. This provides the OHP a larger seat at the table, so to speak, when developing city planning goals and initiatives. Few other historic preservation commissions can boast such influence within their local government organization. One negative outcome of the reorganization is that it occurred so quickly that the OHP did not receive an allocation in the city budget for a short while, forcing it to work with limited financial resources.

In addition to building projects related to historically designated properties, the HDRC also reviews all building projects located within the River Improvement Overlay, Viewshed and Downtown Business districts; or that are publicly-owned. They can hold those permits for up to 30 days for research. If the HDRC finds that a property awaiting a building or demolition permit is eligible for historic designation, it may submit a nomination for designation and alert the

⁸⁶ This assertion comes from the perceptions given verbally by Shanon Miller and not any quantitative analysis.

owner and the public. It is worth noting that such a demolition delay procedure is not available to all CLGs and is an important power, much like the Determination of Eligibility in federal Section 106 reviews. However, a nomination is more likely to be approved if it is initiated by a third party or is backed with substantial public support. The owner of the property does not need to give permission for the designation to be approved. This is an extraordinary power not typically given to Historic Preservation Offices, which are usually limited to reviewing only permits submitted for already designated historic properties or districts.

Another distinctive piece of San Antonio's OHP is the setup of the commission.⁸⁷ When a designation nomination is submitted, the OHP makes a recommendation for approval or denial to the Historic and Design Review Commission, who then makes a recommendation back to the OHP to make the final decision.

These exceptional features mean that their model may not necessarily be easily mirrored for other CLGs, but there are important lessons to take away from these measures, which will be discussed further on in this chapter.

State Level Influences

When it comes to the San Antonio OHP's financial and regulation incentives, both Mr. Dupont and Ms. Miller pointed out critical state level legislation that affects what they can provide. Most importantly, Texas does not have an income tax, which means that tax incentives will come in the form of reduced property taxes. Also, since the OHP operates on a city level, it

⁸⁷ The following information is based on verbal information received from Shanon Miller during our interview and confirmed by Article VI of the San Antonio Unified Development Code found at this link: https://library.municode.com/tx/san_antonio/codes/unified_development_code?nodeId=ARTVIHIPRURDE.

can only provide City property tax incentives. Although City property taxes are just one line item of many listed on overall property taxes, the tax exemptions described above do make a difference to the homeowners, who seem very willing to accept the tradeoff for owning a historic property. In a way, the City property tax deduction is powerful in and of itself, even though it applies to about 20% of the property tax bill.

A second major state level bill, HB 2496 – Historic Landmark Designation that came into effect on September 1, 2020 changed the designation process so that owner’s consent is required and it must be “approved by a three-fourths vote of the governing body of the municipality and the zoning, planning, or historical commission.”⁸⁸ This has significant impacts for commissions across the state who now need to ensure all members of their commissions are present to vote for zoning changes, such as historic district overlays. As of yet, no data has been collected or study conducted as to how this has affected the designation of new historic districts, and it would be interesting to see this data when it is available.

Perception of Preservation

When asked why support for preservation was so strong in San Antonio, Mr. Dupont acknowledged that the city has always seemed to have a strong sense of cultural preservation, possibly from the connections between family, the military presence, and volunteering ideology of the community, topics explored in the upcoming book he has co-edited with Harriett Romo, *Bridging Cultures: Reflections on the Heritage Identity of the Texas-Mexico Borderlands*.⁸⁹ San

⁸⁸ Jackson Walker, “Texas Legislative Update: New Laws Impacting Real Estate Developers and Builders,” *JDSUPRA*, Accessed April 3, 2021.

⁸⁹ William Dupont and Harriett Romo, eds., *Bridging Cultures: Reflections on the Heritage Identity of the Texas-Mexico Borderlands* (San Antonio: Texas A&M University Press, forthcoming).
<https://www.tamupress.com/book/9781623499754/bridging-cultures/>

Antonio has also been a focal point for many major historical events in colonial history of the U.S. and Mexico, and holds a higher concentration of heritage sites than other places in Texas by some people.⁹⁰ The city's strong sense of heritage, coupled with the incentives from the city's initiation as a CLG appear to contribute to its preservation success. However, the rich array of incentives, several relatively new, have increased the public awareness of offerings and feelings that preservation can be beneficial for the city.

3c. Maren Bzdek, Fort Collins, Colorado

The interview with Maren Bzdek, Senior Historic Preservation Planner with the Historic Preservation Services Division in Fort Collins, Colorado, was held April 2, 2021. As noted earlier, one of the respondents to the NAPC Survey named Fort Collins as a CLG to emulate for their no-interest loan program. Interestingly, one of the respondents to the same survey who was from Fort Collins had named San Antonio as a CLG to emulate. The purpose of the interview was to find out how the loan program is implemented and its success within the city. Fort Collins. To begin, Ms. Bzdek emphasized that most of the local preservation incentives offered by the City of Fort Collins are used by homeowners. Owners of commercial buildings and multiple-occupancy buildings have the option to take advantage of them as well, though the incentives are mostly utilized by homeowners.

⁹⁰ This statement is not intended to be quantitative or illustrate a lack of interest in history or preservation in the rest of Texas and is based solely on conjecture from Mr. Dupont and Ms. Miller as they have experienced sentiments from residents.

No-Interest Loan Program & Other Incentives

Fort Collins' no-interest revolving loan program is codified into the historic preservation ordinance and requires a match from the owner.⁹¹ The repayment of the loan is made as a single lump-sum when the property is sold, transferred, or refinanced. The payoffs go back into the preservation program's "rainy day fund" rather than into the city's general budget. In this way, the no-interest loan program includes a self-sustaining component. The amount for the loans is built into the Historic Preservation Office's budget, which is allocated by the city every 2 years. How much is allocated depends on the city's overall budget and is not guaranteed, though the full program budget has been maintained since inception. They have experienced times when the demand for the loan was high, in which case they use a scoring system to prioritize applications. There have also been times when they have fewer applicants and have money remaining at the end of the fiscal year. Currently, the HPO is looking into determining metrics to adapt the program for low-income qualifications that will consider adjustments to the match requirement and evaluate opportunities to market the loan program more effectively to a broader socioeconomic range.

The HPO also offers a Design Assistance Program that provides grants to assist with the costs of design and planning for historic building projects.⁹² Some of the most common uses go towards window studies, mortar analysis, condition assessments, materials evaluations, and feasibility assessments. The OHP discusses the loan and Design Assistance Program with

⁹¹ The program began as a grant program in 1995 and converted to loans in 2000. "Rehab Right: Landmark Rehabilitation Loans," *City of Fort Collins*, accessed March 20, 2021, <https://www.fcgov.com/historicpreservation/landmark-rehabilitation.php>; Fort Collins, CO, Municipal Ord. No. 034, 2019, § 3, 3-5-19.

⁹² "Rehab Right - Design Assistance," *City of Fort Collins*, accessed March 20, 2021, <https://www.fcgov.com/historicpreservation/design-assistance.php>.

homeowners up front in the design review and encourage homeowners to consider and apply to either program as early as possible. This way, the owner has the opportunity to adjust their designs and plans accordingly. The most interesting piece of information from Ms. Bzdek is that the OHP found that owners appreciate just the theoretical knowledge that they have incentive options to offset the burden of the additional design review oversight, even if they never take advantage of it. However, owner consent is provided for designation in nearly all cases, so the owner already agrees to the designation.⁹³

Why It Works

Ms. Bzdek did admit that Fort Collins' size, current economic conditions, and the size of the budget sit in a "sweet spot" where it is still possible to manage and receive generous funding from the city government. It is also a progressive city where residents are generally supportive of taxes and fees that support a higher quality of life. The most advantageous position, however, is that they have learned to predict with reasonable certainty changes in their city based on changes occurring in the nearby city of Boulder because they very often see the same changes about 10 years later. This affords them the rare ability to plan with greater insight, based on nearby real experience.

City Department Organization

The OHP is situated within the Community Development & Neighborhood Services Department (CDNSD), though it used to be in the Advanced Planning Department, where there

⁹³ Fort Collins' historic preservation ordinance does have a non-concensual designation section, though it is rarely used. In the case of local landmark districts, the owner of a contributing property can dissent but be outnumbered by their neighbors, and the dissenter is still eligible for incentive programs.

was a lack of communication between departments and preservation was often overlooked. According to Ms. Bzdek, within the last 5 years the city government personnel are inclined to inter-department communication and trust building. Now preservation goals are actively integrated with city planning. The city government is fortunately small enough that the OHP can have work sessions with the City Council to educate them on historic preservation and integrate its goals into city planning. A new aggressive city housing plan with affordable housing goals takes historic preservation into account, and its implementation will work to resolve any conflicts between preservation policies and affordability goals. Yet again, Fort Collins demonstrates that it is a likely outlier in what many municipalities can do, but they do lead by example and show that in small cities, historic preservation offices could make a huge difference.

Website

Research prior to the interview discovered that their OHP website was masterfully crafted. All crucial topics are available at the top of the page with dropdowns and clear headings to lead a visitor to the right location. The members of the OHP are listed on the home page along with links for more information about their core responsibilities. When asked about the website, Ms. Bzdek said that all credit should go to Jim Bertolini, the Historic Preservation Planner, for the big improvements he has made the site over the last two years. The website is the OHP's way of being proactive and opportunistic. The goal of the website is to build as deep as possible with as many resources as possible, while sharing the history of Fort Collins. The OHP website recently experienced a big jump in traffic after a post this year for Black History Month about African American history in Fort Collins that caused a buzz around the city. The OHP's next

goal with the website is to continue to add new content related to survey of Civil Rights Sites that represent other historically underrepresented groups in the city, in response to residents saying they felt they were not visible on the City's website and in order to support recognition and protection of places that matter to everyone in the community. This website is a prime example of how powerful a tool websites and social media can be for preservation. By keeping relevant and even ahead of the game, the Fort Collins OHP is pushing boundaries in their community.

3d. Interview Lessons Learned

Related to the population distinction between Matrix A and Matrix B, the two cities represented in the interviews are of drastically different sizes. Fort Collins' population in 2020 was 165,609 compared to San Antonio's 2020 population of 1,508,000. Despite the size difference, both OHPs utilized their knowledge and intimacy of their city to implement creative solutions and offer both new and the usual incentives for homeowners. Seven themes emerged from the interviews, which will be considered together with the themes from analysis of Matrices A, B, and C to inform the final recommendations of this thesis.

1. State laws are a crucial component.

A CLG's ability to offer incentives, especially financially and/or regulatory, can be helped or hindered by state legislation. The Pennsylvania state constitution constrains individual CLGs' abilities to offer tax incentives, which have proven to be extremely beneficial for San Antonio and Fort Collins, despite how small the benefit is for the recipient. Just the existence of an automatic tax incentive, like San Antonio's Historic District tax exemption, is a powerful

recognition of the need to offer “carrots” along with the “sticks.” However, the new designation requirements in Texas may just have made designating historic districts more difficult. In contrast, Colorado’s SHPO enjoys a relatively larger budget from which to provide significant financial support for its CLGs. Each CLG and SHPO will have a better understanding of how state legislation affects what they can offer incentive-wise, and cross-state comparisons constrain blanket incentive recommendations. This is supported by responses from the NAPC-L survey where some respondents said they would only be interested in what other CLGs within their state are doing to offer financial incentives.

2. You can still do a lot with a little money.

Despite small budget limitations at the beginning of the new administrative structure, San Antonio’s OHP was able to initiate major changes in how they managed education and communication with residents. They have made a major impact through training programs and initiating volunteer groups, as well as some creative fundraising and strategic partnerships, to push positive preservation initiatives that have helped residents maintain their historic houses. The Rehabber Club supports grassroots efforts to train volunteers and homeowners while encouraging pride in the city, and PoP creatively channels funding for these and other programs. Even though Ms. Bzdek admitted that Fort Collins receives a generous budget from the city, they have a sustainable no-interest loan by requiring applicants to match their requested amount, which forces the homeowner to consider costs carefully. Ms. Bzdek also acknowledged that the program is not ideal for low-income homeowners but that they are looking into how to waive the match requirement and keep the loan self-sustaining.

3. Make preservation fun!

This statement came directly from Ms. Miller in her interview about PROM. She mentioned how much everyone enjoyed the annual event and continue to talk about their favorite themes. Besides being a fun event, it promotes preservation through its chosen venues and is the most crucial fundraising event of the year for PoP. People will turn up if you make preservation fun enough, and they just might learn something in the process. It will also leave positive feelings about preservation.

4. Let people know what you already have.

Ms. Miller mentioned that when she arrived in 2008, the tax exemption for substantial rehabilitation was barely utilized, even though it had been available since 1993. When they began asking applicants whether they wanted to apply for it, people would say they didn't know it existed and wanted to use it; as a result, its use grew. If residents don't know there are programs to help them, they won't take advantage of them. The simple act of asking during the procedural process was an effortless but very effective method to encourage its use, proving that it doesn't need to take much effort to inform residents of what's available to them. Fort Collins proved that just the theoretical knowledge alone is enough for homeowners to feel unburdened by the designation, even if the owner never takes advantage of them. Their website is also easy to navigate with all critical information upfront for residents to find quickly. Communication and outreach are fundamental to using available incentives.

5. Public-Private Sector Support

The outpouring of volunteer support for San Antonio's annual REHABARAMA is overwhelming and clearly makes the event successful, while strengthening community ties. It is possible to take advantage of the support that already exists for preservation and makes individuals feel useful. The power of volunteering should not be overlooked.

6. Partner with contractors, architecture and design firms, and local universities and colleges.

By connecting local colleges and universities with professional firms to create internships, San Antonio's S.T.A.R. program provides crucial experience to students, assistance to residents in need, and community clout for professional firms. Again, building support among various organizations can spread the workload, build working relationships, and grow support for preservation.

7. Establish inter-communication/education within city government.

Just as communication with residents is crucial to success, so is communication between city departments. This lesson may be easier for smaller cities to apply than larger ones. Fort Collins' OHP was able to increase their influence and coordinate goals in only five years with inter-departmental communication and education. Granted, the initiation came from the mayor, which prompted quick compliance, but it still demonstrates the power of intra-governmental communication.

6. Discussion

Four conclusions can be drawn based on the analysis of surveys and interviews:

1. Smaller CLGs are struggling to provide the financial support necessary to provide financial incentives.
2. CLGs are concerned about lack of political support and support from residents.
3. CLGs are concerned about residents' lack of education about preservation regulations and their staff's lack of training.
4. CLGs want more technical assistance for their residents.

Each of these problems can be linked with lessons learned throughout this study and can be linked with Mason and PlaceEconomics' guides for successful incentives. Firstly, the government's capacity to support any incentives program must exist. Without this, no incentive would survive, as survey respondents have made clear. Respondents to the NACP Survey who felt there was a positive view of preservation in their municipality also said that preservation was integrated into the City Plan. With that kind of political support, incentives are more likely to be successful. With political support can come the financial support and the ability to get the necessary training for staff. This is still tricky for smaller or poorer municipalities, but the other lessons can make up the difference.

Since local preservation relies on permit-granting, CLG authority remains primarily a "stick" and the "carrots" ease the stick, but do not replace it. The second guide to success, then, is that the incentives must meet the actual needs of the stakeholders – in this thesis, the homeowners – and then the incentive can be created to balance the "sticks" and "carrots." This is where education and training can help. Engaging with homeowners to find their concerns first can help the CLG to craft the right materials – and the right incentives – to educate and balance

the scales. Both in Fort Collins and in San Antonio, clear messaging and active engagement with residents positively impacts the use of incentives and decreases negative attitudes. Both CLGs also know who their homeowners are, what they need, and what gaps need to be filled to meet their needs.

The third and most crucial piece to everything, however, is clear communication to the target stakeholders and governmental officials. Active marketing, accessible websites, and transparency help homeowners to comply with preservation regulations without feeling overly burdened. The survey respondents show a clear message that they feel they are lacking incentives for homeowners, especially lower income homeowners. Inter-communication and education between city departments helps unify policy objects and integrate preservation goals in the overall goals of the city. The greatest success happens when these incentives also help to meet other policy objectives.

One final hindrance could stand in the way of CLG success. Some state enabling legislation is a major contributor to what CLGs can do. This is a much larger roadblock to tackle and one that may never change, which is why channeling efforts into the local politics is so crucial.

With these issues in mind, the next section will provide recommendations for incentives that CLGs can implement for homeowners, both directly and indirectly. As illustrated from the surveys and interviews, providing incentives takes more than just creating them. Successful incentives require political and homeowner support, funding opportunities, and creative problem-solving.

7. Recommendations

1. Create accessible educational materials.

For those struggling to get homeowner support, a well-organized campaign to promote familiarity with the regulations and incentives will go a long way. The campaign should also include non-preservation specific incentives as they are still beneficial and applicable programs. If homeowners know what is available to them, the benefits of preservation, and what rules to follow, they are more likely to support preservation and use the available programs. If possible, create a list of “approved” materials or certified contractors to assist homeowners to make the right preservation decisions. Providing recommendations on how to incorporate “green” technologies that are sympathetic to the historical context could also reduce negative views of preservation.

2. Public-Private Sector Cooperation.

This could be as simple as partnering with local advocacy groups and historical societies to support each other’s initiatives, or getting creative like San Antonio and creating a non-profit entity to funnel resources into programs. While regulators need to be cognizant that they have a different role to play than advocacy organization, this kind of cooperation allows each sector to utilize their strengths to the other’s advantage as well.

3. Initiate and advocate for intra-communication and education within local government departments.

This recommendation does not appear to be directly related to providing incentives for homeowners, but Fort Collins’ story demonstrates how this part is crucial to integrating

preservation into city planning and therefore on residents' radar. It will also bolster the necessary political support for new incentives, both financial and regulatory.

4. Be proactive.

San Antonio's Vacant Building Program targeted owners of vacant buildings. Although this is not a direct incentive for homeowners, homeowners near vacant buildings would receive the benefits through increased property values when the vacant building is rehabilitated. New Orleans' revival grant program also targeted low-income homeowners to provide badly needed financial relief to keep their houses well maintained and prevent deepening poverty resulting from overwhelming city fines.

5. Consider sustainable funding sources, like a revolving loan fund, to self-support incentives.

Although Fort Collins' no-interest loan program would not be ideal for all CLGs, working some kind of financial incentive program that pays for itself could be successful.

6. Advocate for and support the Historic Preservation Fund.

It is difficult to imagine there is a CLG out there not already doing this. Advocating for Congress to fully fund, or even increase the budget allotment, could help get CLGs more funding.

8. Future Research Considerations

- Matrix A is not exhaustive or deeply analytical. There are over two thousand CLGs in the United State and not enough time to cover that much ground for this thesis. To the extent of the research conducted for this thesis, no such exhaustive comparative study exists, and further research would prove beneficial.
- The survey results are based on the respondents' understanding of preservation within their municipalities. The responses are by no means broad enough to make any definitive trends. A new iteration of the survey or something like it should be conducted with multiple reminders and posting to multiple listservs or online forums to gather more information.
- More research is needed to evaluate the effects of state enabling legislation on CLGs abilities to create incentive programs. With more information about these effects, CLGs could create better financial incentive programs.

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Appendix A: Matrix A Online Research Results

Part 1: Basic Information. Shared access to all data can be found via this link: <https://drive.google.com/file/d/1Ahw55wPWypcNH2zmDjjQOsO7jzhTiSiW/view?usp=sharing>

City	State	Population	Website	Established CLG Status
Los Angeles, CA	CA	3,967,000	LA City Planning, Preservation Design	08/03/2007
Ontario, CA	CA	176,760	Ontario City Planning, Historic Preservation	08/07/2001
Palm Springs, CA	CA	47,897	Palm Springs City Planning, Historic Resources	08/28/2014
San Francisco, CA	CA	874,961	SF City Planning, Preservation	08/18/1995
Aspen, CO	CO	7,431	City of Aspen Historic Preservation	09/05/1985
Boulder, CO	CO	106,392	Boulder Historic Preservation	09/04/1985
Denver, CO	CO	705,576	Denver Landmark Preservation	09/23/1985
Fort Collins, CO	CO	165,609	Fort Collins Historic Preservation	01/31/1991
Miami, FL	FL	454,279	Miami HEPB	01/07/1986
Miami-Dade County, FL	FL	2,717,000	Miami-Dade Historic Preservation	03/12/1987
Sarasota, FL	FL	56,919	Sarasota Historic Preservation	08/26/1987
St. Augustine, FL	FL	14,515	City of St. Augustine Historic Preservation	01/07/1986
Atlanta, GA	GA	488,800	Atlanta Urban Design Commission	03/13/1985
Boise, ID	ID	226,115	City of Boise Historic Preservation	08/25/1986
Chicago, IL	IL	271,000	Chicago Historic Preservation	01/13/1997
New Orleans, LA	LA	390,845	https://www.nola.gov/hd/c/	12/01/2017
Baltimore, MD	MD	609,032	Baltimore City CHAP	11/28/1995
Lansing, MI	MI	117,159	Lansing Historic Preservation	03/18/1997
Duluth, MN	MN	85,915	Duluth Heritage Preservation Commission	06/13/1990
St. Paul, MN	MN	304,547	St. Paul Heritage Preservation	10/10/2018
Jackson, MS	MS	166,383	City of Jackson Historic District Commission	09/11/1986
Durham, NC	NC	269,702	Durham Historic Preservation	09/03/1996
Taos, NM	NM	5,967	Taos Historic Preservation	03/10/1988
Buffalo, NY	NY	256,480	Buffalo Preservation Board	10/02/1987
Eugene, OR	OR	168,302	Eugene Historic Preservation	08/03/1988
Pittsburgh, PA	PA	302,205	Pittsburgh Historic Preservation	10/03/1990
Charleston, SC	SC	135,257	Charleston Planning Preservation Sustainability	02/03/1986
Columbia, SC	SC	133,273	Columbia Historic Preservation	03/22/2012
Austin, TX	TX	950,807	Austin Historic Preservation	09/19/2001
Dallas, TX	TX	1,331,000	Dallas Historic Preservation	09/12/1986
San Antonio, TX	TX	1,508,000	San Antonio Historic Preservation	06/10/1993
Richmond, VA	VA	226,622	Richmond Historic Preservation	05/03/1996
Roanoke, VA	VA	99,229	Roanoke Architectural Review Board	09/17/2003
Seattle, WA	WA	724,305	Seattle Historic Preservation	06/03/1987

Part 2: Incentives

City	Tax Incentives	Grants	Loans	Exemption (Building Code)	Zoning Variances	Other/Unique
Los Angeles, CA	Mills Act Historical Property Contract program Easements			California Historical Building Code		
Ontario, CA	Mills Act Historical Property Contract program			California Historical Building Code		Historic Plaques
Palm Springs, CA	Mills Act Historical Property Contract program			California Historical Building Code		
San Francisco, CA	Mills Act Historical Property Contract program Easements	Legacy Business Registry & Historic Preservation Fund	Community Housing Rehabilitation Program (CHRP) Code Enforcement Rehabilitation Fund (CERF) Unreinforced Masonry Building (UMB) Loans	California Historical Building Code		
Aspen, CO		Eligibility for Colorado State Historical Fund				Contractor Licensing
Boulder, CO	City Sales Tax Waiver	Eligibility for Colorado State Historical Fund		For setback, massing, accessory buildings, side yards, solar access, greenpoints, etc		Recognition: bronze plaque at a public ceremony Staff Assistance: for review and permit processes Structures of Merit
Denver, CO					Form-based zoning	Historic Denver Action Fund: community or neighborhood project, invest \$2500-10,000, technical assistance, staff support; projects benefitting only a single property are ineligible
Fort Collins, CO		Design Assistance Program - \$2,000	Landmark Rehabilitation Loan Program: 0 % match up to \$7,500			
Miami, FL				Variances	Form-based zoning, conditional uses, waivers of lot size, floor area, open space, height, building space, foot requirements	
Miami-Dade County, FL	Ad-Valorem Tax Exemption: 10 years					
Sarasota, FL	Ad Valorem Tax Exemption			General exemptions	Adaptive reuse variances	
St. Augustine, FL	Ad Valorem Tax Exemption: 10 years			Flexibility with the building code for rehabilitation		
Atlanta, GA	Landmark Historic Property Tax Abatement Program, 10 years Rehabilitated Historic Property Tax Abatement Program, Facade Easement City/County Urban Enterprise Zone Tax Abatement Program					
Boise, ID				Flexibility for fire and building codes		
Chicago, IL						Historic Chicago Bungalow Initiative
New Orleans, LA	Cultural Products District					
Baltimore, MD	CHAP Tax Credit: 10 years; cannot be combined with any other tax credits					

City	Tax Incentives	Grants	Loans	Exemption (Building Code)	Zoning Variances	Other/Unique
Lansing, MI					Yard requirement variances	Design Assistance Team Heritage Neighborhood Committee - city budget may include funding for implementation
Duluth, MN				For continued use		
St. Paul, MN	<i>Advocacy group provides the greatest financial assistance</i>					
Jackson, MS	7-year tax exemption		Housing Rehabilitation Loan: 0% interest for low-income homeowners and rental property owners (not preservation specific)			City budget may include funds for historic districts
Durham, NC	Deferred taxes					
Taos, NM				Alternatives		
Buffalo, NY	Exclude 50% value from taxes				Form-based zoning	
Eugene, OR	Conservation or Preservation Easements	Historic Property Restoration Grant: up to \$1000 match	Historic Loan Program			
Pittsburgh, PA	<i>Advocacy group provides the greatest financial assistance</i>					
Charleston, SC	Easements/covenants with advocacy groups Adopted the Bailey Bill					
Columbia, SC	Adopted the Bailey Bill Richland County version of Bailey Bill					
Austin, TX				Recommended amendments		
Dallas, TX	Tax Exemption: city property taxes Conservation Easements					
San Antonio, TX	10-15 year reduced tax assessment OR 0% city property tax for 5 years and 50% city property tax for 5 years 20% city tax exemption for property in Historic Districts			City fee waiver		Vacant Building Program Rehabber Club
Richmond, VA				Flexibility in fire and building codes, provided no increased danger		
Roanoke, VA		Up to \$5,000 grant			New use variances on historic properties	
Seattle, WA	Special Valuation: 10-year tax assessment freeze Façade easements			Uniform Building Code: allows for alterations within a reasonable degree of public safety		

Part 3: Ordinance Information

City	Owner Consent to Nomination	Sunset Clause	Demolition Delay	Inventory	Tiered Designation
Los Angeles, CA	No			Yes	
Ontario, CA	No, also automatic designation if on National or California Register			Yes	Yes
Palm Springs, CA	Yes		No	Yes	Yes
San Francisco, CA	No			Yes	Yes
Aspen, CO	No, except for AspenModern designation where only the property owner can designate			Yes	Yes
Boulder, CO	No, nomination limited to owner, city council or landmarks board, any historic preservation organization, or group of property owners for a district		Yes		
Denver, CO	No		Required for any and all applications for total demolition, not just designated structures	Yes	
Fort Collins, CO	Yes				
Miami, FL	No		Yes	Yes	
Miami-Dade County, FL	"encouraged to obtain the permission of the property owner(s)"			Yes	
Sarasota, FL	No		Yes	Yes	Yes
St. Augustine, FL	No		Properties on Florida Master Site File, 50+ y.o., or designated must be reviews	Yes	Yes
Atlanta, GA	Yes			Yes	
Boise, ID	No		Demolition Review		
Chicago, IL					Yes
New Orleans, LA	No			Yes	
Baltimore, MD	No				
Lansing, MI	Yes - Historic Districts only, 51% of owner support		No, but specific required approval	Yes	
Duluth, MN	Only owner can nominate				
St. Paul, MN	No		Yes		Yes
Jackson, MS	No		No	Yes	
Durham, NC	Only owner can nominate		Yes, and demo by neglect	Yes	
Taos, NM	No		Yes		
Buffalo, NY	No		Yes	Yes	
Eugene, OR	No		Yes		
Pittsburgh, PA	No		Yes		
Charleston, SC	Yes		No		Yes
Columbia, SC	No		Yes	Yes	Yes
Austin, TX	No (new HB 2496 affects objections)			Yes	
Dallas, TX	No (new HB 2496 affects objections)	for tax incentives			Yes
San Antonio, TX	No (new HB 2496 affects objections)			Yes	
Richmond, VA	No			Yes	
Roanoke, VA	No		Yes		Yes
Seattle, WA	Negotiations with owner				

Part 4: Education and Outreach

City	City Outreach	Outreach and Education by Local HP Non-profits	Preservation Organizations	Economic Benefit Study	City revitalization plans	Other
Los Angeles, CA		Yes	Yes			
Ontario, CA						
Palm Springs, CA						
San Francisco, CA				2016-2017 Report		
Aspen, CO	Design Guidelines		Colorado Historical Foundation	Historic Colorado Economic Benefits Study		State provides model ordinances, wealth of other info for CLGs
Boulder, CO			Colorado Historical Foundation	Statewide study	City Planning Documents	State provides model ordinances, wealth of other info for CLGs
Denver, CO	Discover Denver	Discover Denver	Historic Denver, Inc. Colorado Historical Foundation	Statewide study	2040 Plan Neighborhood planning areas	State provides model ordinances, wealth of other info for CLGs
Fort Collins, CO						
Miami, FL						
Miami-Dade County, FL						
Sarasota, FL						
St. Augustine, FL				Resilient Heritage in the Nation's Oldest City		
Atlanta, GA	Yes					
Boise, ID	Educational Materials		Preservation Idaho			
Chicago, IL	Yes		Chicago Bungalow Association (and all vintage homes)			
New Orleans, LA	Yes	Yes				
Baltimore, MD		Yes				
Lansing, MI						
Duluth, MN						
St. Paul, MN				Economic Development		Reviews new construction on vacant lots in historic districts
Jackson, MS				Multiple intensive studies	Economic Stabilization Program	
Durham, NC			Preservation Durham	Economic Impact of Historic Preservation 2013 Home Prices Study Mills Bill Analysis Low-income NC Study	2017 City Comprehensive Plan Historic Preservation Plan	
Taos, NM						
Buffalo, NY		Yes			Buffalo Urban Renewal	
Eugene, OR			Historic Preservation League of Oregon Restore Oregon			
Pittsburgh, PA			Preservation Pittsburgh & Pittsburgh History & Landmarks Foundation	2015 Economic Report		
Charleston, SC						Specify Historic Preservation as Sustainability

City	City Outreach	Outreach and Education by Local HP Non-profits	Preservation Organizations	Economic Benefit Study	City revitalization plans	Other
Columbia, SC	Homeowner workshops and toolkits Guides for Window Review, Maintenance Plans, Energy Efficiency		Historic Columbia			
Austin, TX	Education Materials				Neighborhood Planning Areas	
Dallas, TX	Easy-to-find resources, include sustainable building practices for historic homes		Preservation Dallas			
San Antonio, TX	oral histories, low-income projects once a year, resources for property owners, Rehabber Club, training videos about CoA and Design Review; Traditional Building Trades Academy, Living Heritage Symposium		Comprehensive list on website	Yes - 2015		Preservation Prom fundraiser; focus on climate heritage
Richmond, VA						
Roanoke, VA			Roanoke Valley Preservation Foundation			
Seattle, WA						

Appendix B: NACP-I and CLG Coordinator Survey Questions

The survey questions below were submitted via the NACP listserv and passed to the State CLG Coordinators via Cory Kegerise.

My name is Alli Davis and I am a student in the Historic Preservation master's program at the University of Pennsylvania. This semester I am finalizing my thesis on preservation incentives at the local level that are specifically geared towards owners of historic houses. This thesis will be a review of incentives types, financial and non-financial, in local governments and a cursory analysis of their effectiveness.

I'd like to invite you to complete my survey, so you can help me compile and understand any incentives that your local historical commissions and governments offer incentive-wise, what barriers prevent the local historical commissions and homeowners alike from making preservation successful, and what you would ideally like to see support preservation on a local level. An underlying assumption of the thesis is that local commissions' typical reliance on disincentives ("sticks") rather than or without accompanying incentives ("carrots") is often an impediment to broadening the reach of local preservation.

The survey below should take you no more than 10-15 minutes. I greatly appreciate your time.

Please complete the survey by **Saturday, February 20**.

If you have any questions or comments for me directly, please email me.

NACP

1. What is your city and state?
2. Is your location a certified local government?
3. What is your role in historic preservation where you live/work? (check all that apply)
 - advocate
 - preservation professional
 - trades person
 - board or commission member
 - interested resident
 - other:
4. In your experience, how is preservation viewed by your constituents or community members on the whole?
5. What incentives are available to owners of historic houses in your location? (check all that apply)
 - financial
 - educational materials
 - technical assistance
 - other:
6. Does your overall city plan directly support your area's preservation goals? If so, how?
7. Are there any other local incentives not directly related to preservation that can help owners of historic houses?

8. In your experience, what are the most common questions homeowners have about maintaining or altering their historic homes?
 - technical issues
 - financial issues
 - regulatory/restrictive issues
 - other:
9. Are there partnerships between your local historical commission and preservation advocacy groups that assist homeowners?
10. Are there any other cities that you think could be a model for your local historical commission? Why?
11. What do you see at the strengths and weaknesses of your local preservation program?

State CLG Coordinators

1. What state do you work for?
2. Do you know any municipalities in your state that offer incentives to owner-occupied historic residences, whether financial, educational, or technical assistance, or others?
3. What are common questions you receive from historical commissions about assistance for homeowners?
4. Are there any governments or historical commissions in your state that you see as successful in employing preservation incentives for homeowners? Please name the place and describe what makes them successful.
5. What impediments are your local historical commissions facing?
6. What do you wish you could do to further assist your historical commissions achieve their preservation goals?
7. What are other states or historical commissions doing that you aspire to?

Appendix C: Matrix B NAPC-L Survey Results

Part 1. This data can also be accessed via this link: https://drive.google.com/file/d/19Zr6gUurtE2jSf_gqlzkclDFoWgdvuka/view?usp=sharing

City	State	Population	Certified Local Government?	Advocate Role	Preservation Professional Role	Local Government Role	Interested Resident Role	Other Role
Amherst	New Hampshire	11,329	Y	X		X	X	
Angola	Indiana	8,660	Y		X			
Brandon	Vermont	3,966	Y			X		
Burlington	Vermont	48,545	Y	X	X	X	X	
City of St. Albans	Vermont	6,804	Y			X	X	
Columbia	South Carolina	133,273	Y		X			
Dallas	Texas	1,331,000	Y	X	X	X		Former HPO and Landmark Commissioner, now consultant
Denver	Colorado	705,576	Y		X			
Elkhart	Indiana	52,257	Y					
Forest Grove	Oregon	24,457	Y		X			
Fort Collins	Colorado	165,609	Y		X	X		
Fort Wayne	Indiana	265,752	Y		X			
Frankfort	Kentucky	27,680	Y		X			
Fredericksburg	Virginia	28,622	Y		X			
Friday Harbor	Washington	2,426	Y		X			
Geneva	Illinois	21,888	Y		X			
Highland Park	Illinois	29,628	Y	X		X		A former commissioner on HPC. I serve on a board for a historic house museum--Glessner House. And do other volunteer activities.
Kennebunk	Maine	11,529	Y			X		
Kennett Township	Pennsylvania	8,254	N		X			
Knoxville	Tennessee	186,173	Y		X			
LaPorte	Indiana	21,577	Y					
Lawrence	Kansas	96,369	Y		X			
Little Rock	Arkansas	197,958	Y	X	X			
Littleton CO	Colorado	47,989	Y			X		
Logansport	Indiana	17,966	Y					
Madison	Indiana	11,967	Y	X	X	X		
Madison	Wisconsin	254,977	Y		X			
Miami-Dade County	Florida	2,717,000	Y		X	X		
Michigan City	Indiana	31,118	Y					
Minneapolis	Minnesota	420,324	Y		X			
NR	NR		Y			X		
Phoenixville	Pennsylvania	16,895	Y			X		
Schuylkill Township. PA	Pennsylvania	8,641	Y	X	X	X	X	
South Bend	Indiana	102,037	Y		X			
Spokane	Washington	217,353	Y		X			
Strafford	Vermont	1,075	Y			X		
Topeka	Kansas	126,397	Y		X			
Tredyffrin Township	Pennsylvania	29,504	Y			X		
Venice	Florida	23,086	N		X			
Walla Walla	Washington	32,793	Y			X		
Washington	DC	692,683	Y		X			

Part 2

City	Preservation Perception (Long Form)	Preservation Perception	Financial Incentives	Educational Materials	Technical Assistance	Other Incentives	Other Incentives Code
Amherst	Very highly, our historic district is on the National Register of Historic Places- 1983	positive				unsure	
Angola	Negative or indifferent in all towns except Angola where it is appreciated for the positive change it has brought to downtown through establishment of a local historic district.	positive	X		X		
Brandon	It is a large part of our community in preservation and renovation.	positive	X	X	X		
Burlington	People like the idea of saving old buildings, but not actually doing it if they own the building	mixed		X			
City of St. Albans	Community members value the historic look and sites in our community. Generally, historic sites are identified as challenges for code compliance, accessibility and energy efficiency.	mixed				unsure	
Columbia	Generally good support in our historic districts but dislike elsewhere	mixed	X	X	X		
Dallas	Preservation is seen by the neighborhoods as a way to stabilize them and keep inappropriate buildings out. Developers like the financial incentives, some even enjoy the historic buildings for what they are. Most developers who work on preservation projects understand the give and take of the incentives vs. preservation design considerations.	positive	X	X	X		
Denver	Moderately. There's a strong property-rights sentiment, as well as a strong save-everything sentiment. Most people are in the middle and are fairly quiet about their views.	mixed	X	X			
Elkhart	Negative or indifferent in all towns except Angola where it is appreciated for the positive change it has brought to downtown through establishment of a local historic district.	negative	X		X		
Forest Grove	Very favorably	positive	X	X	X		
Fort Collins	It's mixed. We are experiencing a development/housing pinch like most of the Colorado Front Range and that's created a full spectrum of folks. A small percentage are extremely pro-preservation and love purist/restoration-based preservation work. Some view historic preservation as an egregious imposition on property rights or a barrier to modernization/affordable housing. Most fall in the middle and are somewhat supportive of preservation but definitely have a more flexible view of how that looks in terms of caring for historic places than is generally allowed under the Secretary's Standards for Treatment.	mixed	X		X		
Fort Wayne	For the most part, an obstruction to "progress" and that it requires people to make changes they can't afford.	negative			X		
Frankfort	Generally positively, but there are definitely detractors, and some of those are in leadership roles.	positive	X	X	X		
Fredericksburg	Well-supported and understood by many community members, though there are differing opinions on what that means for the historic area and what level of change is appropriate.	positive	X	X			

City	Preservation Perception (Long Form)	Preservation Perception	Financial Incentives	Educational Materials	Technical Assistance	Other Incentives	Other Incentives Code
Friday Harbor	Better in recent years. I have done a lot of public education around various topics to illustrate that the program is not just about controlling what they can do with their property.	positive		X	X	We are working on adopting a small grant program for residential facade improvements, zoning code flexibility (this would mostly permit B&Bs in single family zones), we added the IBC existing/historic building code provisions in our HP ordinance, as well as language about special tax valuation.	in progress
Geneva	By the preservation advocates in the community, the City doesn't do enough and I need to take a more active advocacy role (which is prohibited in my contract). By the anti-preservation residents, the City interferes with individual property rights and my position should be eliminated.	mixed	X	X	X		
Highland Park	"Preservation" is a dirty word. It starts with the mayor/local government. If they don't care about, nobody does.	negative	X			City staff doesn't educate the public--a big problem. As a CLG we have local landmarks and districts, but my local designation 6 months ago was the first one in about 8-10 years in my town. There's the property tax assessment freeze--but staff don't tell anyone about it!	no communication
Kennebunk	Our Historic Overlay District is seen as a drawing point for attracting new residents to Town. Some District residents feel that requiring a Certificate of Appropriateness it can be restrictive when changing paint color or landscaping. Some In town believe it hampers commercial development.	mixed				CLG grants for properties being used for business purposes.	business grants
Kennett Township	Positively	positive			X		
Knoxville	In general, community members can see and experience the benefits of historic preservation in our downtown area and the extremely popular historic neighborhoods in the central city. Developers and design professionals are generally respectful of historic zoning requirements, though residents do sometimes consider the processes to be onerous.	positive		X	X		
LaPorte	Negative or indifferent in all towns except Angola where it is appreciated for the positive change it has brought to downtown through establishment of a local historic district.	negative	X		X		
Lawrence	As a hindrance	negative		X	X		
Little Rock	Some see the benefit of HP and others see it as a hinderance	mixed	X	X	X		
Littleton CO	Many of our citizens like the idea of preserving our historic assets, but have not come out to support preservation initiatives, particularly those that place restrictions on properties. We also have a small group of vocal citizens who advocate for property rights.	mixed	X			For designated houses, state tax credit for rehab projects, plaques. For non-designated houses, City is starting up the Littleton Legacy List to honor properties with historic significance. For all historic properties, the city is working towards completing more historic building surveys, giving property owners valuable info on their properties.	tiers, plaques, eligiblity survey
Logansport	Negative or indifferent in all towns except Angola where it is appreciated for the positive change it has brought to downtown through establishment of a local historic district.	negative	X		X		
Madison	Very positively	positive	X	X	X		
Madison	There's a range of perspective on preservation here, but I would estimate that support for preservation policies is pretty broad.	mixed	X	X			
Miami-Dade County	There are a lot of misconceptions about the purpose and requirements, but there is also a lot of support and engagement with issues like resiliency and affordable housing.	mixed	X		X		

City	Preservation Perception (Long Form)	Preservation Perception	Financial Incentives	Educational Materials	Technical Assistance	Other Incentives	Other Incentives Code
Michigan City	Negative or indifferent in all towns except Angola where it is appreciated for the positive change it has brought to downtown through establishment of a local historic district.	negative	X		X		
Minneapolis	Skeptically. Late 19th century and early 20th century architecture attracts the most support, modern architecture attracts the least.	mixed				historic variances (to the zoning code)	variances
NR	Many value it to some degree. Many are wary of being in a district.	mixed	X	X			
Phoenixville	Ok as long as it is not an obstacle	mixed		X	X		
Schuylkill Township. PA	Most home owners of historic properties that I encounter show an interest in and a desire to preserve the historic features of their homes. I see this less so with owners of properties that are lease out or those who have purchased property with historic structures with intent towards further development.	mixed		X	X		
South Bend	Mixed. There's a strong undercurrent of preservation, but this is tempered by an equally strong group who don't care. Economic disinvestment has not helped that equation.	mixed	X	X	X		
Spokane	Positively!	positive	X	X	X		
Strafford	50 -50	mixed				unsure	
Topeka	50/50 good/hassle	mixed	X			Only federal and state tax credits + local property tax relief in select areas	limited
Tredyffrin Township	While there is broad public interest in local history, the township government has not supported local preservation rules. There has been no advocacy for sustained regulation in the past decade. Public outcry only occurs when a prominent or well-loved building is threatened. But protections for less well-known buildings is not in place. The constituency also includes strong and vocal critics of intrusions on property rights.	mixed				conditional use (bed & breakfast, cultural studio), area & bulk dimensions	conditional use
Venice	A government taking of property rights.	negative	X	X			
Walla Walla	important in theory but not something individuals generally want to be responsible for themselves	mixed	X				
Washington	Mixed. Typical political football like zoning or any other public topic these days. Divide into tribes and fight.	mixed	X	X	X		

Part 3

City	City Plan Integration (Long Form)	City Plan Code	Non-HSPV Incentives	Non-HSPV Codes
Amherst	Master Plan support, preserving our rural character, Historic District Commission, Heritage Commission	Y	Barn Easements within the state of New Hampshire	easement
Angola	don't know	UN	Angola and Michigan City have facade grants. While the work must be approved by the HPC, the process and funding comes from the city.	city-funded program
Brandon	Yes, it is part of our Town Plan.	Y	We offer a tax stabilization plan based on the cost of renovation/construction projects.	tax stabilization plan
Burlington	No, as the city's preservation activities are not clearly defined and conducted in a scatter-shot approach, based on outdated and incomplete survey information	N	Some weatherization incentives are offered by the municipal electric company	weatherization
City of St. Albans	Our City Plan identifies preservation and support of historic sites as a priorities, balanced with the needs of redevelopment and modern function.	Y	No.	
Columbia	Preservation is included in our Comprehensive Plan	Y	Not that i know of	
Dallas	Yes, preservation is part of the comprehensive plan. There are significant financial incentives for homeowners and developers of historic commercial buildings. There is a property tax exemption for homeowners in historic districts. For developers they can use the federal and state tax credits as well as TIRZ funds and the exemption.	Y	The IEBC and building code amendments for historic buildings. CDBG funds can be used for preservation planning, surveys and NRs.	building code amendments, CDBG funds
Denver	Yes! My team had a direct role in drafting preservation-minded language for the city's comprehensive plan, as well as the land-use plan. We're actively involved in neighborhood plans, too.	Y	no	
Elkhart		Y		
Forest Grove	It is codified in both the Comprehensive Plan and the Development Code. Furthermore, a 10-year preservation strategic plan was recently adopted by the HLC and was readily endorsed by the City Council.	Y	No.	
Fort Collins	Yes - our comprehensive city plan includes a Neighborhood Vitality and Livability section (primarily regarding social sustainability) where we have several "sole-ownership" objectives for the Preservation Division. There are also other objectives throughout the plan in economic, social, and environmental sustainability that are supportive of preservation, or where preservation can help support shared outcomes.	Y	Our Utilities Department has some robust energy performance analysis and improvement grant and loan programs. We've worked with them in the past to support work on historic buildings, although the track record is mixed. There are also other water/cost reduction programs available including rooftop solar rebates, xeriscaping grants, etc., all of which can be used on historic buildings if the work meets the Standards.	utilities update programs
Fort Wayne	Yes and no. There are statements made that relate to historic preservation, but enforcement or actual inclusion in projects is extremely limited.	Y/N	There is a small amount of funding available to low-income homeowners to make improvements to their homes such as a new roof.	low-income maintenance fundings
Frankfort	We are working in that direction with a Comp Plan update, and hopefully a preservation plan is on the horizon.	Y/N	not that I am aware of	
Fredericksburg	Historic preservation is specifically addressed and supported throughout the City's Comprehensive Plan, both in a dedicated section and in each small area plan. The City seeks to further preservation efforts through support for traditional regulatory measures (historic district/review board) and through form-based codes, zoning changes, dimensional standards, and other measures that support the retention of existing buildings.	Y	Small-business grants through the EDA and zero-interest loans through the local Main Street organization are meant to assist businesses rather than buildings, but as many are located in historic buildings in the district, they benefit both.	small-business grants
Friday Harbor	The Municipal Plan identifies preservation as a goal, but inclusion there is not strong enough unless there is language in the ordinance.	Y/N	Zoning codes that protect single family areas from tear-down pressure that would arise if larger multi-family and commercial structures were allowed.	zoning
Geneva	Yes. Preservation is a key component of the City's published plans. However, the support of implementation of those goals and policies by the City Council varies from case-to-case and Commission determinations are often over-ruled in election years. That is the nature of politics. It is essential that I maintain my professional perspective which means no one is ever 100% happy with my leadership 100% of the time.	Y	No, all of our single-family property incentives are tied to preservation.	
Highland Park	Absolutely not. Local landmarks have been torn down unnecessarily in the last 5 years.	N	If people aren't educated, they don't care about the financial incentive to landmark.	
Kennebunk	Yes and I. Some who believe it is not conducive to promoting a business friendly vision especially for the future.	Y	No.	
Kennett Township	There is no city plan. The county has preservation goals.	Y	Zoning incentives	zoning
Knoxville	Yes. Preservation is recognized as a goal from the City policy side and by formal documents - preservation is incorporated into long-range planning, sector plans, and small area plans. The City regularly funds a Historic Preservation Fund which provides financial support for rehabilitation projects via grants and loans. Though paused due to pandemic budget constraints, the City's HP Fund is actually allocated the same amount the State usually receives from the NPS fund.	Y	There are general rehabilitation grants available through Community Development/HUD funding/etc. However, these often come into conflict with neighborhoods' design guidelines as they fund lead-based paint remediation, inappropriate window replacements, etc - often going for the lowest common denominator and being unwilling to negotiate with staff.	rehab grants
LaPorte		Y		
Lawrence	Yes. Our city's comprehensive plan includes a section on the preservation of historic resources.	Y	No	
Little Rock	I do believe they do, to an extent, within the City government, in our planning and development office we have a preservation planner.	Y	no, not at this time	

City	City Plan Integration (Long Form)	City Plan Code	Non-HSPV Incentives	Non-HSPV Codes
Littleton CO	Yes, in the most recent comprehensive plan. The plan includes goals to preserve historic resources and support property owners.	Y	Hlstric Denver has a database of contractors that have skills with restoration of historic homes.	trained contractor list
Logansport		Y		
Madison	Yes! Preservation grants (called the PACE program) up to \$35,000 for preservation or rehab projects that helps property owners offset the cost of projects; education programs with the community and civic organizations; preservation commission and ordinances	Y	none that I'm aware of	
Madison	Yes. My city has a relatively new Historic Preservation Plan that includes historic contexts for traditionally underrepresented communities. The HP Plan is a component of the city's Comprehensive Plan.	Y	Yes. My city offers low-cost, forgivable loans for home-owners with income below a certain percentage of the median household income for the county.	low-income forgivable loans
Miami-Dade County	Yes, to an extent. Protection of historic and cultural resources is a land use element in our comprehensive development master plan.	Y		
Michigan City		Y	Angola and Michigan City have facade grants.	façade grants
Minneapolis	In word. Our comprehensive plan has called for financial incentives for historic preservation ever since we've had a separate heritage preservation chapter, but even suggesting incentives has been wildly unpopular.	Y	none that I am aware of	
NR	Expansion of one district is in the comprehensive plan.	Y	No	
Phoenixville	No	N	Zoning relief	zoning
Schuylkill Township, PA	My township has an historic preservation ordinance designed specifically to the protection of identified historic resources and particularly targets demolition by neglect.	Y/N	Unknown, other than encouraging open space and ultimately protecting historic landscapes.	
South Bend	Yes, if in principle. The city acknowledges the importance of placemaking, but would like us to expedite and simplify our preservation policies.	Y	There's a small project improvement grant program (less than \$500) administered by the city, but ensuring that those 'fixes' are sympathetic to preservation best practices has proved challenging.	small project improvement grant program
Spokane	Yes - we have a comprehensive plan that devotes a chapter to Historic Preservation. Here is the link to that chapter: https://static.spokanecity.org/documents/shapingspokane/comprehensive-plan/chapter-8-urban-design-and-historic-preservation.pdf	Y	There is a multi-family tax exemption that could be used for the creation of housing - I suppose it could be used in the case of an historic mansion being broken up into apartments. I'm not aware of it being used on homes at this point, but it has been used for historic buildings. It excuses property taxes on the residential portion of the property for 8 years on market rate; and 12 years if a certain percentage is low-income.	multi-family tax credit
Strafford	NO	N	NO	
Topeka	Full-time City program with full-time staff (of 1). CLG. Very competent and active Landmarks Commission. Active with various preservation programs for neighborhoods, homeowners, and developers. All programs are dependent of funding through federal HPF funding.	Y	CDBG, though nothing preservation-related is coordinated with CDBG funding.	CDBG funds
Tredyffrin Township	A new township Comprehensive Plan is expected to be reviewed and approved in early 2021. Historic preservation is expected to be addressed in the new Plan.	Y	While there are tremendous historical research resources available through the local historical society and other online sources to research properties, there are no services available for the individual house owner.	
Venice	Our Comp Plan has an historical resources component to it, but it is pretty weak and not necessarily followed. For example, one strategy is to "Pursue certified local government status." That is being interpreted as authority to consider it, but nor authority to apply for it.	Y/N	Not here.	
Walla Walla	Comprehensive Plan has an entire section devoted to historic preservation	Y	No	
Washington	Yes. Major planning documents include a thick section on historic districts. Historic neighborhoods and neighborhood character theories thread through the remainder of the plan. The Historic Preservation Office is part of the Office of Planning. All administrations since 1990 have recognized the market advantage our historic neighborhoods give us over surrounding suburban and exurban jurisdictions in terms of livability and sustainability.	Y	Single-family Rehab program run by the housing department to help seniors with grants and low-interest loans for home improvements like accessibility, energy efficiency, HVAC, roofs, etc. By policy that department understands that the typical junk vinyl window isn't allowed in our HDs, so they just fund other building components.	senior single family rehab funds

Part 4

City	Common Questions: Technical	Common Questions: Financial	Common Questions: Regulatory	Common Questions: Other	Common Questions: Other Code	Partnerships with Advocacy Groups	Code
Amherst	X					Access to the NH Preservation Alliance and other like minded preservation organizations	Yes
Angola			X			Angola partners with their Main Street Organization.	Yes
Brandon			X			No.	No
Burlington	X	X	X	why is their house considered historic?	lack of knowledge	no	No
City of St. Albans	X	X	X			Not at this time.	No
Columbia			X			somewhat	Somewhat
Dallas	X		X			Yes, the advocacy group works with the commission to provide technical assistance for the homeowners.	Yes
Denver	X	X	X			Our preservation advocacy group has a research and designation fund, but no funds for physical preservation work.	Somewhat
Elkhart			X				No
Forest Grove			X			No. There is a local "friends" group but while they are advocates, they offer no direct assistance to homeowners.	No
Fort Collins	X	X	X			Not at present, our three local non-profits, Historic Larimer County, the Fort Collins Historical Society, and the Poudre Landmarks Foundation are all mostly engaged in research and education rather than advocacy. There's some institutional history reasons for that. I'm hoping as the municipal program gets a bit better about limiting advocacy to the confines of our laws and program guidance from City Council, the non-profit sector will realize there's a leadership vacuum municipal staff can't fill and that they step in to fill it.	No
Fort Wayne		X	X			Yes	Yes
Frankfort		X	X			Yes - it is a recent development. Our local advocacy group recently worked with the city (and provided the funding) to move a historic house owned by a church, which was in danger of demolition.	Yes
Fredericksburg		X	X			A local nonprofit is available for technical assistance and occasional workshops, but their reach is limited given their own budget, staffing, and capacity issues.	Yes
Friday Harbor	X	X		Home owners typically don't have the skills necessary to address delayed maintenance on their own, so they face high costs in hiring contractors who are expensive and may or may not have the know-how or concern about how to work with historic homes. In addition, I would say that windows are the most common problem.	skilled labor	We are a very small community. The local historical society does not concern itself with buildings, only artifacts and written/oral information. Our local land trust group that functions via REET (money they earn with each sale of property) has as one of its objectives, protecting historic resources. In practice, they are much keener on undeveloped landscapes and shorelines for public access and protection from development. They seem to be uncomfortable with historic buildings and farms, primarily because assessing value of land vis a vis the buildings is tricky, as is monitoring for compliance.	No
Geneva			X			Yes. A county advocacy group and a statewide advocacy group.	Yes
Highland Park			X	Everyone thinks that if you're house is "historic" that you can't do anything you want. Again, staff is terrible about educating and they don't even know the info themselves.	lack of knowledge	Landmarks Illinois is amazing, but our HPC and city do not do anything to connect owners with LI. Landmarks IL reaches out to owners when they're made aware of a demo permit or issue.	Somewhat
Kennebunk			X			No.	No
Kennett Township	X	X	X			There are no preservation advocacy groups that assist homeowners only. The county wide historic preservation network and the county preservation planner support local historical commissions and assist property owners. [sic]	No

City	Common Questions: Technical	Common Questions: Financial	Common Questions: Regulatory	Common Questions: Other	Common Questions: Other Code	Partnerships with Advocacy Groups	Code
Knoxville	X	X	X			Yes - after a contentious (and ultimately failed) expansion of an existing historic overlay in a lower-income neighborhood, the City funded a "historic overlay gap fund" to be administered by the local preservation non-profit. The grant was intended to fund the "gap" between repair costs or historically appropriate new materials, and the less-expensive synthetic materials. The grant was intended for low-to-moderate-income, homeowner occupants. It has been underutilized as most folks living in these neighborhoods no longer meet the income constraints.	Yes
LaPorte			X			LaPorte HPC connects with a local preservation group;	No
Lawrence		X				Yes. Only for education and technical issues.	Yes
Little Rock		X	X			I am with the city's preservation advocate and we assist homeowners on a regular basis	Yes
Littleton CO			X			Not currently.	No
Logansport			X				No
Madison	X	X	X			Yes, we have several organizations like Cornerstone Society, Indiana Landmarks, Historic Madison Inc., and the Main Street that work cooperatively with our commission to help homeowners and advocate for community-wide preservation	Yes
Madison	X		X			No	No
Miami-Dade County		X	X			We have a strong partnership with Dade Heritage Trust, a local non-profit hp advocacy group	Yes
Michigan City			X				No
Minneapolis			X			no	No
NR			X			No	No
Phoenixville			X			Yes, Chester County Historic Preservation Network	Yes
Schuylkill Township. PA	X	X	X			The Historical Commissions in Chester County are supported by Chester County Historic Preservation Network.	Yes
South Bend	X	X	X			Our HPC has a strong relationship with Indiana Landmarks, the Indiana's large statewide preservation non-profit. We partner with them on many of our projects and initiatives.	Yes
Spokane		X	X	I suppose it could be considered "technical issues" but as the Historic Preservation Officer, I get a lot of questions asking for skilled contractors for historic homes.	skilled labor	We have a local nonprofit, Spokane Preservation Advocates, who have a small grant program. We have encouraged them to use these funds to offset costs for homeowners to have an HP Consultant write nominations for listing on the local register.	Yes
Strafford			X			Only with the State Division of Historic Preservation	Yes
Topeka		X				No. This is a sore spot for me.	No
Tredyffrin Township		X				A very strong historic preservation trust thrives in the township that intervenes to protect select properties when threatened. However, there is no partnership between the trust and the township or commission.	Somewhat
Venice		X	X			Not yet, but looking into it.	No
Walla Walla		X	X			No local preservation advocacy groups active	No
Washington		X	X			No	No

Part 5

City	Partnerships with Advocacy Groups	Code	Cities to Emulate (Long Form)	Cities to Emulate (Coded)	Reasons to Emulate
Amherst	Access to the NH Preservation Alliance and other like minded preservation organizations	Yes			
Angola	Angola partners with their Main Street Organization.	Yes	Angola's HPC has seen a lot of success. Their planning department works with property owners to layer grants (state and local) and HPC to develop successful projects. The mayor supports preservation and the city backs the HPC in their decisions, recently taking a defiant COA applicant to court where he was ordered to work with HPC and staff to remove unapproved work and restore the building to its original appearance.	itself	
Brandon	No.	No	I am sure that any other town/city will have something to offer to add to our commission.	Any city	
Burlington	no	No	Portland, ME and Boulder, CO come to mind - smaller cities with progressive politics	Portland, ME and Boulder, CO	small cities, progressive politics
City of St. Albans	Not at this time.	No			
Columbia	somewhat	Somewhat	our issues come more from City Council than our commission	other	
Dallas	Yes, the advocacy group works with the commission to provide technical assistance for the homeowners.	Yes	San Antonio, LA	San Antonio, LA	
Denver	Our preservation advocacy group has a research and designation fund, but no funds for physical preservation work.	Somewhat	Fort Collins, CO has a great no-interest loan program for property owners. We'd love to do something like that in our city, but geared towards low- or fixed-income property owners.	Fort Collins, CO	no-interest loan program
Elkhart		No			
Forest Grove	No. There is a local "friends" group but while they are advocates, they offer no direct assistance to homeowners.	No	Oregon City and Albany, Oregon. Comparable in population and their programs have been around longer.	Oregon City and Albany, Oregon	
Fort Collins	Not at present, our three local non-profits, Historic Larimer County, the Fort Collins Historical Society, and the Poudre Landmarks Foundation are all mostly engaged in research and education rather than advocacy. There's some institutional history reasons for that. I'm hoping as the municipal program gets a bit better about limiting advocacy to the confines of our laws and program guidance from City Council, the non-profit sector will realize there's a leadership vacuum municipal staff can't fill and that they step in to fill it.	No	San Antonio - while they are a much larger community than we are and their municipal preservation staff rival most SHPOs, they have a solid balance of programs from incentives, to outreach, to education in addition to their regulatory role to preserve places. We are striving to downsize their model to something that works for a team of 2-4 staffers.	San Antonio	balance of programs: incentives, to outreach, to education, regulatory role, with a small team
Fort Wayne	Yes	Yes	Kalamazoo, MI, because it takes a more proactive role in historic preservation issues.	Kalamazoo, MI	proactive
Frankfort	Yes - it is a recent development. Our local advocacy group recently worked with the city (and provided the funding) to move a historic house owned by a church, which was in danger of demolition.	Yes	I think that our city could learn a lot from our nearby neighbors Louisville, Lexington, and Covington.	Louisville, Lexington, and Covington, KY	
Fredericksburg	A local nonprofit is available for technical assistance and occasional workshops, but their reach is limited given their own budget, staffing, and capacity issues.	Yes	We typically look to other cities in Virginia for examples when we assess any part of our program. We often look to Charlottesville or Richmond, but not necessarily to recreate those programs exactly. Every city has things they do well and others they could improve.	Charlottesville or Richmond	not necessarily to recreate those programs exactly
Friday Harbor	We are a very small community. The local historical society does not concern itself with buildings, only artifacts and written/oral information. Our local land trust group that functions via REET (money they earn with each sale of property) has as one of its objectives, protecting historic resources. In practice, they are much keener on undeveloped landscapes and shorelines for public access and protection from development. They seem to be uncomfortable with historic buildings and farms, primarily because assessing value of land vis a vis the buildings is tricky, as is monitoring for compliance.	No			
Geneva	Yes. A county advocacy group and a statewide advocacy group.	Yes	Each community is so different that I have found that no one model works for another community. However, discussions with colleagues (especially through NAPC) helps us find elements of other plans that can be adapted locally. I know that several colleagues follow what we are doing in Geneva to further preservation in their communities. It also depends on what level of commitment to preservation exists in a specific community as well as state enabling legislation as to what ideas and concepts can transfer from one locality to another.	depends	
Highland Park	Landmarks Illinois is amazing, but our HPC and city do not do anything to connect owners with LI. Landmarks IL reaches out to owners when they're made aware of a demo permit or issue.	Somewhat	Yes, Lake Forest, IL--the next community north of us--3-5 miles away.	Lake Forest, IL	

City	Partnerships with Advocacy Groups	Code	Cities to Emulate (Long Form)	Cities to Emulate (Coded)	Reasons to Emulate
Kennebunk	No.	No	Yes. Several Maine cities have developed a relationship with trades people and historical societies that promotes the towns preservation efforts with good community outreach.	in-state	relationships with trades people and historical societies; promotion and community outreach
Kennett Township	There are no preservation advocacy groups that assist homeowners only. The county wide historic preservation network and the county preservation planner support local historical commissions and assist property owners. [sic]	No	Cities are not relevant to my historical commission. Our commissions serve the entire municipality. We have several excellent models in Chester County, PA	non-cities	
Knoxville	Yes - after a contentious (and ultimately failed) expansion of an existing historic overlay in a lower-income neighborhood, the City funded a "historic overlay gap fund" to be administered by the local preservation non-profit. The grant was intended to fund the "gap" between repair costs or historically appropriate new materials, and the less-expensive synthetic materials. The grant was intended for low-to-moderate-income, homeowner occupants. It has been underutilized as most folks living in these neighborhoods no longer meet the income constraints.	Yes			
LaPorte	LaPorte HPC connects with a local preservation group;	No			
Lawrence	Yes. Only for education and technical issues.	Yes	Looking for now.	no	
Little Rock	I am with the city's preservation advocate and we assist homeowners on a regular basis	Yes	not within my state. We have several CLGs, but not many that are sophisticated. Aside from Little Rock, I would say there are two other cities that have staff focused on historic preservation, Fayetteville, and Conway. They have better and more sophisticated planning staffs. Many of our cities do not have dedicated staff, they undertake HP as a collateral duty.	Fayetteville, and Conway, Arkansas	staff support
Littleton CO	Not currently.	No	Ft. Collins for their website and hp code.	Fort Collins, CO	website and code
Logansport		No			
Madison	Yes, we have several organizations like Cornerstone Society, Indiana Landmarks, Historic Madison Inc., and the Main Street that work cooperatively with our commission to help homeowners and advocate for community-wide preservation	Yes	Both New Orleans and Jefferson City, MO, have excellent commissions and design guidelines that we would like to model ours on.	New Orleans; Jefferson City, MO	commissions and design guidelines
Madison	No	No	Our Commission (Madison, WI) does really good work, and takes their role seriously. I think you commission could be a model for others.	itself	
Miami-Dade County	We have a strong partnership with Dade Heritage Trust, a local non-profit hp advocacy group	Yes			
Michigan City		No			
Minneapolis	no	No			
NR	No	No	No	no	
Phoenixville	Yes, Chester County Historic Preservation Network	Yes	Our ordinance is a model for the county	itself	
Schuylkill Township. PA	The Historical Commissions in Chester County are supported by Chester County Historic Preservation Network.	Yes			
South Bend	Our HPC has a strong relationship with Indiana Landmarks, the Indiana's large statewide preservation non-profit. We partner with them on many of our projects and initiatives.	Yes	I'm constantly looking at other communities for inspiration. Insights into other communities must be tempered with the understanding that their enabling ordinances may be different than our own, so experiences may vary.	Any city	
Spokane	We have a local nonprofit, Spokane Preservation Advocates, who have a small grant program. We have encouraged them to use these funds to offset costs for homeowners to have an HP Consultant write nominations for listing on the local register.	Yes	Honestly, I'm not sure that I would have an answer for this since we have a fully functioning, long-standing HP program (since 1982). We aren't looking for cities to model our program after.	no	
Strafford	Only with the State Division of Historic Preservation	Yes	Possibly Norwich, Vermont	Norwich, Vermont	
Topeka	No. This is a sore spot for me.	No	Yes. Any city that budgets local funds for preservation education and incentives.	Any city	budgets for education and incentives
Tredyffrin Township	A very strong historic preservation trust thrives in the township that intervenes to protect select properties when threatened. However, there is no partnership between the trust and the township or commission.	Somewhat	East Pikeland, Chester County, PA - www.eastpikeland.org. East Pikeland does a very good job with designation.	East Pikeland, Chester County, PA	designation
Venice	Not yet, but looking into it.	No	The City of Sarasota, Florida just up the road from us has been doing an excellent job of surveying their resources and and providing zoning incentives for historic properties.	Sarasota, Florida	surveying and zoning incentives
Walla Walla	No local preservation advocacy groups active	No			
Washington	No	No	Not sure. No time to network.	no	

Part 6

City	Strengths & Weaknesses (Long Form)	Strengths	Weaknesses	Other Comments
Amherst	Strengths: Village Green, Historic District, Town Center Weaknesses: Have and Have Not's	designation	inequalities	
Angola	Strengths - preservation stabilizes communities and improves the economy, even in our lower income neighborhoods. Weaknesses - lack of public awareness and understanding.	stabilization in all neighborhoods	public education	Our rust-belt communities struggle to survive. Preservation, especially in downtowns, can be a catalyst for revitalization, but financial help is needed. Even small grants to historic property owners could make a huge difference. Programs need to be stable over time - we have seen progress in a town completely disappear with a change in administration. Preservation should be bipartisan.
Brandon	We need more folks to be involved.			
Burlington	It's not predictable for property owners and not applied evenly throughout the city because the most recent survey data upon which it is based is from 2007; other surveys are much older.		unpredictable	Burlington's zoning ordinance is too broad in its application of design review for historic buildings. It says that any building in the city that is eligible for or listed in the State or National Registers is subject to design review. As a result, no property owners will support local surveys, SR, or NR listings because these actions trigger local regulatory oversight. The city needs to clearly define and designate local historic districts, document the properties within each district, and provide clear guidelines to property owners as to what is and is not permitted in each district. There need to be some incentives too - property tax abatement, waived permitting fees, low-interest loans, etc. - something to make it financially beneficial for property owners who invest in these districts.
City of St. Albans	It is a new program with a lot of passion and energy.			
Columbia	Lack of support from council is becoming an issue but we have a good staff	staff	city support	
Dallas	It is a mature program, started in 1973. Weaknesses: lack of funding, lack of qualified staff--staffing goes up and down with the economy			Under Texas law, cities and counties can offer property tax exemption to historic properties. As Texas has no income tax, the property tax effective is the income tax. So, 11.24 of the Tax Code allows the exemption program and cities can shape the program to be politically palatable to the elected officials and the community. Dallas has had a robust program for 15 years and it has really helped historic districts to stabilize. The exemption encourages them to rehabilitate and maintain their properties.
Denver	We struggle with a lack of political support for preservation. Our city's government is very pro-development. Development is important, but it needs to be paired with reuse of existing buildings, which is not the dominant ethos here.		pro-development city planning, lack of political support	
Elkhart				
Forest Grove	S: Solid community and City Council support (e.g. we just established our fourth NR district). W: Money (of course) and the inability to ensure that people who own historic homes understand what that means, regulation-wise (despite at least annual notices to residents about that very thing).	stakeholder support	public education, lack of funds	
Fort Collins	Strengths: Strong regulations and generally good support for preservation within the community, although comprehension varies. We also have an extremely robust incentives toolkit and monetary support from City Council to complete projects or match grants, even grants applied for on behalf of community partners rather than for city projects. Part of that support comes from a strong ethic and track record to help property owners as much as possible. Weaknesses: Generally, we have too much focus on architectural preservation and not enough of cultural/historic resources that might evolve and change more readily under the Standards. We also only started seriously engaging and outreaching to communities of color in 2020. We've lagged on comprehensive program planning so we don't always leverage our resources the most effectively. We also are still operating under an "antiquities" approach and only starting to shift away from a "save everything" approach so we have lots of individual City Landmarks, many of which are questionably eligible for the program and better left to historic districts. However, because of that older culture and desire to be of help, we've just Landmarked marginal properties rather than tell an owner they would need to advocate for a district - as a result we have a seemingly arbitrary Landmark list and have denied people the chance to become community advocates for preservation by not even suggesting the possibility of a Landmark District, which doesn't help when developers or development-minded Council members point to those as examples of how we don't know what we're doing.	strong regulations, financial support, consistent	homogeneity in listed properties (demographics, architecture), failed advocacy	I think incentives are really powerful tools, and Fort Collins is a great example of how small incentives (\$2k mini-grants for project planning/research and \$7.5k loans for small projects) can make a huge difference in outcomes. The Design Assistance grants in particular have helped answer questions up front, like assessing woodwork, getting a mortar analysis complete, etc., to help a property owner or a less educated general contractor take a project from worrisome to excellent and help create more preservation advocates through the opportunity to educate new folks.
Fort Wayne	It's very passive and it's also viewed as the red-headed step-child of our local government.		passive, public perception	

City	Strengths & Weaknesses (Long Form)	Strengths	Weaknesses	Other Comments
Frankfort	Current strengths - supported by the mayor and majority of city commissioners; recent addition of a Historic Preservation Officer to staff; we have a rich history and an amazing collection of nationally, regionally, and locally significant resources. Weaknesses - the city has been ignoring major responsibilities of the CLG agreement for years, having staff expertise is a recent thing, so much "bad" precedent has been set with regard to loss of resources and of character-defining features of resources (our largest historic district has allowed vinyl siding by right since 1992). The population is hungry for education, but time and resources are limited. The local economic development entity is anti-preservation and feels regulation is a hindrance.	political support, new/additional staff	bad precedent, lack of expertise, limited time & resources, lack of developer support	
Fredericksburg	There is a great deal of political and local support for our program, which is very beneficial, especially when modifying the code or creating new regulations. We do experience conflict between those who wish to see no change and those who see some level of change as acceptable.	stakeholder support	development conflict	
Friday Harbor	Enforcement is a problem. Also, if a property owner's project does not qualify for incentives--or if they don't want the restrictions that come with incentives--we cannot make them preserve their historic resources. Also, I find County government politically and institutionally pretty unwilling to play ball.			
Geneva	Strengths is that--in all resident surveys and public planning efforts--preservation always ranks high as a benefit to the quality of life in Geneva. The drawback is that preservation is, typically, the first thing to be attacked and set aside when any opposition to preservation surfaces. From a single-family perspective, the greatest threat to preservation is lack of "absorbed education" about preservation techniques and technologies, the constant dissemination of mis-information by non-preservationists, and the skyrocketing property taxes when a rehabilitation occurs.	public appreciation	public education, misinformation, high property tax	Prior to this position, I operated my own architectural firm for 30 years, primarily focused on preservation projects. I have also been the Founding Chair of 3 Preservation Commissions and find that the issues do not vary much from one community to another.
Highland Park	There are no strengths right now. 2 years ago our preservation ordinance was completely gutted. Technically we shouldn't even be a CLG, but there's no one in the SHPO overseeing CLGs in the way they probably should be.		guttled ordinance	I'll email you with some resources.
Kennebunk	Budget is a weakness.		financial support	It would be helpful to have more grants or tax credits available for residents of historic districts.
Kennett Township	Strength: Municipal ordinance empowered, committed, grassroots. Weakness: Fully understanding authority, concern over confronting homeowners.	grassroots	authority	
Knoxville	Strengths: visible revitalization of all of our major historic neighborhoods Weakness: outdated design guidelines with limited staff time to update them	revitalization	guidelines, limited staff	
LaPorte				
Lawrence	Strength is context review. Weakness is no financial incentives.	review	financial incentives	
Little Rock	They are well established, but have problems with consistency, application of standards and guidelines. We have many opportunities to rehabilitate properties, and neighborhoods, but there is little political will to enforce basic building codes, or pursue foreclosure of properties that have been derelict for a long time. There is pressure to demolish historic buildings as opposed to seeking repair and securing at an earlier stage.		inconsistent, demolition pressure, lack of enforcement	
Littleton CO	In the past, city council and city manager not having the strength to make changes that may have a slight negative impact on some property owners. This is changing now with current council manager and other staff. Not enough hp staff to complete all that can be done to preserve the city. Strength right now is an excellent hp commission and director in place advocating for historic preservation.			Need education materials for council members and hp commissioners to learn about how to preserve without bringing about gentrification, displacement, inequality and understanding of the housing crisis Colorado and much of the nation is in.
Logansport				
Madison	The strengths - community support and dedicated staff; weaknesses - design guidelines are vague in areas and leave out some important aspects, our historic commission tends to be more lax on restrictions than we'd like (we're addressing this issue with training)	public support, staff support	staff training, vague guidelines	
Madison	We have a relatively strong preservation ethic in our city, a well-functioning HP Commission, and a well-developed HP Plan. BUT...We are barred by our state constitution from offering local property tax incentives for historic properties, Our local advocacy organization is not well-funded, and we don't have strong collaboration between the Commission and our advocacy community.			
Miami-Dade County	A major strength is our ability to designate based on social and cultural history. A weakness is a focus on traditional approaches to historic preservation with no provisions for community-based approaches.	pluralistic designation criteria	top-down approach	
Michigan City				

City	Strengths & Weaknesses (Long Form)	Strengths	Weaknesses	Other Comments
Minneapolis	On the positive side, our preservation program led the way (among Minneapolis' departments) in formally recognizing the longstanding contributions of underdocumented [sic] groups (and tactfully handling the accompanying conversations about race relations, past and present) well before it became a national priority this past year. On the negative side, we reorganize our preservation functions every three years or so, and we experience considerable staff turnover.	DEI designation	staff turnover, planning churn	
NR	A tax credit to [sic] cumbersome. No one has used it.			
Phoenixville	Offering technical assistance, good practice advice, trying to avoid being a bad guy.	technical assistance, education	authority	We need to broaden the incentives in easing certain regulations and fees related to maintaining listed resources, promote adaptive reuse
Schuylkill Township. PA	Our strength lies with direct support from our governing Board of Supervisors which can vary with the commitment of the individuals filling those positions. We generally get positive support, but this support can wane if there are legal costs for the township involving a preservation issue. Both BOS and public support tend to be for the structures that are older, more prominent, and deemed "most historic" and therefore more worthy of preservation. It can be more of an effort to argue for preservation of what are perceived to be structures of lesser value. Property owners often ask about financial incentives of which there are none we can offer.			
South Bend	Great question. 1. Lacking our own incentive program (we rely primarily on the State's tax credit, which is only for National Register listed properties), we spend a good deal of time attempting to get compliance out of property owners. I often joke that I "have a broken stick, and no carrot." 2. Our local landmarks are not always listed on the National Register of Historic places -- only one of our nine local historic districts is also on the National Register. I would like to see all of those listed, to ensure those tax credit opportunities are available to a larger percentage of our property owners. 3. I'd hate to say it, but I think our inventory of historic properties may not be understood (or endorsed) by our community. Some of my predecessors were rather 'aggressive' in their landmarking initiatives, resulting in properties that staff sometimes are left scratching their heads as to why it has been landmarked.		no incentives, public education	
Spokane	We have strengthened our ability to deny demolition of locally listed properties both individually listed and those within local historic districts. We are actively listing districts having just passed one with nearly 300 properties and are working on another residential district of 500+ properties. We would love to have even more incentives to be able to offer historic property owners - right now, we have a 10-year property tax reduction program based on a recent (2 year) investment as well as a small facade improvement grant program (up to \$5,000 match) funded by all demolition fees within our city.			Good luck with your thesis...I might suggest adding a question about what the incentives are for each community completing the survey rather than just the check boxes above. Might be helpful to understand what different communities offer!
Strafford	Few strengths, lots of weaknesses			
Topeka	Preservation is a new concept here, but is beginning to take root. There are projects that have utilized and benefited from tax credits to convince a growing portion of the public that preservation is a good idea, and pays for itself.	word of mouth support		Locally funded incentives for preservation are key. If State and Federal preservation incentives went away, we got nothing.
Tredyffrin Township	The township strengths are its PA CLG status and very good resources survey, though out of date. Opportunities include updating the historic overlay ordinance and establishing a broad educational program to elevate the public support for historic preservation. And incentives must be improved.	resources survey, education		
Venice	It has little authority and even less incentives.		little authority, no incentives	
Walla Walla	weakness - small pool locally of professionals who are interested in serving			
Washington	Just financial incentive programs? Strength: staff gains greater expertise about historic buildings by managing grant projects. Expertise that can be directly applied to evaluations of feasibility when reviewing permits. Weakness: grant program allows homeowners to select contractor giving our office only non-direct control of contractors during projects.	high expertise	lack of expertise	

Appendix D: Matrix C State CLG Coordinator Survey Results

Part 1. This data can also be accessed via this link: <https://drive.google.com/file/d/11c4juO4GCPDbhpsAC5-O6M-WZwySmS5q/view?usp=sharing>

State	Cities	State Populations	CLG Homeowner Incentives	Incentive Types	Yes/No	CLGs Examples
Washington		7,656,200	We have a statewide incentive that is adopted and administered at the local level. It is property tax reduction for rehabilitation projects, referred to as Special Valuation. It can be used for residential and commercial. https://dahp.wa.gov/grants-and-funding/special-tax-valuation . We do not have state income tax so it can't be used as an incentive as some other states do. I don't have a lot of info on any individual financial incentives that individual cities use. We have 60 CLGs so keeping up with that is not possible. For residential properties I would guess there is not much incentive outside Special Valuation. It is difficult to incentivize private homeowners with public dollars. You can make a case for it in commercial districts where it is about economic development and jobs, but not when it's about houses. The City of Tacoma does a great job with education and outreach. As does Spokane.	Special Valuation	Y	
Arizona		7,421,401	Yes		Y	
Colorado		5,842,076	Yes, we have multiple CLGs that offer incentives. See a full but not comprehensive list here: https://www.historycolorado.org/sites/default/files/media/document/2020/Colorado%20CLG%20Ordinance%20Comparison%20November%202020.xlsx		Y	
South Carolina		5,218,040	Yes. Generally there are no local grants for homeowners, but some offer a special property tax assessment.	Property tax assessment	Y	
Oregon		4,268,055	Yes		Y	
Iowa		3,163,561	Larger towns like Des Moines, Dubuque, etc.		Y	Des Moines, Dubuque
Iowa		3,163,561	Yes, multiple cities do. I work in Iowa City so I can speak to that. We have incentives		Y	Iowa City
Kansas		2,913,805	Several offer property tax rebates. One county CLG offers grants for a variety of property types.	Property tax rebates; Grants	Y	
New Mexico		2,106,319	To my knowledge there are no financial incentive programs provided by municipalities in New Mexico. Some CLGs have offered educational and technical assistance training.	Educational and technical assistance training	N	
Nebraska		1,937,552	Red Cloud, Lincoln, Omaha, North Platte, Plattsmouth		Y	Red Cloud, Lincoln, Omaha, North Platte, Plattsmouth
	Amana Colonies Land Use District in Iowa Note: I am an employee of the local CLG, not the State.		yes		Y	Amana Colonies Land Use District
	Tulsa Planning Office - Tulsa, Oklahoma		The staff of the Tulsa Preservation Commission provides technical assistance, and the Tulsa Preservation Commission sponsors workshops on the repair of wooden windows.	Technical assistance, workshop training	Y	Tulsa

Part 2

State	Common Commission Questions (Long Form)	Common Commission Questions Codes	Successful CLGs (Long Form)	Successful CLGs	Successful CLGs Incentives
Washington	I really don't hear about this a lot. The most common question is to explain how Special Valuation works.	special valuation	I do not know what would be described as successful. There are municipalities that may see a few homeowners apply for special valuation, such as Spokane.		special valuation
Arizona	Will a proposed change cause a property to be delisted	effects of alteration	The state has a 50% reduction in property taxes for historic homes that has over 8000 properties enrolled		state level
Colorado	Most questions relate to our state tax credit and eligibility for state grant funds.	money	The City of Louisville has an interesting incentives program that includes grants and loans but also a landmarking bonus, though I'm not sure how successful it is: https://www.louisvilleco.gov/local-government/government/departments/planning-building-safety/historic-preservation-15284 The City of Castle Rock has their own grant fund: https://www.crgov.com/1933/Local-Restoration-Grant-Program Many of our CLGs have local tax rebates but I don't think they are utilized very often.	Louisville, Castle Rock	grants, loans, landmarking bonus, local tax rebates
South Carolina	Are there state or federal grants available for homeowners? The answer is there are no federal or state grants for historic homeowners. South Carolina does have a state income tax incentive for homeowner projects. Local governments may also adopt a special property tax assessment for rehab of historic properties.	money	City of Columbia. They had 25 completed projects during Oct 2019-Sept 2020 that used the special property tax assessment. I don't know the breakdown of how many of these were homeowner or commercial projects but I suspect that most were commercial. Homeowners at least have the option of applying for the special assessment.	Columbia	special property tax assessment
Oregon	How to fund it, how to maintain standards	money, standards	Astoria - the have a design assistance program Salem, Albany, Forest Grove - offer grant assistance	Astoria, Salem, Albany, Forest Grove	design assistance, grants
Iowa	What monies are available and how do I access them?	money	Larger municipalities like Des Moines or Dubuque make use of these.	Des Moines, Dubuque	
Iowa	not many questions from Commissions because i am the staff member for ours. but they do want to provide more. so they probably ask what else we can provide.	assistance	In Iowa City we have a Historic preservation [sic] fund that provides a matching grant or no-interest loan for projects. It has been a great help at saving original material. we could use more funds and more contractors who know how to do the work.	Iowa City	matching grant, no interest loan
Kansas	What can we do to incentivize local register listing? They don't necessarily have funding or support to do a grant.	incentivize designation	Because we have a strong state tax credits that is very useful for homeowners, local programs don't tend to compete. Local property tax rebates are the best that most can do.		local tax rebates
New Mexico	The main question is how can we get more grant money? Most of the CLGs function independently and rarely seek assistance with local issues.	money	There are local governments and commission that have provided training and education efforts.		education, training
Nebraska	if there are any financial incentives or money to help with rehab projects	money	The City of Red Cloud receives money from a former resident to help with rehabilitation projects. This money is filtered through their Historic Preservation Commission in the form of competitive grants. The HPC reviews the applications and decides which projects get funding.	Red Cloud	individual donor grant program
Amana Colonies Land Use District in Iowa	Do we have money available to assist homeowners who do not have the means to restore their property.	money	Yes. Amana Colonies Land Use District	Amana Colonies Land Use District	
Tulsa Planning Office - Tulsa, Oklahoma	The Historic Preservation Officer of the City of Tulsa is a member of the staff of the Tulsa Planning Office and serves as the staff for the Tulsa Preservation Commission. Among the frequent inquiries are those about the requirement for an Historic Preservation Permit, the availability of financial assistance for owners, and the eligibility of property for the Federal Historic Preservation Tax Incentive Program.	permits, money	Although the program is not specifically directed towards preservation, the City of Tulsa's Working in Neighborhoods Department provides financial assistance for those owners who qualify with its funds from the Community Development Block Grant. Some recipients own residences in districts listed in or eligible for inclusion in the National Register of Historic Places.	Tulsa	CDB grants

Part 3

State	CLG Impediments (Long Form)	CLG Impediments Codes	Assistance Wish List (Long Form)	Assistance Wish List Codes
Washington	Severe development pressure and very high real estate values. Far left activists that think historic preservation is the new redlining and are spreading this belief.	development pressure, high property values, YIMBYism	An endless supply of training	training
Arizona	Lack of knowledge, lack of backing from mayor and council, out of date design guidelines, commission decisions being overruled by other boards and commissions	education, political support, out of date guidelines	Better training, better understanding of legalities that face	staff training
Colorado	Public apathy and sometimes hostility towards preservation, lack of funding for their programs, lack of political support.	stakeholder support, funding	Provide them with qualified staff to run their programs.	staffing
South Carolina	Lack of broad support for, or understanding of, what they do to help preserve historic character of the community. Political pressure to approve projects that do not achieve preservation goals. Lack of effective financial incentives to help homeowners maintain historic fabric.	staff education, political pressures, funding	Provide state grant funding to assist with homeowner projects.	state grant for homeowners
Oregon	fast development, opposition to property controls, misinformation and cost of historic repair vs new replacement, lack of preservation skilled contractors.	development pressure, property rights infringement, misinformation, lack of skilled contractors	Provide more funding, provide more studies and evidence to support the value of preservation in Oregon.	funding, evaluations
Iowa	Generational interest in historic preservation is less strong, unless one can remind the younger generation that the "greenest house" is the one that already exists and that rehabilitating historic buildings saves landfill space, preserves community memories, and is ecologically sound.	youth support & education	Increase community awareness of the benefits of preservation,; [sic] involve more people at the grassroots level, educate people about the benefits of saving/rehabilitating older buildings	resident education, resident support
Iowa	owner resistance to preservation when they can't do what they want, lack of staff time to provide good customer service, lack of support from city government	residential support, staff time, political support	provide more services and assistance to building owners, provide a loan for tax credit projects for upfront costs, provide more education to owners, realtors, etc.	education, upfront loan for tax credit projects
Kansas	No budget for preservation programs, lack of support for local incentive programs, lack of staff to administer another program, generally weak local preservation programs.	funding, stakeholder support, staffing, weak programs	Empower the commissioners and staff to see themselves as a valid part of the municipal government similar to the planning commission or zoning board.	staff empowerment
New Mexico	Staff support. The smaller CLG communities' staff often wear many hats. They are barely making the minimum support to the local commission. The larger CLGs (albuquerque / santa fe) have staff but, they are so busy they can barely think about big picture planning issues and support.	staffing	Provide more solutions to help them at the local level, whatever their needs are. As I have been here for 7+ years I have gotten to know some of the staff and issues in the 9 CLGs that New Mexico has. This has helped to better understand each community's local issues. Still, NM is plagued with staff issues and intense feelings about property rights, it remains challenging to maintain even the simple things like a code enforcement program (which helps to maintain buildings before deteriorating beyond recall) as the political support is lacking.	political support, sensitive enforcement, consistent staffing
Nebraska	Right now, not being able to hold larger gatherings for in-person educational programs, apathy from HPC staff and board, apathy from community members.	COVID restrictions, stakeholder support (apathy)	I wish I could reinvigorate some of them to work on their preservation goals. One of my CLGs is enthusiastic, but lacks focus. Others are not very enthusiastic. Some have been doing the same types of projects year after year without introducing new ideas.	innovation, inspiration
Amana Colonies Land Use District in Iowa	Property owners who do not think that historically correct materials are the best choice.	residential support	Give them an unlimited amount of money to help property owners	funding
Tulsa Planning Office - Tulsa, Oklahoma	No insurmountable obstacles!	none	Obviously beneficial would be the availability of funds and incentives to assist owners of residences with projects.	funding, incentives

Part 4

State	Other State Strategies (Long Form)	Other State Strategies Codes	Other Comments
Washington		No	
Arizona	No idea	No	
Colorado		No	
South Carolina		No	I believe more substantial grants (local and state) would help homeowners do more to preserve historic fabric. Our state income tax incentive helps large scale rehab projects but is not as useful for someone who just needs to repair a roof or windows appropriately. It is difficult for homeowners to see long-term benefit of appropriate repairs over short-term utility of inappropriate replacements.
Oregon	Disaster planning and climate change response, studies on the value of preservation	disaster planning, studies	
Iowa	The answer to this question is largely the same as the answer to the previous question. We also need to use the 2021 technology for virtual meetings (especially in the covid virus days), educating businessmen and business women in the benefits of working with historical commissions, and reminding people that historic preservation is also linked to tourism, since you have to have interesting things for people to see and to visit if you hope to keep more tourism dollars in your community.	education about tourism, education to outside stakeholders, technology	
Iowa	providing enough staff, respecting the importance of preservation	staffing, education	
Kansas			
New Mexico	Hosting training opportunities and having CLG staff/commission members attend.	staff training	
Nebraska	Getting more CLGs. Nebraska only has 8, and I've been working to certify more. Many communities have no interest in the CLG program and see the program as just having restrictions to private property owners. I've been working to promote the benefits.	more CLGs, marketing	I would like to know how so many other states got to have as many CLGs as they do.
Amana Colonies Land Use District in Iowa	N/A	No	I am the Administrator for the Amana Colonies Land Use District in Iowa. We have a new-ish Historic Preservation Grant Program, funded entirely by a percentage of local hotel/motel taxes collected. More information is available https://aclud.org/historic-preservation-grant-program/ .
Tulsa Planning Office - Tulsa, Oklahoma	No response presently!	No	No

Figures

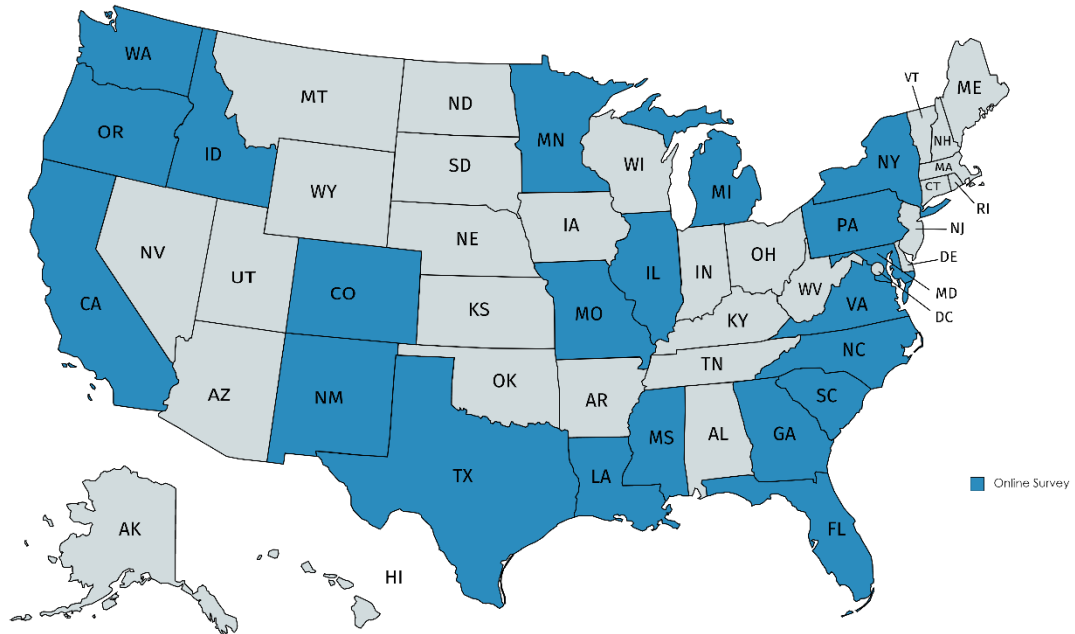


Figure 1. States in light blue illustrate the locations of Certified Local Governments mentioned in the literature used for the online search for comparisons. Created with mapchart.net.

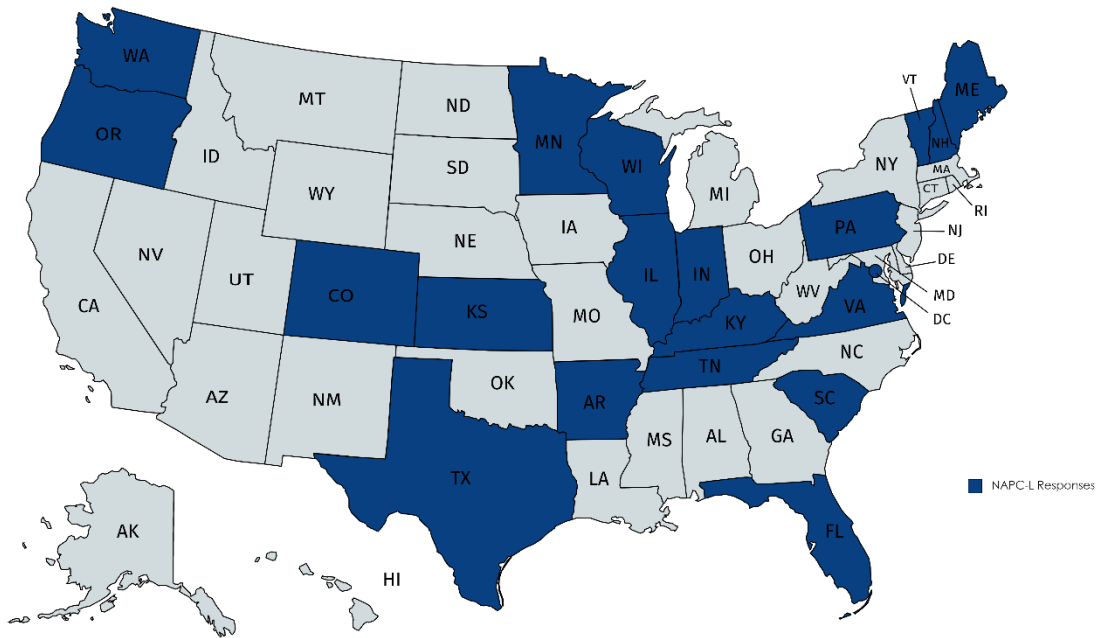


Figure 2. Respondents to the National Alliance of Preservation Commissions survey represented the states highlighted in dark blue. Created with mapchart.net.

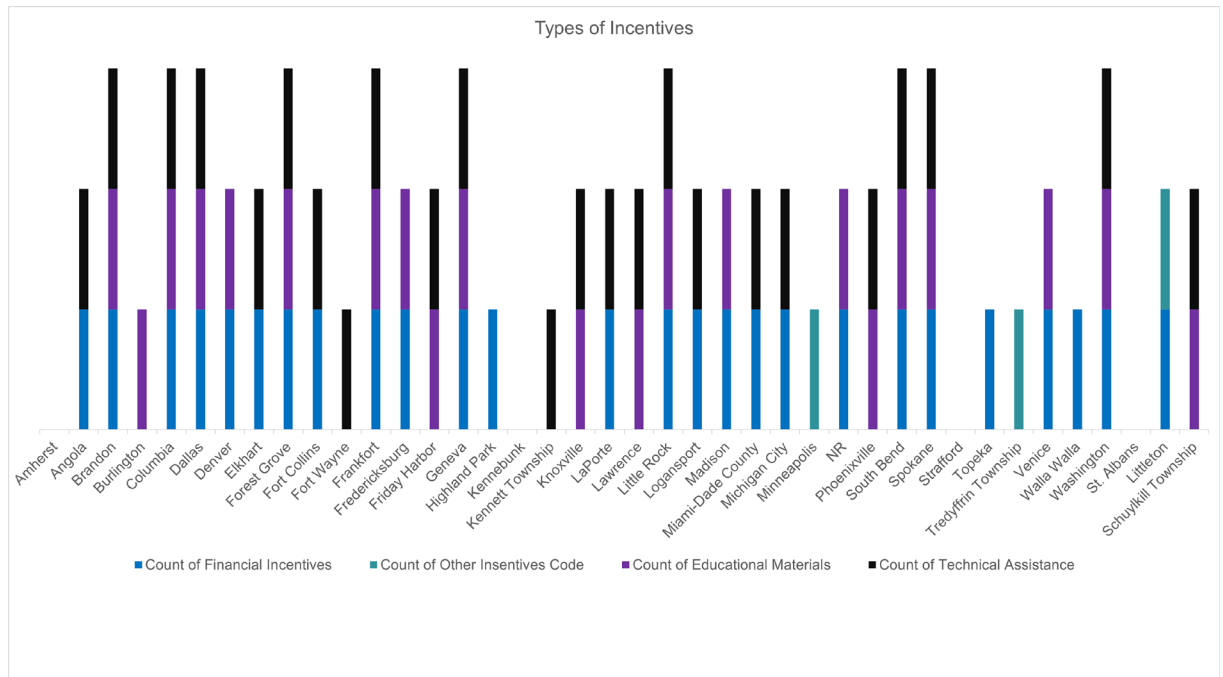


Figure 3. This chart illustrates the types of incentives each CLG responded as utilizing.

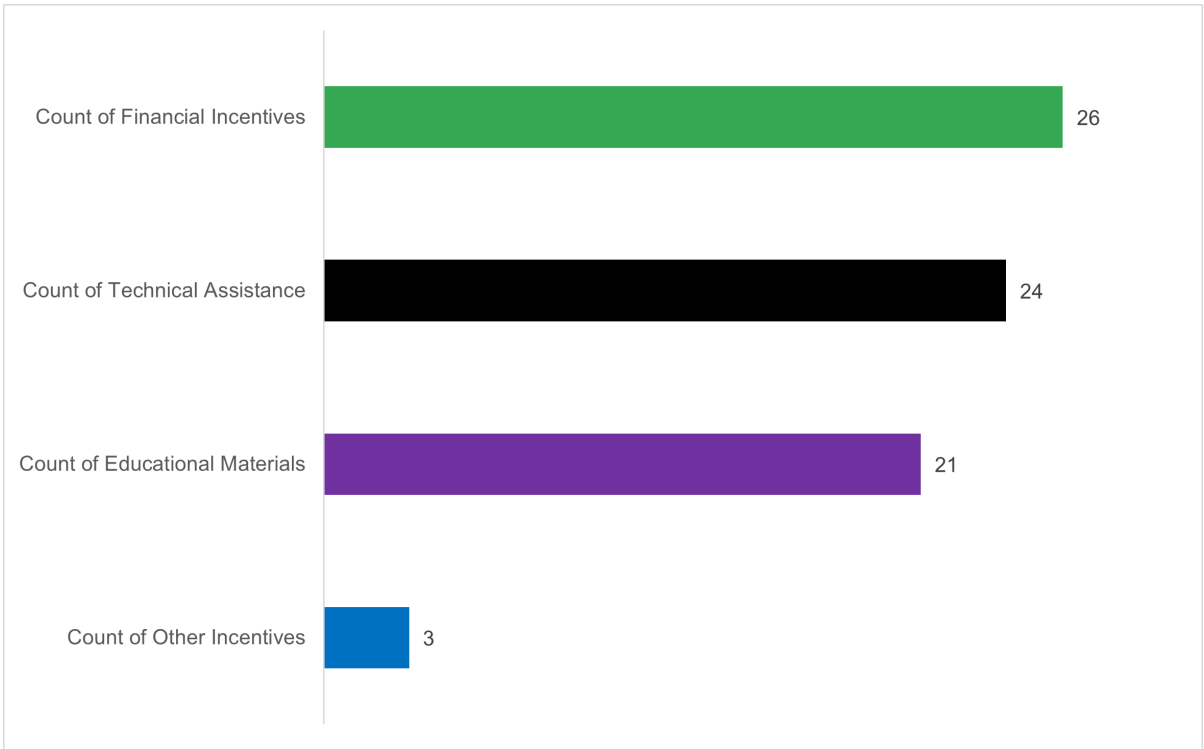


Figure 4. This chart demonstrates the frequency that each type of incentive appeared in the NAPC-L Survey.

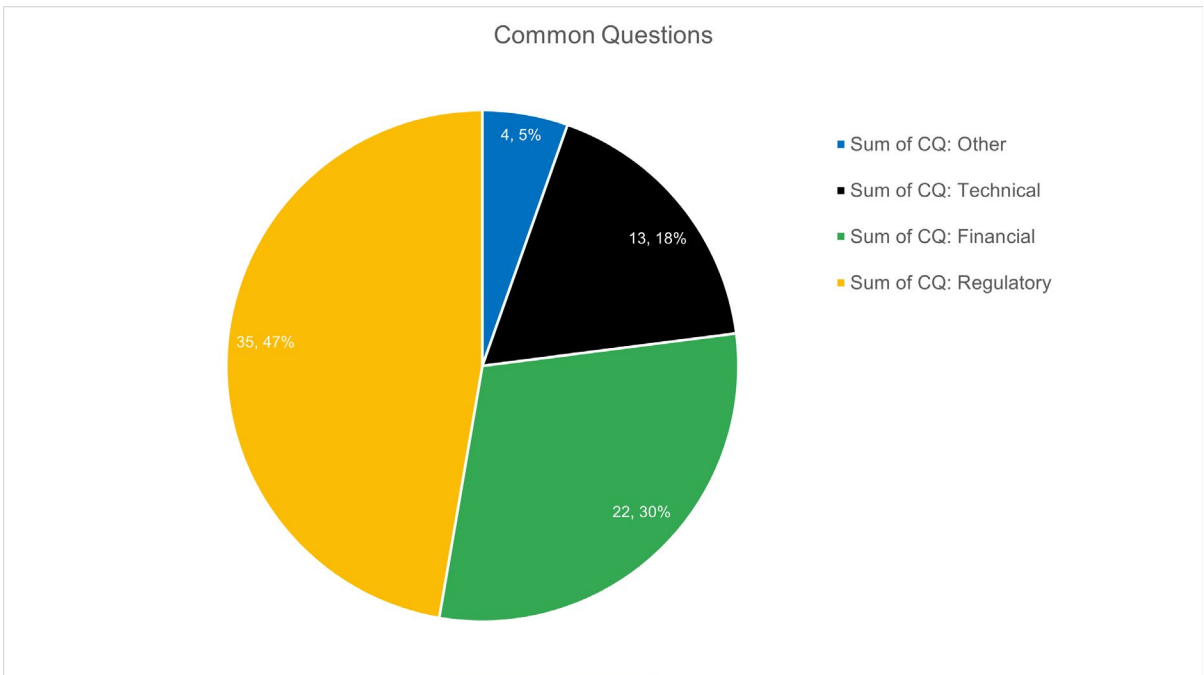


Figure 5. This pie chart shows the frequency of common questions from residents to CLGs, as responded to in the NAPC-L Survey.

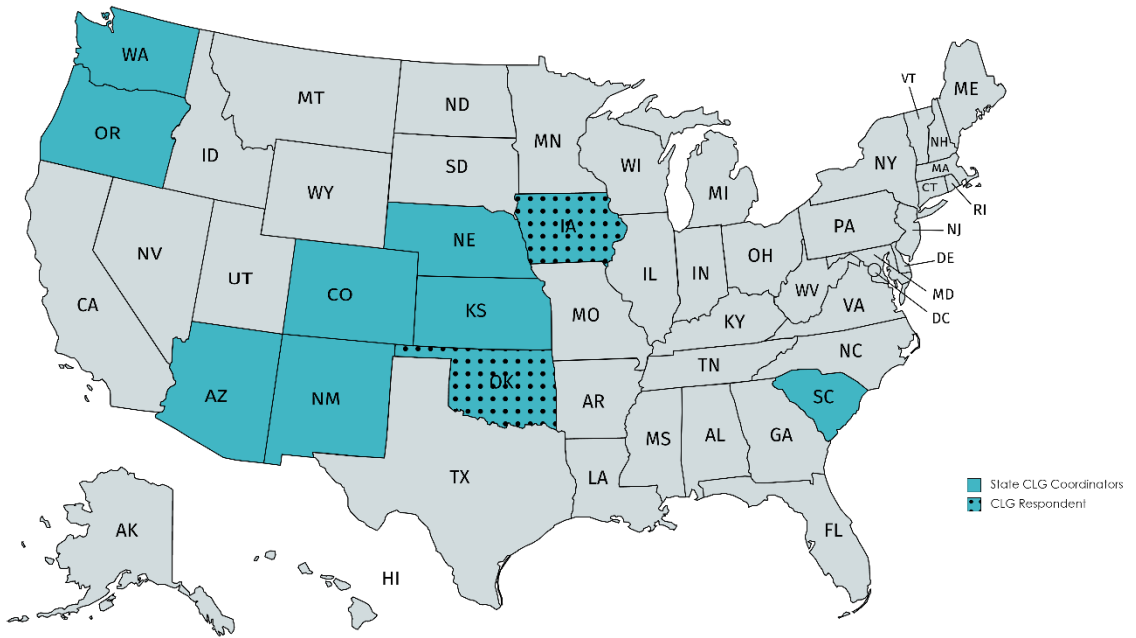


Figure 6. Respondents to the State Certified Local Government Coordinator survey are represented in the teal colored states. Those states with dots indicate respondents who represented a CLG rather than State Coordinators. Created with mapchart.net.

Successful Incentive Types

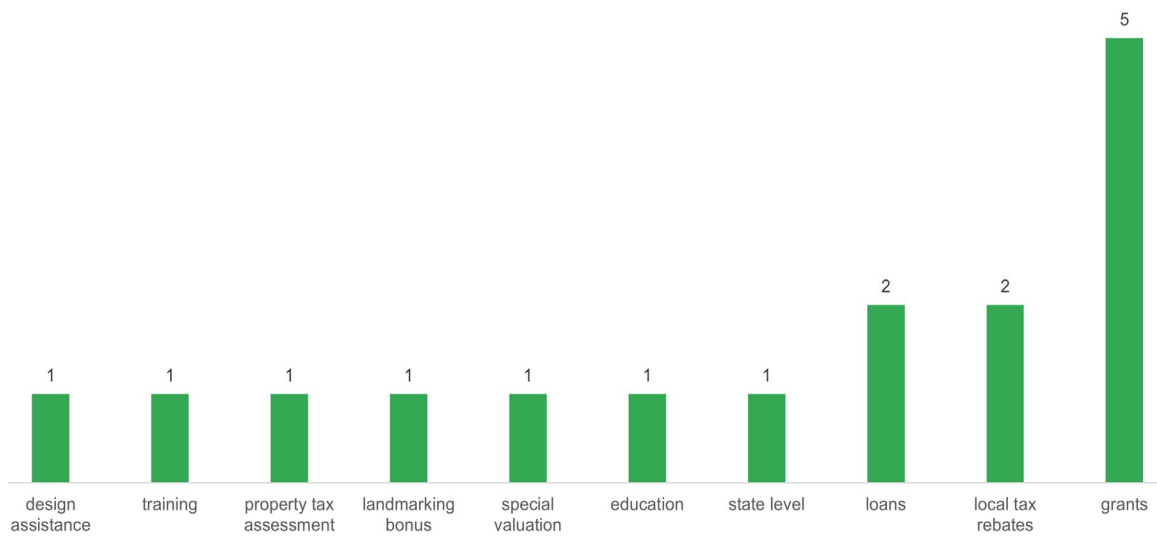


Figure 7. This graph represents the frequency of the kinds of incentives the CLG Coordinators say their CLGs use.

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