



DRAFT FOR PUBLIC COMMENT

Preserving Philadelphia's Future: Key Recommendations from the Philadelphia Historic Preservation Task Force

December 2018

Public comments can be submitted between December 13, 2018 – January 14, 2019 to: preservation@phila.gov.

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Introduction

The Mayor charged the Historic Preservation Task Force to consider how best to balance historic preservation and new construction across the city and in doing so, provide recommendations in four areas by the end of 2018:

1. Survey of historic resources – to create a citywide process for identifying historic assets.
2. Incentives for historic preservation – to identify incentives for individual property owners and developers to preserve historic resources.
3. Regulations for historic preservation outcomes – to identify potential policy and legal reforms to strengthen the city’s historic preservation ordinance and other city practices, while welcoming new investment.
4. Outreach and Education – to provide materials for residents, building industry professionals, city staff and others to convey the value of historic preservation as well as the city’s historic preservation laws and process. This work also includes getting information from the public to help shape the work of the Task Force.

The Mayor’s 33-member Historic Preservation Task Force is comprised of preservationists, advocates, architects, developers, community members, educators, and city staff and officials. With technical assistance from the National Trust for Historic Preservation and a grant from the William Penn Foundation to document their work, the Task Force has been working with staff at the Department of Planning and Development to review the current state of preservation.

The Task Force first convened in the summer of 2017 and developed the following vision to guide our work:

Philadelphia in 2035 is an internationally recognized leader in historic preservation practices, celebrating the unique identity of the city’s historic buildings, blocks and neighborhoods through continued stewardship, innovative development, restoration and reuse.

Philadelphians are active protectors of their neighborhood history and cultural identity. In a groundbreaking partnership, the city government, civic leaders, planners, and historic preservation professionals identify and protect historic resources so that they may best be leveraged as assets by businesses, developers and residents, preserving both heritage and sense of place for current and future generations.

The city uses a comprehensive set of tools that include incentives, protections, education and planning to preserve historic places in active use and contribute to the extraordinary layering of history that makes Philadelphia unique.

In this effort, we convened 13 meetings, eight of which were open to the public, and two public workshops involving over 400 participants. We have issued two white papers: one on the state of historic preservation and one focusing on best practices in historic preservation (see phlpreservation.org/reports).

As we've deliberated and developed the following recommendations, we recognize that without additional funding and dedicated staff support, the recommendations will not be feasible.

Recommendation themes include:

1. Plan for Success
2. Create a Historic Resource Inventory
3. Modify Historical Commission Processes
4. Reduce Historic Building Demolition and Broaden Neighborhood Preservation
5. Clarify the Designation Process
6. Incentivize Historic Preservation
7. Support Archaeology
8. Activate Education and Outreach

Next Steps:

- Draft Recommendations Release to the Public at the Final Task Force Meeting (open to the public), Thursday, December 13th, 8:30-10:30 am, 1515 Arch Street, Room 18-029
- Public Comment period – December 13, 2018 – January 14, 2019
- Final Report Released – Late January / Early February 2019

Historic Preservation Task Force Members By Subcommittee

Harris Steinberg, FAIA, *Chair*
Dominique Hawkins, *Vice Chair*

Survey / Inventory

Nan Gutterman and Randall Mason,
Co-Chairs

Oscar Beisert
Cory Kegerise
Scott Maits
Doug Mooney
Reina Murray*
Aparna Palantino
Mike Powe*
Bob Thomas

Regulatory

Dominique Hawkins and Matt McClure,
Co-Chairs

Leonidas Addimando
Will Cook*
Carl Dress
Mike Fink
David Hollenberg
Justino Navarro
Fon Wang
Seri Worden

Incentives

Peter Angelides and James Wright,
Co-Chairs

Di Gao*
Duane Bumb
Catherine Califano
Lorraine Gomez
Roland Kassis
Shawn McCaney
Councilman Mark Squilla
Anthony Veerkamp*

Outreach & Education

Trapeta B. Mayson and Laura M. Spina,
Co-Chairs

Denise Gilmore*
Patrick Grossi
Julia Gutstadt
Bob Jaeger
Lou Iatarola
Elhadji Ndiaye
Rob Nieweg*

**National Trust for Historic Preservation staff*

KEY RECOMMENDATIONS

I. Plan for Success

What are the challenges we are trying to solve?

- There is historic preservation activity that happens in multiple city offices and agencies, but currently those disparate activities are not linked or leveraged.
- Historic preservation is not consistently represented on the many City government boards and commissions and within other development organizations.
- High-density zoning discourages historic preservation of undesignated historic properties.

What best practices did we investigate?

- Having historic preservation representatives from different perspectives sit on the different organizations' boards (Washington, DC)
- Holding historic preservation presentations and hands-on workshops for neighborhood organizations (Washington, DC)
- Using historic preservation as a tool across departments to reduce displacement of existing residents and encourage equitable development (Atlanta, GA & New Orleans, LA).

What are we recommending Philadelphia do?

- Create a Historic Preservation Policy Team of municipal employees to pursue policies and practices beneficial to historic preservation activities.
- Ensure boards and commissions understand all aspects of development, including historic preservation, to form partnerships and leverage resources.
- Assign a Historic Preservation Liaison that can forge relationships between developers, neighborhoods, owners, and City agencies and departments.
- Direct City agencies adopt "historic preservation-first" and adaptive reuse policies as means to revitalize vacant buildings throughout the city.
- Collect and update historic resources inventory information during neighborhood and district level planning processes and use information to inform those plans.
- Use zoning as a tool to support historic preservation activity.

A. Create a Historic Preservation Policy Team of municipal employees to pursue policies and practices beneficial to historic preservation.

- The Task Force recommends using the Federal Preservation Officer model to better incorporate, moderate, and coordinate historic preservation practices through all City agencies and departments. (At the national level, each federal agency is required to designate a qualified staff member to be the agency's "preservation officer." The preservation officer coordinates activities related to the National Historic Preservation Act and legislation for their respective agency).
- City agencies and departments that have a direct or indirect role in historic preservation of City facilities and/or provide incentives or regulations that impact historic properties or infrastructure should create a "preservation officer" role to act as a resource to their respective agencies on historic preservation issues.
- The City should identify an existing staff member whose current duties best align with the preservation officer role in each of the following departments: Managing Director's Office, Office of Transportation, Infrastructure, and Sustainability (oTIS), Streets, Commerce, Licenses and Inspections, Department of Public Property, Department of Parks and Recreation, and the Department of Planning and Development (DPD).
- These preservation officers should convene as a Historic Preservation Policy Team. The Team should meet regularly to discuss timely issues, receive training on relevant topics, and act as a resource. The Team should be tasked with reviewing existing practices, requirements, and policies that support as well as deter historic preservation and provide recommendations on how to resolve the deterrents.
- The team should be led by a Senior Staff member from DPD.

B. Ensure boards and commissions understand all aspects of development, including historic preservation, to form partnerships and leverage resources.

- The Mayor should appoint representatives with historic preservation experience and expertise on boards and commissions that affect development, including, but not limited to, the Planning Commission, Art Commission, Zoning Board of Adjustment, Housing Advisory Board, Board of Building Standards, Philadelphia Housing Authority, Office of Sustainability, and Licenses and Inspection Review Board.
- Support a City Charter change to require all existing board and commissions that have an impact on historic preservation and development decisions made throughout the city to have a member with experience and knowledge managing historic preservation and development. This would ensure future City Administrations' support for historic preservation activities.

C. Assign a Historic Preservation Liaison as a single point of contact who can forge relationships between individuals, property owners, community groups, developers, and the City, and shepherd applications through the approval process as part of

Development Services in DPD.

- Currently, owners and developers receive guidance from Development Services, a division of DPD, on issues regarding their project. The Development Services staff helps individuals, property owners, community groups, and developers to better understand and use the development processes and provides guidance about the permitting and development approval processes both generally and regarding specific projects or properties. Moving ahead, Development Services should expand its services and support to projects reviewed and approved by the Historical Commission to ensure that all applicable City resources are applied in support of these projects and that they proceed in an appropriate and timely manner.
- Developer Services staff should also be trained about available statewide and national resources and incentives that support historic preservation of buildings, structures, and sites by developers and investors working in Philadelphia.

D. Direct City agencies (such as Public Property and Department of Parks and Recreation) and partners (such as Philadelphia Redevelopment Authority and Philadelphia Industrial Development Corporation) adopt “preservation-first” and adaptive reuse policies as a means to revitalize vacant buildings throughout the city.

- More than 5,000 buildings have been demolished in the last decade by the Department of Licenses and Inspections (L&I) under police powers granted by the code to remove threats to public safety. Provide additional funding to the Department of Licenses and Inspections to increase enforcement actions against owners of vacant historically designated buildings who are allowing these resources to deteriorate by neglect. Enforcement action is needed before they threaten public safety and warrant demolition. Establish a fund for encapsulation of such properties where owners fail to comply with the Courts' orders to maintain these buildings.
- As City agencies plan for their Capital Program Investments, prioritize building reuse, either for existing facilities or in support of expanded programs and initiatives. We recommend that the City prioritize building reuse in its use of dollars for capital improvements and investments.
- Align historic preservation activities in the City with the City’s broad and ambitious sustainability objectives, including the reduction of building waste to landfills through adaptive reuse. We suggest the Mayor’s staff work with the Office of Sustainability, PHC, and DPD staff to create policy guidelines that support this alignment for City departments to implement.
- DPD and the Budget Office should weigh the benefit of historic preservation more heavily than new construction or demolition of historically and culturally significant resources.

E. Collect and update inventory data during neighborhood and district planning processes and use this information to inform those plans.

- The collection of updated historic resource inventory data points should be integrated into all planning projects undertaken by the Philadelphia City Planning

Commission. Ideally, survey work would be complete prior to / at the beginning of each planning process so that the collected information can be used to inform the analysis and outcomes of the plan. The data gathered during the survey process will be shared with the community so that they can see the assets and make informed decisions throughout the planning process based on updated data.

- Use the City Planning district boundaries to systematically collect comprehensive inventory data and fill in data gaps.

F. Use zoning as a tool to support historic preservation activity.

- Identify concentrations of historic properties with high-density zoning that are incommensurate with their existing configuration and prioritize their survey and potential designation.
- Correlate neighborhood district zoning with historic building scale, mass, and setbacks.
- Apprise City Council of any zoning remapping ordinances in support of historic preservation to obtain approval.

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II. Create a Historic Resource Inventory

Historic resource survey is the ongoing process of gathering and managing information for the purposes of building and maintaining a constantly evolving inventory, rather than a discreet activity or project. Survey activities must be integrated with historic preservation regulations and incentives, with allied City agency and department policies (DPD, ZBA, L&I, etc.), and with community engagement activities.

What is the challenge we are trying to solve?

The city's historical resource inventory is limited, with many individual resources and neighborhoods under-represented.

- There is a desire and fundamental need, but not a process, nor staffing capacity to undertake an ongoing citywide survey and inventory process, hence there is:
 - Limited, uneven, and incomplete survey data and inventory of Philadelphia's historic structures, buildings, sites, objects, interiors, and archaeological resources;
 - No citywide inventory and no citywide agency data sharing plan; and
 - No current digital inventory management system to collect, track, and maintain historic resource data.

What best practices did we investigate?

- Inventory Management Systems and Survey Methodology used by New York Landmarks Preservation Commission and the Los Angeles Office of Historic Resources.
- Staffing supplementation by volunteers (Alexandria, VA; Detroit, MI; and Muncie, IN); and community input (SurveyLA - Los Angeles, CA).

What are we recommending Philadelphia do?

- Establish an ongoing, citywide survey program for historic and cultural resources as a core function of the Philadelphia Historical Commission and Department of Planning and Development.
- Use inventory management software.
- Verify and use legacy data from City agencies and department as well as local, state, and federal organizations.
- Leverage the data collection efforts and resources of partners in public, private, and nonprofit sectors.
- Create a survey protocol that is useful for decision-making across the city.
- Prioritize survey efforts.
- Provide adequate staffing and financial resources to implement a survey program.

A. Establish an ongoing, citywide survey program for historic and cultural resources as a core function of the Philadelphia Historical Commission (PHC) and Department of Planning and Development (DPD).

- PHC should consult with other agencies and partners at the city, state, and federal levels of government to determine what information the City seeks to gather and maintain about the historic, cultural, and architectural significance of properties throughout the city, and then establish policies and systems that allow data gathered by other City agencies and external partners, including legacy data, to help infill and supplement data collection. For data categories where information is missing or is old or unreliable, the City should conduct discrete survey projects to collect that information.

B. Use inventory management software.

- A strong survey program requires specialized software to collect, store, analyze, search, and retrieve information about historic and cultural resources. PHC is actively evaluating the suitability of the Arches, a free and open source platform developed and maintained by the Getty Conservation Institute, for use by professionals and the public, which the committee endorses.
- The software should:
 - Integrate with other City-maintained property databases and be configured to allow for communication between these databases.
 - Allow for public access to historic resource data in a read-only format and respect the sensitive nature of some parcel information.
 - Facilitate the collection of survey information via mobile devices by a range of users.
 - Collect information on a wide range of resource types, including historic buildings, structures, objects, landscapes, and archaeological resources.

C. Verify and use legacy data from City agencies and departments as well as local, state, and federal organizations.

- Survey does not entirely require the collection of information from scratch, as there are significant sources of reliable information that should be systematically verified and imported into the inventory management software at the outset of any survey project. If gathered from trusted and verifiable sources, this information, particularly historical information, should be used to populate the inventory database, saving the City time and money in new research.
- Legacy data exists in many forms and comes from a variety of sources, including from the National Register of Historic Places, the Pennsylvania State Historic Preservation Office (PA SHPO), PHC files, and the Philadelphia Architects and Builders Project. The nature, scope, and reliability of existing information will vary

based on the source, age, and reasons it was acquired. For example, many National Register Historic District nominations have property level inventories that contain significant, reliable information about date of construction, designers/architects, and former occupants or events.

D. Leverage the efforts and resources of partners in public, private, and nonprofit sectors.

- Historic resource surveys are routinely undertaken by a diverse array of public and private sector partners for a variety of purposes. Examples include surveys conducted by PennDOT, SEPTA, and Amtrak in conjunction with construction projects financed with state and federal funding, projects sponsored by the City's Division of Housing and Community Development using U.S. Department of Housing and Urban Development (HUD) funding, and National Register nominations sponsored by real estate developers to enable Historic Tax Credit projects. These efforts all produce information that would meet the City's needs but are typically submitted to the PA SHPO rather than to the City directly.
- Encourage community organizations, universities, advocacy groups, and individuals to sponsor surveys of particular neighborhoods or resource types, independent of City-initiated efforts or other publicly funded projects.
- The survey program established and managed by PHC should:
 - Allow for the exchange of data with PA SHPO on a regular basis;
 - Establish standards, protocols, and tools to allow internal and external partners to gather and submit survey information; and
 - Allow members of the public, (including those without formal training or education in historic preservation, architecture, or architectural history) to contribute to survey efforts in ways that use their skills effectively while ensuring that the collected information is useful and accurate. This may include using volunteers to check existing data, take photographs, identify important community landmarks, and contribute to discussions about historic and cultural significance.

E. Create a survey protocol that is useful for decision-making across the city.

- Intended to be coordinated with the aspirations and requirements of the new district types proposed herein, we identified the following three tiers of survey / inventory data [see Table 1 below]:
 - *Identification / Planning*
 - Data collected should include basic location, ownership, historical, and architectural information sufficient to identify patterns and trends, establish priorities for more intensive investigation, and make preliminary decisions.
 - Data should be obtainable quickly, with relatively minimal survey and data gathering training. Some information may be gathered from current high-resolution photographs.

- Fields should include the “minimum record” information required by PA SHPO for integration into the State’s database. Terminology should conform to PA SHPO/NPS standards.
- *Intensive / Evaluation*
 - Fields should include all information from the Identification / Planning stage and detailed history that may be useful in determining whether the historic resource should be considered for certain incentives or designations.
- *Designation*
 - Fields should include information from the Identification / Planning and Intensive / Evaluation stages with additional information / analysis necessary to apply designation status through regulatory programs.
 - Specific fields and documentation requirements may be further segmented to correspond with proposed district and individual landmark designation types.
 - For example, fields may include detailed information that is necessary / useful in managing the resource in the future (i.e. architectural details, character-defining features, etc.)

TABLE 1 - Example Criteria for Proposed Survey Protocol

	Identification / Planning	Evaluation	Designation
Location	X	X	X
Materials	X	X	X
Style	X	X	X
Historic function	X	X	X
Current function	X	X	X
Form	X	X	X
Age/Era	X	X	X
Exterior photography	X	X	X
Architect		X	X
Cultural affiliation		X	X
Historical narrative		X	X
Architectural description		X	X
Character defining features			X

F. Prioritize survey efforts.

- While the survey program should be able to accept information from a variety of internal and external sources on an ongoing basis, the City should sponsor targeted survey projects to gather new or update existing information for historic resources that may not be surveyed for other purposes or that require special data collection, including areas / properties that are, for example, revealed as endangered by analyses of zoning mismatch - where the existing or proposed zoning is significantly different than the form and character of the existing buildings.
- Historic contexts, or studies about themes, resource types, or geographies, should be prepared at the outset of individual survey projects to identify important places and assist in the understanding and documentation of the historic resources.

G. Provide adequate staffing and financial resources to implement a survey program.

- Assign dedicated staff to develop necessary guidance and policies, perform quality control, manage survey data, and coordinate City-initiated survey projects. At a minimum this should include hiring a Survey Manager for PHC and provide related support from other divisions within DPD, including Geographic Information Systems (GIS) / Information Technology (IT).
 - Once a plan is established to begin a survey program, the Survey Manager should have access to a budget and hire consultants to conduct survey work and/or use dedicated funds for grants to complete this work.

III. Modify Historical Commission Processes

What are the challenges we are trying to solve?

- The current regulatory framework for locally designated historic resources is perceived as overly rigid for both individually listed historic resources and districts, though it has more flexibility than is currently understood or exercised. Based upon the identified level of significance, the Historical Commission can, and often does, exercise lesser or greater levels of regulatory control, some of which can be administered by PHC staff. However, there is no straightforward way for the public to understand their property's level of significance and the associated approval process for proposed alterations.
- Currently, PHC staff review and approve approximately 90% of submitted applications, having been given broad authority to do so in PHC's Rules and Regulations. However, there is no formal process for reporting staff approvals to the public.
- The regulatory framework does not provide PHC with full jurisdiction and review for all properties within the boundaries of local historic districts. Thus, the design review of new construction in local historic districts does not fall within PHC's purview and the lack of review can negatively impact the historic character of historic districts when new construction is incompatible in massing, scale, and character.
- Appeals of Historical Commission rulings are facilitated by the L&I Review Board, which does not have historic design or regulatory review expertise and whose process can be lengthy (several months to many years).

What best practices did we investigate?

- Design guidelines that clearly articulate expectations of the historic property owner and the historic preservation ordinance processes (Pittsburgh, PA).
- Proactive education and outreach activities sponsored by City agencies and historic preservation nonprofits at neighborhood meetings and events (various cities).

What are we recommending Philadelphia do?

- Identify a review system for individual properties already subject to existing historic district review criteria (based upon their level of significance) to help identify properties at which lesser levels of review diligence is required (non-contributing) or where exterior alterations should be minimized (high significance).
- Clarify the existing staff review process (Section 6.10.c) within the Philadelphia Historic Preservation Ordinance Rules and Regulations.
- Establish PHC regulatory approval for all new construction within designated historic districts, subject to guiding principles.
- Establish PHC regulatory approval for substantial alterations to non-contributing buildings.
- Create a new Appeal Board for alteration and demolition decisions.

A. Create a review system for individual properties already subject to existing historic district review criteria (based upon their level of significance) to help identify properties at which lesser levels of review diligence is required (non-contributing) or where exterior alterations should be minimized (high significance).

- Establish criteria defining levels of significance for PHC designated properties and identify a process by which to adopt a historic resource inventory that identifies those levels of significance based upon current survey data.
- Build upon confirmation and reevaluation of data drawn from multiple existing surveys and other listings, creating levels of significance within districts if and as appropriate.
- Implement refined designation procedures administratively through PHC with the adoption of formal regulations:
 - Qualify “significant,” “contributing,” and non-contributing” evaluations of individual properties, whether stand-alone or within local historic districts, with corresponding design standards with greater or lesser of change for each criterion. This supplemental aspect of a property’s evaluation would allow, for example, a higher level of review for alterations of row houses in an intact row, even if a row house is seen as “contributing” rather than significant. Conversely, the same rowhouse on a highly altered block would still be “contributing,” but regulated in a more flexible manner.
 - Draw distinction between individually list-able buildings (“significant”) and those that reflect the historical or architectural character of the district as defined in the Historical Commission's designation (“contributing”), but with regulation informed by identified allowable degrees of alteration.
 - Staff review authority, in 6.10.c. of PHC’s *Rules and Regulations*, is broad. Thus, PHC’s *Rules and Regulations* should be amended to clarify supplemental language. When guidelines exist **or** are created, the range acceptable treatments that have staff review shall be specified.
 - Allow for PHC to define jurisdiction of the historic resource at the time of designation.
 - Acknowledge flexibility inherent in the *Secretary of the Interior’s Standards*, quoting from the federal regulations (36 CFR Part 68): “one set of standards ...will apply to a property undergoing treatment, depending upon the property’s significance, existing physical condition, the extent of documentation available, and interpretive goals, when applicable. ***The Standards will be applied taking into consideration the economic and technical feasibility of each project.***”
 - Include a public summary of staff design review approvals for building permits in PHC’s monthly agenda should. Through public reporting, PHC can insure public transparency about the PHC approvals that are at staff level, and thereby improve consistency between and among staff reviews.

B. Clarify the existing staff review process (Section 6.10.c) within the Philadelphia Historical Commission *Rules and Regulations*.

- Establish a monthly staff procedure to digitally post a comprehensive list of staff design review approvals for building permits on the PHC website.
 - This posting should include a brief, bulleted description of the decision components, with-reference to specific guideline standards.
 - In local historic districts, a certain degree of staff and Commission discretion must be preserved. The proposed monthly posting should be clear when decisions / recommendations are considered discrete, versus when they are explicitly drawn from guidelines.
 - Consider bi-annual public report to the Historical Commission by DPD staff overseeing districts other than local historic districts on actions taken, for comments, and to help identify broad trends. A similar record, though less detailed, of decisions made by DPD staff based on guidelines should be made available.
- Incorporate the following document preambles into PHC's *Rules and Regulations* to clarify the public's right to historic preservation, and the City's purpose of and right to regulate historic properties:
 - National Historic Preservation Act of 1966
 - Pennsylvania Constitution, (Article I, Section 27)
 - 1984 Philadelphia Ordinance Section 14-2007 Historic Buildings, Structures, Sites, Objects, and Districts
 - Individually and collectively, these high-level documents identify preservation as a public good, rather than a mere nicety.
 - *Note that the preamble to the 1985 Philadelphia Historic Preservation Ordinance no longer appears in the latest version of the Zoning Code. After the Code was revised, those introductory words were stripped out and should be reintroduced.

C. Establish PHC regulatory approval for:

All new construction within designated historic districts, subject to the following guiding principles:

- PHC must produce understandable guidance defining compatibility.
- PHC approval of new construction should concern massing, setbacks, fenestration patterns, materials, and further architectural detail than what is already governed by zoning, such as use or general bulk area entitlements, ultimate gross floor area, and, height, etc. City Council should ultimately legislatively remap historic districts to better align zoning requirements with the goals of the specific historic district.
- All newly prepared guidelines should acknowledge and accommodate the aspirations and exceptions for contemporary architectural design, consistent with the strong architectural evolution of the City.

Substantial alterations to non-contributing buildings, subject to the following guiding principles:

- Procedures can be adopted and implemented administratively by PHC with the adoption of formal regulations.
- PHC approval of new construction should concern massing, setbacks, fenestration patterns, materials, and further architectural detail than what is already governed by zoning, such use or general area entitlements, ultimate gross floor area, and height, etc. City Council should ultimately legislatively remap historic districts to better align zoning requirements with the goals of specific historic district.
- All newly prepared guidelines should acknowledge and accommodate the aspirations and exception for contemporary architectural design, consistent with the strong architectural evolution of the City.
- The demolition of non-contributing buildings will remain unregulated.

D. Create a new appeal body for alteration and demolition decisions.

- Ensure appeals of alteration and demolition decisions go to a specialized administrative law judge, designated by either the Mayor or the DPD Director, as opposed to the Licenses and Inspections Review Board. Appeal hearings are on the record, but limited, based on whether PHC's actions were arbitrary or capricious. This will require City Council to introduce an amendment to the existing Ordinance.

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IV. Reduce Historic Building Demolition and Broaden Neighborhood Preservation

What are the challenges we are trying to solve?

- Significant, undesignated buildings across the city are demolished by-right, without review of potential neighborhood impact. The current designation process is slower than the rate of demolition and is overly reliant on the designation of individual buildings rather than local historic districts.
- Demolition of existing buildings and incompatible new construction are altering neighborhoods throughout the city. Citizens are seeking an approach to designation that provides more regulatory control than the current Neighborhood Conservation Overlay (NCO or “Conservation District”) process, especially with regard to demolition, and less than the current PHC review process, especially with regard to alterations.
 - PHC provides a framework for detailed review of proposed alterations and associated materials to maintain historic integrity. Demolition review is generally limited to a rigorous financial hardship application process that, in its current form, is time-consuming and costly. The PHC demolition review process is perceived as too burdensome in detail and cost of compliance to be an option for many of the City’s neighborhoods.
 - Philadelphia’s Conservation District regulatory review is limited to specific design items identified at the time of adoption. The existing six Conservation Districts focus on new construction and parking, subject to simple guidelines that are typically verbal only. Only one district’s guidelines address alterations and none delay or prevent demolition.
- The current PHC designation and Conservation District designation processes are insufficient to meet the emerging range of flexibility, protection, and regulatory control desired by Philadelphia’s neighborhood organizations, residents, and property owners.

What best practices did we investigate?

- Pre-emptive survey and classification of historic resources to determine eligibility for listing on the local historic register (Chicago, IL)
- Review of all proposed demolition applications for properties more than 50 years old (St. Augustine, FL)

What are we recommending Philadelphia do?

- Create an index of potentially significant buildings.
- Adopt ordinance amendments establishing additional district types.
- Correlate minimum documentation requirements and associated incentives for each of the differentiated district types.

- Supplement information that is useful for decision-making.
- Establish review criteria for Conservation District CD-1, that if not met by the applicant, would require a public review.
- Create and / or update communications materials to explain the various aspects and benefits of designation.

A. Create an index of potentially significant buildings.

For the City to “catch-up” on designation efforts, the City (as a one-time effort) will create an “Index” of eligible historic buildings subject to demolition delay. Every property on the Index must include a documented finding that the property meets at least one of the current Ordinance’s criteria for designation, as determined by either the Historical Commission staff or a third-party consultant. It is anticipated that the Index could include hundreds of unrelated properties throughout the City. If certain regulatory actions are proposed, such as the application for a demolition permit or a property owner’s proactive request for a designation determination, the Historical Commission will have within a defined period of time to add the building to the Philadelphia Register or elect not to do so. If the designation does not occur, the property would be exempt from designation for a to-be-determined period of years.

The one-time adoption of the Index would essentially regulate numerous unrelated properties throughout the City (as opposed to the case-by-case designation of individual properties and historic districts) in one fell swoop, and we believe the delegation of administrative authority from City Council to the Historical Commission to create the index is necessary. Once approved by City Council, the Historical Commission staff would be responsible for the mechanism, identification and approval of the properties on the Index.

As part of PHC’s determination of the index, the property owners will be notified expeditiously. In the meantime, the Historical Commission can continue to review designations of individual properties regardless of the Index.

B. Adopt an ordinance amendment establishing additional district types.

The City should adopt ordinances and provide administrative regulations for new types of historic regulatory control. Also, the City should provide direction, through clear design guidelines and procedural descriptions, to facilitate property owners' understanding of these newly flexible options and their associated incentives and requirements.

The 4 district types include:

- 1) Keep local Historic Districts (PHC-1) the same, with the important adjustment of new construction regulation within the districts in all cases, with reference to a set of newly-created district-specific design guidelines that are informed if / as appropriate by zoning and administered by PHC.

- 2) Adopt a new Historic District typology, to also be administered by the Philadelphia Historical Commission (PHC-2). The new district type would include a “lighter” historic preservation review framework, relaxing PHC-1 standards, such as the use of alternative materials. The ability to prevent demolition would remain, and the financial hardship demonstration required for properties in locally designated districts appropriately simplified.

- 3) New enhanced Conservation District type (CD-1) would have “lighter” regulation of alterations than Historic District type PHC-2, regulation of new construction, and public review if district criteria were not met by the applicant. All review would be based on clear and presumably checklist-format, district -specific guidelines administered by PCPC.
 - Established designation criteria as well as associated incentives need to be identified for enhanced “conservation district types.”
 - Inclusion of a process for the degree of demo delay / regulation is included to enable demolition. PCPC will need resources to add such a process to its review for the CD-1 as an expanded range of NCODs.

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- 4) Existing Conservation District type (CD), would focus on new construction and parking and is subject to simple, verbal guidelines and would remain unchanged.

C. Correlate minimum documentation requirements for designation of each of the differentiated historic districts, e.g. a higher level of protection and compliance requires increased documentation. Define the level of documentation that is sufficient for demonstrating that an area meets each districts’ criteria.

- Implement designation procedures administratively through PHC with the adoption of formal regulations.
- Acknowledge that proposed level CD-1 designation and approval processes for districts or properties will be administered by PCPC, not PHC.

D. Correlate incentives with each of the differentiated historic districts, e.g. a higher level of protection and compliance increases access to higher value / greater range of incentives.

- At the time of permitting, an owner would be presented with a menu of incentive options to determine the best package of incentives for his / her project.
- Properties reviewed under PHC-1 would have access to the greatest number of incentives, with PHC-2 being more limited and CD-1 having the smallest range.
- Historic preservation incentives would not be available to properties solely regulated by the current Neighborhood Conservation Overlay ordinance.

E. Supplement information that is useful for decision-making

- In addition to designation and permit reviews undertaken by PHC and PCPC, survey information should be used to inform a variety of City-level decision-making processes, including the development of neighborhood and district-level plans and zoning maps, code enforcement actions, and expenditure of public funding.
- The survey program, including the software, policies, and guidance documents, should support the four-tiered level of regulation and range of incentives proposed. Some fields can be populated from other datasets within the City (i.e. ownership) as well as existing surveys from a variety of sources.

F. Impose a demolition review process in Conservation District CD-1

During the process, the applicant must present their proposal for demolition/new construction simultaneously; if a variance is required, the applicant must then present their proposal at a public neighborhood meeting. After the design has been reviewed and an application that meets the required criteria has been submitted along with all required documentation regarding the proposed demolition (or the presentation of the application in the case of a variance), the applicant may proceed with the demolition once all the required submissions have been approved.

G. Create and/or update the following communications materials to explain the various aspects and benefits of designation:

Design guidelines addressing alterations and new construction applicable to each districts' criteria. These should clarify and inform a consistent application review process by the PHC and PCPC staff and be able to be referenced by staff in such reviews. Also, sustainability guidelines, informed by the Secretary of the Interior's Standards as well as environmental impact criteria under Pennsylvania state laws, should be incorporated.

- The absence of neighborhood-specific design guidelines has been identified as a deficiency (a rare one) in Philadelphia's Certified Local Government ("CLG") process.
- Design guidelines clearly will play a role at minimizing perceived inconsistencies in review and can be tied to the interrelated concepts of acceptable degrees of change as well as "significance," and make as clear as possible the designation and approval processes.
- **In Conservation District level CD-1**, wherever possible, design guidelines should clearly identify – "yes-no," where possible – the applicable criteria for permit-requiring work. Where professional judgment is inevitably merited, they should say so, while still providing baseline guidance.
- Acknowledge the difference in degree and type (verbal or written) design guidelines within Neighborhood Conservation Districts versus local Historic Districts. For example, the guidelines for the six existing Neighborhood Conservation Districts are written design guidelines).
- Regarding the intersection of historic preservation and sustainability: *The*

Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings can be referenced for local Historic Districts, as a guide. It remains to be determined whether they are too rigorous for the other district and individual designations under consideration; and if so, alternative guidelines will be required. (The Historical Commission should adopt regulations to ensure its compliance with the public trustee obligations under Pennsylvania Constitution Art. I, Section 27 as interpreted by the Pennsylvania Supreme Court in *Robinson Township et al v. Commonwealth of Pennsylvania*).

- Preparation of design guidelines will require funding, both to retain a consultant as well as for on-going updating and printing of design guidelines for public use.

A clear framework/road map for applicants to understand the nomination and permit review processes and requirements.

- Guidelines must be clear enough to be understood by their four primary audiences: the public, neighborhood residents, property owners / applicants / designees, and the City's design reviewers. The guidelines can include language such as "likely to get approved, maybe approved, not likely to be approved" – always leaving room for appropriate regulatory discretion
- Guidelines need to include clear process flow charts understood by all four audiences.
- A checklist that guides applicants through the process could be incorporated as part of the framework/roadmap and would be especially helpful for proposed Conservation District CD-1 applicants.

V. Clarify the Designation Process

What are the challenges we are trying to solve?

- There is not a clear and universal understanding of how the nomination and ultimate designation to the Philadelphia Register process works to protect historic resources. This includes clarifying the specific information needed to classify an application as “complete,” and the difference between “complete” and “complete and correct.”
- The current Historical Commission policy is to notify property owners only upon the receipt of a “complete” application. When “incomplete” nominations are submitted by third parties, the staff works with the applicant to revise the application so that it meets the Historical Commission’s requirements, a process that can take several months and is often without the property owner’s knowledge.
- The existing designation process does not identify a nominated property’s level of significance as related to the subsequent regulatory review criteria.

What best practices did we investigate?

- Qualification of levels of designation based upon significance (City of New Orleans, LA)

What are we recommending Philadelphia do?

- Establish designation criteria for PHC-reviewed properties based on level of significance, qualifying the identification of allowable alterations.
- Provide clear guidance regarding the designation process.
- Streamline the PHC nomination review process.
- Establish a process by which property owners are notified expeditiously of filing of a PHC historic designation application.
- Re-survey all properties listed on the Philadelphia Register to establish accurate data and evaluation on levels of significance, during which all those existing listed properties remain subject to the current PHC *Rules and Regulations*.

A. Establish criteria by which PHC reviewed properties are designated based upon their level of significance.

- Provide clear criteria for designation levels in districts based upon three levels of significance: “significant,” “contributing,” and “non-contributing,” qualified by identification of allowable alterations.
- Identify criteria for the review of properties proposed for designation owing to their cultural rather than design (architectural or landscape) merit.
- Individual nominations should be clear about the significance of the site and guide the PHC for its administration of permit applications.

B. Provide clear guidance regarding the designation process.

Develop clear direction regarding the PHC designation process, clearly defining the expectations for complete and correct nominations:

- Refine the requirements for nominations to the Philadelphia Register, found in Section 5 of the *Rules and Regulations*, to accommodate adjustments recommended in this report, such as levels of significance and allowable degrees of alteration.
- Post the designation criteria information on PHCs website.
- Post successful PHC-approved nominations on PHC’s website for reference by nomination preparers.
- Encourage potential nominators to meet with staff to receive guidance as needed to submit a successful nomination application.

C. Streamline the PHC nomination review process.

- Implement designation procedures administratively through PHC with the adoption of formal regulations.
- Establish a policy by which PHC staff review of the completeness of nomination submissions occurs expeditiously and within a defined time period.
- Increase the frequency of designation meetings to reduce the overall time for nomination review.
- Provide additional staff resources to review and author additional nominations

D. Establish a process by which property owners are expeditiously notified of a PHC historic designation application.

Under the existing ordinance, upon the Historical Commission’s determination that a nomination is complete, all building permits (including demolition permits) must be reviewed and approved by the Historical Commission. This is the automatic “stay” that remains pending the timely review of the nomination.

- Implement designation procedures administratively through PHC with the adoption of formal regulations.

- Property owners should be notified expeditiously of the Historical Commission's receipt of a designation nomination from whatever source – regardless of the quality, completeness, or correctness of that nomination. Such notification shall clearly inform owner of the Commission's associated processes and authority and include a copy of the nomination.

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VI. Incentivize Historic Preservation

What is the challenge we are trying to solve?

- There is little to no city-sponsored financial assistance for and tools to promote and support residential and commercial historic preservation activities; restoration, rehabilitation, and adaptive reuse.

What best practices did we investigate?

- Adaptive Reuse Ordinances (ARO) (Los Angeles, CA; Phoenix, AZ)
- Programs to encourage historic building reuse and homeownership (Baltimore City Vacants to Value (V2V); Chicago Historic Bungalow Initiative and Greystone and Vintage Home Program)
- Transfer of Development Rights (TDR) / Density Bonus program

What are we recommending Philadelphia do?

- Modify and expand existing tools to incentivize historic preservation activities, such as by-right zoning for special purpose historic buildings.
- Expand existing City-led financial programs such as home buying incentives and the storefront improvement program.
- Introduce new City-led financial programs such as Housing Preservation Loan Program (HPLP).

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As we considered incentives that would support historic preservation activity in the city, the following financial and regulatory incentives were identified and developed. We recognize that incentives need to be linked to districts as they are adopted and customized to the specific type of building (i.e. Germantown twin residential buildings vs. Fishtown rowhouses). Although the menu of incentives may be broader, every incentive proposed cannot be adopted wholesale across the city.

Aside from the tax assessment and abatement, in order for property owners to receive the following incentives, the property must be designated and/or under jurisdictional control of PHC or DPD. This will help ensure that there is equitable distribution of incentives to all property owners regardless of financial means.

REGULATORY CHANGES

A. Assessment Formula that Recognizes Historic Impact

The OPA assesses the market value of a property based on characteristics of the property and recent sales. Historic designation places restrictions on a property and the presence or absence of a restriction is a characteristic of a property in the same way the presence or absence of a garage is a characteristic of a property.

Proposed Change: We propose that the OPA take the historic preservation restriction on the building into account when it assesses the market value of the building. This recommendation will likely require procedural change at OPA. *This proposal applies to any property affected by local historic designation.*

B. Accelerate Permit Speed

Development projects require building, zoning, and other permits from the City. Permits often take a substantial amount of time, which delays projects and adds costs to the development process. Quicker permitting removes an incentive to tear down older buildings and provides incentive to get a building historically designated.

Proposed Change: We propose that certain historic projects (either contributing buildings in a historic district or historically significant individual buildings) receive accelerated treatment in the entitlement process by allowing automatic expedited treatment of permits for locally designated and National Register listed properties. The accelerated permit process makes historic status more valuable and makes investment easier.

C. Reduce Parking Requirements

Parking requirements add significant cost to development projects both because of the cost to construct the parking and because the need to provide parking limits the flexibility of design.

Proposed Change: We propose that parking requirements be reduced or eliminated for projects to redevelop historic buildings that preserve the building façade and street experience. We recognize that in many current circumstances, this recommendation is current practice. Implementation may require policy changes and perhaps City Council action.

D. Allow Accessory Dwelling Units (ADUs) in historic structures

An Accessory Dwelling Unit is a second unit in a building or on a property that can be rented. The current code allows for ADUs to be established for a defined single-family unit, that are owner occupied (the homeowner must reside on the property). The ADU, if in the same structure as the main unit, is accessed via the same front door as the main unit, so from the street the structure appears as a single-family residence. ADUs are already included in the zoning code, but not mapped to any location.

Proposed Change: We propose that ADUs are permitted by-right for properties in all defined categories of historic districts. Permitting ADUs will provide revenue to the homeowner to help maintain the building. Vacant properties could also be rehabilitated and sold with an approved ADU.

E. By-Right Zoning for Special Purpose Historic Buildings

Certain types of historic buildings, such as churches, theaters or gymnasiums, are very difficult to adapt to other uses, and are often not zoned to permit residential or commercial uses. The expense of rezoning a special purpose building, combined with the physical challenges inherent in such a building, limits the ability and willingness of a developer to attempt reuse of the building.

Proposed Change: We propose that the City amend the zoning code to allow any use in these buildings that is permitted in CMX1, CMX2, CMX 2.5, CMX 3 (and perhaps other districts) zoning areas, regardless of underlying zoning of the building, if the developer commits to historically rehabilitating the building. By right zoning removes uncertainty in the development process and makes it more likely that an owner would seek to rehabilitate the existing building instead of demolishing it and replacing with a new building. The by-right building rehabilitation would still require approval from the Historical Commission.

F. Historic Property Prioritization for Grants

The City supports grant applications for many projects every year, and often must prioritize or rank different projects.

Proposed Change: We propose that the City prioritize projects that include restoration / reuse / rehabilitation of historic buildings for Redevelopment Assistance Capital Program (RACP) and other grants. This recommendation will require a policy change with all agencies, including the Philadelphia Industrial Development Corporation (PIDC) and the Department of Commerce.

G. Upgrade Life and Safety in Historic Buildings

Many existing historic structures lack standard life safety systems, particularly sprinklers. The lack of sprinklers can permit otherwise minor fires to spread and destroy the building. These fires can also damage or destroy adjacent buildings. The lack of sprinklers therefore increases fire insurance costs for buildings without sprinklers, and for sprinklered buildings near un-sprinklered buildings.

Proposed Change: We propose that the City consider increasing the fire protection requirements for existing buildings and prioritize assisting building owners with sprinklers and other life safety improvements of historic properties. A current example is Bill #180745. Written by the Department of Licenses and Inspections and sponsored by Councilman Squilla, this Bill proposes to revise the Fire Code to require some existing 5- and 6-story buildings (many in Old City) to install fire sprinklers. The intent of these changes is to address the preservation of densely situated historical buildings, reduce business disruption to the surrounding community resulting from major fires, and protect firefighters from the difficulties in fighting fires in these types of buildings. Since Fire Code revisions are mandatory, there may be significant pushback. However, increased use of sprinklers will lead to fewer buildings lost to fire and reduced fire insurance costs for many buildings. We encourage the City's economic development agencies to consider ways to help owners manage these new costs.

H. Streets Department Impact Fees

The Philadelphia Streets Department requires developers to pay for infrastructure improvements in the adjacent or nearby sidewalks and streets. These improvements include projects like new ADA sidewalk ramps to crosswalks, new stop signs or signals, and repaving.

Proposed Change: We propose that the City eliminate the fee in the case of rehabilitation / restoration of historic properties.

I. Zoning Bonus for Historic Preservation

The Philadelphia Zoning Code contains Floor Area Ratio (FAR) bonuses that allow developers to increased density in RMX-3, CMX-3, CMX-4 and CMX-5 districts. The code offers several bonus options, including public plazas, affordable housing, and other amenities.

Proposed Change: We propose that the City adds historic preservation as a zoning bonus option. The developer of a property, which need not be historic or in a historic district, agrees to rehabilitate/preserve/invest in one or more historic structures. Larger historic preservation investments will result in larger zoning bonuses, up to the maximum zoning bonus allowed on the site. The historic preservation bonus can be combined with other bonuses, again up to the maximum permitted. The City will need to determine a pricing mechanism and a regulatory regime to ensure the funds go to historic preservation. The

bonus is conceptually similar to a TDR program (described below) but is administratively much simpler. This incentive rewards private capital for investing directly in historic preservation.

J. Real Estate Tax Abatement

Zero Basis for Significant Renovations – Property assessments have two components - the land assessment and the improvements assessment.

The 10-year tax abatement applies to the change in the assessment of improvements to a property. A vacant lot has an improvement assessment of \$0, so the abatement applies to the full value of the improvement once it is built. Because a historic property has an improvement assessment before it is redeveloped, the abatement applies only to the increase in the assessment, which is less than the full value of the improvement. Thus, improvements to an existing building typically receive a smaller abatement benefit than new construction.

For example, consider two lots, A and B. Lot A is vacant and has an assessed land value of \$100,000. Lot B also has an assessed land value of \$100,000, and also has an existing structure with an assessed improvement value of \$200,000. The developer of lot A constructs a building and the assessed value of the new structure is \$900,000. The developer is eligible for an abatement of \$900,000 for 10 years. The developer of lot B significantly rehabilitates the structure, replacing all interior systems, and the assessed value of the rehabilitated structure is \$900,000. The developer is eligible for an abatement of \$700,000 (\$900,000 new assessed improvement value less \$200,000 pre-rehabilitation assessed value) for 10 years. The value of the abatement is less for the rehabilitation than new construction. This difference provides incentive to the developer of lot B to demolish the existing structure and construct a new structure.

Proposed Change: We propose that the Office of Property Assessment (OPA) reassess the value of the improvements to \$0 while a project to rehabilitate an existing building is under construction. Once the project is complete, the OPA can reassess again to the market value appropriate to a completed project. This change means the abatement therefore would apply to the full improvement value, making the rehabilitation abatement benefit equivalent to the new construction abatement benefit, and lowering the incentive to demolish the existing structure. This change will likely require procedural change at OPA. *This proposal applies to any type of rehabilitation, regardless of historic status.*

K. Transfer of Development Rights (TDR)

A TDR program transfers unused development rights from an existing structure or structures (sending properties) to a development site (receiving property). These transfers are only possible where the size of a development is determined by FAR, as opposed to a height limit or other dimensional standard.

Proposed Change: We propose that the City develop a TDR program that allows historic structures to transfer development rights, e.g. allowable gross floor area, to other projects. Implementation of a TDR program is technically and politically challenging and may not generate significant interest citywide, depending on demand for new construction and density. A TDR program is similar in concept to a zoning bonus, but administratively more complex. This incentive rewards private capital for investing directly in historic preservation.

The Preservation Fund would be designed to accept: (a) private contributions from either donations or payments made to access the zoning bonus; (b) public funds or (c) philanthropic investments. The Preservation Fund would support capital investment projects that restore, revitalize and maintain structures that are within a local historic district and designated as significant or an individually locally designated property. The fund would be supported by the Department of Planning and Development, it would have a board to oversee the allocation of funds and establish criteria for allocating the funds on a regular basis.

FUNDING TO BUILDING OWNERS

A. Targeted Home Buying incentives

Potential homeowners face significant upfront costs when buying older historic homes - often requiring additional maintenance and financial investments that may discourage buyers.

Proposed Change: We propose creating a targeted home buyer program to encourage investment and purchase of properties within local historic districts. The program will help steer homebuyers toward existing historic buildings, incentivizing their continued use. This proposal requires funding, and the City needs to identify an external funding source. The incentives apply to a broad range of historic buildings.

B. Storefront Improvement Program

The City has a grant program for retail stores in selected commercial corridors, which provides funding to fix-up the storefront.

Proposed Change: We propose to increase the grant amount for historic properties and expand the number of corridors that are eligible for funding. The increase in potential funding depends on the level of historic significance. It is further recommended that this program be expanded to include established corner stores. This recommendation requires a policy change and additional funding.

C. Housing Preservation Loan Program (HPLP)

The City will launch a home loan program for homeowners in January 2019. The loan will allow the homeowner to borrow up to \$25,000 for repairs to the property.

Proposed Change: We propose that the loan limit be increased to support historic preservation efforts. The amount of the increase depends on the level of historic significance.

D. Basic System Repair Program

The City has an emergency grant program that allows very low-income homeowners to receive grants to fix core operating systems to stabilize properties and make them compliant with City code. The construction work is completed by PHDC contractors and the scope is limited to \$17,000.

Proposed Change: We propose that the City increase marketing efforts for the program in local historic districts to low-income homeowners.

E. Energy Efficiency Program

The new Energy Code Standards require significant property changes to reduce energy inefficiencies. These code changes only exempt historic properties from the window and exterior standards. A complete review should be conducted of all the requirements and ensure historic preservation exemptions are provided in all cases that create a significant financial requirement or put burden on the property that are inconsistent with preserving the historic fabric of the building.

GENERAL CHANGES

A. Increase Tangled Title Program

Many houses have deficient, or “tangled” titles. Tangled titles arise for a variety of reasons, often because of inheritance that is not formalized. A property with a tangled title has difficulty accessing financing and may not be eligible to participate in City programs.

Proposed Change: We propose that the City assist existing residents to secure clean title to historic properties. This will remove a significant obstacle to reinvestment. However, title clearance can be complex and is difficult to do at scale. Removing a tangled title allows the owner to invest more easily and more confidently in the historic property, since the owner will be able to enjoy the improvements and can profit from their value when selling the property.

B. Activate Upper Floors of Commercial Properties

The upper stories of many multi-story commercial properties are unused or used only as storage. Bringing these upper floors back into use would be useful because it would

increase the value of the building, making it more likely to be preserved. The upper floors are underutilized because it is too difficult or expensive to upgrade the units and make them compliant with the fire and safety code.

Proposed Change: We propose that the City investigate and pilot programs to put the upper floors back to use. Funding will likely be required and could be secured through the Department of Commerce. This problem is technically challenging; design guidelines will be necessary.

C. Contextually Designed Buildings Permitted

In many neighborhoods, the predominant building type is not permitted as of right. In other words, rebuilding the buildings that are in the neighborhood now there would not be possible, and any new building therefore will not conform to existing buildings. Some developers who want to develop contextually sensitive buildings are frustrated because of the variance process and choose to build aesthetically incompatible as-of-right buildings.

Proposed Change: We propose that the City extend permission to selected vacant lots to permit new construction to match the existing overall physical attributes found within their context. This recommendation will require changes to the existing zoning code and mapping.

D. Technical Assistance

The City currently offers limited technical assistance.

Proposed Change: We propose that the City continue providing aid to property owners with help from DPD Development Services, working with PHC staff. Funding will be required.

VII. Support Archaeology

What is the challenge we are trying to solve?

- Philadelphia does not have an inventory or regulatory process that adequately protects archaeological sites.

What best practice did we investigate?

- Archaeological ordinance and review procedure (Alexandria, VA; Phoenix, AZ; New York, NY; St. Augustine, FL)

What are we recommending Philadelphia do?

- Create map-based predictive models of archaeological sensitivity.
- Adopt a new ordinance for archaeological resources which delegates to the PHC the ability to designate “sensitivity zones.”

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A. Create map-based predictive models of archaeological sensitivity.

- Data regarding the presence/absence of archaeological resources is gathered and managed in fundamentally different ways than it is for above-ground resources.
- To effectively manage impacts to archaeological resources, the City should create map-based sensitivity models that combine existing information about known archaeological resources with topographic and environmental data and historic maps to predict the likelihood that subsurface resources exist in an area.

B. Adopt a new ordinance for archaeological resources which delegates to the PHC the ability to designate “sensitivity zones”:

The “sensitivity zones” must be established through thorough research, and the new ordinance must create safe harbors for property owners, e.g. if a “Phase 1” report finds that no archaeological evidence is present, then the property applicant is done with the project and construction review process. If the Phase 1 report does yield archaeological evidence, then the property owner follows review process steps in the new ordinance to inform their due course. An overarching goal is that developer can accomplish the investigation and review with PHC in a timely manner during the pre-development period and PHC can help to preserve important archaeological resources.

- PHC already has authority to designate archeological resources – not only those that are known or reasonably believed to exist as part of a particular property, in association with a building designation, but also archeological sites in and of themselves. It has done so only rarely. PHC’s *Rules and Regulations* are less than informative about nominations and regulatory implications.
- Add an archaeologist to the PHC staff.
- Add a professional archaeologist to the Historical Commission.
- Create a committee to craft legislation to address this issue and present ordinance language to City Council by the end of 2019. Ensure a clear development timeline and firm deadline to see this task through.

VIII. Activate Education and Outreach

What are the challenges we are trying to solve?

- There are not enough resources dedicated to building a constituency for historic preservation. Philadelphia needs more tools (in-person and online) to engage citizens and to help them access information.
- Historic preservation education and outreach struggles to recognize the city's diverse cultural heritage and engage Philadelphians in historic preservation in their neighborhoods.
- Outreach efforts don't always reach all members of Philadelphia's diverse constituency.

What best practices did we investigate?

- Preservation Resource Center of New Orleans' fully staffed Education and Outreach Program (New Orleans, LA)
- Neighborhood-based hubs for citizen outreach (St. Louis, MO)
- Targeted outreach to neighborhood and community organizations (Atlanta, GA; Chicago, IL)
- Relationship building with residents who have not traditionally been part of the conventional historic preservation movement (Boston, MA & New York)
- City, schools, congregations, and after-school programs programming that helps to support and grow interest in cultural and historical assets (Atlanta, GA, New Orleans, LA; St. Louis, MO)
- Walking and trolley tours of the city's architectural and cultural history, sponsored by mainstream historic preservation organizations and neighborhood organizations (Baltimore, MD; Chicago, IL; New Orleans, LA)
- E-newsletters and social media for communication (Buffalo Niagara) and a well-designed and user-friendly website (New Orleans, LA; Washington, D.C.)

What are we recommending Philadelphia do?

- Expand public outreach efforts and build a broader constituency for historic preservation by:
 - Creating hands-on experiences to learn about historic preservation and the city's architectural and cultural histories.
 - Maintaining a user-friendly website.
 - Producing digital and print booklets and brochures to promote historic preservation and inform property owners on process and procedures.
 - Forming partnerships with artists and link them to historic sites' organizations for potential collaborations that can draw public attention and awareness to these sites.
 - Integrating education and community outreach activities into the survey and inventory process.

We found that many neighborhood organizations and their residents are interested in historic preservation, but are not familiar with the regulatory process, tools, and resources of the Historical Commission. As we consider how best to provide connections to the public's interest in historic preservation and the City historic preservation process, we identified the following ways the City can meet organizations and residents where they are in their understanding and expand the constituency that helps protect the city's heritage and drives economic opportunity in various neighborhoods:

- Expanding the PHC and PCPC staff to address various historic preservation issues in the neighborhoods outside of the offices' regulatory role will bridge the gap between neighborhoods and the city;
- Focusing on the people and special places in neighborhoods rather than the regulatory duties of the City will demonstrate the broad range of historic preservation; and
- Using existing resources - knowledge, experience, community ties, etc. - to expand historic preservation education, and build a constituency, emphasizing underserved areas.

A. Expand public outreach efforts and build a broader constituency for historic preservation

- This can be done through many smaller-scale communications:
 - Create a dialogue between the City and constituents through person-to-person interaction and the use of accessible, user-friendly language in order to learn from people in true conversation.
 - Meet residents on their own terms (i.e. at neighborhood meetings / events) and increase public information.
 - Hold discussion groups with historic preservation advocates and professionals to discuss timely issues.
 - Have PHC and PCPC staff attend community meetings to continue to have transparent dialogue with local nonprofits, the development community, and neighborhood groups.
 - Continue to integrate residents' input into City plans and programs.

B. Create hands-on experiences to learn about historic preservation and the city's history

- There is a strong desire by neighborhood organizations to gain access to further historic preservation educational materials, especially pertaining to the regulatory role of the PHC and technical resources.
- Creating opportunities to discuss the city's history and historic preservation opportunities with the public will help to support neighborhood organization's historic preservation activities at the grass-roots level, including:
 - Expand the Citizens' Planning Institute to include more modules on historic preservation or an entire course on historic preservation topics;

- Partner with schools, congregations, and after-school programs to educate youth on historic preservation and its role in city planning and the city's history;
- Work with the tourism industry and local historical societies to create a tour program that draws visitors to other neighborhoods besides the "historic district" of Center City through various walking and trolley tours;
 - Partner with the World Heritage Foundation and the Independence Visitors Center to collaborate with and highlight more geographic areas of the City and reach a wider audience.
 - Have neighborhood representatives, supported by local historical societies and civic groups, help lead the tours to draw in more community people.
- Create a mobile exhibition on historic preservation, including the Historic Preservation Task Force's recommendations and findings and ways to get involved in historic preservation- related activities.

C. Maintain a user-friendly website

- Create a one-stop-site for historic preservation information that is helpful to all users.
- Information can be categorized by user (historic home-owner, developer, researcher) to mimic the current platform of the City's new website.
- Users can access this information from desktop computers or mobile devices, and the City should:
 - Present information in a way that is accessible to all people, through use of clear and coherent language and multiple language versions. translations.
 - Provide information for historic property owners that features design guidelines, guidance on permit applications, and available incentives.
 - Provide information for researchers, including maps of historic districts, survey and inventory data, local register designation reports, and strategic neighborhood and area plans (through both the public and nonprofit sectors).

D. Produce digital and print booklets and brochures to promote historic preservation and inform property owners

- Create user-friendly brochures and booklets that put relevant information into a format that catches people's attention and keeps them engaged.
- This digital media should be accessible through the City's website and can include:
 - An updated version of the Philadelphia Rowhouse Manual and other guides that pertain to various local districts; and
 - A new booklet that explains the benefits of historic preservation and incentives for historic property owners.

E. Form partnerships with artists and link them to historic sites' organizations for potential collaborations that can draw public attention and awareness to these sites.

- Tying important sites or buildings to the arts brings an added dimension to the understanding and accessibility of these locations.
- Seeing historic locations through the eyes of contemporary artists reinforces the relevancy of those sites in today's world.
 - Activate Mayor's Office of Arts & Culture / Mural Arts toward this cause.

F. Integrate education and community outreach activities into the survey and inventory process.

- The City should welcome and encourage participation by neighborhood organizations and individuals in survey projects by:
 - Working with local partners to undertake survey projects when possible and feasible;
 - Identifying skill-appropriate tasks that volunteers can undertake with the appropriate training, coordination and supervision, such as photography, and field verification of existing information;
 - Engaging with the public in areas that are being surveyed to identify important themes and community landmarks; and
 - Establishing clear policies and procedures for external partners to sponsor survey projects and contribute the results to the City.

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