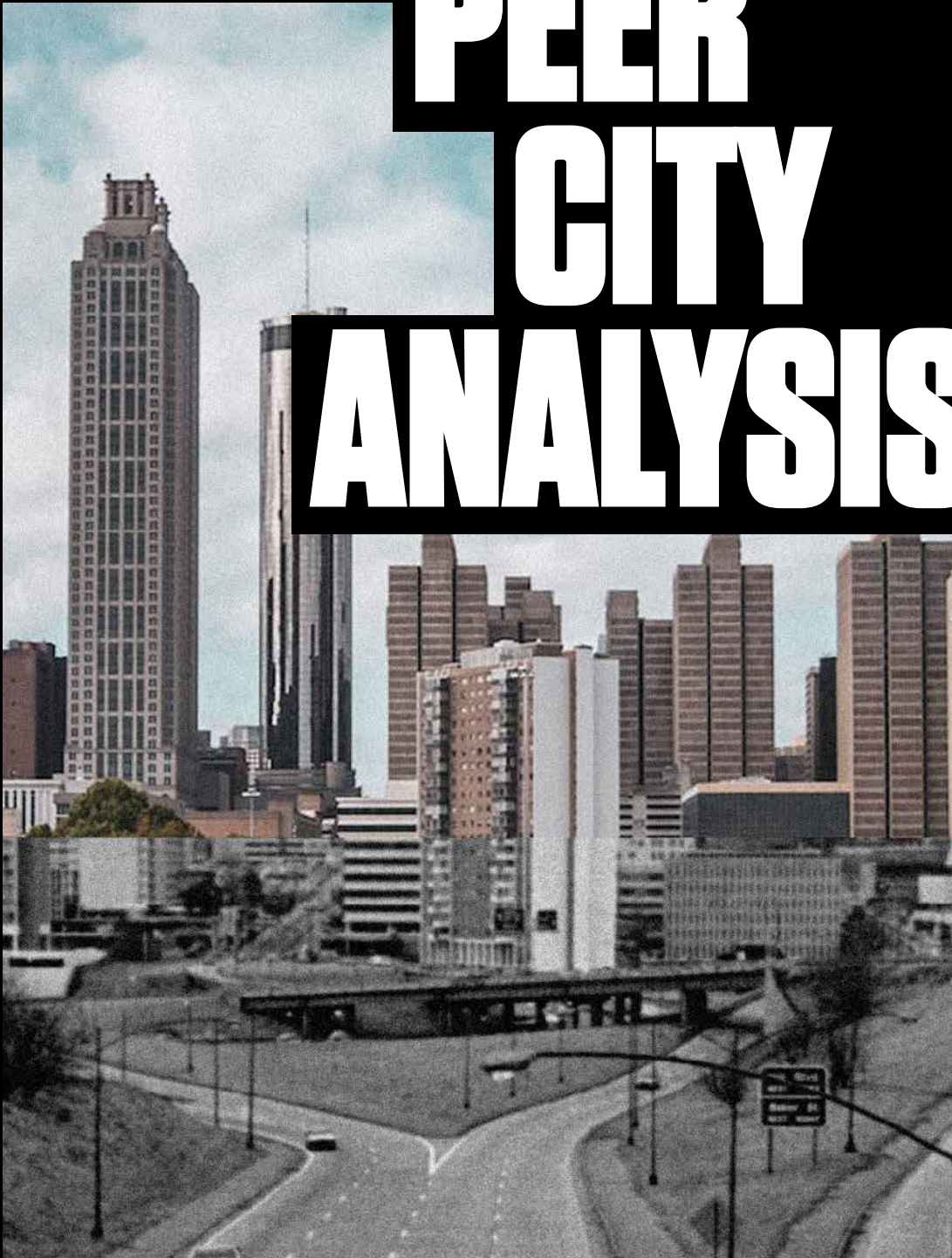


PEER CITY ANALYSIS



Department of
CITY PLANNING

**FUTURE
PLACES
PROJECT**

PEER CITY ANALYSIS

FUTURE PLACES PROJECT

Charles Lawrence, Lord Aeck Sargent

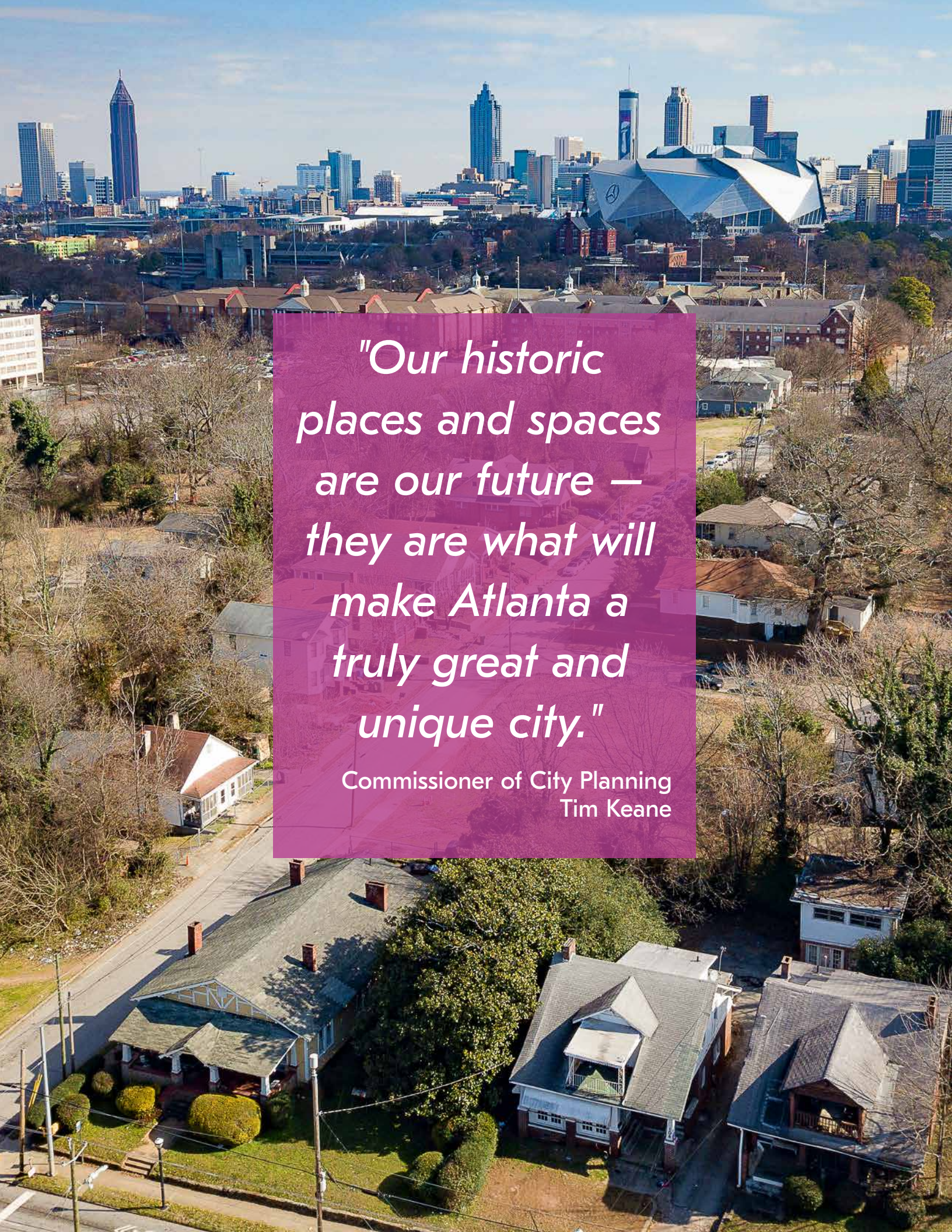
Prepared For:

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Department of
CITY PLANNING

May 2020



*"Our historic
places and spaces
are our future —
they are what will
make Atlanta a
truly great and
unique city."*

Commissioner of City Planning
Tim Keane

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VISION

To my fellow Atlantans -

The City of Atlanta has a story like no other city in America. From its beginnings, as a small railroad junction, to its rise as a hub for transportation and business, to its central role in redeeming the promises made during our country's founding, Atlanta is a place of opportunity, struggle, progress, and hard work. It is a place to learn, a place to work, a place to create, and a place to call home.

Atlanta can only be the place that we love and care about if we—all of us—remember the people and events that shaped it into such a special place. The authentic Atlanta is rooted in history and lives on in our stories and our communities.

The stories, communities, and culture of Atlanta are not an abstract notion only read about in books or taught in school—they can be seen, felt, and experienced all around the city, every day. They live in the smiles of our residents, the art on our walls, and the historic structures all around us. We must not erase our own stories by allowing our historic places and spaces to go by the wayside. We must take action to keep our city vibrant now and in the future so everyone can enjoy, learn from, and shape Atlanta in their own way. We must take action so that we can know and respect those who came before us, those who created opportunity and success through struggle and hard work.

The Future Places Project has information and ideas that can improve the City's ability to keep Atlanta for all of us, even as we continue to shape our City into the place we want it to be. Our history and our culture do not have to be lost in this effort. Our historic places and spaces are our future — they are what will continue to make Atlanta a truly great and unique city.

The Atlanta we know today is the result of decisions made in the past — decisions that we cannot undo. However, we do have the ability to make decisions today that can recognize, embrace, and protect our heritage. Our communities: Our Future Places.

Join us in our effort to make Atlanta's history part of its future.



*Tim Keane,
Commissioner of City Planning*

THE FUTURE PLACES PROJECT

Atlanta City Design provides a clear and achievable vision for the City of Atlanta's future that is based on five key values: Equity, Progress, Ambition, Access and Nature. To implement Atlanta City Design, the Department of City Planning commissioned a comprehensive analysis of its historic preservation-related activity — the Future Places Project. This project sought to:

- ◆ Determine the status and perception of the City's current historic preservation work;
- ◆ Elevate the overall perception of historic preservation in the City and build a sustainable community dialogue;
- ◆ Understand and expand the definition of what is considered historic to Atlanta;
- ◆ Learn from fellow Atlantans and from other cities;
- ◆ Outline a path forward; and
- ◆ Make recommendations the Department of City Planning and other City agencies could consider for their historic preservation-related work.

This multi-faceted endeavor produced several deliverables, including this technical report detailing the analysis of Atlanta's peer cities approach to historic preservation. In total, these project deliverables included the following documents and materials.

- ◆ Call to Action Booklet highlighting the key messages and recommendations
- ◆ Summary Report including all aspects of the project
- ◆ In-depth Technical Reports
 - ❖ Peer City Analysis
 - ❖ Every Park Tells A Story: City of Atlanta Parks Historic Resource Survey
 - ❖ Windshield Survey
 - ❖ Public Engagement
- ◆ Data and Mapping Catalog
- ◆ Website
- ◆ Introductory Video

ACKNOWLEDGEMENTS

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PEER CITY ANALYSIS

Data collected for this report was gathered in part through conversations and interviews with individuals at various city historic preservation offices and with the National Trust for Historic Preservation. Thank you to the following individuals who offered their time and expertise; Doug Young, Matt Adams, and Susan Coleman with Atlanta; Cara Bertron for Austin; Dennis Fernandez for Tampa; Eleanor Burke, Elliot Perkins, and Traci St. Julien for New Orleans; Jennifer Cappeto for Denver; and James Lindberg and Leslie Canaan for the National Trust. Additional thanks to all of the people at New South Associates and Matchstic for the design and editing of this report.

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EXECUTIVE SUMMARY

This peer city analysis report is the culmination of six months of research into the history and development of Atlanta's historic preservation program and the programs of cities across the United States. The work was completed by Lord Aeck Sargent under contract with New South Associates and as part of the larger Future Places Project team. The peer city analysis includes the context and historical development of Atlanta's historic preservation program, data from over a dozen cities, state and national best practices, in-depth analysis of four peer cities, component comparison with the City of Atlanta's program, and recommendations for actions to strengthen and broaden Atlanta's program.

Review of Atlanta's historic preservation program and the historic preservation programs of other cities demonstrates many strengths of the 1989 ordinance and the current functions of the historic preservation office. Recommendations, which range from quick fixes to more intensive changes to the ordinance, will enhance and empower a well-thought out citywide historic preservation program to be more efficient, equitable, and proactive.

Chapter 1

INTRODUCTION AND METHODOLOGY



The City of Atlanta has begun a multi-layered re-evaluation of their historic preservation program, dubbed the “Future Places Project.” One part of this work is a comparative analysis of the historic preservation programs of peer cities. At its foundation, this exercise establishes a context through which we may evaluate the current program in Atlanta. A secondary, but no less important outcome of the comparative analysis is the identification of inventive and pioneering features of historic preservation programs around the nation. Decision-makers may use this data to establish a number of best practices in policy, procedures, and implementation for Atlanta’s historic preservation program.¹

In order to compare the policies and features of peer city historic preservation programs to Atlanta’s program, it is necessary to understand how Atlanta’s historic preservation program developed. Understanding the developmental

background of Atlanta’s historic preservation efforts places the existing program within its historical context. That context helps inform the social, political, physical, and fiscal perspectives that have shaped the current program. We have included a historical background on the existing program, first created by ordinance in 1966 and last substantially updated in 1989, and provide the context from which it grew. Research included published and unpublished academia, departmental annual reports and historic property inventories published by the city, newspaper archives, and industry reports.

Interviews were conducted with Atlanta’s Office of Design - Historic Preservation (D-HP) staff to establish an understanding of the program as it operates today. The D-HP staff are responsible for a wide range of activities as part of the Office of Design, which is within the Department of City Planning, and the interviews provided a deeper level of insight into the day-to-day activities of staff.

¹ For the purposes of this study, “historic preservation program” is meant to encompass all activities and functions enabled or implied, established or otherwise, of a municipal historic preservation office and its commission.

How a property in Atlanta becomes a designated historic property:

1. Property owner, director of historic preservation office, or the City Council initiate a nomination.
2. A designation report is prepared.
3. Urban Design Commission (UDC) holds a hearing.
4. Neighborhood Planning Unit (NPU) and the Zoning Review Board (ZRB) review.
5. Zoning review committee of City Council vote
6. Full city council vote
7. Mayor action

The project team, with D-HP staff, examined and selected criteria for determining Atlanta's peer cities. We began compiling data and organizing it into several broad categories:

- ◆ Demographic and Geographic Information,
- ◆ Historic Preservation Ordinance (HPO),
- ◆ Administrative Structure,
- ◆ Commission Structure,
- ◆ Program Data,
- ◆ Inventory Management System,
- ◆ Designation and Review Process,
- ◆ Incentives, and
- ◆ Programs.

Using the same set of questions from the D-HP interviews, we also interviewed several of Atlanta's closest peer cities; Austin, Denver, New Orleans, and Tampa. These interviews provided additional layers of information on each respective city's historic preservation program and because the same questions were posed to each, answers can be compared and contrasted across the peer group.

The peer review, found in the final section of this report, organizes the comparative analysis first as a narrative account of Atlanta's program. Then, we examine different program features from the peer study group organized by the above bulleted list. Each category includes a table providing a side-by-side snapshot of how Atlanta and its peer cities respond to each category of analysis. The tables are followed by narrative comparing and contrasting features and components of each city's historic preservation program.

There are over 2,300 HPOs nationwide. Each ordinance is influenced by state and local politics, economic drivers, and historic social conditions. Each municipality crafts their ordinance to fit the needs and concerns of their communities and fits their program within the bounds of state enabling laws. Nearly all historic preservation programs do share certain core characteristics, like having a review board and nominating historic properties. But, the breadth and scope of a commission's or staff's duties varies. A summary of the National Trust for Historic Preservation's guidance on best practices in municipal historic preservation programs is provided as a sampling of innovative and interesting programs, processes, or features that may not be widely adopted in the peer city group.

As experience with HPOs grows, best practices guidance continues to identify features of successful historic preservation programs. The report concludes with recommendations for the City of Atlanta based on the results of the peer city analysis and guidance provided by the National Trust for Historic Preservation and others on best practices for HPOs. These recommendations should be evaluated by city leaders and developed into an implementable action plan based on need and urgency.

Chapter 2

WHAT IS A HISTORIC PRESERVATION ORDINANCE?



While similar in many respects, preservation ordinances can differ widely from place to place. Variations may arise, for example, because of specific limitations on permissible regulatory action imposed at the state level or because of differing levels of political support for preservation in a given community.²

While there is no single template for an HPO, several organizations have developed guidance for municipalities crafting their own legislation, including the National Trust for Historic Preservation³ and the Nebraska State Historic Preservation Office.⁴ Using a combination of published guidance and best practices research conducted for this study, the following list describes the necessary features of an effective ordinance.

- ◆ A statement of purpose consistent with state enabling legislation.
- ◆ Establishment of a historic preservation commission including powers and duties, membership and qualifications, and terms of appointment.
- ◆ Provisions for public hearings and consideration of public input.
- ◆ Authorization for the commission to designate local historic districts and individual landmarks and to recommend such designation to the local governing body.
- ◆ Definitions of criteria for designation of historic properties.
- ◆ Authorization for the commission to review and make recommendations or binding decisions upon all actions requiring building or demolition permits, including procedures for review concerning alteration, demolition, relocation and/or new construction of any structure within a locally designated historic district, or those which may be individually designated as local landmarks.
- ◆ Authorization for the commission to review other land use actions affecting historic resources, such as requests for a variance or permit, the subdivision of land, or undertakings by other city, governmental, or quasi-governmental agencies.
- ◆ Definitions of actions that merit review by the historic preservation commission.
- ◆ Provisions for professional staff members; with one to serve as director of the commission, without right to vote.

2 National Trust for Historic Preservation Website, "Local Preservation Laws" accessed from <https://forum.savingplaces.org/learn/fundamentals/preservation-law/local-laws> on Dec. 1, 2019.

3 A Layperson's Guide to Historic Preservation Law; A Survey Of Federal, State, and Local Laws Governing Historic Resource Protection, Julia H. Miller, National Trust for Historic Preservation.

4 Establishing a Local Government Historic Preservation Program: An Introduction to Local Ordinances, Nebraska State Historical Society - State Historic Preservation Office.

**No single approach
works in every situation,
and thus, historic
preservation ordinances
are generally tailored
to meet the individual
needs of the community
and the resources
being protected.**

National Trust for Historic Preservation

- ◆ Authorization for the commission to delegate minor reviews, process reviews, and other tasks of the commission to the commission's professional staff.
- ◆ Specific time limits within which the commission and an applicant shall act for findings pertaining to decisions made.
- ◆ Provisions for enforcing decisions.
- ◆ A process for appeals.

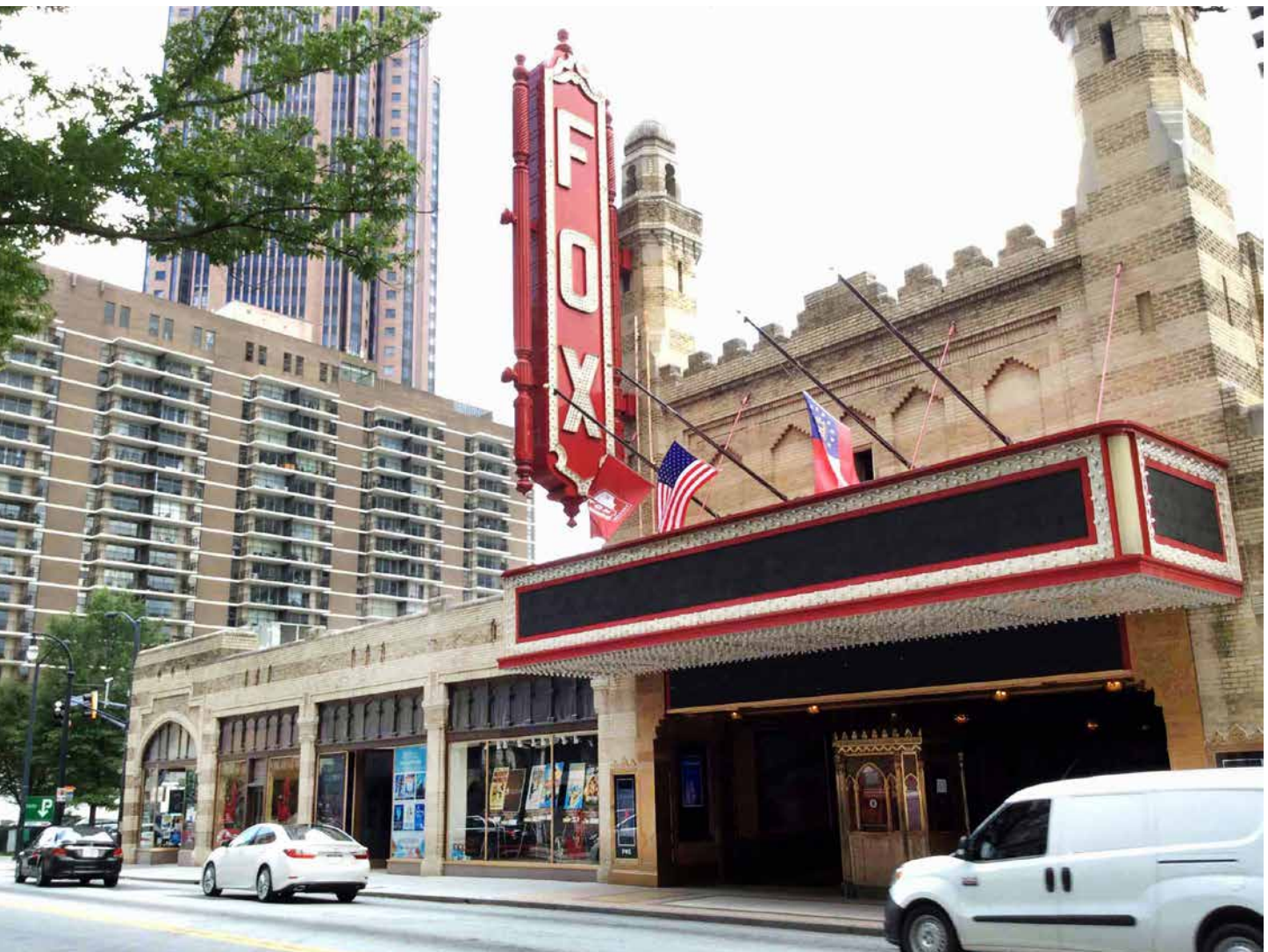
HPOs generally set forth procedures and criteria for the designation of historic properties, along with procedures and criteria for reviewing requests to alter, move, or demolish such properties. A commission or board administers most local ordinances. They are typically administrative bodies of municipal or county governments with staff that support appointed or elected members. Commissions review proposed historic designations and changes to designated historic properties and may have either binding or advisory authority. Some commissions have the authority to place interim controls on historic properties and some may provide funds for or own historic properties.⁵

City historic preservation offices typically exist to support the activities of the reviewing body as well as fulfill other parts of the HPO and the city's other historic preservation programs. These offices range in size and form, but almost always have staff that take on a number of duties related to historic preservation activities within the city. These duties may include administrative reviews of proposed changes to historic properties, research and development for nomination reports, community outreach, administering department or municipal historic preservation programs, customer support, and additional tasks related to their office's roles within the city government.

⁵ National Trust for Historic Preservation Website, "Local Preservation Laws" accessed from <https://forum.savingplaces.org/learn/fundamentals/preservation-law/local-laws> on December 1, 2019.

Chapter 3

HISTORIC PRESERVATION AND ATLANTA



In 1913 contractors hired by Atlanta real estate developer Asa Candler, salvaged about a dozen massive Greek revival columns from the antebellum Leyden House, which was being demolished to make way for commercial development along Peachtree Avenue.⁶ The columns were saved and eventually re-erected on a building at 149 Peachtree Circle.⁷

That same year, coincidentally, Atlanta's first preservation group was established. The Uncle Remus Memorial Association bought the house of writer Joel Chandler Harris, author/transcriber of the Uncle Remus stories, and raised funds to restore it.⁸ The Wren's Nest, the name given to Harris' house, continues to operate as a museum and interpretive site.

In those ways, the earliest efforts to protect historic buildings in Atlanta demonstrated both reactionary and ownership-intervention approaches to preservation and mirrored similar preservation genesis stories nationwide. In one version of the story, a reactive public coerced developers to mitigate damage to a historic place by salvaging important architectural features and in another version, a proactive volunteer organization raised the funds to purchase and preserve a historic house before it was altered or lost.

The Mount Vernon Ladies' Association purchased in 1858 the former home of George Washington in one of America's first acts of ownership-intervention for the preservation of a historic place. When the National Park Service was established in 1916, a national mechanism for the direct ownership and preservation of significant historic sites was established, but evolved slowly to include purchasing and protecting individual historic buildings.

Perhaps to fill the gaps between opportunities to directly purchase historic properties and a lack of legal structures to effectively protect them, preservation not-for-profits began to emerge in the early 20th century. The Society for the Preservation of New England Antiquities (now known as Historic New England) formed in 1910 and the Society for the Preservation of Maryland Antiquities in 1931. These organizations were more advocacy-minded than earlier 'historical societies' and with a broader focus than early 'memorial associations'. With limited preservation tools, however, preservation not-for-profits still mostly relied on directly acquiring important historic properties.

The very beginnings of the concept of public control over privately owned historic property emerged in New Orleans around 1925 with the formation of the Vieux Carre Commission, an advisory council that oversaw the maintenance of the neighborhood's historic resources but lacked the legal power to

6 "Historic Leyden House will Pay the Price of Progress," *The Atlanta Constitution*, February 18, 1913, P. 12.

7 "Atlanta Strides from Day to Day," *The Atlanta Constitution*, April 9, 1914, P. 11.

8 "'Wren's Nest' to Change Hands Soon," *The Atlanta Constitution*, January 2, 1913, P. 9.

enforce its decisions. The commission did not receive its regulatory powers until a successful public petition led to an amendment to the Louisiana State Constitution in 1936. Charleston, therefore, gets the distinction of having the nation's first modern historic preservation commission (HPC); their Board of Architectural Review (BAR) was established in 1931 and required no state amendments for its regulatory powers.

Charleston and New Orleans both demonstrated a shift in approaches to historic preservation. Prior to these examples of using a city's regulatory power to preserve historic buildings, it was non-profit organizations and private citizens, rallying around the landmark buildings associated with national leaders. Or also likely, cities, counties, and the Federal Government, might purchase or receive as a gift an important historic site and manage it under a parks or facilities department. By 1935, Congress passed the Historic Sites Act, which established a national policy for preservation.

By 1936 there were 15 local preservation ordinances in the United States. Some of those also required amendments to state legislature for their regulatory powers.⁹ Despite the growing interest in local protection of historic places, between 1931 and the mid-1950s, there were only 12 historic districts in the whole country.¹⁰ But by 1965, 51 preservation ordinances existed nationwide.¹¹

Back in Atlanta, in 1926, state legislator Walter McElreath and 13 other Atlantans, formed the Atlanta Historical Society to "arouse in the citizens and friends of Atlanta an interest in history."¹² The historical society was primarily interested in collecting artifacts and historic documents and publishing the Atlanta Historical Bulletin, a journal of Atlanta history. The Historical Society began its life in rented office space in the Biltmore Hotel and then the Erlanger Theater. In 1946 the organization purchased a historic house at 1753 Peachtree Street for its new offices. After purchasing the house, the historical society struggled financially until 1965, when a \$5 million bequeath from the estate of McElreath was passed on to the organization. In 1966 the Historical Society purchased the Swan House, on West Paces Ferry Road, and later changed its name to the Atlanta History Center.

Programs to promote history, often through the interpretation of a historic site, continued to grow in Georgia, but entirely avoided the adoption of local regulatory ordinances. The Georgia Historical Commission was formed in 1951 and was almost exclusively concerned with identifying and marking

9 Maryland Historic Preservation Commission Training Manual. Winter & Company with Maryland Association of Historic District Commissions, Fall 2011.

10 Harvey K. Newman, "Historic Preservation Policy and Regime Politics in Atlanta", *Journal of Urban Affairs*, 2001. 23:1, 71-86.

11 <https://www.nps.gov/tps/education/workingonthepast/earlymodels.htm>.

12 As quoted in Garrett, Franklin M., *Atlanta and Environs: A Chronicle of Its People and Events, 1880s-1930s*, University of Georgia Press, Mar 1, 2011, p.824.

sites, and mostly sites related to the Civil War or antebellum life.¹³ A precursor to the current Historic Preservation Division of the state's Department of Natural Resources, the Historical Commission had no regulatory or review powers.

Georgia saw its first historic preservation not-for-profit in 1955 with the formation of Historic Savannah Foundation in response to the loss of the City Market and threat to the Davenport House, as well as the "state university's plan to demolish an entire block...and Catholic Diocese proposal to tear down a significant house."¹⁴ The successes of Historic Savannah Foundation to halt demolitions attracted widespread attention in the state. By the mid-1960s Thomasville Landmarks, Historic Augusta, Middle Georgia Historical Society in Macon, Historic Columbus, and Athens-Clarke Heritage Foundation, had been established.¹⁵

In 1966, in response to the nationwide destruction brought about by predominantly federally initiated programs (namely interstate highway construction and "Urban Renewal") a Special Committee on Historic Preservation for the U.S. Conference of Mayors explored the issue of historic preservation. With several examples of functioning HPOs and a steady progression of federal preservation legislation, the Committee produced guidelines for developing "an expansive inventory of properties reflecting the nation's heritage, a mechanism to protect those properties from unnecessary harm caused by federal activities, a program of financial incentives, and an independent federal preservation body to coordinate the actions of federal agencies affecting historic preservation."¹⁶

Up until that time, the National Park Service's Historic American Buildings Survey (established in 1933) had documented 12,000 historic places in the United States. By 1966, half of them had either been destroyed or damaged beyond repair.¹⁷ The Committee on Historic Preservation's report, titled *With Heritage So Rich*, sparked adoption of the National Historic Preservation Act (NHPA) later that year.

The NHPA established the highly specialized President's ACHP, the system of SHPOs, the Section 106 process to review federal projects for impacts to historic places, and the NRHP, a system for evaluating and identifying the nation's historic places.

13 Lyon, E.A., "From Landmarks to Community: The History of Georgia's Historic Preservation Movement," *The Georgia Historical Quarterly*, 1999. 83:1, 77-97.

14 Ibid.

15 Ibid.

16 Robert Stipe, *A Richer Heritage: Historic Preservation in 21st Century*, University of Chapel Hill Press, 2003, p. 35.

17 Historic Preservation, Introduction, a webpage of the National Park Service, accessed from <https://www.nps.gov/subjects/historicpreservation/introduction.htm>.

With the impetus for a national standard for historic preservation beginning at the local level, it is no surprise that following the adoption of the NHPA, more than 100 cities formed HPCs.¹⁸ It is in this environment that Atlanta passed the state's first local HPO in 1966. In its early form the ordinance had little regulatory oversight.

The 1966 ordinance, an amendment to the city's zoning code, established the Atlanta Civic Design Commission and the City's first historic district, later dubbed "Underground Atlanta." The commission's role was limited; it made only recommendations for local properties listed on the NRHP and promoted the preservation and redevelopment of Underground Atlanta, an area of dilapidated late-19th century buildings that had been preserved under a series of viaducts.¹⁹

At the time, cities across the United States were beginning to see their populations decline and their urban centers deteriorate. The effects of decades of highway construction and urban renewal schemes, combined with White Flight, were taking their toll on Atlanta as well. Despite these challenges to the urban environment, civic groups in some of Atlanta's historic residential neighborhoods began to foment around the desire to preserve their neighborhood's historic properties. Inman Park Restoration (IPR) was organized in 1970 and was the first of several similar organizations formed around promoting neighborhood preservation and revitalization.²⁰

Following the redevelopment of Underground Atlanta in the late 1960s and perhaps encouraged by IPR and other similarly vocal preservationists, the Civic Design Commission set its sights on identifying historic buildings and districts within the city boundaries. In 1973 the Commission produced a list of 50 historic buildings and districts in the city, but it still lacked any power to protect them.²¹

In 1974, the governor eliminated the Georgia Historical Commission and transferred the responsibilities to state agencies, creating the Historic Preservation Division of the Department of Natural Resources. In response to this, the Georgia Trust for Historic Preservation was formed, largely due to concerns that moving the functions of the commission to a bureaucratic department and out of the hands of

It is in this environment that Atlanta passed the state's first local historic preservation ordinance in 1966.

18 Harvey K. Newman, "Historic Preservation Policy and Regime Politics in Atlanta," *Journal of Urban Affairs*, 2001. 23:1, 71-86.

19 The 1966 Atlanta Civic Design Commission ordinance, as transcribed in Martin, Harold H., Garrett, Franklin Miller. *Atlanta and Environs: A Chronicle of Its People and Events, 1940s-1970s*. University of Georgia Press, 2011.

20 Atlanta, Growth and Preservation, a webpage from the National Park Service, accessed from <https://www.nps.gov/nr/travel/atlanta/growth.htm>.

21 Harvey K. Newman, "Historic Preservation Policy and Regime Politics in Atlanta," *Journal of Urban Affairs*, 2001. 23:1, 71-86.

public citizens showed that the state “was not adequately committed to the mission of the Historical Commission.”²²

Despite growing public preference for regulatory control of significant historic landmarks and districts, in Atlanta only the board of aldermen and Mayor could intervene to save a building - and even then, their powers were limited.

1974 was also the year that the Fox Theater became an endangered property. A grass-roots campaign to “Save the Fox” quickly emerged following news that the iconic building would be torn down. Volunteers and activists picketed in front of the Fox and attracted critical media attention. In an uncharacteristic coalition between Atlanta’s mayor, the Civic Design Commission, and the newly formed non-profit organization, Atlanta Landmarks, Inc., the campaign succeeded and the Fox was saved.

A coalition between the City of Atlanta and preservationists saved the Fox Theater.

In 1975, responding to a disenfranchised Civic Design Commission riddled with vacancies, the Atlanta Urban Design Commission (UDC) was created. The original Civic Design Commission could claim some successes like developing the first tree and sign ordinances, but had largely failed at its primary mission to identify historic resources, list them to the National Register, and to rehabilitate Underground Atlanta,

which, by 1975, had become a “vacant, rat-infested, subterranean strip.”²³ Aside from the name change and additional oversight of Underground, the commission’s authority to review proposed work in historic districts was expanded, though still advisory and without mechanisms for enforcement.²⁴

The 1970s also saw the beginning of construction of the Metropolitan Atlanta Regional Transportation Authority’s (MARTA) rail system, which directly threatened many of the city’s oldest commercial buildings. Without the power to intervene, the UDC urged the mayor to halt the impending demolitions. MARTA ignored these pleas and in 1976, tore down the Atlanta National Bank building, the Bailey’s Supreme Coffee warehouse, the Eiseman Building, and several other historic downtown landmarks.²⁵

22 Lyon, E.A., “From Landmarks to Community: The History of Georgia’s Historic Preservation Movement,” *The Georgia Historical Quarterly*, 1999. 83:1, 77-97.

23 “Battling to Preserve what Sherman Left” *Atlanta Journal Constitution*, March 13, 1977, 18A.

24 “Ethics” *Atlanta Constitution*, November 13, 1978, 2C.

25 “Scrapping a Skyscraper,” “Un-building for MARTA,” *Atlanta Constitution*, 1976.

Without the power to intervene, the UDC urged the mayor to halt the impending demolitions. MARTA ignored these pleas and in 1976, tore down the Atlanta National Bank building, the Bailey's Supreme Coffee warehouse, the Eiseman Building, and several other historic downtown landmarks.

It was not until 1976 that federal funding for statewide and community historic preservation efforts became available through the Historic Preservation Fund in amounts that would have significant impact on the preservation landscape. The focus of much of this funding was on fostering and encouraging local preservation efforts, such as surveys and National Register nominations. Continuing what must have felt like a race against the proverbial bulldozer, the UDC, with support from grants from the federal Historic Preservation Fund, nominated the Flatiron Building to the National Register, updated the citywide survey of historic resources, and subsequently published the first edition of the “Atlanta Historic Resources Handbook” in 1978. The federal historic preservation funding was drastically reduced by the end of the 1980s.

As HPCs nationally began to flex more of their regulatory powers, challenges to these powers followed. The constitutionality of local HPOs has been consistently upheld, beginning in 1941 with *City of New Orleans v. Pergament*, but most notably by the U.S. Supreme Court in the case *Penn Central Transportation Company v. New York City*, which was decided in 1978. The Penn Central decision upheld the legal framework that allowed land use controls that preserve places that have special historical, archaeological and architectural significance. The court ruled that historic preservation regulations are not a “taking” of a property as long as an owner can still get a reasonable economic return. This ruling forms the foundation for the economic hardship clauses common to HPOs, but more importantly, affirmed the right of cities to establish and enforce regulatory controls for the purpose of historic preservation.

In 1980, major amendments to the NHPA created a framework for the creation of strong local HPOs and created the Certified Local Government (CLG) program. That same year, the Georgia Historic Preservation Act was passed which enabled local governments in Georgia to create historic districts under their zoning codes and provided a template for the creation of preservation commission design review for municipalities throughout the state.

One impetus of the Georgia act was to ensure that local governments could qualify for assistance under the NHPA CLG program and receive a share of the federal Historic Preservation Fund money. In 1985, the first nine cities in the country were certified as CLGs, including Atlanta. To be certified, cities must have completed surveys of their historic properties. That year, the UDC also produced a list of Atlanta projects that were rehabbed under the federal tax credit for historic rehabilitation (HTC) created under the National Economic Recovery Tax Act of 1981.

... the National Register... subsequently published the first edition of the “Atlanta Historic Resources Handbook” in 1978.

Atlanta was one of the first cities in the nation to become a Certified Local Government.

One of the few amendments to Atlanta's original HPO allowed the UDC to determine zoning adjustments related to historic districts and went into effect in 1983. In early 1986, in response to another spate of historic building demolitions, the UDC proposed a moratorium on demolition permits on properties under review for designation as historic buildings. In support of this moratorium, an editorial in the *Atlanta Journal Constitution* made the case that historic preservation

and urban development are not mutually exclusive.²⁶ In an uncharacteristic move, the city council approved the proposal and voted on a three-month moratorium on demolition permits for historic buildings. However, Mayor Young vetoed the bill, repeating the common concern that preservation would inhibit development.²⁷

Young is famously quoted during this time when he called the historic "Castle" off of Peachtree Street in Midtown, a "hunk of junk" not worthy of saving.²⁸ His comment became a rallying cry for preservation advocates who responded with buttons and bumper stickers proclaiming "Save the Hunk of Junk." When the mayor appeared at the annual UDC's awards reception, preservationists booed Young for his lack of support and comments about the city.²⁹ While the "Castle" was eventually saved, other historic buildings like the Peachtree Terrace Apartments, were demolished. The exchange between the mayor and preservation advocates galvanized a movement to increase the powers of the UDC to regulate historic properties.

In September 1986, the National Trust awarded Atlanta a matching grant of \$35,000 to develop a comprehensive preservation policy. In a turn of events, in 1987 Mayor Young created a task force to evaluate and recommend changes to Atlanta's HPO. The August 1988 report from the task force described the process:

"In the Spring of 1986, several historic structures were demolished in Atlanta, controversy developed over a proposal to designate additional historic sites and districts, and newspapers publicized the confrontations between developers, preservationists, and city government officials. In Atlanta's booming development climate, these confrontations seemed likely to

26 "Preservation, development go together," *Atlanta Constitution*, May 15, 1986, 18A.

27 Harvey K. Newman, "Historic Preservation Policy and Regime Politics in Atlanta," *Journal of Urban Affairs*, 2001. 23:1, 71-86.

28 "Young: Let progress overrun 'Castle'," *Atlanta Constitution*, June 15, 1986, 1A; "Mayor's comment on 'Castle' stirs up preservation group," *Atlanta Constitution*, June 10, 1986, 25A.

29 Harvey K. Newman, "Historic Preservation Policy and Regime Politics in Atlanta," *Journal of Urban Affairs*, 2001. 23:1, 71-86.

continue. Instead of allowing this climate to prevail, government, business, and preservation leaders decided that a more effective historic preservation program was needed."³⁰

One of the first signs of progress in strengthening the preservation program came when the task force proposed an "interim control ordinance" for a preliminary list of historic places while the study was being conducted. City council approved the ordinance and Mayor Young signed it into law, just two years after vetoing a very similar moratorium on demolitions.

The interim control ordinance was in place for one year while the new historic preservation code was being drafted. This important protection created a necessary pause in demolition permit applications, many of which would likely have been speculative, so that the task force could study the situation and develop a functional, comprehensive policy.

Atlanta's current HPO was adopted in 1989. Because the city had adopted historic preservation laws prior to the passage of the state Historic Preservation Act in 1980, Atlanta's 1989 HPO was exempted under the state law and does not follow a number of the state's model provisions, namely that appeals in Atlanta do not go to the city council and that historic property designations are not separate from the city's zoning code.

Interim controls were used to prevent major changes to historic buildings while expansions to the historic preservation ordinance were being considered.

Atlanta's 1989 ordinance was among the strongest in the nation, giving the UDC the quasi-judicial power to rule on proposed alterations or demolition of designated historic properties and permitting appeal of its decisions only to the judicial system. According to the National Park Service, "not until passage of a new, comprehensive HPO in 1989 did [Atlanta] have the tools it needed to preserve what remained of the city's architectural heritage."³¹

The ordinance has not been significantly amended since 1989 but the form and function of the now Office of Design – Historic Preservation and the UDC has continued to evolve. In 2000, the HPO was amended to allow staff review of proposed minor changes to designated properties

30 Atlanta Comprehensive Historic Preservation Program, Established by the Historic Preservation Policy Steering Committee, August: 8, 1988, Prepared with the Assistance of the Southeast Negotiation Network, Georgia Institute of Technology and the Institute for Environmental Negotiation, University of Virginia.

31 Atlanta; Growth and Preservation from a webpage by the National Park Service accessed from <https://www.nps.gov/nr/travel/atlanta/growth.htm>.

Young is famously quoted during this time when he called the historic “Castle” off Peachtree Street in Midtown, a “hunk of junk” not worthy of saving. His comment became a rallying cry for preservation advocates who responded with buttons and bumper stickers proclaiming “Save the Hunk of Junk.”

and was first used in the Grant Park Historic District. In 2002 the D-HP helped to draft legislation that removed requirements for the publication of legal ads for Type II, Type III, and Type IV Certificates of Appropriateness (COA), thus reducing a nearly \$20,000 budgetary burden for doing so. Additional revisions to the HPO to bring program requirements into the digital age are still needed. In 2008, a minor amendment to the HPO gave to the executive director of the UDC the power to develop a fee schedule for applications and other services.³²

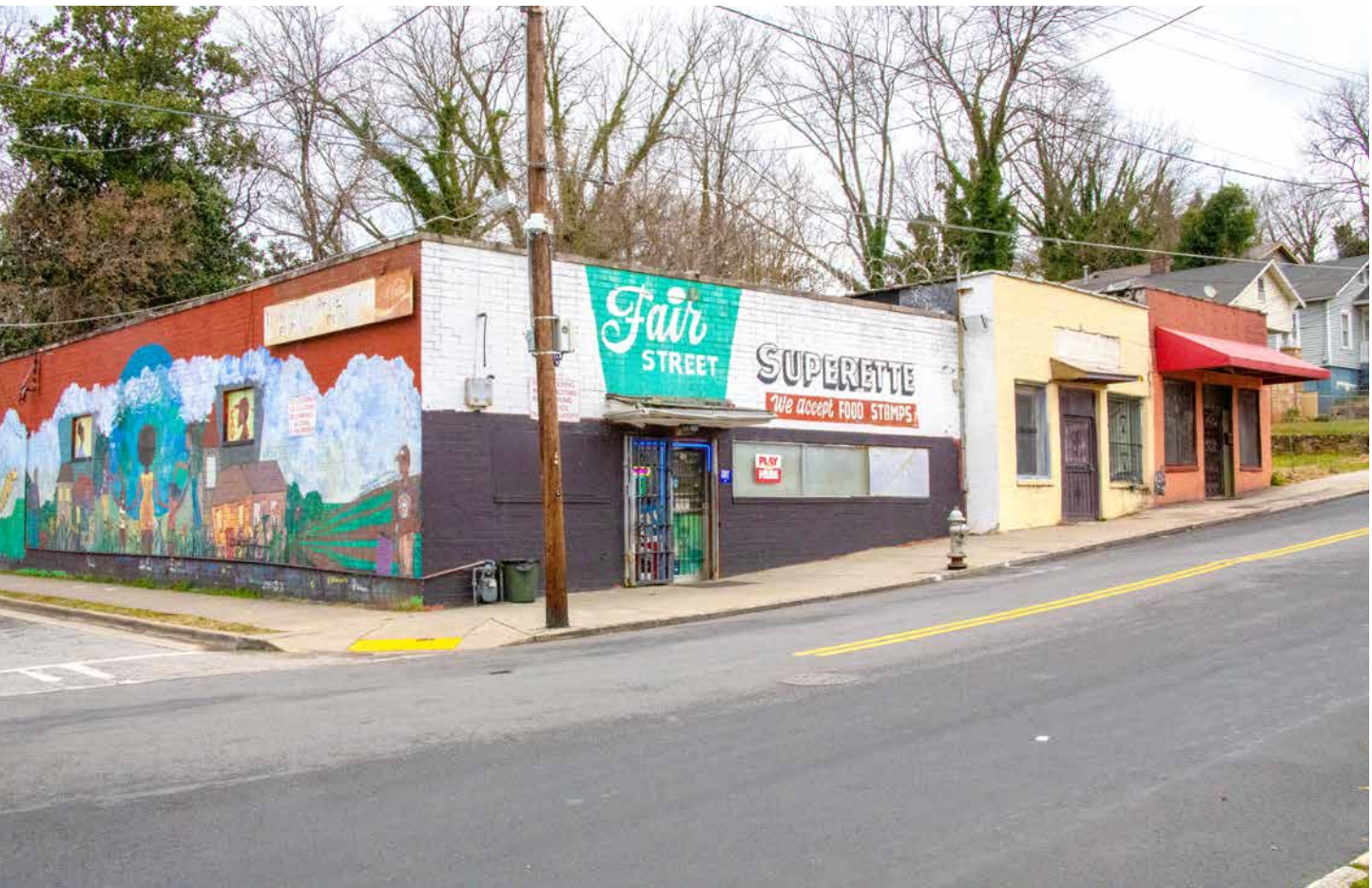
After a recent reorganization in executive branch offices, the historic preservation program is now one of several studios within the Office of Design. The Office of Design is part of the Department of City Planning, which also oversees the Offices of Buildings, Housing and Community Development, and Zoning and Development. Under this structure and in addition to their prescribed duties, D-HP staff are also asked to support some of the functions of the other offices within the Department of City Planning.

Atlanta's 1989 ordinance was among the strongest in the nation, giving the UDC the quasi-judicial power to rule on proposed alterations or demolition of designated historic properties and permitting appeal of its decisions only to the judicial system.

32 Atlanta City Ordinance 08-O-1001(4).

Chapter 4

ANALYSIS OF ATLANTA'S HISTORIC PRESERVATION PROGRAM



Under the HPO, property owners, the director of the historic preservation office, or the City Council can initiate a nomination. There is no mention of a requirement for owner support in the ordinance. D-HP staff prepare a designation report and place it on an UDC hearing agenda. If the commission approves of the designation, a zoning amendment is sent to the Zoning Review Committee of City Council. The appropriate Neighborhood Planning Unit (NPU) and the Zoning Review Board (ZRB) review the nomination and sent it back to the committee with their comments. The Zoning Review Committee then makes it recommendation to the full City Council. If the council approves, a zoning amendment is sent to the Mayor for signature.

Designated properties, whether individual or contributing to a district, must apply for a Certificate of Appropriateness (COA) for nearly all scopes of exterior work. The type of COA depends on the scope of work and the designated district or property. Applications for exterior work that are limited in nature and poses little potential harm to a historic building are administratively reviewed. More significant scopes of work, including demolition requests, are reviewed by staff and the Commission. If approved, the applicant may receive a permit from the Office of Zoning and Development and Office of Buildings.

Using the model HPO provisions listed in Chapter 2, Atlanta’s HPO compares favorably (see below).

Model HPO	Atlanta’s HPO
Consistent Statement of Purpose	X
Historic Preservation Commission	X
Public Hearings	X
Power to Designate	X
Definition of Criteria	X
Authority to Review and Make Binding Decisions	X
Authority to Review Other Land Use Actions	X
Definition of Actions that Merit Review	X
Professional Staff	X
Authority to Delegate	X
Prescribed Time Limits	X
Provision for Enforcement	X
Process for Appeal	X

Atlanta D-HP staff are also responsible for reviewing most public projects within the city, including federal historic preservation compliance review (Section 106) for HUD-funded projects. Design reviews constitute the largest workload for city staff and leave little time for other programs, which include an oral history project, an update to the zoning code, administering the cemetery review board, sub-

Design reviews constitute the largest workload for city staff and leave little time for other programs, which include an oral history project, an update to the zoning code, administering the cemetery review board, sub-division reviews, NPU meetings, and the aforementioned responsibilities to the larger Department of City Planning.

division reviews, NPU meetings, and the aforementioned responsibilities to the larger Department of City Planning. Atlanta D-HP staff also have limited time for educational work, community engagement, technical outreach, proactive survey and designation work, and interaction with other agencies to advocate for historic preservation priorities.

In 2016, the city performed a Zoning Diagnostic Study. The report concluded that the HPO suffered from three categories of problems; inherent complexity of the designation process, burdensome state laws on commission process, and the resulting staffing implications from an “overburdened system.”

The report details several recommendations to fix the problems it had identified: standardize district regulations and criteria for COAs, clarify terminology and definitions, eliminate “conservation district” and “historic building/site” categories, improve enforcement and increase fines, increase staff, re-evaluate how and what gets reviewed, and reduce the commission size. Generally, these recommendations do not recommend significant changes to the HPO, but some, like changes to the commission size, elimination of certain designation categories, and changes to what is reviewed and how, would require an amendment to the current legislation. Most of the recommended changes would not require an amendment to the HPO and vary from ‘quick fixes’ like hiring additional staff and clarifying terminology, to more intensive fixes like amending district regulations and design guidelines.

The 2016 Zoning Diagnostic Study’s recommendations point the way towards a more easily understood program, a simplified ordinance, and a more streamlined review process. Ultimately, these fixes would improve public perception of the program, customer satisfaction with the review process, and improve staff workloads. In that way, these fixes are essential, but do not address potential new programs or significant changes to the ordinance to reflect best practices in HPCs. For that, we look to the peer city analysis.

Chapter 5

PEER CITY ANALYSIS



A “peer city” is a term used to describe cities that share similar characteristics. Depending on the focus of the peer city analysis, the identification of peer cities may result in very different lists. For the purposes of this analysis, five factors important to how HPOs and programs function were selected.

Population, population growth, population density, and the relationship between the city population and the metro area. Atlanta has a population of almost 450,000, an 8% increase in size since 2000. There are about 4,000 people per square mile. The region has a population of nearly 6 million. Atlanta is a growing and densifying city in one of the largest metropolitan regions in the country. These growth pressures lead to both increased threats to historic places and concerns that overly burdensome property restrictions chase development away from the city’s jurisdiction and into suburban areas.

Size of the local government. The City of Atlanta employs about 7,620 staff. Presumably, amongst similarly sized cities, those with larger local governments have greater ability to allocate resources to improve program performance, while those with small local governments must be able to ration resources at the expense of expanded programs.

Costs of living and economic inequality. These two factors may provide insight into affordability and how costs are shared throughout a city. Property values, housing costs, and the cost of living in Atlanta have risen sharply in the past decade. So has inequality among its citizens. Increasing costs and economic disparity may make it more difficult to protect historic places in disadvantaged areas. Combined with increasing development pressures on undervalued property, the likelihood of predatory real estate development and violations to historic preservation laws goes up.

Specialized peer-city identification criteria. Both the New York Times and the Chicago Federal Reserve have tools to identify peer cities based on a number of specialized and curated data points. The New York Times tool uses jobs and employment data and the Chicago Federal Reserve uses metrics that fall into four categories; resilience, equity, outlook, and housing. These tools offer a broad comparison across several factors to identify cities that demonstrate similar trends. Both tools use a number of jobs and employment factors in their algorithms and when focusing in on Atlanta, both found similar characteristics and shared several of the same peer cities.

Job growth is strong and the kinds of jobs most in demand in Atlanta are attracting young urban professionals. These new city residents generally appreciate historic places and seek out enriching experiences, which is good for historic resources. However, the pressures of this demand can present challenges to preservation, especially for vernacular places.

HPO and administration profile. Similarities and dissimilarities between historic preservation offices presents opportunities to identify peer cities (and best practices cities) based on the form and function of their historic preservation programs. Atlanta's HPO is part of the city's zoning code. There are currently 61 individually designated properties and 21 historic districts, for a total of over 10,000 properties. The D-HP has three staff members (as well as some shared staff members) and the UDC has eight commission members out of a possible eleven potential members. The D-HP reviews on average about 600 projects annually.

Using the above cohorts, 12 cities were initially identified as peer cities to Atlanta:

- ◆ San Antonio, TX;
- ◆ San Francisco, CA;
- ◆ Milwaukee, WI;
- ◆ Denver, CO;
- ◆ Tampa, FL;
- ◆ New Orleans, LA;
- ◆ Raleigh, NC;
- ◆ Austin, TX;
- ◆ Charlotte, NC;
- ◆ Louisville, KY;
- ◆ St. Louis, MO; and
- ◆ Richmond, VA.

Four cities consistently showed up in multiple analysis models and were selected for in-depth study and staff interviews. These four are Denver, New Orleans, Tampa, and Austin.

The analysis is organized into Demographic and Geographic Information, HPO, Administrative Structure, Commission Structure, Program Data, Inventory Management System, Designation and Review Process, Incentives, and Programs. The associated tables provide a side-by-side data view of the narrative.

Demographic and Geographic Information

	Atlanta	Denver	New Orleans	Tampa	Austin
Population	447,841	649,495	378,715	352,957	885,400
Population in 2000	416,474	554,636	484,674	303,447	675,370
Population % Increase Since 2000	8%	17%	-22%	16%	31%
Population Density (People per Square Mile)	3,961	4,235	2,097	3,150	3,520
Metropolitan Statistical Area Population	5,949,951	2,888,227	1,275,762	3,142,663	2,168,316
City Population As Percent of Metro Area	8%	22%	30%	11%	41%
Median House Age	40	48	55	37	27
Median Monthly Housing Cost	1,061	1,039	942	992	1,138
Cost of Living Index	96.7	108	99.7	94.6	95.7
Gini Education Inequality Index*	11.7	13.8	13	13.2	13.3
Total number of local government employees	7,620	12,130	6,048	4,070	12,396

*The Gini index is a widely used measure of inequality. It looks at the distribution of factors like education, income, or wealth, where 0 represents complete equality of the frequency distribution and 100 total inequality.

Denver is a growing medium-sized city with a somewhat spread out population. Denver residents have a much larger presence within their metropolitan region than Atlanta. Denver is growing faster than Atlanta but has managed to keep its housing costs slightly lower. Cost of living overall in Denver is higher than Atlanta, but there is also less inequality.

Tampa is a smaller city, but is rapidly growing. Tampa is also an urban center of a large metropolitan area. It is slightly less expensive than Atlanta and has a much smaller local government.

New Orleans is smaller than Atlanta and has seen a significant loss in population after Hurricane Katrina, though more recent trends indicate that the population is growing. In 2000, New Orleans had a larger population than Atlanta at the same time. Housing costs and costs of living are less expensive in New Orleans than Atlanta. The building stock in New Orleans is older.

Austin is much larger than Atlanta and is also growing very rapidly, and it also represents a bigger proportion of its metropolitan area. It's relatively young housing stock is more expensive, but overall costs of living are comparable. As with Denver, Austin has a very large local government.

TAKE AWAY: The peer city group consists of medium-large cities that are experiencing recent rapid growth. They typically represent a fraction of the regional growth, but are the economic heart for their region. Costs vary from inexpensive to expensive, but jobs growth tends to account for that effect, though inequality is growing, especially in Atlanta. The peer city group shows a wide range of government sizes, with Atlanta and Denver at about 50-60 residents to every employee, New Orleans at 63, Austin at 71, and Tampa with 87.

Historic Preservation Ordinance

Each peer city shares the core features of a model HPO.

Model HPO	Atlanta	Denver	New Orleans	Tampa	Austin
Consistent Statement of Purpose	X	X	X	X	X
Historic Preservation Commission	X	X	X	X	X
Public Hearings	X	X	X	X	X
Power to Designate	X	X	X	X	X
Definition of Criteria	X	X	X	X	X
Authority to Review and Make Binding Decisions	X	X	X	X	X
Authority to Review Other Land Use Actions	X	X	X	X	X
Definition of Actions that Merit Review	X	X	X	X	X
Professional Staff	X	X	X	X	X
Authority to Delegate	X	X	X	X	X
Prescribed Time Limits	X	X	X	X	X
Provision for Enforcement	X	X	X	X	X
Process for Appeal	X	X	X	X	X

Denver's Preservation Ordinance was created in 1967 following the passage of the National Historic Preservation Act in 1966. Like many other ordinances of the time, the commission had limited powers, but did secure the authority to delay demolitions. Denver's HPC continues to evolve, with the most recent changes being increased fees for non-owner nominations and an update to the ordinance in 2019 that added a cultural significance category and increased review and response times for contentious nominations. Denver staff are currently exploring additional incentives to designation, and reducing regulatory barriers once a building is designated.³³

³³ <https://www.denvergov.org/content/denvergov/en/community-planning-and-development/landmark-preservation/>

New Orleans' ordinance covering the Vieux Carre is one of the oldest in the nation, passing in 1925. In 1936, an amendment to state legislation gave the commission regulatory powers and defined an early certificate of appropriateness process. In 1976, New Orleans passed an expanded ordinance that created their current commission structure, one not limited to a single district. As with Atlanta, New Orleans updated their ordinance in 1980 to comply with requirements of the CLG program.

Denver and New Orleans organize staff by function, with little overlap in duties.

Tampa's HPO was passed in 1987. In 1993, the city passed an *ad valorem* tax exemption for improvements to historic properties.

Austin's commission was established in 1974. The original commission was tasked to prepare a Preservation Plan; establish designation criteria; and recommend designation to the Planning Commission and/or City Council. The current ordinance, passed in 2007 has not altered these responsibilities significantly but includes expanded language making it more similar to national models: promote historic preservation activities in Austin; prepare and periodically revise an inventory of the structures and areas that may be eligible for designation as historic landmarks; prepare, review and propose amendments to the Historic Landmark Preservation Plan; and review requests to establish or remove a historic designation, make recommendations on the requests to the Land Use Commission.

TAKE AWAY: There are differences in how the peer city HPOs originated and how each has evolved their programs or features, but at face value, the HPOs of each peer city have expanded and improved over time to more align with national models and best practices. Successful programs adapt to changing conditions and respond to thoughtful input and study.

Administrative Structure

Administrative Structure	Atlanta	Denver	New Orleans	Tampa	Austin
Department Name	Historic Preservation Studio	Landmark Preservation	Historic District Landmarks Commission/ Vieux Carré Commission	Architectural Review and Historic Preservation	Historic Preservation Office
Type of Department	One of several studios in the Office of Design.	Part of the Office of Community Planning and Development and Responsible to the Mayor.	Independent City Departments.	Part of the Planning and Development Department and Responsible to the Mayor.	Part of the Planning and Zoning Office Responsible to City Manager.
Number of Staff (Vacancies)	3 (2)	11	12/6	5	5 (1)
Budget	Stable	Increasing	Increasing	Stable	Increasing
Qualifications	36 CFR 61	36 CFR 61	36 CFR 61	36 CFR 61	36 CFR 61

Denver has a larger local government which corresponds to their larger historic preservation office, which they call the Landmark Preservation department. The department is within the Office of Community Planning and Development and is responsible to the mayor. The department's budget and staff size has increased since 2005. Eight of the 11 staff are divided between two groups, the regulatory/planning group and the design group, with some overlap in duties. The regulatory and

planning group manages historic preservation plan development, code and ordinance updates, and other planning activities. The design group is almost entirely dedicated to design review, technical assistance, and supporting commission meetings. The office also has one inspector for designated properties.

Atlanta has the fewest number of staff among the peer city group, especially when taking into consideration vacancies.

New Orleans has two wholly independent historic preservation offices: the Historic District Landmarks Commission and the Vieux Carré Commission. One is specific to the Vieux Carré historic district and the other, larger office oversees the remainder of the city's historic resources. Despite having a relatively small local government, New Orleans has nearly 20 full time staff for their historic preservation programs. The historic preservation offices have also seen increasing budgets since 2005. In the Historic District

Landmarks office, five staff members are International Code Council (ICC) certified plans examiners, two are ICC certified building inspectors, and one is an architectural historian.

Tampa has five full time staff in their historic preservation office, which, like most of the peer cities, is within their department of planning. Prior to consolidating in 2007, Tampa's preservation staff were divided among their three HPCs. About 75% of staff time is dedicated to design review with the remainder spent on the other duties of the office. The historic preservation office also has one full time building inspector.

Austin also has five full time staff in their historic preservation office and has seen increasing funding in recent years. All of the peer city historic preservation offices are funded through their city's general fund, but Austin's program is also supplemented by a city hotel tax. Portions of the revenue from the hotel tax are used to support capital projects, surveys, and other historic preservation activities that support and enhance tourism. More than half of staff time is spent on design review.

Atlanta has the fewest number of staff among the peer city group, especially when taking into consideration vacancies. This becomes even more critical in one of the following sections that looks at the number of designated properties and number of reviews the office oversees.

Denver and New Orleans have specialized staff positions with distinct duties separated between design development and review and planning and program activities. This structure could be advantageous with an adequately staffed office, providing for clear and efficient program administration, clear qualification hiring standards, and a division of duties to reduce responsibilities conflicts.

Atlanta's Historic Preservation Studio reviews up to twice the number of projects as its peer cities.

TAKE AWAY: Historic preservation offices are typically subdivisions of a city's planning department, except in New Orleans' case, where the office is independent of planning but within the executive branch. Budgets and staff size vary, but all peer cities have staff that meet or exceed the Secretary of the Interior's Qualification for Architectural History (36 CFR 61). In some cases, like New Orleans, staff have additional training and licensing requirements.

Commission Structure

Commission	Atlanta	Denver	New Orleans	Tampa	Austin
Review Body Name	Urban Design Commission	Landmarks Preservation Commission and Lower Downtown Design Review Commission	Vieux Carré Commission, Historic District Landmarks Commission, and Central Business District Historic District Landmarks Commission (Also three Architectural Review Commissions)	Architectural Review Commission, Barrio Latino Commission, and the Historic Preservation Commission	Historic Landmark Commission
Number of Seats	11	9/9	9/15/10	9/9 /7	11
Terms	3 Years	3 Years	4 Years	3 Years	4 Years
Vacancies	3	1/2	1/0/0	2/4/4	1
Frequency of Meetings	Bi-monthly	Bi-monthly/ Monthly	Monthly (Bi-monthly)	Bi-monthly/ Monthly	Monthly

Denver has two commissions, one of which is specific to the Downtown Development District. There are 9 commissioners for the LPC that meet bi-monthly. The commissions make recommendations to the city council for historic property designations and review proposed changes to designated properties through a COA process.

New Orleans has three commissions, each with their own architectural review board. The Vieux Carré Commission is the oldest in the nation and was created to protect New Orleans' French Quarter. In the 1970s, the city established the Historic District Landmarks Commission and the Central Business

TAKE AWAY: All of the peer city commissioners are nominated by or from various organizations or associations related to historic preservation, planning, architecture, or similar and are appointed without compensation. Where there is an architectural review board, like in New Orleans and Tampa, the commissioners are required to be Architects. Where commissions are specific to a historic district, some of the commissioners must be residents of or represent that historic district.

District Historic District Landmarks Commission. Each commission has an architectural review board that meets twice monthly and provides recommendations to the commission on proposed alterations to historic properties.

Tampa’s Architectural Review Commission (ARC) and the Barrio Latino Commission (BLC) review proposed changes to historic properties. The latter is specifically for properties within the Barrio Latino historic district. The HPC evaluates historic sites and properties and initiates the historic designation process for individual buildings and districts. Tampa appoints several alternate commissioners to their commissions to ensure that commission meetings reach quorum.

Austin has one commission that meets monthly and makes recommendations to the city council for historic property designations. The commission reviews, either administratively or through public hearing, proposed changes to designated properties and issues or denies the COA.

Several of the peer city commissions have alternate commissioners that are available in cases when a quorum among regular commissioners cannot be met. This can be an effective strategy, especially when commissioners are required to have specialized professions, backgrounds, or live in a specific district.

Program Data

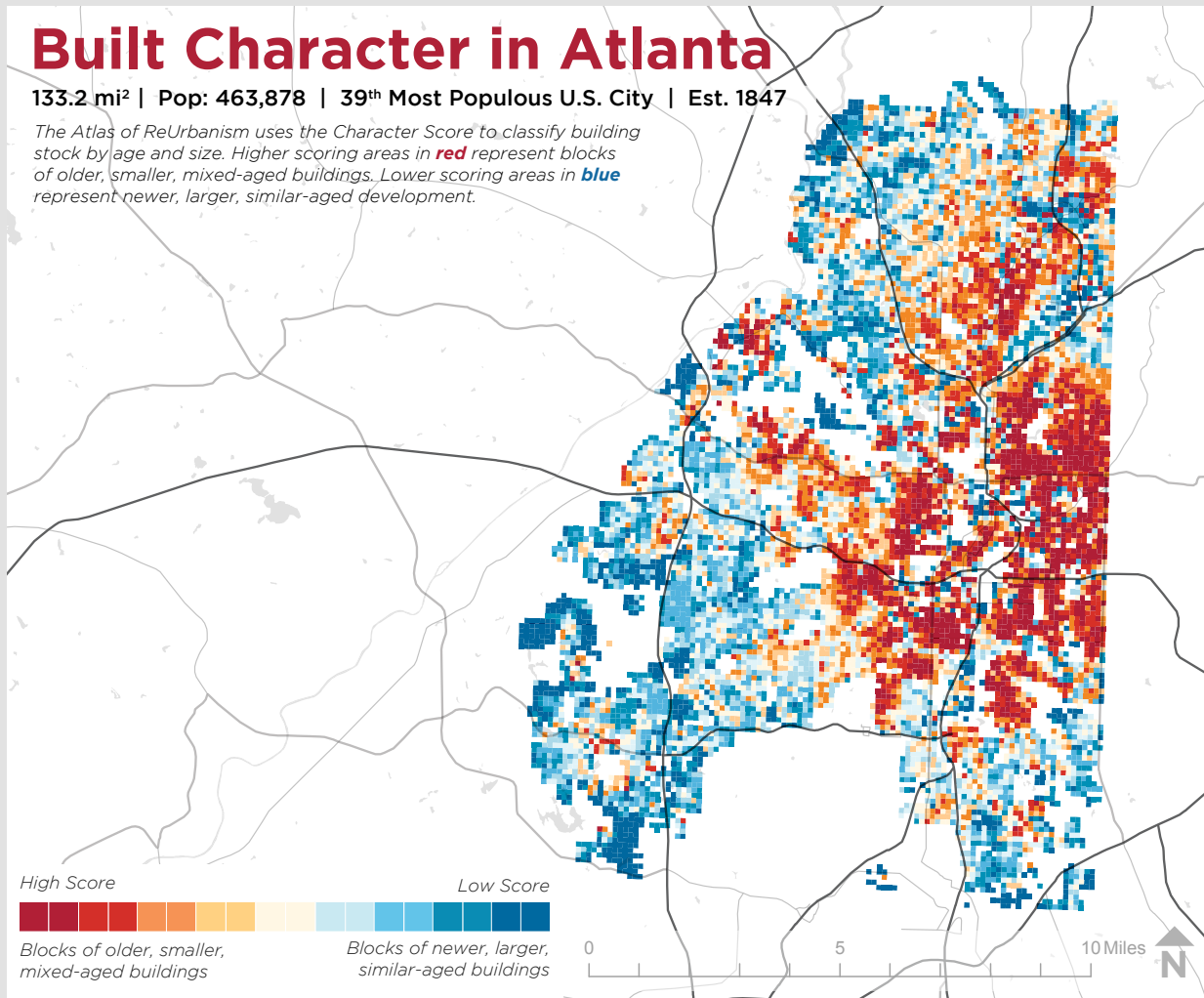
Program Data	Atlanta	Denver	New Orleans	Tampa	Austin
Individual Historic Properties	65	344	300	64	620
Historic Districts	25	55	19	4	7
Total Designated Properties	10,315	6,800	5,100	4,800	1,450
Percent of City Property Designated	5.4%	5.4%	6.3%	4.1%	0.7%
Review per Year	600	1,600	1,800	850	600
Designated Properties per Staff	3433	618	283	960	183

Another important metric to consider above is the number of designated properties per staff member. While there does not appear to be any direct correlation between the overall number of designated properties and the average number of annual reviews, it can be presumed that with more designated properties per staff member, less staff time is available for other programs. Atlanta has by far the largest number of designated properties per staff member, even if the office were at full staffing. As well, Atlanta D-HP staff review on average 200 design projects per year per staff member. Other peer cities generate between 100 and 150 reviews per staff member. Atlanta also leads the pack with the most designated buildings, but still remains near the national average in terms of the percent of the city’s building stock that is designated.

Built Character in Atlanta

133.2 mi² | Pop: 463,878 | 39th Most Populous U.S. City | Est. 1847

The Atlas of ReUrbanism uses the Character Score to classify building stock by age and size. Higher scoring areas in **red** represent blocks of older, smaller, mixed-aged buildings. Lower scoring areas in **blue** represent newer, larger, similar-aged development.



Building and Preservation Facts

Parcels/Buildings	Atlanta	50-City Average
Total	167,179	204,038
Per Square Mile	1,253	1,436
Median Year Built	1962	1952
On Nat'l Register of Historic Places	19.6%	6.8%
Locally Designated	5.4%	4.3%
Historic Tax Credit Projects	26	27.5

Year Built By Period, Atlanta | 50-City Average

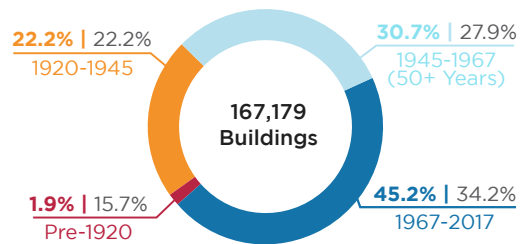


Figure 1. Map of Atlanta; Atlas of Reurbanism, National Trust for Historic Preservation. The graphic shows a multi-component heat-map of Atlanta, highlighting older, smaller buildings and associated statistical comparisons. This is an example of the data analysis and presentation capability of an inventory management system.

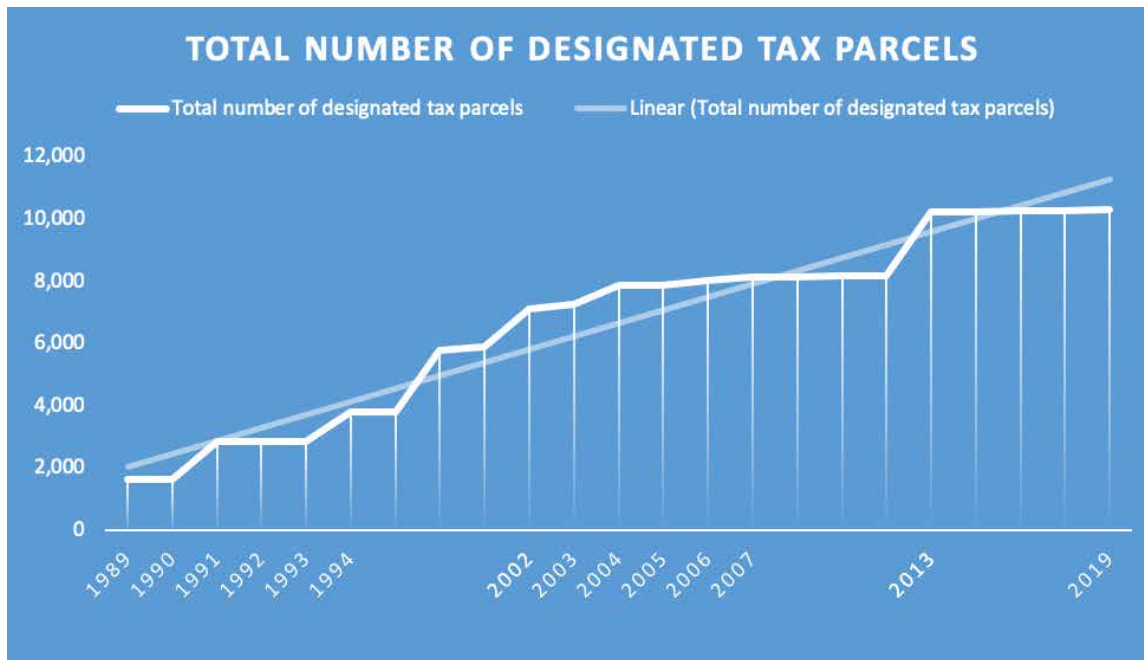


Figure 2. Historical chart of total designated properties by year for the City of Atlanta.

TAKE AWAY: Among the peer city group, the designated properties make up just a fraction of the total number of buildings in a given city. The National Trust estimates that nationally, about 4.3% of all buildings in the United States are locally designated.³⁴ Even in cities with the highest percent of designated buildings, like Washington D.C. and Manhattan (New York City), designated properties make up only about 20% of the total buildings.³⁵ These figures indicate that arguments around designations preventing development or preventing affordable housing within a city's boundary are unsubstantiated at best.³⁶

34 The Atlas of Reurbanism, National Trust for Historic Preservation, November 2016.

35 <https://ggwash.org/view/65911/why-dc-has-so-many-historic-buildings>.

36 <https://www.citylab.com/design/2016/02/why-historic-preservation-districts-are-crucial-to-cities/462210/>.

Inventory Management Programs

According to the National Trust for Historic Preservation, an Inventory Management System “refers to the practice of collecting and managing cultural resource information in an inventory management system. An inventory is a database, or an organized collection of data. Inventory management systems are digital software platforms that allow for the management and administration of the data, as well as the database itself. This includes the ability to query, filter, select, and export or share the housed data, as well as the ability to integrate other related datasets... When applied to historic preservation, inventories serve as central repositories of information on cultural resources. These inventories store information on the cultural resources themselves, including but not limited to: Location; Designation status; Year built; Date of last survey/inspection; Condition.”³⁷

Inventory Management Program	Atlanta	Denver	New Orleans	Tampa	Austin
Type (GIS or Other)	GIS	GIS	GIS	GIS	GIS (Recent)
Who Owns the Data	Planning Department	Planning Department	Planning Department	Planning Department	Historic Preservation Offices
Where is the Data Managed	Centralized	Between Offices	Centralized	Centralized	Internally
How is the Program Funded	General Fund	General Fund	General Fund, Some from Mitigation Funds	General Fund	Hotel Tax
Is it Publicly Accessible	Partially	Partially	Partially	Partially	Yes

TAKE AWAY: All of the peer city offices use a Geographic Information System (GIS) to manage the city’s inventory of designated historic buildings. These are typically operated by professional staff in the parent Planning office, except in Austin where the historic preservation office manages their own GIS database. Databases are updated regularly as new properties are designated. In some of the peer cities, the GIS database is connected to the permitting system, so that when a permit request comes in for a designated building, the system directs the applicant to a Certificate of Appropriateness request. Most peer cities allow some level of public access to the GIS database for historic resources. This may be through an interface like Accella, or a custom-made, interactive map embedded on the office’s webpage.

37 Survey Subcommittee – NTHP Best Practices Research; Philadelphia Historic Preservation Task Force.

Simple, tried and tested inventory management works best. New York City uses the ESRI GIS software program, which is considered the industry standard, combined with a Microsoft Access database, another widely used and widely supported software. The larger challenge is integrating the historic preservation system with the city-wide system, including the permitting process, and offering an easy-to-understand public interface. Interviewed peer cities report that Accella has features that allow this to be done.³⁸

Designation and Review Process

Designation and Review Process	Atlanta	Denver	New Orleans	Tampa	Austin
Designation Levels	Historic Buildings or Sites, Landmark Buildings or Sites, Conservation Districts, Historic Districts, or Landmark Districts	Landmark or Historic District	Historic Landmarks, Full-Control Historic Districts, or Partial-Control Historic Districts	Landmark, Landmark Site, Multiple Property designation, Historic Conservation Overlay District, or Historic District	Historic Landmark or Historic Districts
Who Nominates	Property Owners, Council, Director, Commissioner of the Department of City Planning, or Mayor	Anyone	Property Owners or Commission	Property Owners or City Official	Property Owner or City Official
Is Owner Support Required?	No	No	No	Yes	Yes
Nomination Fees	No	Yes	No	Yes	Yes
Interim Controls	Yes	Yes	Yes	Yes	Yes
Application Fees	Yes	Yes	Yes	Yes	Yes
Appeals	Superior Court	Superior Court	City Council, Superior Court	City Council	Planning Commission, City Council
Enforcement	See Above	See Below	See Below	See Below	See Below

³⁸ [ibid.](#)

Under Denver's historic preservation ordinance, anyone may nominate properties for their landmark designation program...

“A good, overarching way to think about historic preservation in Denver: It is community-driven. The city itself doesn't go around landmarking buildings and districts. We look to the community to bring forward the things that are of the most value.”

**Andrea Burns,
Communications Director for
Denver's Community Planning
and Development office.**

Denver

Under Denver's HPO, anyone may nominate properties for their landmark designation program, though it requires three residents of Denver if it is not the owner submitting the nomination. The Landmark Preservation office provides applications and assistance in researching and preparing the applications. Complete applications that meet the designation criteria are sent to the commission for a public hearing. If an application is considered complete, interim controls are placed on the property and information on the property is posted on the commission's website. If the owner of the property does not support designation, the commission holds several more public hearings. If the commission approves of the designation, the application is sent to city council for a vote and the designation becomes official with the mayor's signature.

Changes to designated properties are approved through a Certificate of Appropriateness process, with limited work scopes handled under administrative review. Approved COAs allow applicants to receive building permits. In Denver, all applications for demolition, whether for a designated property or not, are reviewed by the Landmark Commission staff. As well, historic preservation staff in Denver may initiate a review process for any non-designated National Register property or designated properties that are in a state of neglect. If a review determines that a property is eligible for designation, that process is initiated and interim controls are put in place. As with Atlanta, appeals in Denver go to a superior court system.

Denver's historic preservation office provides technical assistance to COA applicants in an effort to avoid violations to designated properties. They have one

inspector who reviews complaints and approved projects. The inspector can issue stop work orders with citations that have increasing fees for non-compliance.

New Orleans

In New Orleans the processes for designation of individual resources and historic districts is slightly different. Both begin with a nomination, which can come from an owner or through the commission with or without owner support, and both provide interim control over nominated properties. For individual properties, the historic preservation staff prepare a report and present the nomination and report at a public hearing. If approved, the Office of Conveyances establishes the designation as part of the property's deed. For historic districts, a study committee is formed and prepares a report with district boundaries and recommended statuses for all properties within. Some districts have full control over all proposed work while others review only demolition and/or new construction requests. If the commission approves the designation at a public hearing, the report is submitted to the planning commissioner. If approved, it is sent to the city council for a vote and becomes a subsection of the city's zoning ordinance.

Proposed changes to designated properties are triggered by a building permit application and reviewed by the Architectural Review Commission. A COA is generated and reviewed, either administratively or through public hearing. Appeals to decisions by the commission can be brought by any aggrieved person and must be made to the city council within 10 days of the decision. Further appeals go to the district court.

New Orleans' historic preservation office has two building inspectors and one enforcement coordinator. These staff actively look for unpermitted work, review approved work, and potential demolition by neglect cases. The office prefers to exhaust all procedural options before sending violations to adjudication staff, which is co-located on the same floor as the preservation office. A hearing is held and fines are levied or Certificates of Occupancy withheld where violations are not remedied.

Tampa

In Tampa, property owners or city staff may nominate a property for designation. While owner consent is not required, the ordinance directs the commission to consider whether an owner supports designation and the application forms appear to only allow an owner

Several cities in the study group allow citizens or preservation groups to nominate properties, even without owner support.

Interim controls are widely used to prevent abuse of the public nomination and designation process.

or owner's legal representative to nominate a property. After an application is received and fee paid, historic preservation staff prepare the nomination for a public hearing where the commission may recommend designation and the property is placed on the HPC's "workplan." Once a property is placed on the workplan, it becomes subject to interim controls. Nominations go to the city council after more public hearings are held and if approved by council, the designation becomes part of the city's zoning code.

Proposed changes to designated properties are triggered by a building permit application and reviewed by the Architectural Review Commission. The commission also considers zoning variance requests, in addition to building permit issues. An application and sliding-scale fee is submitted and reviewed, either administratively or through public hearing, and the commission may either approve or deny the request. Appeals go to the city council.

Tampa's commission is able to enforce "compelled adherence" to the preservation regulations by tying in their one inspector to the city's code enforcement and permitting program. The inspector can issue stop work orders and withhold certificates of occupancy.

Austin

In Austin an owner, commissioner, or staff member may nominate a property. While owner consent is not needed, without it the commission must have a super-majority to approve. Austin also has a provision where religious buildings may be exempted. The commission may make a recommendation for designation to the planning commission which then makes an advisory determination to the city council. Designated properties become part of the zoning code as overlay zoning. Once the commission recommends a property for designation interim controls are put in place.

Proposed changes to designated properties are handled through a COA process. As with all of the peer cities, administrative or commission review is determined by the scope of proposed changes. Approved COAs allow an applicant to apply for a building permit. Proposals for demolition or relocation are reviewed for all properties 45 years old or older, regardless of designation status. If found to be eligible for designation, the commission may initiate that process. Appeals, though rare, go first to the planning commission and then to the city council. The commission also performs advisory reviews for proposed changes to National Register properties.

Enforcement in Austin is handled by the city's code enforcement staff. The preservation staff can request that a building inspector investigate potential violations or demolition by neglect, but the process is often cumbersome and ineffective.

TAKE AWAY: All of the peer cities share a similar process for both designation and design review. Most of the peer cities have fees associated with both nominations and design review, the latter being more common.

Owner support of a nomination is not typically required, but the structure of most of the codes makes it more challenging to nominate a property without owner support. Although few of the peer city ordinances have a requirement for owner consent as a provision for designation, this is generally not advised. Owner consent provisions undermine the authority of the HPO, in favor of subservience to the owner's property rights.³⁹

To this, it should be pointed out that all land use controls in some way restrict certain rights of private property owners, but these same controls have been consistently supported in the courts and in the public's mind. In order to fully protect a historic property from inappropriate alteration or demolition, a strong preservation ordinance should not require owner consent. Most of the peer cities make nomination without owner consent more challenging and typically require the support of directors and commissioners or the city council.

Approved nominations typically trigger interim controls that restrict the issuance of permits for demolition or major work for a period of time or trigger a full commission review while the nomination is being considered. Nominations are typically sent to other departments for review before going to the city council for a vote. Designated properties are typically included in the city's zoning code, except in New Orleans where individual designations are recorded in the property's deed.

All peer cities have a similar COA process where applicants develop plans in accordance with published or provided design guidance. Small-scale or simple work can be reviewed and approved administratively and more complex or contentious work is reviewed in a public hearing. Approved COAs allow applicants to apply for or receive a building permit. Because some commissions perform only an advisory function, appeals are directed to the city council. Stronger commissions, like Atlanta's, are appealed only to a superior court.

³⁹ <https://savingplaces.org/stories/10-on-tuesday-10-basic-elements-of-a-preservation-ordinance#.XVwCEOhKi9I> and <https://www.laconservancy.org/node/1464>.

Most peer cities have a building inspector within their historic preservation program. Typically, these inspectors are given the same powers as other building inspectors and code enforcement officials within the city and have the power to stop work, deny permits, or levy fines. It is more common however, that peer cities try to exhaust all procedural paths to compliance before turning to enforcement. In some cases, like New Orleans, inspectors proactively canvas historic districts for potential demolition by neglect cases.

Incentives

Incentives	Atlanta	Denver	New Orleans	Tampa	Austin
Rehabilitation Tax Abatement			X	X	
Property Tax Abatement/Rebate	X	X		X	X
Grants/Loans				X	X
Fee Waivers				X	
Transferable Development Rights (TDRs)	X	X		X	
Pre-Design Assistance	X	X	X	X	X
Accelerated Permitting					
Reduced Parking Minimums	X	X		X	
Flexible Rezoning Options	X	X		X	
Zoning Bonuses (Increase FAR)	X		X	X	X

Denver - A tax rebate for historic property owners in the Downtown Historic District is offered by the city. Transferable Development Rights (TDRs) are also available for historic buildings in a 40-block area of downtown. Historic property owners who choose to rehabilitate their buildings can receive a density bonus of four square feet for each square foot of the rehabilitated structure. In essence, they can transfer the right to develop a structure four times the size of their landmark building to a developer in the same district. Several buildings in Denver have taken advantage of the city's TDR program.⁴⁰ Denver's Landmark Preservation Commission also has the ability to make administrative zoning code adjustments to maximize allowances, heights, reduce parking minimums, and allow uses not normally allowed within a given zoning category.

New Orleans - The Restoration Tax Abatement (RTA) Program provides *ad valorem* tax exemption for five years post-construction based on the pre-improved valuation, but only for commercial properties in a historic district. New Orleans also offers density bonuses for planned developments in the Historic

⁴⁰ A Preservationist's Guide to Urban Transferable Development Rights by Jennifer Cohoon McStotts, National Trust for Historic Preservation, nd.

Urban and Historic Core zoning districts. Neither program is directly administered by the historic preservation office.

Tampa - *Ad valorem* tax exemptions are available for approved improvements to historic properties. Tampa's historic preservation office also offers a permit rebate program, construction variance

review, increased size allowance for accessory dwelling units (ADUs), set-back averaging, and reduced parking minimums. TDRs have been available for about six years but have not yet been used. Tampa also administers the Interstate Historic Preservation Trust Fund Grant and Loan Programs which were established from the impacts of the Interstate expansions. The grants or loans can be used by homeowners in certain National Register districts to make approved improvements on their historic properties.

Austin - Tax exemptions for individual landmarks and tax abatements for rehabilitations in historic districts are available. Designated properties in the downtown historic district may receive increased floor area ratios (FAR). Heritage Grants, generated from the city's hotel tax, are available to "support historic preservation and restoration projects, as well as, activities that attract tourists and convention delegates." Use of hotel occupancy taxes must directly enhance and promote tourism and only non-profit, government, and commercial designated individual properties or within a historic district are eligible.

All of the peer cities are in states that offer a statewide rehabilitation tax credit. While these credits use National Register and not local criteria for identification, evaluation, and design review, the tax credits have a distinct value to cities. In Denver, historic preservation staff review state tax credit applications and make recommendations to the state.

When preservation is integrated into a city's other land use control programs, there are effective synergies with zoning, permitting, and incentives.

TAKE AWAY: All of the peer cities offer some kind of grant program. These appear to have evolved from opportunities identified in programs originating in other agencies. Tampa's fund came from a transportation project mitigation endowment and Austin's from a tourism tax. The funds are used in a number of ways to benefit a range of specific or broad communities. Programs appear to be more effective when there is adequate staff time and funding for management and enforcement.

All peer cities encourage pre-application meetings to improve efficiency and increase the likelihood of approved certificate of appropriateness applications.

Because the HPO in Atlanta is within the zoning code, the city has the ability to address a range of zoning incentives to promote historic preservation. The city has developed innovative incentives for designated properties and districts in recent years and is encouraged by these successful trials to continue in this path.

Programs

Programs	Atlanta	Denver	New Orleans	Tampa	Austin
Archaeology Monitoring				X	
Cemeteries Survey, Identification, and/or Protection	X			X	
Deconstruction/Salvage			X		
State Tax Credit Review		X			
Educational Programming	X	X	X	X	X
Section 106/Compliance Review	X			X	
Own or Manage Property					
Established Survey Program		X		X	X
Community Engagement	X		X	X	X
Awards Program	X				

Denver is the only city in our peer group that performs reviews of state tax credit applications. While rare, providing this service improves the efficiency of reviews and reduces administrative burdens at the state level.

Tampa’s program includes archaeology and cemeteries in their HPO. In most other peer cities, requests that involve these resources are directed to the state.

Few cities offer or encourage salvage or deconstruction programs. Most of the interviewees found these programs difficult to enforce and manage. New Orleans administers some deconstruction and salvage as part of the FEMA requirements related to flood mitigation.

All of the peer cities provide educational programming and some form of community outreach. Most HPO statements of purpose include provisions for education and outreach. Outreach includes

Most of the peer cities have some form of established survey program.

attending neighborhood meetings and education often includes commissioner training. Most offices also provide a series of presentations that describe, explain, and promote their HPO.

While Section 106 projects are ultimately reviewed at the state level, some cities initiate Section 106 and other compliance programs for city-led, federally funded or permitted capital projects. All of the peer cities are de facto consulting parties to the Section 106 process within their jurisdiction. While not often a time consuming task, some Section 106 projects require significant staff time for design analysis and consultation with state agencies.

None of the offices directly own or manage property, but all of the offices work with the city agencies that do. In most cases, the city must engage in the same COA process for designated historic city-owned properties. State and Federal agencies are typically exempted from city permitting requirements.

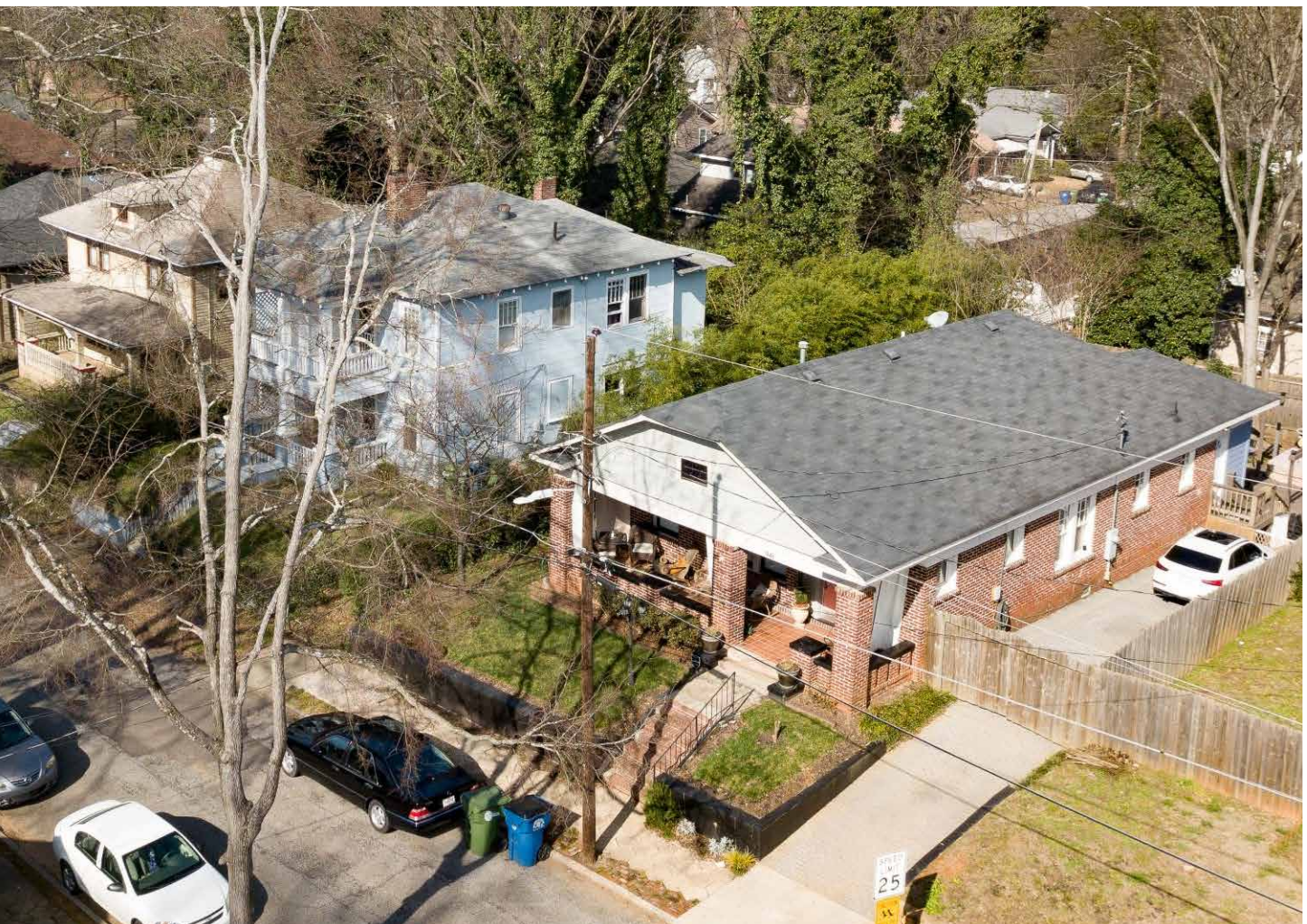
Most of the peer cities have some form of established survey program. These programs are typically funded with special funding and are supplemented with support from local not-for-profits and other city agencies. Austin uses funds from their hotel tax to fund surveys and other cities apply for state and federal grants. The survey programs are typically not comprehensive, but rather they target under-served, under-represented, and previously un-surveyed areas of the city.

Few cities offer awards programs. Some interviewees noted that these programs had been offered in the past, but the effort to plan and host these events made them untenable. Typically, awards programs that include awards for adaptive use or rehabilitation are offered by other city agencies or not-for-profit organizations.

TAKE AWAY: Peer cities operate a range of programs within their historic preservation offices. These tend to be tailored for the specific needs of the communities they serve. Some offices have tested different programs and have ceased or plan to eliminate those programs based on poor experiences and overly burdensome requirements. Historic preservation offices must be experienced in a way that retains positive outcomes while trimming ineffective programs.

Chapter 6

BEST PRACTICES



The National Trust for Historic Preservation is the primary source of research on HPOs nationwide. Perhaps one of their most intensive studies on the subject began as part of a 2017 Philadelphia Historic Preservation Task Force. The Trust produced a number of “selected” best practices in all facets of the local historic preservation program.⁴¹ According to the Trust:

Based on two rounds and nearly five months of intensive research by a team of eight multi-disciplinary professionals, the National Trust found that there is no “silver bullet” for historic preservation. Instead, our research found that historic preservation success emerges from integrated, multi-faceted programs broadly supported by a diverse constituency and adequately funded over time.

The Trust’s Best Practices

SURVEYS AND INVENTORY MANAGEMENT SYSTEM

- ◆ Use GIS-based Surveys.
- ◆ Survey and designate non-traditional property types (e.g. modern resources, culturally-important places, legacy businesses, or, like in Georgia, “Centennial Farms”).
- ◆ Survey for differentiated regulation levels (e.g. districts designated as ‘demolition delay only’ or ‘new construction design review only’).
- ◆ Crowd-Source Surveys and partnerships with other historic preservation groups.
- ◆ Operate an ongoing survey and re-survey program.

TAILORED DESIGNATIONS

- ◆ Develop multiple designation components with associated design regulations.
- ◆ Develop custom regulations on case-by-case basis.

⁴¹ Historic Preservation and Building Reuse: Best Practices Research Memo, National Trust for Historic Preservation, May 17, 2018.

INCENTIVES

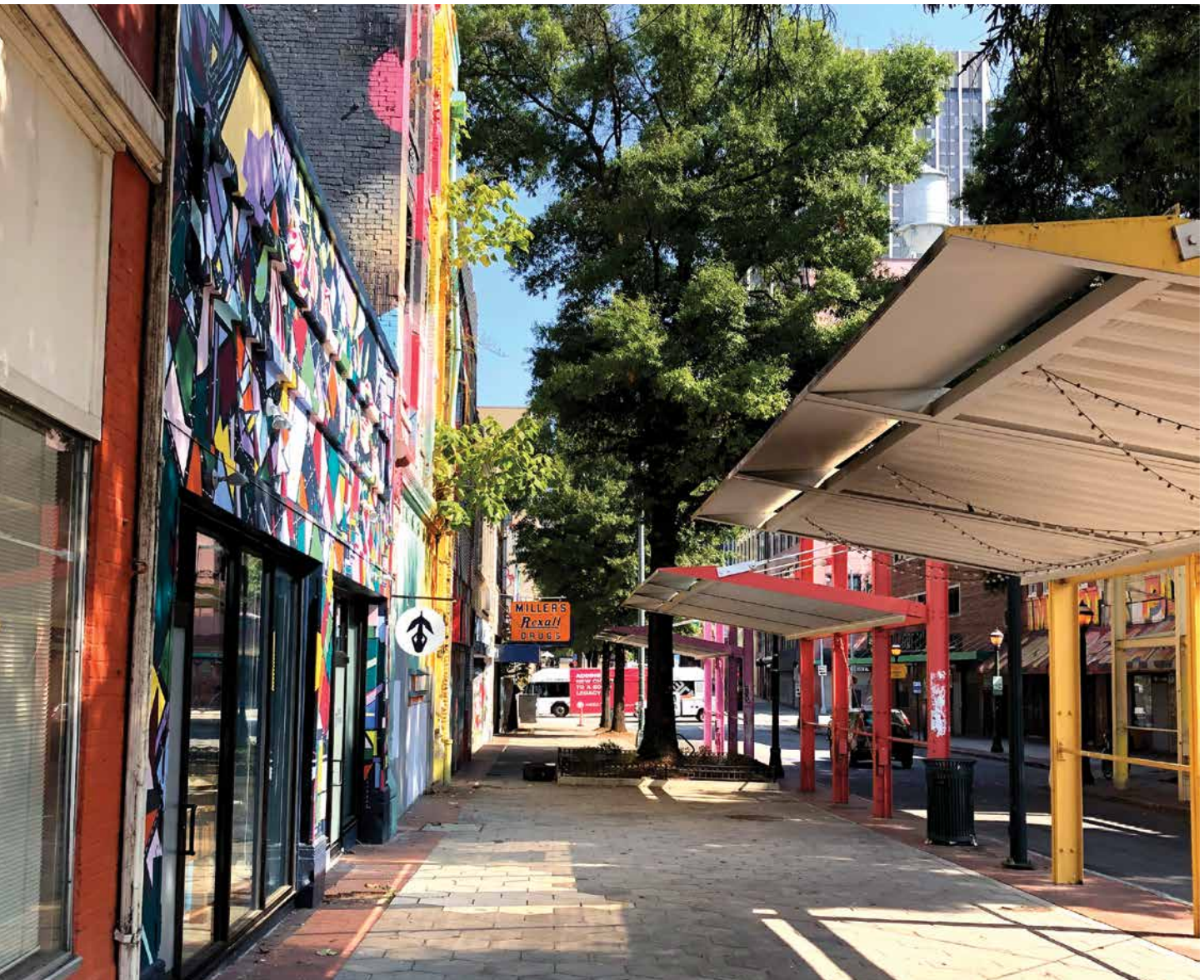
- ◆ Tax Credits
 - ❖ Create a city tax credit for rehabilitation projects.
 - ❖ Create a city property tax abatement for rehabilitated historic properties
- ◆ Grants
 - ❖ Provide basic historic home repair assistance.
 - ❖ Provide commercial rehabilitation incentive grants.
 - ❖ Provide legacy business/owner incentives.
- ◆ Regulatory Relief
 - ❖ Provide reduced parking requirements.
 - ❖ Allow additional uses.
 - ❖ Provide permit fee waivers for rehabilitation projects.
- ◆ Market Based
 - ❖ Create a Transferrable Development Rights (TDR) Sending District
 - ❖ Use Incentive Zoning
- ◆ Technical Assistance
 - ❖ Provide property owner consultations
 - ❖ Coordinate code and permit review between departments

- ◆ Packaged incentives
 - ❖ Create an Adaptive Reuse Ordinance
 - ◆ Development guidance
 - ◆ Expedited Review
 - ◆ Flexible codes
 - ◆ Permit Fee waivers
 - ◆ Expedited Entitlements
 - ◆ Zoning Alignment
 - ◆ Reduced parking
 - ❖ Create a Legacy Business Preservation Fund (a la San Francisco)
 - ◆ Employee retention grants
 - ◆ Lease extension grants
- ◆ Homeowner Support
 - ❖ Acquire and Rehabilitate vacant and abandoned properties.
 - ❖ Provide owner-occupied home rehabilitation support and loans.
- ◆ Intra-agency cooperation between municipal Planning Departments and Historic Preservation Offices to accomplish outreach and education to build a preservation constituency (Note that Atlanta is considered, by the National Trust, one of the best practices cities in this area, related to both the AUDC NPU outreach and the City Studio pop-ups).
 - ❖ Assign a preservation officer (similar to federal model) to city departments, agencies, and boards with potential to impact historic properties.

Atlanta currently uses, to some degree or another, a number of these best practices, including using GIS-based inventory management systems, using tailored designations and regulations, and providing regulatory relief and market based incentives to historic properties. The Trust's best practices are widely adaptable and in the following chapter, many of these best practices have been adapted as recommendations for the City of Atlanta.

Chapter 7

RECOMMENDATIONS



The City of Atlanta has completed a study of Peer City Historic Preservation programs as part of the Future Places Project. The study identifies several recommendations based on demonstrated best practices in these peer cities.

The City of Atlanta's Historic Preservation Studio operates a Historic Preservation program similar in many ways to thousands of other effective historic preservation programs in cities across the country. Atlanta's preservation program includes the enabling legislation and subsequent amendments and all of the day-to-day operations of staff and commissioners. Atlanta's program has features that have enabled staff and commissioners to designate and protect thousands of significant historic properties in the city. However, few substantial changes to the program over the past three decades has resulted in a functioning program, but one that has fallen behind national best practices in historic preservation.

Atlanta's current program has as its foundation the 1989 City HPO. The ordinance establishes the UDC, its regulatory powers, and a process for nomination, evaluation, designation, and appeal. Like the preservation programs in many other cities, Atlanta provides opportunities for public hearings at major decision-points and historic landmark or district designations require a final vote of approval by City Council. Unlike many cities, decisions on applications for COAs made by Atlanta's UDC are final and can only be appealed under financial hardship conditions.

Historic preservation programs across the country were looked at in the Peer City Analysis and four cities in particular were identified for in-depth analysis; Denver, Tampa, New Orleans, and Austin. Nearly all cities with effective HPOs nominate, evaluate, and designate historic properties in similar ways. As well, the way cities review proposed work on designated historic properties is similar, even though their regulatory powers and design guidelines may differ. All cities exhibit a wide range of additional features and activities reflective of the needs and idiosyncrasies of their communities. All four peer cities have similar enabling legislation, but each has features and programs that are unique and worth replicating. As well, many additional components worth exploring for Atlanta were identified from research by the National Trust for Historic Preservation and the work done in cities and states around the country.

The report concludes with several key recommendations based on the analysis. The recommendations are aimed to address a series of conceptual goals including: helping people know more about preservation programs in the city; helping people better understand the city's historic resources; helping people participate more in preservation efforts; helping people learn more about Atlanta's history; recognize, keep, and protect more of the places we value; bring more resources to the table; and, to run a more efficient and helpful program.

HELP PEOPLE KNOW

- ◆ Improve public access to historic preservation data in the city.
- ◆ Use social media and frequent website updates to communicate information to the public, like upcoming nomination hearings or demolition request for potentially historic buildings.
- ◆ Improve coordination with neighborhoods and communities by appointing community liaisons for historic preservation to each NPU.

HELP PEOPLE UNDERSTAND

- ◆ Improve the quality of historic preservation data by conducting more surveys
 - ❖ Use character studies or similar quick assessment tool.
 - ❖ Use cultural mapping or similar publicly-generated data on significance and value.
 - ❖ Use volunteers to conduct surveys.
 - ❖ Survey and re-survey high-growth areas.
 - ❖ Survey under-served and under-represented areas.
 - ❖ Survey cemeteries.
 - ❖ Survey cultural landscapes.

HELP PEOPLE SHARE

- ◆ Expand the group of those eligible to bring forward a nomination.
- ◆ Provide a nomination tool kit to help people provide nomination information.

LEARN MORE ABOUT OURSELVES/OUR CITY

- ◆ Develop an online, interactive database of historic preservation in the city.

RECOGNIZE WHAT WE VALUE

- ◆ Monitor growth and development patterns to proactively identify under-served or threatened areas and to inform survey needs and opportunities for outreach.
- ◆ Develop an official Structures of Merit list.
- ◆ Develop a Legacy Business, Owner, or Building program that recognizes businesses, building owners, or specific buildings that have operated in the city of more than 30 years.

KEEP WHAT WE VALUE

- ◆ Develop a city-wide demolition review process for eligible historic structures and buildings.
- ◆ Continue pace of designations.
- ◆ Enforce Demolition by Neglect

PROTECT WHAT WE VALUE

- ◆ Place interim controls on Structures of Merit and properties under consideration for designation.

BRING MORE RESOURCES TO THE TABLE

- ◆ Use the Hotel Tax to fund historic preservation projects that improve or encourage tourism.
- ◆ Use a tiered-fee structure for nominations and COA applications to fund additional historic preservation programs.
- ◆ Provide targeted incentives to under-served areas.
- ◆ Review the Transferable Development Rights program to improve effectiveness.
- ◆ Provide incentives to Legacy Businesses.
- ◆ Develop and maintain far-reaching partnerships to leverage resources.

BE EFFICIENT AND HELPFUL

- ◆ Develop a category of designation similar to a “historic district light” with fewer regulatory controls but effective stopgaps for demolitions and major alterations.
- ◆ Maintain adequate staffing and offer competitive salaries.
- ◆ Provide for Commissioner Alternates that can temporarily fill positions in the absence of regular commissioners.
- ◆ Require deconstruction and salvage for certain historic properties.
- ◆ Provide review assistance for State Tax Credit Projects within the city.
- ◆ Develop and maintain strong inter-agency cooperation within city departments and programs.