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Members, Tacoma City Council
747 Market Street.
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RE: Proposed Moratorium on Historic Districts

Dear Honorable City Council Members:

Historic Tacoma submits these comments in opposition to the proposed moratorium on historic districts and asks that the Council reject this proposal. We also ask that this letter and its attachments be part of the City's record on this matter.

Normally, local governments adopt moratoria with respect to land uses that are permitted *as of right* to prevent those uses from vesting under current law and to allow the local government to enact code changes that will apply to those land uses. The important term here is "*permitted as of right*." Historic districts are not permitted as of right; they are discretionary decisions by the Council. Also, unlike other types of land use decisions, there is no time frame required for a decision. Therefore, there is simply no need for a moratorium. To the extent that there is any support for the contention that a historic district application would "waste time," we note that the waste of time results from the Landmarks Preservation Commission (LPC) being second-guessed by the Planning Commission, which lacks LPC's expertise in historic preservation.

That raises the question of what the Council's real intent is with respect to historic districts. We note that no similar moratoria are being proposed for other types of land use approvals, such as View Sensitive Districts. Given that Home in Tacoma is likely to incentivize the replacement of older, owner-occupied homes with rental apartments, we have serious concerns about what this moratorium means for the future of historic preservation in Tacoma as well as for future opportunities for home ownership.

The proposed moratorium is inconsistent with the Growth Management Act.

Local governments planning under the Growth Management Act (GMA) are required to adopt development regulations that are consistent with GMA. A moratorium is a development regulation and must comply with the goals of the GMA set out in RCW 36.70A.020; see e.g., *State of Washington, Dept. of Corrections v. City of Lakewood*, GMHB No. 05-3-0043c (FDO, Jan. 31, 2006). In that case the Growth Management Hearings Board held that Lakewood's moratorium violated GMA goals in RCW 36.70A.020 and it was invalidated. Tacoma's proposed historic district moratorium is also inconsistent with several of the goals of the GMA.

One of GMA's goals is "*Historic preservation. Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance*" [RCW 36.70A.020(13)]. By preventing new or expanded historic districts from even briefly being considered, the moratorium is inconsistent with and undermines this goal.

Historic preservation also preserves older, more affordable housing. One of GMA's goals is "*accommodate housing affordable to all economic segments of the population of this state*" and to "*encourage preservation of existing housing stock,*" per RCW 36.70A.020(4). By limiting demolition, historic preservation can help to preserve existing and more affordable housing stock.¹ The proposed moratorium is inconsistent with these goals.

Several of Tacoma's older neighborhoods are populated by our city's underserved communities. One of the major advantages of historic district designation is that it allows homeowners to claim a special property tax benefit for restoration work on homes that are contributing structures. This is the only property tax benefit available to individual homeowners. By denying historic district designation to lower-income neighborhoods and neighborhoods of color, the City will be denying those residents access to the kind of property tax benefits available to existing historic districts and owners of individually designated buildings.

Historic Tacoma has been working with residents of the McKinley and South Tacoma neighborhoods to develop more historic preservation opportunities in communities that are largely minority and/or lower income. In fact, the City has funded work to inventory and identify historic buildings in these neighborhoods. This work will be delayed if not entirely discouraged by the City's proposed moratorium. It also denies people in these neighborhoods the opportunity to benefit from growth and stability in home value that creates greater generational wealth for populations that have been historically denied these opportunities.

Historic preservation retains older buildings that were built with old growth timber, which is extremely durable and sequesters carbon. Refusing to consider actions to preserve these buildings is inconsistent with GMA's goal of ensuring that development regulations "*adapt to and mitigate the effects of a changing climate*" [RCW 36.70A.020(14)]. For the same reason, the moratorium is also inconsistent with the City's declared "climate emergency." See attachment, "*Why Do Old Places Matter? Sustainability.*" - National Trust for Historic Preservation, Oct. 30, 2014, <https://savingplaces.org/stories/why-do-old-places-matter-sustainability>.

The moratorium is inconsistent with Tacoma's Comprehensive Plan.

In addition to being contrary to and undermining the goals of GMA, the proposed moratorium is also inconsistent with many sections of the City of Tacoma Comprehensive Plan. An extensive list of these sections is provided with this letter; see Exhibit 1. GMA requires that development regulations be consistent with and implement a local government's comprehensive plan, per RCW 36.70A.040 and *Cossalman v. Town of Eatonville*, CPSGMHB No. 05-3-0032 (Order on Motions June 20, 2005). This is another example of how the proposed moratorium is inconsistent with GMA.

Historic preservation preserves smaller and more affordable "starter" homes and older, less expensive apartments.

Builders are typically not building starter homes. Historic preservation is a good tool for preserving already existing, smaller starter homes, which are typically older homes, and which are an important part of addressing our housing shortage. A moratorium on historic districts eliminates a significant tool available to neighborhoods to preserve these small homes and will leave them vulnerable to demolition. By making demolition of existing homes much less likely, historic preservation tends to mitigate the significant adverse effects of rapid growth such as gentrification and displacement.

Unlike our older neighborhoods, many neighborhoods in Tacoma and elsewhere in Pierce County are protected from demolition and more intense redevelopment because of single family covenants and

¹ Aaron Pasell, *Preserving Neighborhoods: How urban policy and community strategy shape Baltimore and Brooklyn*, Columbia University Press, 2021.

protections like Tacoma's View Sensitive Districts. Demolition and redevelopment will consequently be concentrated in older neighborhoods with smaller homes that can be demolished in entire blocks for redevelopment. This has the effect of removing smaller, more affordable homes, displacing those who rent those homes and eliminating home-buying opportunities for first-time homebuyers and lower income people.

Likewise, we need to preserve smaller, older apartment buildings that are more likely to be locally owned and more affordable than new construction. While the City could consider other types of protections or overlay zones for preserving existing housing, historic preservation is currently the only tool available.

Historic preservation has created economic benefits for Tacoma.

The City of Tacoma has benefited greatly from historic preservation efforts, including from development in historic districts. The former Elks Temple that is now McMenamins is part of a historic district; it was not individually listed as a historic structure. That designation as a contributing structure to a historic district allowed the condemnation and eventual repurposing of a historic structure into a thriving business. The University of Washington Tacoma campus is another example of the preservation and re-purposing of historic buildings that has resulted in revitalization of a significant area in the city as well as the economic growth that comes from having a major university located in the city. Furthermore, the City has recently seen downtown office buildings being converted to needed housing with the help of the special tax benefits for restoring historic structures. The proposed moratorium stands to discourage similar downtown redevelopment.

Tacoma's inadequate tree canopy will benefit from creating new historic districts.

Tacoma is suffering from a serious lack of tree canopy that will only be degraded further if home preservation and ownership are further discouraged. Landlords generally don't like trees as they must maintain them, which costs money. Homeowners are far more likely to plant new trees and maintain existing ones. Historic preservation of older neighborhoods will expand the opportunity of homeownership in our city and help prevent the removal of existing trees.

The Planning Commission's recommendation ignores the overwhelming public opposition to this proposed moratorium and dismisses the expertise of the Landmarks Preservation Commission.

The Planning Commission's letter to the Council, which does not appear to have been approved in an open meeting, minimizes the fact that nearly ninety percent of the public comments received on this issue were in opposition to the proposed moratorium. The Planning Commission also fails to clearly state that the lengthy and detailed letter provided by the Landmarks Preservation Commission (LPC) was **in complete and unanimous opposition to the moratorium**; see Exhibit 2. LPC's members have much greater expertise in historic preservation and are much more familiar with ongoing efforts at preservation and best practices both regionally and nationally.

Further, the Planning Commission's comment that the LPC "may need time to evaluate the current program components for how they may or may not have unintentionally contributed to [systemic racism]" is in complete contradiction to the response of the LPC to the first nomination of the proposed College Park Historic District. In fact, after a lengthy and transparent public process, the LPC recognized and directly called out issues of equity within historic preservation and formally recommended revisions and updates to the program to address equity issues. The LPC is in favor of changes that will increase equity in our city and recognized that a moratorium will do more to damage historic preservation than improve equitable outcomes.

The Council should rely more heavily on the expertise and analysis of the Landmarks Preservation Commission rather than the unsupported contentions of the Planning Commission.

For the foregoing reasons, Historic Tacoma requests that the City Council reject the proposed moratorium on historic districts.

Sincerely,



Jennifer Baersten, President
Historic Tacoma Board of Directors

Exhibits:

1. Comprehensive Plan References Relevant to Historic Preservation and Proposed Moratorium
2. Letter from Landmarks Preservation Commission to Planning Commission re Moratorium

Attachments:

1. *“Why Do Old Places Matter? Sustainability.”* National Trust for Historic Preservation, Oct. 30, 2014; <https://savingplaces.org/stories/why-do-old-places-matter-sustainability>
2. *“Older housing is affordable housing,”* The Planning Report: Insider’s Guide to Planning & Infrastructure, March 17, 2020
3. *“Preservation Positive Los Angeles”* Study Executive Summary, Place Economics, published by Los Angeles Conservancy, 2020

cc: City Councilmembers
Elizabeth Pauli, City Manager
Chris Bacha, City Attorney

Exhibit 1

City of Tacoma Comprehensive Plan References Relevant to Historic Preservation and Proposed Moratorium

Design + Development Chapter:

- Goal DD–5 Ensure long-term resilience in the design of buildings, streets and open spaces, including the ability to adjust to changing demographics, climate, and economy, and withstand and recover from natural disasters.
 - Policy DD–5.11 **Protect and enhance defining places** and features of centers and corridors, **including landmarks, natural features, and historic and cultural resources.**
 - Policy DD–5.12 **Protect, restore, and improve historic buildings** in centers and corridors on adopted inventories.
- Goal DD–6 Protect and preserve designated significant scenic resources, including public views and scenic sites.
 - Policy DD–6.1 **Enhance and celebrate significant places** throughout Tacoma with symbolic features or iconic structures that reinforce local identity, histories, and cultures and contribute to wayfinding throughout the city. Wherever possible, engage artists to create context sensitive additions that enhance these places. Consider these especially at:
 - f) **Historically or culturally significant places**
- Goal DD–7 Support sustainable and resource efficient development and redevelopment.
 - Policy DD–7.1 **Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance**, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.
- Goal DD-13 - **Protect and preserve Tacoma's historic and cultural character.**
 - Policy DD- 13.1 - **Encourage the protection and restoration of high-quality historic buildings** and places that contribute to the distinctive character and history of Tacoma's evolving urban environment.
 - Policy DD–13.5 Survey and **inventory historic resources** as part of future sub-area or neighborhood planning projects, with a focus on areas of anticipated growth and change.
 - Policy DD–13.6 Expand historic preservation inventories, regulations, and programs to **encourage historic preservation in areas that are underrepresented by current historic preservation efforts.**
 - Policy DD–13.8 Encourage the protection and enhancement of cultural heritage structures and sites as valuable and important public assets.
 - Policy DD–13.11 **Discourage the unnecessary demolition of older viable and historically significant structures** through a range of methods including:
 - a) Develop regulations that **encourage** new development on vacant or underutilized spaces and **reuse of existing structures.**
 - b) Develop a proactive survey program for the identification, documentation and **preservation of historically and culturally significant buildings in all areas of the City,** particularly those historically underserved and underrepresented
 - c) Expand current demolition review code language to protect structures of historical or cultural significance outside of current historic districts.
 - d) Avoid creating an economic incentive for demolitions within Historic Districts.

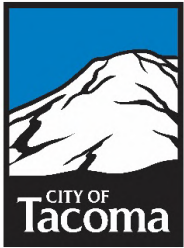
- Policy DD–13.12 Encourage infill that is architecturally compatible within surrounding contexts through appropriate scale and design controls both within Historic Districts and citywide.
- Policy DD–13.13 Take measures to reduce waste stream impacts resulting from demolition such as developing architectural salvage requirements for demolition permits and supporting the reuse of building materials.

Economic Development Chapter:

- Goal ED–5 Create a city brand and image that supports economic growth and leverages existing cultural, community and economic assets.
 - Policy ED–5.9 Encourage preservation and adaptive reuse of the City’s historic building inventory and leverage such efforts in branding and marketing efforts.

Historic Preservation Chapter:

- HP-2 Integrate Tacoma’s historic resources into community planning efforts.
 - Action HP-2A Encourage neighborhood-level preservation and conservation programs.
- HP-3 Promote preservation’s role in community sustainability efforts.
 - Action HP-3E Use historic structures to highlight green building practices.
 - Action HP-3F Encourage the implementation of sustainability plans in historic districts.
- HP-4 Include sustainability objectives in an update to the City’s historic design guidelines.
- HP-5 Use the City’s programs to promote the link between preservation and sustainability.
- HP-7 Leverage the economic development opportunities provided by Tacoma’s historic resources.
 - Action HP-7A Market Tacoma for heritage tourism.
- HP-10 Integrate historic preservation policies into citywide planning efforts.
- HP-11 Capitalize on and promote historic resources in community planning efforts.
 - Action HP-11A Promote urban development strategies that are compatible with historic preservation.
- HP-12 Promote best practices in the City of Tacoma’s stewardship of historic resources.
- HP-15 Maintain a certified historic preservation program.
- HP-26 Use zoning tools to promote historic preservation goals and support an overall heritage conservation system.
- HP-32 Promote financial incentives that stimulate investment in historic properties.
- HP-33 Enhance regulatory incentives to encourage preservation and conservation.



Landmarks Preservation Commission

Planning and Development Services Department

October 25, 2023

Chris Karnes, Chair
Tacoma Planning Commission

Dear Chair Karnes and Members of the Planning Commission:

On behalf of the Landmarks Preservation Commission, I am transmitting this letter in response to the request for feedback and recommendations regarding the proposed moratorium on local historic districts as directed by Council Resolution 41226. The Landmarks Commission has reviewed the public testimony as well as the questions posed by the Planning Commission and used both to guide our response, which we would request be sent as an attachment to the Planning Commission's recommendation when transmitted to Council.

As the City's subject matter expert on historic preservation, it is essential to first state our opposition to the proposed moratorium, as we believe it is not necessary. While the Commission appreciates the support of City Council, it is our position that a moratorium is not warranted given the relative infrequency of historic district nominations, and believe that any benefit is likely outweighed by potential negative consequences both practically and by perception. The Landmarks Commission also notes that a strong majority of respondents to the Public Hearing on September 20 were opposed to the proposal.

Both the Landmarks Commission and the Planning Commission have previously identified the need for improvements to the policy and code framework that governs the City's historic preservation program. Nonetheless, we believe that the Landmarks Commission currently possesses the tools to review and make recommendations for discretionary applications such as historic nominations. Our comments are limited to the merits of a proposed moratorium, and are not intended to speak to future code updates or the merits of any specific proposals.

The specific questions posed by the Planning Commission and our answers are incorporated into this letter below.

Topic: Necessity of a moratorium

1. Are there pending or anticipated historic district nominations within the potential period of a moratorium?

The Commission agrees generally with the observations from many commentors that community driven historic district nominations require extensive time and resources, often done by volunteers. This work involves not only research and documentation but also extensive outreach to generate support. Because of these factors, historic district nominations are relatively infrequent, and the Landmarks Commission is not aware of any current efforts aside from the recent College Park nomination that are currently in development.

Because of the lead time in creating local historic district nominations, Commission is concerned that a moratorium could result in a "chilling effect" that would have a "knock-on" effect that could negatively impact district creation for some time following the end of a moratorium, if one were to be adopted. For example, if a community group decided to begin the process of researching a

nomination at this time, the Commission typically would not expect to see any formal submittal for a year or more. A moratorium could be interpreted by residents to mean that historic district proposals are not viable, and thus discourage any future efforts even long after the moratorium is concluded.

2. Does the Landmarks Commission believe that a moratorium would assist the Commission during the upcoming comprehensive plan review?

The Commission believes that because historic district nominations are infrequent, there is unlikely to be a review of any new historic district proposals within the timeframe leading up to the Comprehensive Plan amendment process in 2024. If such a proposal is received, the Commission believes it possesses the capacity to review and make a recommendation in addition to its present workload.

3. If there was not a moratorium and a new nomination was submitted, does the Landmarks Commission believe that it could review the nomination at the same time it is working on improving the code and comprehensive plan policies, particularly regarding improving equitable outcomes?

The Commission appreciates concerns with its workload and capacity. However, due to the infrequency of historic district nominations, the Commission finds this scenario to be unlikely. The Commission believes that it has the capacity to review incoming nominations concurrently with its planned policy and code review.

4. If there was a new district nomination submitted now, does the Landmarks Commission believe that it currently has appropriate guidelines and criteria that would enable it to make a recommendation, and is there adequate guidance for establishing appropriate design guidelines for new development and redevelopment?

The Commission believes that while the current code framework needs improvement, this does not render the existing process and code non-functional. Consequently, the Commission believes that it currently possesses adequate tools to review and make recommendations for historic district nominations.

Topic: Potential negative effects of a moratorium

1. Will a moratorium prevent historic tax incentives from being available for historic projects?

The establishment of a moratorium will not affect local tax incentives for existing local districts or Federal tax credits, as applicable for current and future National Register Historic Districts.

However, for future proposed local residential districts there may be a delayed effect from a moratorium that slows or discourages development of new local historic districts, for the reasons stated previously. This is particularly concerning for future neighborhood efforts in underserved areas of the city, as it could diminish the viability of the local historic district as an enhancement tool for future neighborhood planning.

In addition, while individual listing on the historic register is always an option for property owners, many older “character” buildings in Tacoma may not meet historic significance criteria individually. However, as a collective group of period buildings, they could still be considered an important contributor to a district. Put succinctly, in historic districts the sum is often greater than the parts.

2. Are there other negative effects on historic resources that would result from a temporary moratorium on historic district creation?

The Commission is concerned that a moratorium could be interpreted as a signal that the City does not support or places a low priority on local historic districts at a policy level, which could make the management of existing districts, particularly in terms of permit compliance, problematic.

Topic: Duration and scope of a moratorium

1. Is the current scope (all locally designated historic and conservation districts) appropriate, or should it be limited or defined (for example, a comment noted that there may be interest in expanding existing districts near University of Washington Tacoma)?

If a moratorium were to be adopted, the Commission recommends that expansion or alteration of boundaries of existing districts be excluded from the scope of the moratorium. However, the Commission does not support distinguishing different types of districts, such as “residential” versus “commercial” areas, as this suggests that one type is more important to the City than the other.

2. If a moratorium were recommended, does the Landmarks Commission have input on duration? For example, should the end of the moratorium coincide with the adoption of revised Municipal Code and Comprehensive Plan policies in 2024, or are there other considerations?

Although the Landmarks Commission does not support the proposed moratorium, if one is adopted, the Commission believes that it is critical to align it with the planned Comprehensive Plan amendment cycle, which to our understanding would conclude in late 2024. A six-month moratorium likely would not benefit the City in any way, and would likely create additional confusion and complexity if it terminates in the midst of policy amendment discussions.

In addition to the above comments, the Commission also believes that a moratorium will not improve equitable outcomes. While the planned amendments to the current policy and code framework will assist the Commissions in addressing issues of diversity, equity and inclusion in the nomination review process, such amendments *per se* will not resolve systemic and long-term issues, which will require ongoing effort beyond amending the code or comprehensive plan. Working towards improved outcomes is critical, but this is not a basis for adopting this moratorium.

Lastly, as a land use tool, the Commission believes that moratoria are generally more appropriate to address emergent issues with “by-right” development; that is, proposals that a City must approve by code even if known to be contrary to public welfare or policy. In this context, a moratorium can be appropriately used to pause permit review while the problematic regulations are addressed. For historic nominations, the review is discretionary, and both the Landmarks and Planning Commissions, and City Council, currently possess the authority to deny such applications without a moratorium.

We appreciate the opportunity to provide our input and recommendations in this process.

Sincerely,



Kevin Bartoy, Chair

Why Do Old Places Matter? Sustainability

 savingplaces.org/stories/why-do-old-places-matter-sustainability

October 30, 2014



• By: Thompson Mayes

Keeping and using old places is one of the most environmentally-sound things a person or community can do—more than building or buying anything new that claims to be “green.” As Carl Elefante, of Quinn-Evans Architects, brilliantly said, “the greenest building is... one that is already built.”¹ Yet it’s my perception that society at large doesn’t yet fully acknowledge the “green” values of keeping and reusing existing buildings and communities—in fact, old buildings are often viewed as throwaways and teardowns. Fortunately, a reuse ethic seems to be growing, and the benefits of reusing existing buildings and communities are becoming recognized more widely.

In this post, I hope to summarize some of the key takeaways from the work by the National Trust’s Preservation Green Lab, the Urban Land Institute, the Green Building Council, Smart Growth America, and others² in the hope that it will give people a brief look at the reasons that keeping and reusing old buildings and communities is “green.” But I also want to suggest that old places should themselves be viewed as part of the ecology we hope to sustain.

Here’s my quick summary of the reasons the continued use of old buildings and communities is environmentally sound:

- **Avoided Impact. Reusing old buildings avoids the environmental impacts of the extraction, processing and transportation of new materials and the construction processes.** As a Preservation Green Lab report, *The Greenest Building: Quantifying the Environmental Value of Building Reuse* states: “Building Reuse almost always yields fewer environmental impacts than new construction when comparing buildings of similar size and functionality” and “...it takes 10 to 80 years for a new building that is 30 percent more efficient than an average-performing existing building to overcome, through efficient operations, the negative climate change impacts related to the construction process.”³
- **Land Conservation. Continuing to use existing buildings and communities avoids or minimizes the use of forests, farms, wildlife habitat, and open space for new construction.** As SmartGrowthAmerica states: “...reusing already-developed land... preserves open spaces that are home to wildlife. Habitat loss is the main threat to 80% of the threatened and endangered species in the United States, but building within an existing community, rather than outside of town on a wild greenfield, helps preserve wildlife habitat, protect air and water quality and foster the strong economic growth that’s only possible in dense development.”⁴

- **Embodied Energy. Old buildings and communities embody the energy and carbon that was devoted to produce them**—the wood and coal used to fire the bricks, smelt the tin, forge the nails, saw and transport the timber. Although some critics argue that the concept of “embodied energy” doesn’t result in any positive impacts today or in the future, it remains true that it would be incredibly wasteful to discard these materials and their historical energy, and haul them to a landfill, adding to the environmental impact of demolition.⁵
- **Operating Energy. Many old buildings, because of the way they are designed, already use less operating energy than new buildings.** Again, from the Preservation Green Lab: “Building owners, developers, policy makers, and green-building experts often assume that it is preferable to build a new, energy-efficient building than to retrofit an older building to the same level of efficiency” yet “... data from the U.S. Energy Information Administration (EIA) demonstrates that commercial buildings constructed before 1920 use less energy, per square foot, than buildings from any other decade of construction.”⁶ While this is not true for all older buildings, many old buildings are inherently green.
- **Passive Design. Older buildings were often designed to take advantage of naturally occurring energy**, like the light well at the Wing Luke Museum that I mentioned in the post on Architecture, or the transom windows in Main Street commercial buildings, like the one at my partner’s store, HomeRule, on 14th Street in DC. Many designers are recognizing anew the inherent passive sustainable designs incorporated in older buildings. I’m reminded of a 1970s study of the farmhouses of the New River Valley in North Carolina. These farmhouses developed organically in response to the climate to take advantage of the landscape for warmth in the winter, coolness in the summer, and the gravity flow of water to the springhouses.
- **Transportation and Density. Older communities are often on existing transportation corridors, have greater density, and are close to workplaces so that fuel consumption from cars is minimized.** This has long been recognized as one of the benefits of the reuse of existing built communities because of the benefits for land conservation, and is one of the key principles of smart growth.⁷

All of these reasons—farmland conservation, habitat preservation, open-space preservation, reduced fuel consumption, avoidance of adverse impacts from the extraction and transportation of new materials, avoidance of new landfill material, and positive environmental passive design, and others—add up to a powerful rationale to continue to use, reuse and strengthen existing buildings and communities. The benefits of reusing existing buildings are now recognized by the Green Building Council in the credits awarded for reuse in the LEED certification calculation (although these may not adequately reflect the full environmental value of reuse).⁸

But there are more deeply philosophical ecological reasons to keep, maintain and reuse old places. First, older communities are organic systems developed over time, with their own distinctive cultures. They are themselves irreplaceable, if ever-changing, parts of our environment. Choosing not to continue to maintain and strengthen them essentially condemns a distinctive and unique community to a form of extinction. One aspect of this is captured by the writer and architect Kimberley Mok: “Building ‘green’ isn’t just about using the latest and greatest technologies—it can also be about preserving time-honored, local building traditions that respect regional cultures and have been proven to be climatically appropriate over the centuries.”⁹

Second, the building materials and craftsmanship also deserve respect, not only because of the environmental cost of extracting, transporting, making, and installing them, but also because of the fact that some of the materials and craftsmanship will never exist again. The floor of my little river cabin in West Virginia is made of chestnut from before the die-off of the chestnut trees. Like heart pine windows, wide pumpkin pine floorboards, old growth redwood siding and a host of other building elements, these materials may never be available again. Yet people who offered to buy the cabin before us planned to scrap it, seeing it as a teardown. It seems to me that throwing old floorboards and siding away is not only disrespectful to the materials and to the humans who labored to saw, plane, groove and install them, but inherently inconsistent with the very idea of sustainability.

In trying to envision a world that is more environmentally sustainable, I hope for a world where we are more appreciative of the communities, buildings and things that already exist, and that we continue to use them, so that we're not constantly tearing buildings down and throwing things away. Unthinking consumerism—including some allegedly “green” consumerism—contributes to many of our environmental problems, including stoking climate change. While I may not be much of a consumer, I am a materialist. I value buildings and the meaning they have for us. I value objects, and the meanings they have for me. The political theorist Jane Bennett, in her book *Vibrant Matter*, notes the way objects seem to call to us, and advocates for a re-thinking of our relationship with objects and materials as a way of shifting our political ecology. As the website Cultivating Alternatives summarized the idea, “Bennett thinks that if we paid attention to the aliveness of matter, we wouldn't be so careless with our stuff.”¹⁰ Being “careless with our stuff” contributes to a throwaway mentality that is environmentally damaging.

Something about Bennett's theory about things resonates with me, and I imagine with others who see meaning in our existing built environment, and who have a respect for materials, buildings and practices that have preceded us. Some people have questioned whether our current view of sustainability may be too narrowly measured by a limited assessment of carbon footprint, and may not adequately take into account other factors, including the factor of time. Scott Doyon, Principal of Placemakers, in his post on considering soul as a part of green building practice, states, “If you tear down a storied and graceful historic building—hand-built and rooted in tradition, in which generations of people have crisscrossed into and through each others lives—and replace it with a high-performance, modular gizmo-green equivalent, how much embedded energy is lost if you also count the loss of soul?”¹¹ He goes on to ask whether a place that has no soul will have the longevity necessary for it to be truly sustainable over time.

As I noted earlier, I'm delighted to see the current turn toward reuse, recycling of materials, and appreciation for old places. Some of the projects I've seen seem to reflect an idea from a quote I found in Jean Carroon's book *Sustainable Preservation: Greening Existing Buildings*: “The reuse and salvage in the project infuses it with a sense of connection, history and narrative. Every detail comes alive with a story of origins, disposal, and rebirth.”¹² I hope people become more aware of the fact that reusing not just materials, but whole existing buildings is good for the soul and the environment.

I suspect that the current low level of recognition of the green qualities of existing buildings and communities is partly because, as Carl Elefante has identified, we are “drunk on the new and now,” and therefore can't even see the obvious benefits of the old.¹³ We are blanketed with advertisements for green products. The building industry is primarily interested in developing new communities. While I


support the development of green products and green communities, the predominance of those voices should not blind us to the reality that simply continuing to use the existing buildings, communities and things that we already have is one of the most environmentally sound (and soulful, and sustainably long-lasting) things that we can do. As Jim Lindberg, senior director of the Preservation Green Lab said to me, "There is intelligence as well as energy embodied in our older buildings and neighborhoods. These places have so much to teach us about adaptation, sustainability, and resilience."¹⁴

Notes:

1. Elefante, Carl. "The Greenest Building Is...One That Is Already Built" *Forum Journal*, Vol. 21. No. 4, Summer 2007.
2. Please refer to the materials from these organizations for the full reports and studies. See also the Fall 2010 *Forum Journal: Bridging Land Conservation and Historic Preservation (Vol. 25, No. 1)*.
3. *The Greenest Building: Quantifying the Environmental Value of Building Reuse*. National Trust for Historic Preservation, 2011, vi. The analysis of older buildings uses Life Cycle Assessment to determine the environmental impact of a building over time. See *The Greenest Building*, 14-15.
4. *Smart growth protects natural habitat*. Accessed October 25, 2014.
5. See *The Greenest Building*, 20.
6. *The Greenest Building*, 18.
7. I take note of the argument made by Ed Glaeser, in *Triumph of the City*, and others, who advocate for replacing current older and historic buildings with high-rise buildings to increase density in urban areas. Fortunately, in addition to the voices crying out about the loss of livability, character, history, identity and memory that this would entail, more recent studies show that the avoided fuel impacts are better in areas where buildings are comparable to older and historic buildings, or approximately 3-6 stories tall, and that the environmental benefits are not better with densities that are greater. See Lloyd Alter *Is There a "Goldilocks Density"- Not Too High, Not Too Low, But Just Right?* Accessed 10/22/14. See also F. Kaid Benfield, *People Habitat*, (Washington, DC: People Habitat Communications, 2014).
8. Huppert, Mark. "Greenbuild 2013: LEED v4 Takes the Stage," December 13, 2013.
9. Mok, Kimberley, *Cool but endangered conical houses get preservation treatment in Indonesia*. Accessed October 23, 2014.
10. Summary: *Vibrant Matter* by Jane Bennett. Accessed October 28, 2014.
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Tom Mayes, chief legal officer and general counsel, has worked on the full range of National Trust legal issues since he joined the National Trust in 1986. He received the National Endowment for the Arts Rome Prize in Historic Preservation in 2013 and is the author of the book *Why Old Places Matter*. © 2024 National Trust for Historic Preservation. All Rights Reserved. The National Trust for Historic Preservation is a private 501(c)(3) nonprofit organization. The National Trust's federal tax identification number is 53-0210807.

Economic Argument for Historic Preservation: Older Housing is Affordable Housing

 planningreport.com/2020/03/17/economic-argument-historic-preservation-older-housing-affordable-housing

*With state efforts to increase new housing production threatening local processes for identifying and preserving historic sites, buildings, and neighborhoods, the LA Conservancy, as part of its 40th anniversary celebration, recently published *Preservation Positive Los Angeles*. The study's goal: to unpack the economic impacts of historic preservation in Los Angeles. TPR interviewed the report's author, **Donovan Rypkema**, principal of PlaceEconomics, and LA Conservancy's **Adrian Scott Fine**, to highlight the report's myth-busting findings on the impacts of HPOZs on affordability, density, diversity, and economic resilience of neighborhoods across Los Angeles. Rypkema reminds state policymakers that preserving old, dense housing inherently preserves what the state asserts it most needs: affordable housing.*



Don Rypkema

"In LA, you have to build more housing, but step one is to—designation or not—quit tearing down stuff that provides affordable housing." —Don Rypkema

Elaborate on why the L.A. Conservancy commissioned a study to specifically examine the economic benefits of historic preservation in Los Angeles.

Adrian Scott Fine: The L.A. Conservancy initially commissioned this report when we were celebrating our 40th anniversary. We had long wanted a data-based analysis to help make the case that preservation "pays." We began by looking primarily at the economics, then we broadened our scope to look at affordability, density, gentrification, etc. We wanted the study to address the tough issues.

Candidly, there were some surprises along the way. We had no idea that HPOZs in Los Angeles were going to be as diverse as they are, or have so many multi-family units. Public policy exchanges and Twitter chatter are focused mostly on how single family-homes and luxury housing stand in the way of building dense, affordable housing; and, HPOZs get lumped into that issue framing. Sadly, HPOZs are being attacked left and right as being the entities that stand in the way of providing affordable units. But that's not an accurate description of what's going on economically, as HPOZs actually are providing a lot of the multi-family housing.

It is important to note the nexus of density and affordable housing. Surely, density is part of the solution set; but a myopic focus on density doesn't necessarily mean you get affordable housing. In L.A., currently we're prioritizing density but losing affordable housing; it's contrary to the goal that the City of L.A. is espousing. This report sheds light

on that failure; our next step is to share this report with policy advocates and decision-makers who should be reading it. Ultimately, it is for the L.A. Conservancy to build an action agenda that translates the central findings of the report into policy recommendations.

Donovan Rypkema, elaborate on the economic mission the L.A. Conservancy invited you to assume and the vital role of historic preservation in placemaking.

Donovan Rypkema: Our approach was to cast a wide net. Adrian Scott Fine and Linda Dishman talked about key issues in play at the moment—housing, density, affordability, etc.—and asked us to look at what preservation is and how it’s positively affecting the city.

While there are a few exceptions, our basic approach is to examine historic neighborhoods rather than individual buildings. We looked at density, small businesses, start-ups, affordability, diversity, and a range of measurements about what’s happening in historic districts [HPOZs].

You’ve got some historic properties in L.A., and some of them are in an HPOZ. Some have a degree of oversight but to a lesser degree are the National Register districts that are not locally designated; but because of CEQA [California Environmental Quality Act], there is some review. You have individual monuments too. And then you have 30,000 or so properties that SurveyLA identified as eligible historic properties, but that aren’t under any protection.

Historic properties end up being about four percent of the city’s land area. You’ve got to have density and more housing, but you’ve got 94 percent of the city that doesn’t fall under any definition of historic. The idea that historic districts are what’s keeping us from having affordable housing and are responsible for gentrification is just nonsense.

You’ve personally been doing city-level studies for three decades; what’s distinguishes the urban landscape of Los Angeles and its historic preservation challenges?

A number of things— the patterns are consistent, but there were some very interesting deviations from other places. We’ve probably done a dozen city-level studies like this, including New York, Savannah, San Antonio, Raleigh, and Indianapolis. In terms of local protections found in Los Angeles, there are far fewer historic commercial districts than in most places, and that is reflected in lots of ways, including jobs. In Los Angeles, about 1.8 percent of all the jobs are in historic districts, whereas it’s 8 or 8.5 percent in New York City and 30 percent in Savannah.

For a lot of reasons – including L.A.’s bottom-up approach to nominating HPOZs – there’s a much lower share of commercial districts that are designated historic. That doesn’t mean it’s either good or bad, but it shows the pattern. What’s more pronounced in other places are the patterns of preference for small, start-up, and creative-industry businesses that, in other places, really show a statistical preference for being in historic neighborhoods. That’s just not demonstrable here, because there aren’t many designated historic commercial districts. There are plenty of great historic districts, but they’re residential neighborhoods, not commercial.

Another distinguishing feature we saw was diversity, because it was so counter to the cliché that historic districts are where rich, white people live. That’s not the pattern in Los Angeles at all. In fact, historic districts are statistically more diverse in terms of race, ethnicity, age, and income than in the city as a whole—even though historic zones include only 3 percent of the population and 4 percent of the parcels. It’s more than a demographic mirror of the city— it’s a greater reflection of the diversity of the city.

How have you organized your research and ultimate findings?

We understand it’s a major issue, so we looked at density in historic districts versus other residential areas, and it’s almost twice as much. In fact, the densest historic districts are decidedly denser than other areas of the city. When you look at the housing and transportation measures, it’s more affordable—or less unaffordable—in these historic districts than in the city as a whole.

There is a greater use of public transportation—24 percent—by people who live in historic districts. The other interesting thing is that when you look at the age curve and population by age, it's almost identical except for millennials. This finding about millennials is very consistent with national analysis that shows 34 percent of all homes, 44 percent of houses built between 1920 and 1960, and 54 percent of homes built before 1920 are bought by millennials.

I think this disproportional skew is driven by the three C's: the character of the neighborhoods, the cost of the housing, and the convenience.

Compared to your other city-level examinations of historic preservation, what role do city rules, regulations, and protections won by the preservation movement over the years have on the economic resiliency of these neighborhoods?

The most obvious impact is that the rate of demolition is measurably less. We looked at 20 years' worth of building permits—both number of permits and cost—and got lots of help from Ken Bernstein, whom I've known since he was at the Conservancy.

Another finding was that 22 percent of the dollars spent in historic districts was for new construction. This idea that somehow these neighborhoods are mummified or stuck in place is just not true.

In fact, it's not that the regulations dictate that a neighborhood has to stay the same forever and no change is acceptable, it's that the change that's made has to be in the character of the neighborhood. That's an appropriate role for regulation, and it really puts aside this idea that protections exist just to freeze these places in amber forever.

There was a great report that came out around the time we were starting our report from some researchers at UCLA in conjunction with UC Berkeley. They looked at all the neighborhoods in L.A. from 2000 to 2015 and identified—based on their definitions—all the neighborhoods that were gentrifying. We overlaid their map with all the HPOZs and found almost no correlation. There was some overlap, but 90 percent of their map had no historic designations.

The issue of housing affordability is true in every place, but it clearly has an order of magnitude greater impact here than in other cities. National Register districts that are not local districts have no HPOZ protections, but here there's at least a cursory review [through CEQA].

I do think there is an underutilization of federal tax credit in Los Angeles. It's a great tool that, for whatever reason, is not used as often and as completely here as it is in other places.

What precisely, from your L.A. research, are the economic benefits of preserving these historic neighborhoods?

Much of our approach is revealed preference analysis: Not asking what people think, but how they act. There's this decided pattern of young people and the creative class, knowledge workers, start-ups, and small businesses with a preference to be in historic neighborhoods because of the kind of character they represent. That has big economic implications.

We didn't spend a whole lot of time on it, but there's also an issue of labor intensity in rehabilitation versus new construction. As a general rule of thumb, if I'm building a new building in the United States today, half the money goes to labor and the other half for material. If I'm rehabilitating a historic building, it's going to be 60 to 70 percent labor. That difference means that if you spend a million dollars, you get more jobs and local income. The rehabilitation has a primary impact with the number of jobs, but there's a secondary impact because when you install a sink, the sink doesn't spend any money, but the plumber who installed it does. The greater share of labor, the greater the rollover effect is for local income.

Another economic benefit found in the report is the rate of appreciation of houses in historic districts outperforming the marketplace. Theoretically, it's less affordable, but when that's almost everybody's major asset, it makes a difference when the property is less subject to loss.

“Density,” in the current California housing debates, is the key word. Speak to “density” from the point of view of this L.A. Conservancy commissioned research and study.

One key finding is that historic districts in L.A. are denser than other neighborhoods. The second relates to ADUs (Accessory Dwelling Units). Preservationists in many places around the country are still fighting back, but I think preservationists in L.A. to a larger extent have just adopted ADUs as a positive. The good news about being in a local historic district is that there is some influence on the character, scale, and quality of what goes into those neighborhoods. It's a really enlightened and compromising position that the preservationists take in Los Angeles, and is untrue of other places.

The other thing is preservation-once-removed: We were tipped off to look at strip malls in L.A. There are 675 strip centers, 7 million square feet of building space, 24 million square feet of land area—almost all of it near transit. If you wanted to add density, there's the target.

We made a back of the envelope calculation that if you put four- or five-story buildings on those strip center lots, you could keep the 7 million square feet of commercial space, add 63,000 housing units with a parking space for each one of them without mucking up the neighborhoods around them. That's a huge amount of density without screwing up anything.

The proposals on the table in the State Capitol this past year would've frozen the approval process of those HPOZs. If the evidence shows that preservation is the economically better choice for density and affordability, why is this not implemented?

It would have frozen some, and it would've eliminated the restrictions of others. At least nine of the existing HPOZs would've been taken off the table if SB 50 passed.

No one gets into preservation to look at that. The motivation for preservation advocates is not real estate economics; it's the quality and character of the city and the embodiment of history that those buildings represent. However, economics do matter as preservation is competitive, cost-effective, and offers incentives that do not come with new construction. This study and others done across the country demonstrate the many ways preservation offers real value and cities should adopt policies that support it.

Lastly, in an era where people don't read their newspapers, how do you make your point on the value of historic preservation?

This is going to sound like artificial humility, and I don't mean it that way, but I got the Louise du Pont Crowninshield Award a couple of years ago from the National Trust for Historic Preservation, but the specific phrasing was for contributions, not achievements. I made some contributions, but I don't think the achievements have been met yet.

This issue is that basic information hasn't really translated into policy decisions as much as I think it should. It's hyperbolic, myth-driven nonsense that steps in the way of preservation.

Another thing that isn't as connected but improving is the environmental side of preservation. The environmental movement is so concerned with green gizmos that they've missed the obvious: By definition, if you tear down an old unit of housing, you tear down an affordable unit of housing. You can't build new and rent cheap, it cannot be done. In L.A., you have to build more housing, but step one is to—designation or not—quit tearing down stuff that provides affordable housing.

To read the full study, please visit laconservancy.org/preservation-positive.

PRESERVATION

POSITIVE

LOS ANGELES

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

Preservation Positive Los Angeles provides an in-depth look at historic preservation within L.A. and how historic places directly contribute to the overall livability of the city. While anecdotally we know preservation and the reuse of older and historic buildings benefits peoples' lives, what has been missing—until now—is the data and analysis to fully back up these claims. This study demonstrates how preservation provides real value and positively impacts every Angeleno.

As the second-most populous city in the nation, L.A. is many things to many people. Yet fundamentally, it is a place where people create lives and homes: from those that are native-born to transplants arriving every day. It is through the historic built environment that Angelenos best learn about and understand the heritage of L.A., providing a tangible way to connect through a shared heritage and story.

Critics often claim that preservation limits growth, is anti-density, or stands in the way of affordable housing development. The data, however, shows a much different story where historic neighborhoods are proving that livability and preservation can work hand-in-hand. Historic preservation is not a barrier to growth as there is a lot of room to grow. **Only 6.2% of total parcels in L.A. have been identified as historic** through designation or by SurveyLA, leaving **93.8% available for new development, increased density, and much-needed housing.**

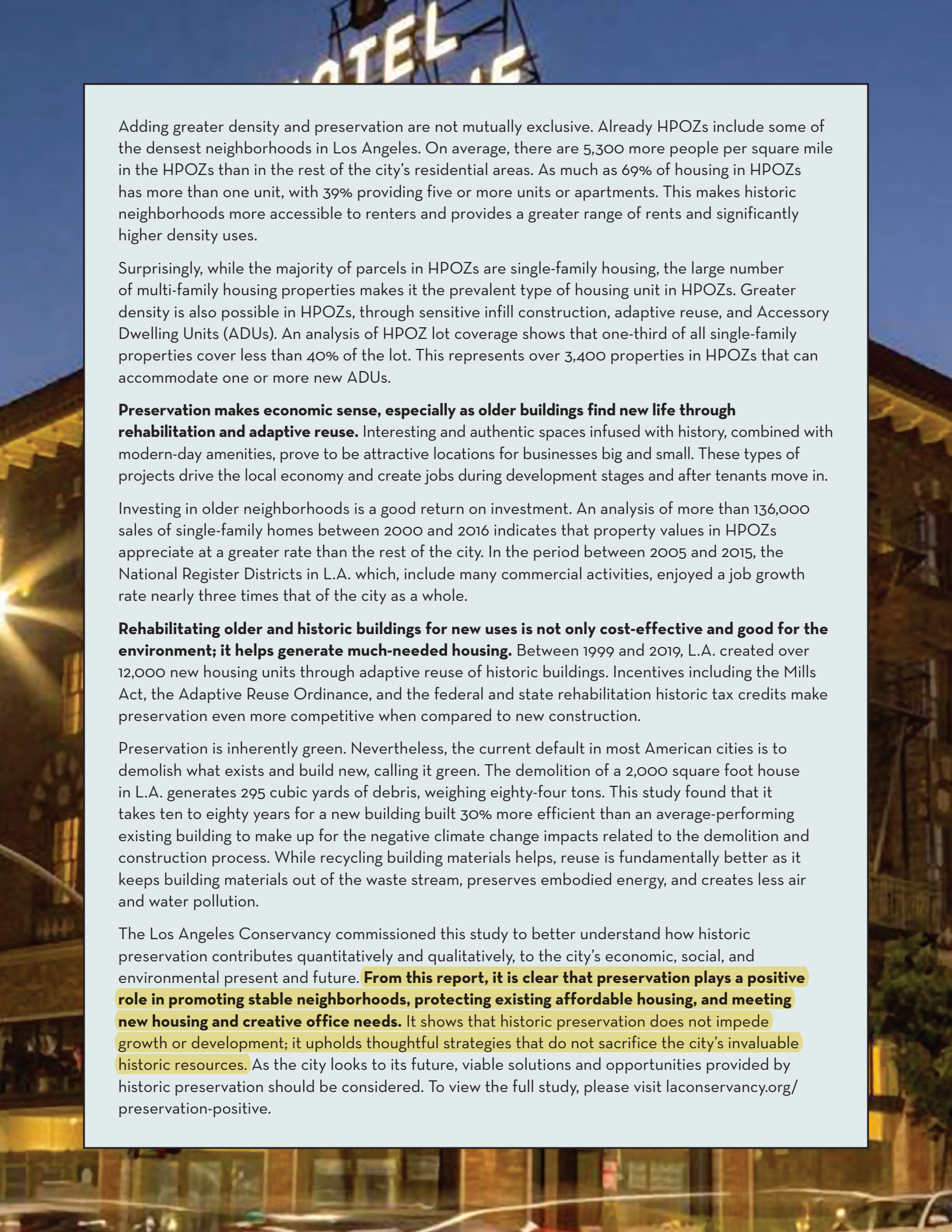
Preservation is affordable housing. As one of the most pressing concerns facing L.A. today, older, smaller, and mixed-use buildings represent the largest share of affordable housing in the city, from quaint bungalow courts to large garden apartment developments.

Historic Preservation Overlay Zones (HPOZs) also play a role in preserving the existing rent-controlled housing stock. While HPOZs are 2.4% of all parcels, they represent 5% of all units under rent control in the city. HPOZs are home to residents with a wide variety of incomes. A larger percentage of residents in HPOZs, than in the rest of the city, have annual household incomes of under \$25,000. The HPOZs of L.A. provide density at a human scale and protect affordable housing, mainly by providing a mix of housing options.

While historic designation is not feasible or appropriate for every older property, HPOZs protect affordable housing, foster neighborhood stability, and serve as home to a racially and economically diverse population. Today, single-family homeownership is no longer the only, or even the best indicator, of neighborhood stability. Longtime residents, be they owners or renters, are themselves a stabilizing force within a community—especially in HPOZs.

HPOZs are home to 3% of Los Angeles population and account for 5% of all long-term residents in the city as a whole. Renters, specifically, are disproportionately longer-term in HPOZs than in the rest of the city. Increasingly, renters are at great risk of displacement from property flipping, rising rents, condominium conversion, demolition, or Ellis Act evictions.

Cultural diversity is a backbone of the city's historic neighborhoods, which are more ethnically, racially, and income diverse than the rest of the city as a whole. Of the thirty-five HPOZs that currently exist, twenty-one have populations where there is a greater share of racial diversity than in the rest of the city. While they cover roughly 8.5 square miles of the city—just 1.8% of the city's land area as a whole—combined, they represent 3% of the population and households. Overall, 54% of residents in HPOZs identify as Latinx.



Adding greater density and preservation are not mutually exclusive. Already HPOZs include some of the densest neighborhoods in Los Angeles. On average, there are 5,300 more people per square mile in the HPOZs than in the rest of the city's residential areas. As much as 69% of housing in HPOZs has more than one unit, with 39% providing five or more units or apartments. This makes historic neighborhoods more accessible to renters and provides a greater range of rents and significantly higher density uses.

Surprisingly, while the majority of parcels in HPOZs are single-family housing, the large number of multi-family housing properties makes it the prevalent type of housing unit in HPOZs. Greater density is also possible in HPOZs, through sensitive infill construction, adaptive reuse, and Accessory Dwelling Units (ADUs). An analysis of HPOZ lot coverage shows that one-third of all single-family properties cover less than 40% of the lot. This represents over 3,400 properties in HPOZs that can accommodate one or more new ADUs.

Preservation makes economic sense, especially as older buildings find new life through rehabilitation and adaptive reuse. Interesting and authentic spaces infused with history, combined with modern-day amenities, prove to be attractive locations for businesses big and small. These types of projects drive the local economy and create jobs during development stages and after tenants move in.

Investing in older neighborhoods is a good return on investment. An analysis of more than 136,000 sales of single-family homes between 2000 and 2016 indicates that property values in HPOZs appreciate at a greater rate than the rest of the city. In the period between 2005 and 2015, the National Register Districts in L.A. which, include many commercial activities, enjoyed a job growth rate nearly three times that of the city as a whole.

Rehabilitating older and historic buildings for new uses is not only cost-effective and good for the environment; it helps generate much-needed housing. Between 1999 and 2019, L.A. created over 12,000 new housing units through adaptive reuse of historic buildings. Incentives including the Mills Act, the Adaptive Reuse Ordinance, and the federal and state rehabilitation historic tax credits make preservation even more competitive when compared to new construction.

Preservation is inherently green. Nevertheless, the current default in most American cities is to demolish what exists and build new, calling it green. The demolition of a 2,000 square foot house in L.A. generates 295 cubic yards of debris, weighing eighty-four tons. This study found that it takes ten to eighty years for a new building built 30% more efficient than an average-performing existing building to make up for the negative climate change impacts related to the demolition and construction process. While recycling building materials helps, reuse is fundamentally better as it keeps building materials out of the waste stream, preserves embodied energy, and creates less air and water pollution.

The Los Angeles Conservancy commissioned this study to better understand how historic preservation contributes quantitatively and qualitatively, to the city's economic, social, and environmental present and future. **From this report, it is clear that preservation plays a positive role in promoting stable neighborhoods, protecting existing affordable housing, and meeting new housing and creative office needs.** It shows that historic preservation does not impede growth or development; it upholds thoughtful strategies that do not sacrifice the city's invaluable historic resources. As the city looks to its future, viable solutions and opportunities provided by historic preservation should be considered. To view the full study, please visit laconservancy.org/preservation-positive.

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LOS ANGELES
CONSERVANCY

ABOUT THE LOS ANGELES CONSERVANCY

The Los Angeles Conservancy is a nonprofit membership organization that works through education and advocacy to recognize, preserve, and revitalize the historic architectural and cultural resources of Los Angeles County. What began as a volunteer group in 1978 now has the largest membership of any local preservation organization in the U.S. For more information, please visit laconservancy.org.



ABOUT PLACEECONOMICS

PlaceEconomics is a private sector firm with over thirty years' experience in the thorough and robust analysis of the economic impacts of historic preservation. They conduct studies, surveys, and workshops in cities and states across the country that are addressing issues of downtown, neighborhood, and commercial district revitalization and the reuse of historic buildings. For more information, please visit placeeconomics.com.

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