

SALT LAKE CITY HISTORIC PRESERVATION PLAN

Interview Summary

August 22-23, 2007

INTRODUCTION

Salt Lake City kicked off the project to develop a historic preservation plan with a series of interviews and meetings on August 22-23, 2007. The project consultants informally met with small groups of stakeholders for interviews about various aspects of the city's existing historic preservation program. Each interview session began with a brief overview of the plan objectives as defined by the city and the steps through which the plan will be developed in the coming year. Interviewees included members of the following groups and departments:

- City Council,
- Planning Commission,
- Historic Landmark Commission,
- SLC Redevelopment Agency (RDA),
- SLC Housing and Neighborhood Development,
- SLC Public Services Division,
- SLC Planning and Zoning Division,
- Developers,
- Architects,
- Realtors, and
- Other citizens.

Interviewees were asked to comment on preservation issues in any of three general areas:

- Planning and Outreach,
- Historic Resource Inventories and Surveys, and
- Regulations and Incentives.

The following pages summarize the cumulative feedback received during these interviews. **All comments are from the interviewees themselves and do not necessarily reflect the opinions of the city or the consulting team.** Along with the results of public surveys and the consulting team's review of various background materials, this feedback will be used to inform the development of the draft plan vision and goals.



PLANNING AND OUTREACH

Preservation Planning Issues Generally

City-wide Planning and Policies

- Articulate a long-term vision for preservation issues on a city-wide basis. Past efforts have focused on preservation only for specific areas and neighborhoods, not city-wide.
- Define the role of preservation in creating healthy neighborhoods.
- “Preservation” sometimes is used as a straw-man to stop growth. The city must allow growth to occur, but needs better tools to evaluate what types of growth are appropriate. (In particular, what type of modern development can occur that is consistent with historic character? What rules are appropriate in changing areas?)
- Need to develop city-wide policy guidance for preservation, and then bring the master plans into alignment with the city-wide policies. Now, there are conflicts between master plans and historic preservation.
 - Example: The Marmalade project was zoned according to the applicable master plan to provide a high-density commercial node for the surrounding area, but then ran into preservation-related conflicts because the site involved three contributing historic structures -- despite the fact that many had degraded in quality since the area was surveyed and would no longer be counted as contributing. The HLC felt “backed into a corner” because they didn’t have any good options or tools to review the status of those buildings apart from the rigid historic district standards.
 - Some master plans are so outdated that they don’t reflect current conditions yet are the only policy tool available.
 - The treatment of historic resources varies greatly from master plan to master plan.
- City should plan and create policies for the treatment of historic resources outside historic districts (e.g., historic homes being scraped for McMansions in Harvard-Yale area). Right now, the program is very district-focused and provides no city-wide guidance.
- Many interviewees sense there is not “political buy-in” for preservation in SLC – no support at the elected official level.

Growth and Development

- There is a lot of development pressure in certain “hot spot” areas (e.g., West College, Harvard-Yale) and, more generally, along the edges of existing historic districts. This plan needs to address how to manage that pressure and develop recommendations for treatment of these “transitional zones.”
- Some locations are likely to experience increased development pressure. Which areas may be appropriate to transition to more intensive use over time as part of the city’s “big picture?” In the absence of a Comprehensive Plan, what processes and tools are the city and neighborhoods using to determine appropriate future land uses?



Population and Housing

- Restrictions on home expansion are gradually driving families out of the city. This is impacting the neighborhood composition and city school enrollment numbers.
- Need to provide a range of housing types in urban neighborhoods so that there are options for a range of household sizes, including singles, couples, and families.
- Address the need for affordable single-family housing in the city so people don't have to move to the suburbs to buy a home. Designating all neighborhoods as "historic" once they reach 50 years old could lead to unnecessary inflation in housing prices.

Linking Historic Preservation to Other City Efforts/Objectives

Inter-Departmental Coordination Generally

- Historic resources are found throughout the entire city and include housing, parks, businesses, and industrial resources. The broad range of historic resources leads to frequent interactions between preservation and other city programs and efforts, such as housing, sustainability, redevelopment projects, downtown redevelopment, etc.
 - Example: Former LDS church 29th Ward at the northwest corner of 1100 West and 400 North is example of conflict between departments: housing department would like to replace with housing, while preservation would like to preserve.
- The city's preservation goals need to be coordinated with other city goals. Preservation policies and regulations could serve as a hindrance or an asset to other city efforts based largely on the level of coordination with other city departments.
- Some interviewees note that the preservation program currently operates with "tunnel vision" and does not often see the "big picture" values and considerations.
- A Comprehensive Plan typically is a vehicle for determining overall city priorities and identifying and resolving possible conflicts between competing city priorities. The lack of such a plan in SLC means that many observers are hoping the preservation plan can help identify and resolve some of these issues. (Officials acknowledge the plan can't resolve all these conflicts, but would like help in framing the larger debates that need to occur.)
- The city owns many large institutional properties, especially in Capitol Hill. To what extent is the city following its own preservation rules on these properties?
- RDA has demolished some historic properties (after extensive process), leading some to charge that they are not abiding by the spirit of the city's preservation goals. Contentious issue. Continues to be friction between RDA and HLC.
- Consider joint membership or joint workshops between HLC and Planning Commission to improve policy coordination.

Infill and Redevelopment

- How can the city make infill compatible while still allowing for modern design and architectural creativity (e.g., creating high-quality structures that someday future generations may want to preserve to represent this era)?
- The city's recently adopted "infill compatibility" standards were frequently discussed:
 - See later notes on compatible infill ordinance in final section of these notes.
 - Project started because of large-scale infill project in Yalecrest neighborhood.



- Project led to different methodologies for determining “compatible infill” – one in historic areas and another elsewhere.
- Project success is viewed unevenly. Some call it a success, but others disagree. One interviewee called it a “dismal failure.”
- The effort led to creation of a citizens’ group called “Citizens for Better Planning” that will be participating in the development of the preservation plan.
- Many people are looking for the preservation plan to revisit this issue and hopefully “fix” the infill standards.
- Many observers are looking for a broader set of tools to protect neighborhood character (e.g., conservation districts), and they hope that the preservation plan can provide those tools.

Affordable Housing

- Some historic homes currently provide affordable housing.
- There is a perception that the requirements of being in a local district (e.g., perceived higher home maintenance costs) can be economically prohibitive to those living on limited incomes.
 - For example, there is a perception that painting of the home is required in historic districts; some interviewees noted that this would be problematic for the elderly, who can’t paint themselves and can’t afford to pay someone to paint their homes.
 - Housing Authority assistance is not working for most of these owners because they are not enough to make up the difference. Result is that homes are suffering from deferred maintenance.
- HUD program requirements for affordable housing require energy efficiency measures currently prohibited by the design guidelines and regulations for materials and modification to buildings.
- Need to address question of home expansions to accommodate families.

Parks, Trails, and Landscape

- Some landmark sites are parks (Pioneer Park, Liberty Park). Public Services Department (parks) owns and operates a number of historic buildings that are now used for community events.
- Public Services Department (parks, streets, street trees) conflicts with preservation when it comes to old tree removal in historic districts and sites. Not allowed by HLC to remove and replace sick or dying trees in these areas.
- Appropriate tree species for historic areas needs to be discussed. Some tree species, while traditionally planted, may not be “environmentally responsible” choices.
- Desire to establish stronger connections between neighborhoods and parks.
- Streetscapes in historic areas contribute to the overall character and authenticity. Street and sidewalk improvements that impact trees and remove and do not replace historic details like brass markers in sidewalks are seen as acts that detract from the character of the district.
- Landscapes are dynamic and should be defined by components, design, and function rather than a strict (static) formula.

Economic Development

- Preservation can be a tool for economic development (e.g., by encouraging tourism and boosting property values), but this is currently not well-understood.



- Need more guidance and flexibility on when and how neighborhood-serving commercial areas may be allowed in older neighborhoods.
- Need to identify areas in neighborhoods that are or are not appropriate to transition to other small-scale, low intensity office and retail uses in existing buildings and where redevelopment and intensification of structures may occur for commercial, employment, and higher density housing options.
- Need to look at how the city can better promote adaptive reuse of historic structures for economic activity (e.g., the historic barns along North Temple in the State, 29th Ward Building at 1100 West and 400 North , which is one of only Landmark sites on west side).

Sustainability

- Historic housing is an ecologically-responsible choice as it reuses existing structures instead of building new ones elsewhere and because not demolishing homes reduces the amount of construction debris that goes to landfills.
- Current renovation practices are seemingly at odds with energy efficiency goals.
- Solar panels on historic structures have been allowed. They were allowed using city standards finding that they were not readily visible from the public view (from the street). Better standards are needed in design guidelines to both promote use and define appropriate design and placement.

Rapid Transit

- Transit lines run in or along several districts. This could result in redevelopment pressure, particularly near transit stations. Need to reconcile the need for higher-densities near transit stations with preservation goals.

Outreach and Education

Outreach

- More outreach should be focused on defining the historic context of the resources of the city so that the general public understands why certain areas or resources are important pieces of the city's history. This could help foster more support and interest in preservation.
- Most education and outreach is conducted by Utah Heritage Foundation, a valuable preservation partner for the city.
- Historic preservation should be co-advertising with other city programs (e.g., RDA and Housing) where there are overlapping programs and incentives that could be paired towards a mutual purpose.
- For this project, need to develop a historic preservation "roadshow" to take out to Community Council meetings.

Education

- The public needs education about the differences between "compatible infill" and "historic preservation." The terms have been used interchangeably as part of recent debates, according to some interviewees.
- Work with real estate community to improve the notification on the benefits and obligations of owning a historic home to potential buyers (an explanation of historic status, special maintenance



- needs, and available financial incentives, etc.). Also, expand the notification of a property's historic status at the title transfer stage.
- More information should be packaged for the community on the process and components of the program to help them navigate.
 - The preservation program would benefit from more outreach about what participation in the program means for property owners – economic benefits of designation, etc. Right now there is a lot of misinformation and people are deterred by worries of having to go through a special process and the potential financial commitment.

HISTORIC RESOURCE INVENTORIES AND SURVEYS

Survey Process

- To the extent possible given available resources, the city should establish a systematic and easy-to-run method or cycle for survey and re-survey activity, so that resources are evaluated automatically and consistently.
- Generally, there is a lack of clarity in the city as to what resources are worthy of preservation.
- Develop criteria the city can use to evaluate and prioritize resources for protection.
- Some new surveys are underway now concurrent with the preservation plan process (Liberty Wells and Sugarhouse), etc.

Existing Districts to Re-Survey

Many of the surveys for existing historic districts are several decades old and considered outdated according to many interviewees. Since the initial surveys, the status of properties within these districts may have shifted due to one or more of the following:

- Contributing properties may have been altered in a way that negatively impacts their contributing status.
- Non-contributing properties may have experienced renovation (e.g., removal of siding) that would enable them to now qualify as contributing structures.
- “Younger” properties that may not have qualified as historic according to the 50-year rule at the time of the initial survey may now be examined for contributing status.
- The forces of demolition and neglect may have eliminated contributing structures from existence or from qualifying as a contributing structure.

The following districts were suggested as priority areas for re-survey work:

- Warehouse (survey to see if should be expanded)
- University, Central City, Avenues (original surveys are now over 30 years old)
- All other districts with older surveys
- All National Register districts not already listed at the local level



Sites to be Protected and Explored

Interviewees suggested a number of sites that they either felt could potentially be threatened by development or should be considered as new individual Landmarks. This list represents a starting point on which this planning process will continue to build.

Existing Landmarks to Maintain

- Depot

Possible New Landmark Sites

- City Cemetery

Areas to Explore for Possible Designation

Salt Lake City experienced a flurry of survey activity in the late 1970s and early 1980s. Since that time, many individual properties and areas of the city have entered the 50-year time window for historic preservation consideration. In addition, as part of the long-term strategy for continually building the inventory and program into the future, interviewees were asked to identify any notable areas with architectural or cultural resources that should be flagged for future consideration. Areas mentioned by interviewees included:

- Fairpark (pre-WWII era subdivision)
- Rose Park (post-WWII era subdivision)
- Poplar Grove (historic neighborhood on west side – gentrification starting)
- Main Street
- Harvard-Yale
- Federal Heights
- Indian Hills Neighborhood (Modern)

Possible Thematic Resources

Thematic resources are a set of resources that are related to each other in terms of time in history and use or activity rather than a particular geographic area as is the case with historic districts. Possible thematic resources identified by interviewees that could be explored further include:

- Churches
- Triple-decker apartments (some work already done)
- Parks and trails (including the South Jordan Canal/Salt Lake-Utah Trail, Tanner Park/Parley's Historic Nature Park, Fairmont Park, etc.)
- Industrial (e.g., Utah Pickle Factory, Allen Meat Packing, etc.)
- 50's Modern Architecture (e.g., Quentin Cannon's circular banks, Ward House)
- Ron Mullen Homes



REGULATIONS AND INCENTIVES

2004 Legislative Action “Audit”

- This council-initiated effort resulted in an extensive internal review of the strengths and weaknesses of the preservation regulations, as well as other aspects of the preservation program.
- Council has since begun to implement the recommendations of the audit, including funding several surveys and the historic preservation plan.
- Audit was helpful to inform the council, but there is not much public awareness of the final recommendations of the report.

Historic Landmark Commission

- HLC members lack information to determine which resources are most worthy of protection.
- HLC is perceived as focusing too much on the “small stuff,” micro-managing (e.g., individual windows) and not enough on the big preservation picture (e.g., allowing whole blocks to be demolished).
 - However, citizen applicants requested more specific feedback from HLC. Some applicants have been told that additions should be “compatible but not identical,” and then not told specifically how to achieve that.
- Some interviewees commented on a perceived “one-size-fits-all view of historic resource protection” from some HLC members, which is too inflexible. In other words, when each structure is touted as significant and irreplaceable, it becomes less clear when that is “true” versus a “stance.”
- Strategically, HLC needs to pick its battles so that the Planning Commission and City Council know when an HLC ruling on a project is of particular importance and should be upheld.
- Ensuring continuity on the HLC is challenging, because it is an all-volunteer group and there is a large number of seats to fill. Interpretation of the rules varies greatly from project to project, and commission to commission. Community should have some level of predictability of project outcome in the administration of the regulations. Staff turnover also hurts continuity.
- Lack of flexibility is viewed as “throwing the baby out with the bath water” because if developer can’t find a compromise position that works for them, they can turn around and demolish through the economic hardship process.
- Clarify role of Architectural Subcommittee. Architectural Subcommittee no longer meets frequently, since the 2004 audit.

Historic Designation

- Voluntary preservation incentives for property owners do not always result in properties being protected, regardless of their significance. Should the city consider designation without property owner consent?
- Need clarification as to the relative merits of different types of historic resources. The most important properties should get the most review and resources. See San Antonio for good example of tiered designation system.
- Consider adopting a new “demolition by neglect” ordinance.
- Need to be able to designate historic landscapes.



Development Review Process

General Process

- Because of the lack of current surveys, any project in a historic district first gets a review to determine the status of the subject property, then gets reviewed according to appropriate standards. This process is considered unnecessarily time-consuming and complex by many interviewees.
- Some in development community avoid historic projects or projects in historic districts because the process is generally too onerous and there is no predictability on getting through the process (time, outcome, etc.). Time it takes to get through the process is highly variable – anywhere from a few weeks to over a year.
- Need clear priorities and evaluation criteria so that the process has some concrete guidance and purpose. Right now decision making is laden with NIMBYism and emotionalism. “When is old just old and when is it worth saving?”
- Process would benefit from procedural flow charts, permit lists, model plans, and other resources to help developers and property owners navigate the process efficiently. Given large staff turnover, this could also help close the information gap.
- Right now, there is some perception of the preservation program as an anti-growth platform that is hostile and obstructionist to new development in historic districts.
- Need to streamline the process to make development more attractive by making it more convenient and timely.
- Establish a multi-department task force meeting to review the project and get consistent answers without having to bounce between departments.
- Property owners feel that plan review often receives a “no” without any suggestions or recommendations for what alterations are needed.

Staffing

- Planner of the Day – This arrangement, whereby one planner is available for questions and assistance on a rotating basis, is seen as inefficient and frustrating from a preservation perspective. Developers and property owners complain of staff lacking historic preservation knowledge or experience and who are unable to accurately respond to questions and provide inconsistent and subjective feedback on development plans. “Also, hard to advocate for clients if unable to form relationships with the staff.”
- Developers who have worked in the city for several years prefer the old system that gave them access to a particular person who would be their point-person. This was easier as staff person was knowledgeable on historic preservation and because they only dealt with one person, did not go through frustration of navigating different responses to the same issue from different people.
- A separate audit of the planning department’s organization is underway now. (Being conducted by Citygate Associates based in Sacramento, CA). The audit will look at issues such as overlapping jurisdiction.
- High level of frustration from the public and the development community with the loss of key preservation staff members and the generally high level of turnover in the preservation office. “Staff is afraid to make decisions.” High frustration with lack of planning staff leadership.
- Developers complain that historic preservation department is understaffed resulting in long review times. As developers must finance properties while development proposals are



- negotiated, this delay is seen as a frustrating and unnecessary hardship that makes developers avoid projects in historic areas or properties.
- Developers have, in some cases, found it easier to get help and advice from SHPO rather than the city due to lack of knowledge.
 - Some staff (multiple departments) have discouraged developers from attempting to pursue adaptive reuse of commercial structures.
 - Some property owners feel staff take an adversarial stance towards them (“wrong until proven right”).
 - Staff members in past used to do pre-application conferences, which developers found very helpful.

Enforcement

- The regulations are not enforced, and this is common knowledge. Provide examples of other communities that do a better job of enforcing preservation regulations.
 - Example: citizen went through six-month process for 2d story addition; house across street simply skipped the process (knew there was no enforcement) and added a non-conforming addition. Leads to sense of arbitrariness.
- Typical violations include garage conversions into living space, and illegal multi-family housing.

Demolition and Economic Hardship

- Interviewees are interested in having Clarion bring forward some “best practice” demolition and economic process examples from comparable communities.
- Standards are very tough. See extensive discussion of issue in 2004 audit. “The city has never won an EH case.”
- This process is “highly dysfunctional” – anyone can find someone to crunch the numbers to make their case. The process needs to be completely revised.
- 5% rule for seismic upgrades is resulting in a lot of demolitions.
- Economic Review Panel:
 - Existing ERP process is too easy for developer to take advantage of.
 - “Reasonable” is the problematic work in the definition of “economic hardship.”
 - Lack of surveys hinders the functioning of this process.
 - Appeals on demolitions should go to the council, not the unelected LUAB. See discussion in 2004 audit.
- Underlying zoning is, in some cases, providing an incentive for demolition rather than preservation by providing for a maximum allowable density far beyond the potential of the existing structure. See extensive discussion of issue in 2004 audit. Lack of mixed-use zoning in particular is a problem. Areas where this is particularly evident include:
 - Central City
 - Sugarhouse (commercial area)

Design Guidelines

Generally, interviewees agreed that the design guidelines are functioning well and result in better residential development overall. However, the following concerns were raised:



- The design guidelines do not address commercial development. They need to be expanded to include commercial and other non-residential uses. (Trolley Square is example of where commercial standards would have helped.)
- Current design guidelines do not encourage the creation of good new architecture but rather ask the building to mimic an old building. The city should broaden its perspective about how modern architecture can co-exist harmoniously with historic structures. “Be consistent with how old buildings are treated, but give us more flexibility and creativity with new construction.”
- Show examples in this plan of how flat standards and “alternative compliance” procedures can work together. Could be a good balance for the city to strike.
- The design guidelines should address transitional/edge areas in greater detail. The design guidelines are allowing some jarring scale juxtapositions that are not appropriate.
- Perhaps add a number of voluntary design elements which, if incorporated, allow the architect flexibility for more design creativity.
- Need more (illustrated) guidance on appropriate signs in historic districts. Currently, applicants can navigate the process only with help from a knowledgeable preservation staff member.
- Clarify if these are mandatory “standards” or voluntary “guidelines.”

Other (H) Historic District Standards

- Ordinance allows commercial uses to be approved conditionally in historic areas. Some interviewees urged broadening the list of possible commercial uses. Allow offices and/or small retail?
- City sign ordinance conflicts with historic district regulations (e.g., limits on the maximum number of signs on a site lead to the removal of historic signs; or regulations on the type of signs sometimes mean historic signs become non-conforming within the historic district).
- Parking requirements seen as “nonsensical” (e.g., requiring ADA parking for a building not required to meet ADA standards). Particularly an issue given the land constraints of urban infill parcels.
- Need more flexibility to promote adaptive reuse of buildings (e.g., fire code ceiling heights).
- Regulations and procedures are tailored to new development rather than renovation.

Compatible Infill Ordinance

- Unclear relationship between the preservation regulations and the new compatible infill provisions. For example, the HLC in some situations can override the infill standards (like height), but lack any policies to guide their decisions or coordinate their infill expectations with decisions made outside the historic districts.
- Establish clearly defined criteria for compatibility so the review bodies know on what features a project should be evaluated. This could help both shorten the review process and lead to more consistent decisions.
- Height limits are problematic. Many criticized the new 23’ ground-to-ridge limit (down from 30’ from gable) as arbitrary and too low. Plus the complication of slope-side development. The HLC can essentially grant variances from this in historic districts and allow unlimited height. Development community has learned it’s easier to get a height variance from the HLC than go through the BOA.
- Zoning code generally does not support infill (setbacks, parking requirements often prohibitive).



Incentives and Tools

Incentives

- City should offer more incentives to balance some of the controls it imposes to encourage more volunteer preservation activity. This will be particularly important if/when state revokes its tax incentive program, which today is the most commonly used incentive for preservation.
- City should offer more incentives for renovation. This is especially important given the rising trend in interest rates.
- Need more incentives geared toward smaller developers because tax incentives are difficult to capture when profit margins are so small (and typically are working with limited resources to begin with).
- Consider allowing accessory dwelling units if will result in preservation of historic structures.
- Existing city program (in which city recommends contractors, and there is a small pot of funding) was heavily criticized, on grounds of too little money and ambiguous eligibility.

Alternative Preservation Tools

- **Preservation Easements:** Preservation easements are typically transferred to Utah Heritage Foundation on a voluntary basis as a trade for conditional use permits. The city would like to make them a requirement as part of a negotiation but cannot because the property owner would then lose the tax credit for the easement if the easement is mandatory.
- **TDRs:** Transfer of development rights programs can help deal with market pressure. Park City uses TDRs in their historic program. SLC uses in the downtown only (e.g., used for Hotel Monaco.) City would like to see some more information and case study examples on this tool.
- **Conservation Districts:** Conservation districts are a flexible tool that can help retain the character of a neighborhood even if the neighborhood does not meet formal criteria for historic designation. Because this tool is geared more towards preserving character rather than pure historical integrity, it allows for a greater degree of flexibility. Review is typically administrative, rather than before a board like the HLC. (Citizen group pushed for conservation districts 15 years ago in Salt Lake City, but didn't succeed.) Interviewees suggested the following general areas as possible candidates for future conservation district protection:
 - **Sugarhouse Business District** – particularly the “cement block” where the property owner would like to intensify use as allowed by underlying zoning (SHBD-1). Zoning allows 75 feet height, or 100 with structured parking. Proposed demolition at heart of district; to replace with mixed-use development. Residents are concerned that redevelopment will damage the walkable “urban youth” storefront character and day-night activity of this section of the neighborhood and drive commercial rents too high for local businesses to remain. Concerns about gentrification and area being overtaken by national chains. There are historic commercial buildings at the area’s core but they have been heavily altered. New historic survey underway now to see if area qualifies as historic district.

