

City of Boulder Historic Preservation: Current Program Assessment

DRAFT

Prepared by:
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Prepared for:
Community Planning & Sustainability Department
City of Boulder
Certified Local Government
Project #CO-12-017

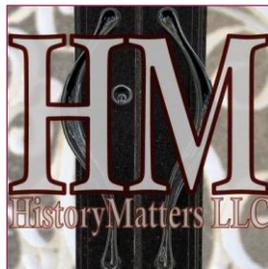
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ABBREVIATIONS

AAC	Alexandria (Virginia) Archaeological Commission
AIA	American Institute of Architects
AOS	Area of Significance
BARA	Boulder Area Renters Association
BVCP	Boulder Valley Comprehensive Plan
BVSD	Boulder Valley School District
CAO	City Attorney's Office
CDOT	Colorado Department of Transportation
CLG	Certified Local Government
CU	University of Colorado
GIS	Geographic Information System
HBI	Historic Boulder, Inc.
HCCRP	Historic Context Community Resource Program
HDI	Historic Denver, Inc.
HPO	(Boulder) Historic Preservation Ordinance

HUD	U.S. Department of Housing and Urban Development
LAC	Landmark Alteration Certificate
LB	Landmarks Board
LDRC	Landmarks Design Review Committee
LPAB	Landmarks Preservation Advisory Board – known as Landmarks Board since 2007
NAPC	National Alliance of Preservation Commissions
NCAR	National Center for Atmospheric Research
NCSHPO	National Conference of State Historic Preservation Officers
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NPS	National Park Service
NR	National Register of Historic Places
NRHD	National Register of Historic Places Historic District
NTHP	National Trust for Historic Preservation
OAHP	(Colorado) Office of Archaeology & Historic Preservation
PLAN	People’s League for Action Now
POS	Period of Significance
SHF	(Colorado) State Historical Fund
SHPO	State Historic Preservation Office
SR	Colorado State Register of Historic Properties
SOM	Structure of Merit
UBC	Universal Building Code

EXECUTIVE SUMMARY

The Current Program Assessment is part of a larger endeavor to create an historic preservation plan for the City of Boulder. The goal of this grant-funded initiative is to establish a long-term vision for historic preservation in Boulder, to set priorities for the next fifteen to twenty years, and to pinpoint specific strategies for achieving the identified goals and objectives in the plan.

Boulder's Historic Preservation Ordinance, originally adopted in 1974 and revised multiple times, established the basic framework for the city's preservation program. The City of Boulder currently has 162 individually landmarked properties and 10 historic districts, for a total of over 1300 designated properties.

Boulder's historic preservation program compares favorably to programs around Colorado and the country in a number of ways:

- Boulder's historic preservation program has documented nearly all resources in the city constructed prior to 1940
- The design review process, and specifically the Landmarks design review committee format, has been recognized as a model for other communities with historic preservation programs
- The demolition ordinance has been in effect since 1994 and has resulted in the preservation of numerous important historic properties
- Boulder has been recognized as a national leader for the integration of sustainability and historic preservation goals citywide
- Historic preservation enforcement procedures compare favorably with other like communities.
- Boulder has been very successful in securing Certified Local Government grants since becoming eligible for such awards in 1985.
- Boulder has the second highest rate of successful Historic Preservation State Tax Credit reviews in Colorado.

Overall, Boulder's historic preservation program is considered to be one of the most robust and progressive of those analyzed as part of this assessment.

Based on this assessment, preliminary suggestions relative to best practices include:

- Continue efforts to keep survey of historic resources updated
- Create post-disaster response and recovery processes to avoid losses to Boulder's historic and architectural resources
- Explore additional incentives to enable broader historic preservation efforts in Boulder
- Enhance outreach and education efforts to promote historic preservation in Boulder
- Maintain adequate staffing to perform all regular duties of the program plus City Council- and LB-requested special projects

SECTION 1: INTRODUCTION

Project Goals and Methodology

This program assessment is part of a larger endeavor to create an historic preservation plan for the City of Boulder. In early 2012 the City of Boulder's Historic Preservation Program received a Certified Local Government (CLG) grant to develop an historic preservation plan for the community. The goal of this grant-funded initiative is to establish a long-term vision for historic preservation in Boulder, to set priorities for the next fifteen to twenty years, and to identify specific strategies for achieving the identified goals and objectives in the plan.

City of Boulder Community Planning & Sustainability Department staff members contracted with the Denver-based consulting firm HistoryMatters, L.L.C. in November 2012 to complete Boulder's historic preservation plan. HistoryMatters' principal owner Mary Therese Anstey-- working closely with City Council, city staff, members of the Landmarks Board (LB), members of the Boulder preservation community, and the general public-- is responsible for creating all project deliverables. While the main goal of the grant-funded project is to look to the future, everyone involved with the project recognized the importance of analyzing studying the past as well. This assessment of current practices evaluates the Boulder historic preservation program and its formation. This report is neither an exhaustive history of the program nor a detailed study of every aspect of historic preservation in Boulder. Instead, it is a broad look at the major program areas. Section 2 details the functions and programs mentioned specifically in Boulder's historic preservation ordinance. Section 3 is reserved for other historic preservation program activities.

This assessment is based upon a number of key types of sources. Most helpful were planning department and Landmarks Board records. Expert input and details from comparative analysis complemented these documents. The research process for this assessment compared Boulder's historic preservation program with five others in the state: those in Aspen, Denver, Fort Collins, Longmont, and Pueblo. Aspen and Fort Collins were chosen for their similarities with Boulder in terms of both high levels of development pressure and completed exploration of their post-World War II resources. Longmont was chosen for its geographic proximity. Denver represents a long-established program from a larger city while Pueblo's program is quite young and that city has a population comparable to Boulder. Nationwide comparisons were gleaned from two sources: web-based searches and answers from respondents to a National Association of Preservation Commissions (NAPC) online questionnaire.

This report concludes with a section devoted to Preliminary Conclusions, a recap of the findings in the current program assessment. This assessment report represents one of the first steps in the inclusive process designed to create an aspirational yet achievable vision for historic preservation in Boulder from 2013 to 2033. An initial meeting to introduce the project, gather input on the current program, and develop goals and objectives of the plan was held on January 16, 2013. There will be additional opportunities for input available to the various partners and stakeholders in this project. Members of the Boulder historic preservation community and general public interested

in actively participating in the historic preservation plan development process are encouraged to contact James Hewat at 303-441-3207 or HewatJ@bouldercolorado.gov.

History of Boulder's Preservation Program

The American historic preservation movement has a storied history. The American Antiquarian Society, created in 1812, was the first national organization charged with coordinating local preservation efforts throughout the country and focussed on protecting the nation's oldest architecture. Other key dates on the national preservation timeline include the passing of the Ancient Antiquities Act in 1906, establishment of the National Park Service (NPS) in 1916, 1920s efforts to restore George Washington's Mount Vernon plantation, the recognition of the first locally designated historic district in Charleston, South Carolina in 1931, the 1935 formation of the National Historic Landmarks (NHL) program, and the 1949 chartering of the National Trust for Historic Preservation (NTHP).

During the 1960s the American historic preservation movement emerged both as a reaction against destructive urban renewal practices and as a supplement to other large scale social changes, most notably the environmental or "green" movement. Two influential books, Jane Jacobs' *The Death and Life of Great American Cities* (1961) and the United State Conference of Mayors' *With Heritage So Rich* (1965), provided the academic foundation for the 1966 National Historic Preservation Act (NHPA). The NHPA created a three-tiered, integrated preservation system which allowed for cooperative efforts among national, state, and local preservation advocates in protecting a wide variety of historic resources ranging from the most recognized national monuments to sites which contributed to the cherished local landscape of some of the smallest communities in the United States.

In Boulder, historic preservation support was both citizen-lead and voter-approved. It emerged from a combination of concerns about the effects of dramatic growth and the need to protect the city's distinct sense of place. Boulder, like so many other communities across the western United States, experienced tremendous post-World War II population growth; it grew from approximately 13,223 residents in 1950 to 72,000 in 1972.¹ This influx of new residents, along with a national mood which emphasized the "new" after years of depression-era and wartime deprivation, placed many older buildings at risk. According to Historic Boulder, Inc. (HBI) founder Joyce Davies, "many small and older buildings were being demolished. Money started flowing in and the developers said the bigger the better."² In the face of this growth and the accompanying development pressures, Boulder Valley Planning Commissioner Albert Bartlett established, in 1950, the People's League for Action Now (PLAN), a group which sought "a more imaginative and enlightened pattern of community development."³ In 1958 the Boulder City Council adopted its "Guide for Growth" map which advocated increased density in Boulder's core, new industrial zones, and neighborhood shopping centers.

Local voters passed a number of important laws to protect Boulder's setting against the backdrop of the Flatirons. In 1959, they approved a "blue line" which restricted water service above the elevation of 5,750 feet as a way to preserve the views toward and character of nearby mountain areas. Boulder was the first city in the United States, in

1967, to approve a dedicated sales tax to purchase open space. The desire to protect Boulder from developers lead citizens to create the Pearl Street pedestrian mall in the 1970s, emphasizing the district's sense of place which originated from its blend of historic architecture, public space, and mountain vistas. Construction of the nine-story Colorado Building at 14th and Walnut streets encouraged voters to pass a 1971 law restricting the height of new buildings to fifty-five feet. Davies and other activists also established HBI in 1971. The new group's goal was to stop the demolition of key historic buildings, namely the 1873 Central School at 15th and Walnut streets, the 1890 Union Pacific Depot at 14th Street and Canyon Boulevard, and the 1891 Highland School at 9th Street and Arapahoe Avenue. Central School was lost, but the depot was saved when the Boulder Jaycees moved it to 30th and Pearl streets. HBI saved Highland School, raising the funds to purchase the building in 1972.

These losses and near-losses made local preservation supporters realize the urgent necessity for a process to evaluate and protect Boulder's historic resources. HBI members prepared an historic preservation ordinance and lobbied City Council for its passage. In 1974 local leaders passed the Boulder Landmarks Preservation Ordinance and, soon after, Boulder started its successful efforts to document its historically and architecturally significant resources. In 1976, city voters approved one of the nation's most restrictive residential growth-management ordinances. Named after City Councilman Paul Danish, the Danish Plan restricted new housing growth to two percent annually and drew open space boundaries around Boulder. This law initiated a period of infill construction and adaptive re-use of historic buildings which continues to the present day.

Since the initial passage of Boulder's preservation ordinance, the city historic preservation program has experienced many accomplishments. These include a comprehensive survey program which has systematically recorded its historical and architectural resources citywide. Boulder also has received awards of Certified Local Government (CLG) grant funding for at least forty two projects between 1985 and the present. The LB has designated 162 local landmarks and ten local historic districts. The Board, staff, professional consultants, property owners, and preservation advocates have worked collaboratively on not only general but also district-specific design guidelines. As Boulder's historic preservation program has evolved and matured, the original 1974 ordinance has been revised numerous times, always with the goal of maintaining the balance between resource protection and property rights. An emphasis on public outreach and maintaining a transparent and inclusive approach remains a key guiding principle for Boulder's historic preservation program.

SECTION 2: BOULDER'S HISTORIC PRESERVATION ORDINANCE

Boulder's City Council adopted Ordinance #4000 on September 17, 1974, after a citizen-lead effort from HBI members and other citizens to enact legislation to preserve and protect Boulder's historic resources. The purpose of the Historic Preservation Ordinance (HPO) is to:

promote the public health, safety and welfare by protecting, enhancing, and perpetuating buildings, sites, and areas of the city reminiscent of past eras, events, and persons important in local, state, or national history or providing significant examples of architectural styles of the past.... to develop and maintain appropriate settings and environments for such buildings, sites, and areas to enhance property values, stabilize neighborhoods, promote tourist trade and interest, and foster knowledge of the city's living heritage.⁴

Responding to concerns raised during the various readings of the proposed ordinance in 1974, the City Council stated their intention was not to “preserve every old building in the city but instead... draw a reasonable balance between private property rights and the public interest...”⁵ The original ordinance established:

1. the procedure for designation of individual landmarks and historic districts,
2. the process for the review of alterations to or demolition of designated buildings,
3. the Landmarks Preservation Advisory Board (LPAB), and
4. the enforcement penalties to be levied if alteration or demolition decisions were disobeyed.

Revisions

Since first adopted, Boulder's HPO has been revised numerous times. Table 1 offers a summary of these changes and when they occurred. Several minor revisions have resulted in small wording changes which streamlined or clarified the original code. Other changes reflect evolutions in the historic preservation field. For example, the original ordinance made no mention of either energy efficiency or access for the disabled as considerations when reviewing alterations to landmarks, but these two issues are now routinely taken into consideration in such discussions. Similarly, the Boulder HPO now allows for designation of a discontinuous historic district, a practice which originated with the National Register of Historic Places (NR) program and was adapted for use at the local level.

The City Council, planning staff, and HBI representatives recognized from the beginning that the original HPO was vague in many areas. This lack of specificity was intentional, with the newly-established LPAB and planning staff charged, as their initial tasks, to create a survey program, establish designation criteria for individual landmark and historic district designation, and develop all required paperwork for the program. As new components of the program were codified, many were added to the HPO as revisions. Other examples of such changes include shifting from use of the term “Certificate of Appropriateness” to “Landmark Alteration Certificate” as a more descriptive title.

Table 1: Revisions to the Boulder Historic Preservation Ordinance

YEAR	ORDINANCE #	AFFECTED AREAS
1986	5009	Landmark Alteration Certificate Hearing Procedures
1991	5377	Landmark Alteration Certificate Hearing Procedures
1994	5626	Council Ordinance Designating Landmark or Historic District
	5627	Construction on Proposed Landmark Sites or in Proposed Districts Review of Permits for Demolition, On-Site Relocation and Off-Site Relocation of Buildings Not Designated
1995	5730	Construction on Proposed Landmark Sites or in Proposed Districts
		Landmark Alteration Certificate Application
1996	5801	Enforcement and Penalties
		Review of Permits for Demolition, On-Site Relocation and Off-Site Relocation of Buildings Not Designated
1997	5929	Recognition of Structures of Merit
		Review of Permits for Demolition, On-Site Relocation and Off-Site Relocation of Buildings Not Designated
1999	6045	Staff Review of Application for Landmark Alteration Certificate
		Landmark Alteration Certificate Hearing Procedures
		Call-Up by City Council
2000	7048	Enforcement and Penalties
		Review of Permits for Demolition, On-Site Relocation and Off-Site Relocation of Buildings Not Designated
	7080	Council Ordinance Designating Landmark or Historic District
		Issuance of Landmark Alteration Certificate
		Recognition of Structures of Merit
2001	7120	Review of Permits for Demolition, On-Site Relocation and Off-Site Relocation of Buildings Not Designated
	7172	Construction on Proposed Landmark Sites or in Proposed Districts
2002	7183	City Council May Designate or Amend Landmarks and Historic Districts
		Staff Review of Application for Landmark Alteration Certificate
		Review of Permits for Demolition, On-Site Relocation and Off-Site Relocation of Buildings Not Designated
	7213	Initiation of Designation for Individual Landmarks and Historic Districts
		Review of Permits for Demolition, On-Site Relocation and Off-Site Relocation of Buildings Not Designated
7225	Landmark Alteration Certificate Required Landmarks Board and City Manager Authorized to Adopt Rules	
2006	7475	Purpose and Legislative Intent
		City Council May Designate or Amend Landmarks and Historic Districts
		Initiation of Designation for Individual Landmarks and Historic Districts
2007	7522	Purpose and Legislative Intent
	7527	Landmark Alteration Certificate Hearing Procedures

Later revisions to Boulder’s preservation ordinance allowed planning staff, rather than the entire LB, to review and approve certain types of alterations to landmarks and within designated historic districts. Also, once the Landmark Design Review Committee (LDRC) was established, the roles and responsibilities of this group have been added to the ordinance.

By far, the most significant changes to the Boulder ordinance are related to the introduction of demolition and relocation review for non-designated buildings over fifty years old. These provisions in the ordinance are discussed in the section devoted to Demolitions (see page 24).

Comparative Analysis

National Park Service guidance on historic preservation ordinances recommends the following items appear in any local enabling legislation:

1. A statement of purpose
2. Establishment of an historic preservation commission including powers and duties, membership, and terms of appointment
3. Definition of actions that merit review by the historic preservation commission
4. Authority to designate local historic districts and individual landmarks
5. Assigned staff member to serve as director of the commission, without right to vote
6. Authority to review and make recommendations upon all actions requiring building or demolition permits
7. Specific time limits within which the commission and an applicant shall act for findings pertaining to decisions made
8. Provisions for enforcing decisions and the right of appeal
9. A process for appeals
10. A provision for economic hardship

Table 2 compares the major components of the Boulder HPO to the legislation in the five other Colorado CLGs.

Table 2: Comparison of CLG Ordinances

COMMUNITY	LANDMARKS BOARD	REVIEW PROCESSES				ENFORCEMENT
		DESIGNATION CRITERIA	STRUCTURE OF MERIT	LAC	DEMOLITION	
BOULDER	Yes	No	Yes	Yes	Yes	Yes
ASPEN	No	Yes	No	Yes	Yes	Yes
DENVER	Yes	Yes	No	Yes	Yes	Yes
FORT COLLINS	No	Yes	No	Yes	Yes	Yes
LONGMONT	Yes	Yes	Yes	Yes	Yes	Yes
PUEBLO	Yes	Yes	No	Yes	Yes	Yes

In both Aspen and Fort Collins, the details regarding their local landmarks board exist. However, it does not appear among the other provisions in the historic preservation ordinance. It is interesting to note both the Aspen and Pueblo ordinances contain direct references to their survey programs. Both the Aspen and Longmont ordinances detail the preservation incentives available; and the Fort Collins ordinance mentions one particular benefit, the community’s landmark rehabilitation loan program. The Denver legislation specifically calls out the historic preservation commission’s State Tax Credit review responsibility.

Landmarks Board

Boulder's original HPO established the Landmarks Preservation Advisory Board (LPAB), a body assigned responsibility for managing Boulder's historic preservation program. During the ordinance development process, there was a great deal of discussion regarding the composition and powers of this board. Many preservation supporters advocated a total of seven members on the LPAB. Others wanted to grant the Planning Board the power to make decisions regarding designation of individual landmarks and historic districts, only allowing the LPAB to make recommendations to this long-established group. Ultimately, a board of five City Council-appointed members, including two members from the architecture or urban planning professions, was established. The original LPAB also had two non-voting members from the Planning Board. The 1974 ordinance also set the existing once-a-month meeting schedule and allowed the board to make rules and regulations as needed for organization and procedure. The LPAB was required to hold public hearings for all designations and all Certificates of Appropriateness (now known as Landmark Alteration Certificates).

While the 1974 ordinance laid out the basics of historic preservation practice, it was the responsibility of the LPAB and planning staff actually to create Boulder's historic preservation program. During the first year, a tremendous amount of work was accomplished, including establishment of the landmark designation process and eligibility criteria, creating a flow chart, and designing application forms for both individual landmark and historic district listing. The board recommended and City Council approved application fees of \$25 and \$75 respectively for landmark and historic district designation. These amounts were chosen based upon existing planning department fees and the board believed these charges were not too high to be a disincentive to potential applicants. The Planning Department was awarded a grant from the U.S. Department of Housing and Urban Development (HUD) in July 1975 to further develop Boulder's historic preservation program. The grant application requested funds for researching potential individual landmarks and historic districts, conducting a visual survey of the city, developing urban design guidelines, establishing incentives, and producing brochures to inform the public about the city's new preservation program.

One of the most noteworthy aspects of this early work is how little has changed from the standards originally established for the LPAB. While its name was adjusted from the LPAB to the Landmarks Board (LB) in 2007, the group still has five members, two of whom must come from design professions. The LB members still serve five year terms as specified in the 1974 ordinance. They still meet on the first Wednesday of the month in the Council Chambers. Monthly work sessions are no longer scheduled, but the group holds a number of special meetings either as a group or as members of their established subcommittees. In addition, the LDRC meets on a weekly basis to evaluate requests for alterations to individual landmarks and alterations to properties within historic districts; this working group also is responsible for reviewing State Tax Credit applications as needed.

Comparative Analysis

In comparison with five other Colorado CLGs, Boulder differs slightly in terms of body name, meeting frequency, board composition, and review of State Tax Credit applications (See Table 3). Most of these communities assign the name Historic Preservation Commission to the group of volunteers charged with overseeing the local preservation program. Meeting frequency also differs among the five Colorado CLGs. Two other municipalities, Longmont and Pueblo, meet monthly, while the three other comparison CLGs meet twice per month; however, it is important to remember the LDRC meets weekly in Boulder. All of the CLGs wisely are composed of an odd number of total members to avoid a tie vote. The number of members ranges from five in Boulder to nine in Denver. Both the Aspen and Longmont commissions have alternate members in case of absence or conflict of interest. Only one of the CLGs, Fort Collins, has no specific requirement for professional members, yet their current Landmarks

Table 3: Comparison of CLG Preservation Boards

COMMUNITY	NAME	MEETINGS	MEMBERSHIP	STATE TAX CREDIT REVIEW
BOULDER	Landmarks Board	Monthly	5 members, 2 members with design professional qualifications plus 1 non-voting Planning Board member ex-officio	Design Review Committee review of applications
ASPEN	Historic Preservation Commission	Bi-monthly	7 members, 1 alternate Members of City Council, Mayor, City employees, appointed City officials cannot serve	Staff review of applications
DENVER	Landmarks Preservation Commission	Bi-monthly	9 members- nominations from specialized groups; members appointed by Mayor	Commission review of applications
FORT COLLINS	Landmarks Preservation Commission	Bi-monthly	7 members	Commission review of applications
LONGMONT	Historic Preservation Commission	Monthly	7 members, 2 alternates	Commission review of applications
PUEBLO	Historic Preservation Commission	Monthly	7 members, 3 with professional qualifications	No local review of applications

Preservation Commission includes two architectural historians, an historian, and two architects. To maintain transparency and to avoid the inevitable conflicts of interest which occur more often in smaller towns, Aspen prohibits certain individuals from serving on their Historic Preservation Commission. Of all the CLGs, Denver has the most prescribed requirements for members of the Landmarks Preservation Commission. Of the nine members, the local American Institute of Architects (AIA) chapter nominates two, History Colorado (formerly the Colorado Historical Society) puts forward two names, the Planning Board Chair chooses two representatives, and one member is recommended by the Colorado Chapter of the American Society of Landscape Architects. The majority of the five Colorado CLGs review State Tax Credit applications, although their procedures differ. In Aspen staff evaluates these

applications, Longmont follows the same procedures for tax credit review as employed for decisions regarding Certificates of Appropriateness, and Pueblo does not review such paperwork at all.

Evaluation

The Boulder HPO assigns numerous duties to the LB. These include designating individual landmarks and historic districts, listing resources on the Structure of Merit (SOM), making decisions regarding Landmark Alteration Certificates (LAC), and granting permits for demolition of historic buildings. During their history, the LB has completed all of these tasks, with the number of designations and reviews varying from year to year.⁶ During the earliest years of the program, the emphasis was on designation. As more and more landmarks and historic districts were designated, the LB (and LDRC) reviewed increasing numbers of applications for LACs. Since the 1994 revision to the ordinance expanding the age of buildings eligible for demolition review, both staff and LB members have spent a great deal of time considering such applications.

Each CLG in Colorado receives a thorough evaluation from OAHF every four years. This program review involves attendance at a public meeting of the local historic preservation commission, an analysis of the CLG's record keeping, a critique of the staff, and an overall assessment of the success of the local preservation program. The aim of this evaluation process is to provide CLGs with helpful hints for improvement. Boulder's program was assessed most recently in 2012. That appraisal focused most closely on Boulder's public hearing process. OAHF staff commended the LB for its overall conduct at public hearings, especially use of *Robert's Rules of Order*⁷ and appropriate local procedures at meetings. This evaluation noted how the work of the LDRC has become an exemplar for design review, mentioning how other Colorado CLGs have modified Boulder's program for their own use. The OAHF evaluation reminded the LB of the need to cite specific criteria as the basis for their decisions regarding designations and design review.

Beyond the periodic CLG evaluations, the members of the LB engage in an annual self-assessment process. The LB holds an annual retreat where all members and staff meet at an off-site location. The purpose of this session is to review accomplishments and set a work plan for the following year. At their most recent retreat, members of the LB identified the following high-priority projects for the near future:

1. Work with property owners, residents, and historic preservation organizations to pursue landmark designation of eligible sites and districts;
2. Continue the Boulder Survey of Historic Places;
3. Update existing surveys to include the contributing-restorable category for those buildings that have lost historic significance, but are capable of being restored to the point that they would contribute to the character of the district;
4. Continue and expand historic preservation education and outreach with the public through continued cooperation and coordination with other preservation groups and training in appropriate design of alterations and additions to historic resources;

5. Develop a framework for designation and protection of archaeological resources and landscape features such as ditches.

Review Processes

Four major LB preservation functions are classified as review processes. They are individual landmark and historic district designation, Structure of Merit recognition, landmark alteration certificates (LAC), and demolitions. All four are discussed below.

Landmark and Historic District Designation

After passage of the historic preservation ordinance in 1974, members of the LPAB developed criteria for the designation of individual landmarks and historic districts. These rules and regulations were adopted in September (landmark) and October (historic district) 1975. Table 4 shows the three general areas of significance, the narrative explanations of these areas, and additional considerations. These two sets of criteria are virtually the same. The historic district criteria differ in only two ways: the consideration “Other (if applicable)” appears under Historical Significance and “Area Integrity” is not a consideration under Environmental Significance.

Table 4: Eligibility Criteria for Designation

SIGNIFICANCE	DESCRIPTION	CONSIDERATIONS
HISTORICAL	The place (building, site, area) should show character, interest, or value as part of the development, heritage, or cultural characteristics of the community, state, or nation; be the site of historic or prehistoric event(s) that had an effect upon society; or exemplify the cultural, political, or social heritage of the community.	Date of Construction
		Association with Historical Persons of Events
		Distinction in the Development of the Community of Boulder
		Recognition by Authorities
ARCHITECTURAL	The place should portray those distinguishing characteristics of an architectural type specimen, a good example of the common; be the work of an architect or master builder, known nationally, statewide, or locally, and perhaps whose work has influenced later development; contain elements of architectural design, detail, materials, or craftsmanship which represent a significant innovation; or be a fine example of the uncommon.	Recognized Period(s)/ Style(s)
		Architect or Builder of Prominence
		Artistic Merit
		Example of the Uncommon
		Indigenous Qualities
ENVIRONMENTAL	The should enhance the variety, interest, and sense of identity of the community by the protection of the unique natural and man-made environments	Other (if applicable)
		Site Characteristics
		Compatibility with Site
		Geographic Importance
		Environmental Appropriateness
		Area Integrity
Other (if applicable)		

Designation Process

Three entities may initiate the landmark designation process in Boulder. The three allowable applicants are the property owner (or authorized agent), an organization with a recognized interest in historic preservation, and the LB or City Council. The fee for filing an individual landmark designation is \$25; this charge is waived if the designation request comes from either the LB or the City Council. Once the designation process begins, preservation staff coordinates the necessary research to determine the

significance of the resource, preparing a report summarizing the findings about the importance of the subject property, making a staff recommendation, and scheduling a LB public hearing. This session must be held thirty to sixty days after the landmark application is received. A sign also is posted at the proposed landmark site for fifteen days in advance of the hearing. At the public hearing the LB makes a recommendation regarding landmark designation to the City Council. This board can approve, approve with modifications, or deny the request for individual landmark designation. All LB decisions are made based upon two factors: public comment from the hearing and the properties ability to meet the eligibility criteria for designation. Denials represent final decisions unless the City Council decides to “call up” the issue for reconsideration.

Within sixty days after the LB makes their recommendation, the City Council also holds a public hearing. Two readings before the City Council are required. A notice of hearing must appear in the local newspaper at least ten days prior to the second reading when the public hearing also is held. At the end of this public hearing the City Council approves, approves with modifications, or denies the application for designation. If the City Council approves the landmark designation, a copy of the relevant ordinance is placed in the Boulder County real estate records within thirty days of this decision; filing this information allows future owners to be aware of the listed status of their building.

The process for designating a Boulder historic district is essentially the same as the procedure for individual landmark listing. The fee for filing an historic district designation application is \$75. Again this charge is waived if the district proposal is either LB- or City Council-initiated. Key differences between the process for individual landmark listing and historic district designation include the requirement to:

1. Provide written notice to all property owners within the proposed historic district boundaries,
2. Inform the Planning Board of the LB’s decision regarding district designation at their public hearing, and
3. Deliver a Planning Board-prepared report regarding the land use implications of the proposed district designation to City Council within thirty days of the LB public hearing.

It is also important to note both preservation staff and members of the LB engage in a great deal of public outreach and property owner education prior to the initiation of the historic district approval process.

Comparative Analysis

Table 5 summarizes the similarities and differences in the designation processes among the chosen comparison CLGs. The communities are quite similar in who is allowed to submit an application for designation, although only Boulder and Longmont will accept designation paperwork from representatives of a local historic preservation organization. Denver allows any person to submit an application for designation of either an individual landmark or an historic district.

Table 5: Comparison of Colorado CLG Designation Processes

COMMUNITY	NOMINATOR	OWNER CONSENT	FEES	
			LANDMARK	HISTORIC DISTRICT
BOULDER	Owner(s), City Council, City of Boulder Landmarks Preservation Advisory Board, or any organization with a recognized interest in historic preservation	Non-consensual designation permitted	\$25	\$75
			Fee waived on LPAB- initiated designations	
ASPEN	Owner(s), Historic Preservation Commission, or City Council	Victorian: Non-consensual designation permitted	None	
		Aspen Modern: Owner consent required		
DENVER	Any person	Non-consensual designation permitted	Owner-initiated: \$250	1-100 resources: \$500
				101-200 resources: \$750
			Non-owner initiated: \$875	201-300 resources: \$1000
				301+ resources: \$1500
Fee waived for City-initiated designations				
FORT COLLINS	Landmark Preservation Commission, owner(s), or any person	Non-consensual designation permitted	None	
LONGMONT	Historic Preservation Commission, owner(s), City Council, or local historic preservation organization	Landmark: Designation without owner consent requires petition by 100 citizens, extraordinary significance, inability to move building, and or not result in an economic hardship to the owner	None	
		District: Requires 25% to nominate, 51% to designate		
PUEBLO	Historic Preservation Commission, City Council, or owner(s)	Nonconsensual designation permitted	\$150	

Non-consensual designation is allowed everywhere except for modern resources in Aspen. In Longmont, approving a non-consensual designation comes with extra requirements. For an individual landmark, there must be a petition with 100 citizen signatures, an extraordinary significance, an inability to move the building, and the designation must not result in an economic hardship for the building owner. An application for a Longmont historic district designation requires 25 percent approval, but final listing requires the consent of 50 percent or more of the property owners within the district.

Boulder's fees, which have not changed since the mid-1970s, are in the middle of the range. Two cities, Fort Collins and Longmont, do not have an application fee. By far, the designation fees are highest in Denver; their City Council recently approved an increase for all non-owner-initiated applications, with the charge for such an individual landmark application set at \$875. The expensive fees (even before the recent increase) for local designation may be one reason Denver has such a high number of resources listed on the NR and SR (see Table 7).

Individual Landmarks and Historic Districts

The HPO empowers the LB to designate resources of historical, architectural, and/or environmental significance. Designation is the preservation step which follows the identification and evaluation completed in historic & architectural surveys. Boulder's historic preservation ordinance allows for listing both individual landmarks-- which may be sites, single buildings, or small complexes-- and historic districts.

Individual Landmarks

To date, the city has designated a total of 162 individual Boulder landmarks.⁸ Of these, the vast majority (64 percent) are single-family houses. Designated landmarks also include multi-family buildings (4 percent), commercial properties (12 percent), and a variety of institutional buildings such as churches, schools, and government resources (10 percent). Despite its current urban character, the Boulder local landmark list includes several barns, farmhouses, and original agricultural sites. Indicating the overall diversity of the collection of locally designated resources, Boulder also boasts a former smelter site, a cemetery, a moved historic depot, a power substation, an oil well, and a drive-in sign. These resources, viewed as a group, highlight the important themes of Boulder's historic development from its earliest origins as an industrial and supply center for nearby mining communities to its post-World War II boom in population that spawned new subdivisions, numerous auto-related services, and educational and scientific institutions. Architecturally, most of the designated individual landmarks are classified as "vernacular." This catch-all term is used to describe local architectural expressions or, more commonly, historic buildings which do not exhibit the pure characteristics of "high-style" or established architectural styles. Many vernacular resources are classified by their building form rather than their stylistic details. However, buildings designed with a mix of architectural influences, often chosen from pattern books, also might be labeled vernacular. Of the recognized architectural "styles", Boulder boasts mostly Queen Anne and Edwardian buildings on its list of individual landmarks. Both of these fall into the larger category of Late Victorian (ca. 1870 to 1910) time-period and represent a key period of civic and residential growth in Boulder; approximately 35.6 percent of Boulder's existing housing stock was constructed during that forty year period.

Historic Districts

An historic district is an area with a shared history and/or special architectural and design character which creates a distinct sense of place. Boulder's historic districts vary in size from very small to quite large; the Floral Park historic district (Boulder's first historic district) contains only nine buildings, while Mapleton Hill has over 900 buildings and outbuildings spread over numerous residential blocks. All historic districts are

assigned both Area(s) of Significance (AOS) and Period(s) of Significance (POS). The AOS is the reason why the historic district is important and the POS is the period which applies to that importance. For example, Boulder's West Pearl historic district is significant for architecture dating from 1874 to 1906. The resources within an historic district which match its AOS and POS are considered contributing, while those which do not are labeled non-contributing. If buildings have changed too much over time to be considered intact examples of the historic period or individual recognized architectural types identified in the historic district designation narrative description, then they are considered non-contributing. Boulder further classifies, beyond contributing and non-contributing, the resources within its historic districts. These classifications include individual landmark, individually significant, contributing restorable, NR-eligible, Structure of Merit (SOM), and significant newer. Individually significant is used for buildings found eligible to be local landmarks. Resources labeled as contributing restorable are considered contributing within local historic districts. Boulder introduced this classification to encourage property owners to take advantage of Colorado State Tax Credits, thereby allowing a building with borderline integrity to become a strongly contributing resource after appropriate restoration work is completed. The classification of significant newer refers to infill buildings constructed after the district's period of significance. For example, a 1960s commission by the architect Charles Haertling located within the Mapleton Hill Historic District might warrant this label since its construction date lies outside the district's POS (1895-1946).

Boulder has a total of ten local historic districts, all of which are detailed in Table 6 and shown in purple on Map 1. Three of these historic districts-- Mapleton Hill, Downtown, and Hillside-- also have been expanded over time to adjust the boundaries and, in the case of Mapleton Hill, extend the period of significance from the 1930s to 1946.

The overall goal when designating historic districts is to have at least 50 percent contributing resources. Beyond this consideration, most historic districts also are designated based upon the concepts of density and distribution. Density refers to the size of the individual contributing buildings and distribution relates to how these resources are spread throughout the district. Ideally, the larger buildings within any designated historic district should be contributing. Having these larger contributing resources near the center of the historic district gives the area a stronger visual presence which strengthens the sense of the area's special character. Boulder's Highland Lawn historic district illustrates an excellent balance of density and distribution. This district contains eighteen houses with accessory buildings at the rear of the properties; many of the main houses have multiple outbuildings. A total of 51.2 percent of the resources, including all but one of the buildings, are contributing. These contributing house are not only much larger than the accessory buildings but also located in a primary position on each lot.

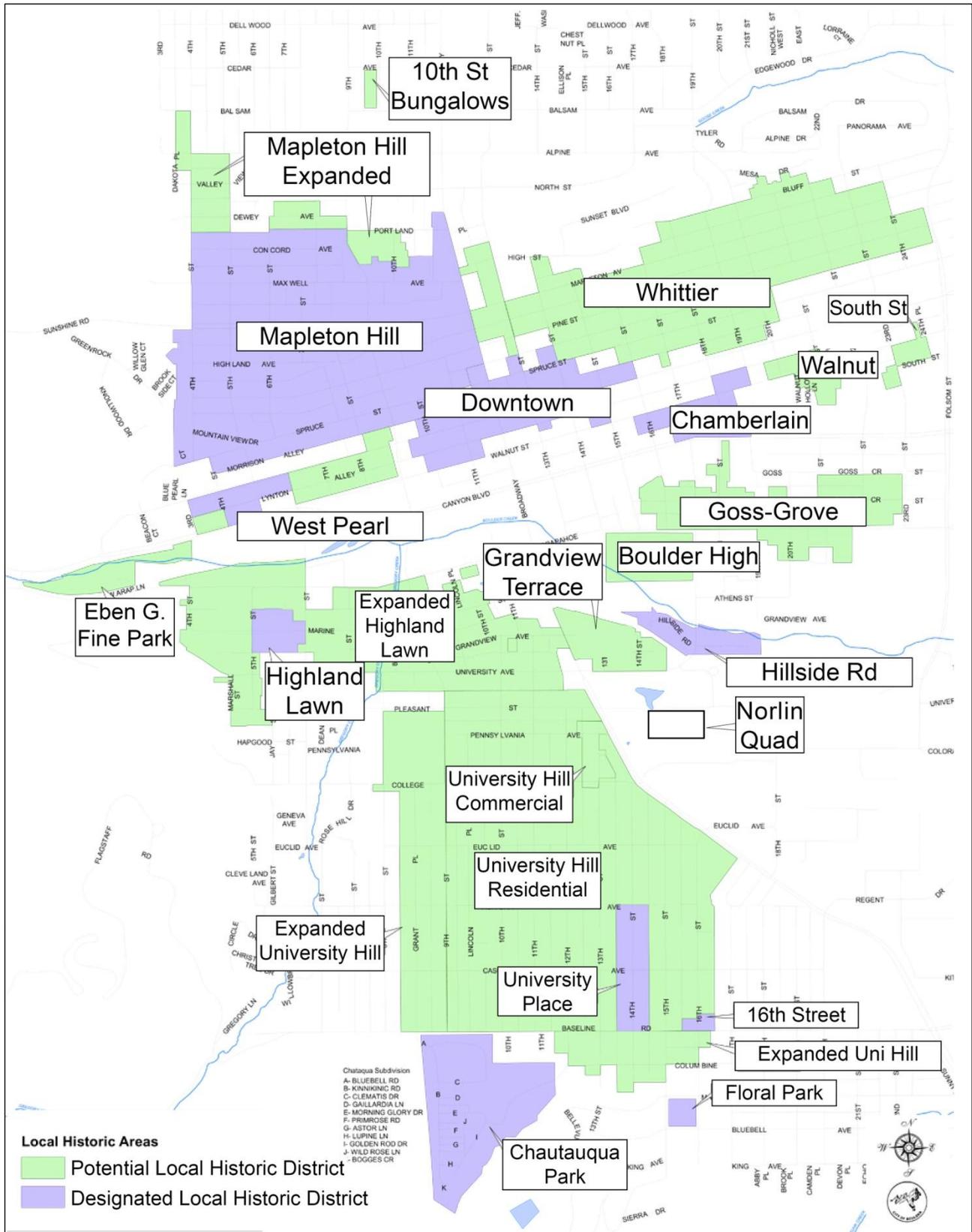
Table 6: Boulder Local Historic Districts

DISTRICT NAME	APPROVAL DATE	AREA OF SIGNIFICANCE	PERIOD OF SIGNIFICANCE	RESOURCES				
				CONTRIBUTING			NC	OTHER
				IS	C	CR		
Floral Park	13 December 1977	History, Architecture, Environment	1940s	n/a	9	n/a	0	n/a
Chautauqua Park	19 September 1978	History, Architecture, Environment	1898-ca. 1926	n/a	113	n/a	0	n/a
Mapleton Hill	7 September 1982	History, Architecture, Environment	Ca 1895-1946	30	398	108	263	150
Mapleton Hill Expansion	17 December 2002							
West Pearl	17 May 1994	Architecture	1874-1906	n/a	23	n/a	16	n/a
Chamberlain	18 July 1995	History, Architecture	1859-1910	n/a	41	n/a	29	n/a
Downtown	15 June 1999	History	1860s-ca 1930	20	26	31	48	n/a
Downtown Expansion	18 February 2003							
Hillside	15 May 2001	History, Architecture, Environment	1900-1940	5	8	n/a	1	2
Hillside Expansion	3 December 2002							
Highland Lawn	3 May 2005	History, Architecture	1884-1925	n/a	21	n/a	20	n/a
University Place	20 March 2006	History, Architecture	1890-1941	n/a	56	n/a	44	n/a
16 th Street	17 October 2006	Architecture	1930s	n/a	5	n/a	0	n/a

Key: IS = Individually Significant; C = Contributing; CR = Contributing Restorable; NC = Non-contributing

In practice, it is property owners and residents within possible historic districts who initiate the designation process in Boulder. Staff has developed a list of potential future historic districts, based mainly upon findings from various completed grant-funded survey and resurvey projects. These areas appear on Map 1 as well; the green shading is for eligible local historic districts and the diagonal hash marks represent potential NRHDs. A great deal of outreach usually both precedes and follows the applicant's initiation of the historic district process. Since all historic districts must have at least 50 percent owner approval for the LB public hearing to go forward, such educational sessions are very important. Residents need to understand fully the designation process and the implications of living in or owning a property in an historic district. At its 2012 retreat, the LB discussed gauging public interest in two thematic, discontinuous districts, one for Bungalow houses and a second for buildings designed by well-known local Modernist architect Charles Haertling.

Map 1: Boulder Designated and Potential Historic Districts



Comparative Analysis

The five comparison CLGs have varying records on landmark and historic district designation. Table 7 summarizes each community's listed properties, including those on the National and State registers and the number of National Register historic districts (NRHD). Although not included in this chart, three of these communities also have a National Historic Landmark (NHL). The Colorado Chautauqua is in Boulder, the Civic Center (park) is located in downtown Denver, and the Lindemeir (archaeological) Site is near Fort Collins.

Table 7: Designated Sites in Colorado CLGs

COMMUNITY	NR	SR	NR HD	LOCAL LAND-MARKS	LOCAL HISTORIC DISTRICTS	LOCAL DESIGNATION DATES					
						60s	70s	80s	90s	00s	10s
BOULDER	16	5	3	162	10	N/A	23	26	65	44	5
ASPEN	28	0	0	198	2	N/A	4	65	112	20	2
DENVER	266	55	15	332	74	16	100	65	115	32	4
FORT COLLINS	24	16	2	216	1	N/A	45	8	81	84	0
LONGMONT	8	0	2	114	0	N/A	16	41	31	26	0
PUEBLO	54	9	2	135	2	N/A	N/A	N/A	N/A	16	6

Not surprisingly, given its relative size and the age of its preservation program, Denver has the most individual landmarks and local historic districts. The capital city also has taken greatest advantage of the OAHF-administered NR and SR designation programs, with a total of 311 resources listed in this manner and fifteen NRHDs. This relationship between community size and the number of listed resources is not absolute among the chosen Colorado CLGs. For example, for its overall size and the fact Pueblo did not start its local designation program until 2005, the total number of 135 local landmarks seems unusually high. However, this figure is based upon the fact, once Pueblo started designating properties as landmarks, all of its NR-listed properties were automatically added to the local landmark list. Aspen represents another anomaly on this list, with a total of 198 local landmarks, despite its small geographic area. Like Boulder,⁹ Aspen developed its historic preservation program in a climate of increasing development pressures. Historic designation and its accompanying alteration review processes have been successful in protecting the historic resources in this former mining community turned skiing mecca. For Aspen, as in Boulder, historic designation has been a way to protect community character.

The rate of designations in Boulder, both individual landmarks and historic districts, has decreased over time. Local landmarks hit their peak in the 1990s, when 40 percent of the 162 resources currently designated were listed. For historic districts there were the most, again 40 percent of the total, in the 2000s. It seems unlikely Boulder has hit some sort of saturation point in terms of designation, especially considering its proportionally high number of Modern and postwar residential resources. Given the important role designation and the resulting design review process plays in protecting Boulder's historical, architectural, and environmental character, it seems worthwhile to devote

special attention to the public outreach and education process needed to encourage property owners to designate their homes and businesses

Structure of Merit

This program, established in 1988, technically still exists but has not been active since 1997. The LB approved regulations for the Structure of Merit (SOM) program to recognize non-landmark properties possessing “historical, architectural, or aesthetic merit.”¹⁰ The goal of this program is to “recognize and encourage the protection, enhancement, and use of such structures.”¹¹ There are four criteria for SOM recognition:

1. All structures officially designated by state or federal agencies are automatically on the list since the ordinance requires their inclusion. Thus structures listed on the Colorado State Register of Historic Properties (SR) and the NR will be listed.
2. As surveys of Boulder are completed, neighborhood by neighborhood, the LB will review survey results and consider appropriate SOM designations.
3. The LB will consider neighborhoods in which few individual structures have been landmarked, yet contain structures which merit designation.
4. Types of structures important to the development of Boulder such as churches, schools and terraces also may be considered for designation.

The LB views SOM listing as a way to increase preservation awareness and encourage community value for recognized properties. Different from landmark designation, the SOM program is strictly honorary and is not subject to the same review processes for alterations to designated individual landmarks or resources within listed historic districts. The procedure for SOM recognition is less regulated than the process associated with landmark and historic district designation. As resources are listed on either the NR or SR, these properties are automatically added to Boulder’s ongoing listing of SOMs. As additions are made to the SOM list, the property owners are notified. In 1997 the LB slightly revised the administrative rules for the SOM program. Changes were intended to ensure consistency between SOM rules and the historic preservation code’s demolition and relocation review process. Demolition and relocation review is required for any building fifty years or older and for SOM properties under fifty years of age. This provision was subsequently changed again in response to owner opposition. SOM properties under fifty years of age no longer are subject to demolition review.

Table 8 lists the current properties recognized as SOMs. Many of these were chosen for their relation to a LB-selected theme. For example, in 1987 the board focused on Goss-Grove Little Rectangle houses. Other thematic listings include those of the terrace form (1989) and homes designed by architect Charles Haertling (1997). The SOM program has not been active since those 1997 recognitions. Over the years, LB members have attempted to reinvigorate this program, but with little success. Although the research has been completed, recognition of East Pearl Scattered Resources as SOMs remained uncompleted from the board’s 1999 work plan. The LB 2003-2004 work plan suggested choosing a theme annually and publicizing new listings with the initiation of a SOM month; apparently this project was not of sufficient importance to be completed either. As recently as the 2012 LB Retreat, board members again mentioned the idea of

thematic listings on the SOM, recommending early agricultural resources in the Newland area as properties appropriate for SOM recognition.

Table 8: Structure of Merit (SOM) Listings

YEAR	PROPERTY	ADDRESS	LANDMARKED	LANDMARKED DATE	
1987	Arnett House	646 Pearl Street	Yes	21 August 1990	
	George-Paddock House	845 11 th Street	No	N/A	
	Coulson-Noxon House	907 7 th Street			
	The Castle	977 9 th Street			
	McNutt-Downing House	983 14 th Street			
	Butsch-Paddock House	1105 Spruce Street			
	Henry Drumm House	1638 Grove Street			
	1728 Grove Street	1728 Grove Street			
	Werley House	1813 Pine Street			Yes
	National Center for Atmospheric Research (NCAR)	1850 Table Mesa Drive	No	N/A	
	1902 Grove Street	1902 Grove Street			
	1915 ½ Goss Street	1915 ½ Goss Street			
	1935 ½ Goss Street	1935 ½ Goss Street			
	Martha Hall House	2102 Goss Street			
	2118 Goss Street	2118 Goss Street			
	2141 Goss Street	2141 Goss Street			
	Oscar & Mary White House	2202 Goss Street			
	James Sackett House	2250 Goss Street			
Lytle House	2552 Pearl Street	Yes			19 February 1991
Bernard Houses	1602-1620 Walnut Street	No			N/A
1988	Leech House		575 Arapahoe Avenue		
	711 Walnut Street		711 Walnut Street		
	Octagon House		821 Lincoln Place		
	Soule-Coates House	1123 Spruce Street	Yes	2 January 2001	
Ruth Cave Flowers House	2019 Goss Street	Yes	19 May 1992		
Clemens House	3345 Broadway Street	No	N/A		
1989	Wahlstrom Mission Terrace	2010-2014 19 th Street	Yes	15 September 1998	
	1433-1435 13 th Street	1433-1435 13 th Street	No	N/A	
	1851-1821 17 th Street	1851-1821 17 th Street			
	Johnson-Betasso Terrace	1911-1915 Pearl Street	Yes	21 August 1990	
	2017-2023 17 th Street	2017-2023 17 th Street	No	N/A	
	2059-2061 Bluff Street	2059-2061 Bluff Street			
	2105-2107 Bluff Street	2105-2107 Bluff Street			
	2117-2121 18 th Street	2117-2121 18 th Street			
	2127, 2131, 2135 14 th Street	2127, 2131, 2135 14 th Street			
	2330-2332 14 th Street	2330-2332 14 th Street			
	2535-2537 5 th Street	2535-2537 5 th Street			
	315-317 Canyon Boulevard	315-317 Canyon Boulevard			
	835-837 Walnut Street	835-837 Walnut Street			
	1515 Spruce Street	1515 Spruce Street			
	1734 Spruce Street	1734 Spruce Street			
2014 Pearl Street	2014 Pearl Street				
2334-2336 14 th Street	2334-2336 14 th Street				
1993	1414 Pine Street	1414 Pine Street			
	1424 Pine Street	1424 Pine Street			
	1445 Pine Street	1445 Pine Street			
	1514 Pine Street	1514 Pine Street			
1996	1420 Bluebell Ave	1420 Bluebell Ave			
	Grieder House	1836 Baseline Road			
1997	Knudsen House	420 Christmas Tree Drive	No	N/A	
	McConnell House	450 College Street			
	White House	530 Pennsylvania Avenue			
	Wilson House	550 College Avenue			
	Johnson House	630 Northstar Court			
	Noble House	650 Pennsylvania Avenue			
	J.R. Knitting Mill	719 Walnut Street			
Jourgensen House	780 Flagstaff Road				

Barnes-Schwalbe House	896 17 th Street		
Krueger House	1025 Rosehill Drive		
Roitz House	1135 Jay Street	Yes	24 July 2007
Albersheim House	1440 Bellevue Drive	No	N/A
Wheat House	1515 Baseline Road		
Moment House	2358 Panorama Avenue		
1714-1718 Broadway Street	1714-1718 Broadway Street		

Although dormant for some time, it seems the SOM program retains value. Staff and the LB may want to consider employing such recognition as a precursor to individual landmark or, in the case of thematic resources, historic district designation. Since SOM properties are not subject to the same level of review as designated resources, this program could serve as a less process-driven introduction to the Boulder historic preservation system for property owners. While SOM do not receive as much protection as landmarks or buildings within historic districts, the recognition potentially can lead to not only increased owner pride but also place these resources “on the radar” of local preservation advocates, including the LB and staff. It seems the SOM is particularly well-suited to recognizing resources which possess historical, architectural, or environmental significance but, for technical (such as not meeting the age threshold) or personal reasons (lack of owner consent), are not currently good candidates for designation. For example, staff and the LB might pursue such recognition for important examples of Boulder’s 1960s through 1980s architecture. This program also could be utilized, as it is elsewhere, for historic resources which have been moved from their original location. If SOM is revived, a promotion and public education initiative should be developed to accompany the program.

Comparative Analysis

Of the five Colorado CLGs chosen for comparison to Boulder, only one also has a SOM program. In Longmont the historic preservation “commission may recognize any property of historic, architectural or aesthetic merit, which has not been recognized under any other provisions.”¹² Overall, Longmont’s SOM program seems quite similar to Boulder’s recognition initiative. The purpose of SOM recognition in Longmont is “to encourage the protection, restoration, preservation, enhancement, and adaptive reuse of such properties.”¹³ In Longmont the historic preservation commission issues certificates of merit, paperwork which can both be given and revoked without requiring a formal public hearing. Such certificates are available only for properties which do not qualify for local designation. As in Boulder, Longmont SOM’s are not subject to the same regulatory provisions and review processes as landmarks and resources within designated historic districts.

Nationwide, it appears SOM programs exist most often in California. The communities of Berkeley, Santa Barbara, San Francisco, and Santa Monica all possess the ability to bestow such honorary recognition on historical and architectural resources. In Berkeley it seems SOM recognition is particularly used for resources which have been moved. Their SOM list also indicated four of the thirty-nine total SOM had been demolished over the years. As in Boulder, the Berkeley SOM program is only honorary and lacks the regulations to review major alterations or demolitions.

Landmark Alteration Certificate (LAC)

Design review, assessing the appropriateness and impact of proposed work on individual landmarks and properties within designated historic districts, represents one of the LB's most important tasks in terms of the potential impact of their decisions on the visual and historical character of Boulder. The revised historic preservation code defines an alteration as "any change to the exterior of a structure or to a landmark site that is visible to the public."¹⁴ Common building changes which require a LAC include additions, renovations, repainting, re-roofing, adding or changing windows and doors, porch enclosures, and fencing. Most requests for LAC do not need to be heard by the entire LB. Staff routinely review common *minor* alterations. Examples of such work include painting, re-roofing, some rear and side yard fencing, restoring existing historic features, and landscaping. Staff also reviews signs, awnings, and patio extensions in the Downtown historic district.

The LDRC was established to assure the timely review of LACs. This group, composed of two LB members and one preservation staff member, meets weekly. The LDRC is responsible for reviewing most LAC requests. The process usually begins with a conceptual or general examination of the proposed work, with follow-up meetings, if needed, scheduled to discuss specific details with applicants. The LDRC relies upon not only *The Secretary of the Interior's Standard for Rehabilitation* but also the general citywide and historic district-specific design guidelines in making decisions about the appropriateness of proposed alterations. All three members of the LDRC must approve the alteration. If such agreement is not reached, then the request for a LAC is referred to the full LB for a public hearing. If applicants are not pleased with the ruling of the LDRC, they may request a LB public hearing to determine whether the LAC should be granted.

The LDRC, in some cases, has encountered problems with the perception of pre-judgment when applicants meet with the smaller group multiple times and then, ultimately, move forward to a LB public hearing. To avoid this scenario, it is best to make a decision early in the design review process whether granting the LAC will require a public hearing and, if so, to proceed directly to this meeting. Applicant education and a clear and transparent process are both important to enhance the effectiveness of LDRC design review.

There are four situations in which the LB must schedule a public hearing to issue a LAC. Two circumstances, disagreement among members of the LDRC and applicant-request, are mentioned above. The other two reasons are a request either to demolish or to construct a new building over 340 square feet on the site of an individual landmark or a property within an historic district. This public hearing must be held with sixty days of the original application. The LB's decision regarding the LAC at the public hearing is forwarded to the City Council. This body has fourteen days to decide whether to "call up" the LB's decision for their own consideration.

Comparative Analysis

The City of Boulder, as part of the historic preservation plan development process, submitted an online questionnaire to the National Alliance of Preservation Commissions (NAPC). This thirteen-question instrument received a total of thirteen responses from

Alliance members. While the number of replies was not as robust as hoped, the communities which did respond represent a diverse group which are geographically scattered across the United States. The questionnaire respondents also work in both small and large communities; the Village of Pittsford, New York, has a population of only 1700 while the preservation program in Montgomery County, Maryland, serves over 970,000 citizens. Boulder’s population of over 97,000 falls in between Calvert County, Maryland, (90,000) and South Bend, Indiana (100,000). The respondents also come from both well-established and newer preservation programs. The oldest, in Mobile, was established in 1962, and Eatonton’s program was created most recently, in 2002. The programs in both Independence and Calvert County, like Boulder, were established in 1974.

Table 9 summarizes the design review processes in the NAPC communities, noting who completes the review and what resources or types of work are considered. The information provided is based upon the thoroughness of the individual questionnaire responses and varies from community to community. It appears, in most of the thirteen communities, their equivalent of the LB makes the decisions regarding permitted alterations to historic resources. Only four replies mentioned any role for the staff. In Jefferson the staff prepares a report but the commission makes the decision regarding approval. The Land Development code in Fernandina Beach determines the distribution of the staff-commission design review workload. In Lake Charles preservation staff is available on as-needed basis to advise the district-specific review boards. And in Valdosta the staff and commission work together to reach design review decisions.

Table 9: Comparison of National Design Review Processes

COMMUNITY	REVIEWERS	REVIEWABLE RESOURCES/ WORK	OTHER
MONTGOMERY COUNTY, MD	Unspecified	430 individual landmarks, 22 historic districts	Also limited review authority over approximately 100 “identified” resources
FREDERICKSBURG, VA	Board of seven appointed citizens	Unspecified	n/a
JEFFERSON, GA	Historic preservation commission with input from staff report	Material change, new work, or infill	Certificate of Appropriateness (COA)
EATONTON, GA	Historic preservation commission makes recommendation; City Council approves	Unspecified	Monthly design review; approximately 5 COAs annually
PITTSFORD, NY	Five-member Architectural and Preservation Review Board	Unspecified	n/a
OAK PARK, IL	Unspecified	Historic landmarks and properties within historic districts Exterior work visible from the street	Design review decision not binding unless property is landmark or contributing resource in historic district that is either proposing demolition or project is

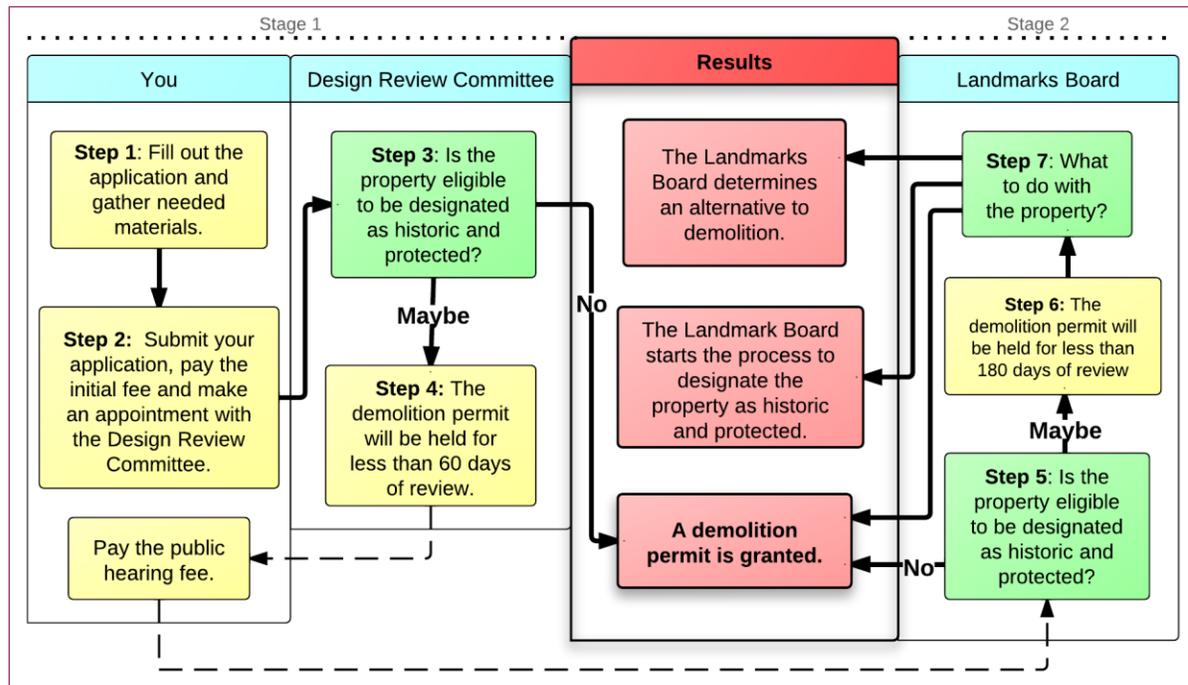
			government- funded
FERNANDINA BEACH, FL	Staff	Matrix in Land Development Code determines what staff can review, what the HDC must review	n/a
	Historic Preservation Board		
MOBILE, AL	Architectural Review Board (11 members, 4 alternates)	Unspecified	n/a
LAKE CHARLES, LA	District-specific review committee	Resources within historic districts (not clear if both contributing and non-contributing)	Total of three historic districts
	Staff experts as needed/ on call		
INDEPENDENCE, MO	Heritage Commission and Historic Preservation Staff	Unspecified	Heritage Commission = 9 member board with 7 community volunteers and 2 ex-officio members
SOUTH BEND, IN	Unspecified	Only landmarks and resources in historic districts	n/a
CALVERT COUNTY, MD	Historic District Commission	Designated properties (not clear if only landmarks or also historic districts)	HDC consults with architectural review committees for each of the town centers
VALDOSTA, GA	Staff and HPC	Unspecified	HPC = 7-member citizen review board

Demolition

Boulder’s original HPO required applicants to obtain a Certificate of Appropriateness for demolition of either individual landmarks or resources within designated historic districts; the LPAB was obliged to hold a public hearing to make their decision. In 1994, in response to the dramatic increase in demolition applications, a revision to the historic preservation ordinance added a review process for the demolition of non-landmarked buildings over fifty years of age and outside of historic districts. Further revisions in 2007 to the preservation code established two processes for demolition reviews, with the LDRC given responsibility for ruling on demolition of non-landmarked buildings constructed prior to 1940 and located outside of designated historic districts and staff assigned the task of reviewing such buildings erected after 1940. Since the LDRC meets weekly, this change allowed for more rapid decision-making.

The current historic preservation code defines demolition as “an act or process that removes: 1) 50 percent or more of the exterior walls of a building as measured contiguously around the “building coverage; or 2) 50 percent or more of the roof areas as measured in plan view; or any exterior wall facing a public street, but not an act or process which removes an exterior wall facing an alley.”¹⁵ Chart 1, which appears on the city’s website, traces the process for demolition requests for non-landmarked buildings built prior to 1940. Individuals wishing to demolish a non-landmarked building must complete and submit an application and pay a fee (currently \$282 for primary buildings, \$51 for accessory buildings).

Chart 1: Demolition Review Process for Non-Landmarked Buildings Constructed Prior to 1940



Source: City of Boulder website - <http://www.bouldercolorado.gov/files/PDS/historicpres/Demolitionreview.png>

The initial review by the LDRC is usually scheduled for the next meeting. It is the LDRC's responsibility to decide whether there is probable cause to consider the subject building *may* be eligible for designation as an individual landmark. If the building is found potentially eligible, a LB public hearing must be scheduled within a 75-day period. If the LDRC members unanimously determine the proposed demolition would cause "no significant impact or potential detriment to the historic resources of the city,"¹⁶ (per 9-11-23 of the Boulder Revised Code), then the demolition permit is granted. The fee for a public hearing to determine eligibility, in these demolition request cases, is currently \$1504. At the LB public hearing, this body is charged with considering eligibility of the subject building based upon the established criteria for eligibility. In addition, the revised ordinance requires the members to consider 1) the relationship of the building to the character of the neighborhood, 2) the reasonable condition of the building, and 3) the reasonable projected cost of restoration or repair. If the LB determines the property is not eligible for designation as an individual landmark, a demolition permit is granted. However, if the LB decides the building may be eligible, then a 180-day stay of demolition is imposed. During this six month period, the LB may start the initiation process to designate the resource and staff engages in discussions with the applicant to explore alternatives to demolition. If the property, after the designation application is prepared and the required public hearing for determining eligibility is held, is determined to be not eligible, then a demolition permit is granted. If the building is designated as an individual landmark, then the LAC process for demolitions is required.

Staff may, for any non-landmark granted a demolition permit, require the applicant to complete written, graphic, and/or photographic recordation of the site prior to issuance

of the final permit. The format of this recordation is typically according to the Historic American Building Standards. The purpose of this documentation is to act as an archival record for a resource which no longer exists.

The 1994 through 2007 revisions to the Boulder historic preservation code related to demolition of non-landmark properties or those located in historic districts older than fifty years old. Table 10 indicates a total of 630 resources¹⁷ received demolition permits between 2003 and 2012. Looking at statistics for permits for demolition of buildings between 2007 and 2011, the percentage of those which fall into the fifty years or older category ranged between 43 percent in 2010 to 57 percent in 2008.¹⁸ Analyzing a map showing all of the exterior demolition permits indicates most, but not all, of the permissions were granted outside of historic districts.¹⁹ There are clusters of demolitions surrounding the 10th Street Bungalow area in North Boulder and just outside the northeast corner of the Whittier neighborhood which is not a designated historic district.. These findings point to the need for resurvey in these areas, since the sheer number of demolitions in a small area may have made earlier findings regarding individual landmark and historic district eligibility invalid or, at the very least, out-of-date.

Table 10: Boulder LAC and Demolition Statistics, 2003-2012

YEAR	LACS			DEMOLITIONS FOR NON-LANDMARKED BUILDINGS OVER 50 YEARS OUTSIDE HISTORIC DISTRICTS*						
	Approve	Deny	With-draw	Accessory Structures		Post-1940		Pre-1940		
				Approve	With-draw	Approve	With-draw or Deny	Approve	With-draw	Deny
2003	186	1	3	0	0	58 approved				
2004	137	4	2	5	0	24 approved, 3 withdrawn				
2005	143	2	4	11	1	65 approved, 2 withdrawn				
2006	173	4	4	3	1	63 approved, 10 withdrawn, 2 denied				
2007	183	2	6	12	0	69	1 (w)	24	6	1
2008	129	2	4	13	0	53	1 (d)	14	0	0
2009	158	2	5	5	0	39	0	7	1	0
2010	160	1	1	3	0	40	0	8	0	0
2011	178	0	2	5	0	36	0	12	1	0
2012	186	1	1	6	0	40	0	15	2	0
TOTAL	1633	19	32	63	2					

* - Beginning in 2007, demolition review applications were differentiated between pre-1940 (LDRC review) and post-1940 (staff review)

Comparative Analysis

Both Table 10 and Table 11 combine details regarding both alteration and demolition review. All of the comparison Colorado CLGs engage in design review, although the communities differ in terms of who is responsible for the review, the types of projects eligible for staff review, and the types of projects requiring a public hearing. All of the CLGs allow for staff review, with most assigning to staff members the role of approving or denying routine changes to historic buildings. All of these CLGs also have certain categories of changes to historic buildings which require a public hearing. In Aspen the historic preservation commission rules on both minor and major development at a public

hearing. If their commission approves the request, the applicant leaves with a “Certificate of No Negative Effect” and work is allowed to proceed. The other communities award “Certificates of Appropriateness.” Boulder’s HPO original used this same nomenclature, but revised the ordinance to refer to the issuing of LACs instead.

Table 11: Comparison of Colorado CLG Design Review and Demolition Processes

COMMUNITY	STAFF REVIEW	PUBLIC HEARING
BOULDER	Common alterations (re-roofing, paint colors, restoration of existing historic features, landscaping, rear or side yard fences)	New construction; Removal or demolition of landmarks; Removal or demolition of resources within historic district
ASPEN	Work with no adverse effect on physical appearance or character-defining features of designated property	<p>MINOR DEVELOPMENT:</p> <ol style="list-style-type: none"> 1) expansion/ erection of 250 square feet or less floor area 2) alterations when 3 or fewer elements affected and work not qualify for certificate of no negative effect 3) erection/ installation of combination/ multiples of attachments to designated properties where cumulative impact does not allow for certificate of no negative effect 4) alterations to non-historic portions of designated historic property not qualifying for certificate of no negative effect 5) erection of visible improvements within designated historic districts of magnitude/ numbers where not allow for certificate of no negative effect <p>MAJOR DEVELOPMENT:</p> <ol style="list-style-type: none"> 1) construction of new structure within historic district 2) alterations to 3+ elements of building 3) expansion increasing floor area by 250+ square feet 4) new development determined not to be minor
DENVER	<ol style="list-style-type: none"> 1) Applications which clearly meet the guidelines 2) Demolitions citywide 	Alteration/ demolition of landmark or contributing building within historic district
FORT COLLINS	Sign review; color approvals; awning recovering; changes that do not remove, cover, alter, destroy significant historic material; changes to plans previously approved by Landmark Preservation Commission	Alteration/ demolition of properties individually eligible, individually designated, potentially contributing to historic district, or contributing to designated historic district
LONGMONT	Alterations which determined to have no significant impact on designated resource	Alterations (including demolitions or relocations) determined to have significant impact on designated resource
PUEBLO	Minor alterations (especially paint)	All Certificates of Appropriateness (for alterations, restorations, construction, relocation, demolition, significant changes to designated resources/ resources within designated historic districts)

Among the five Colorado CLGs chosen for comparison with Boulder, Aspen and Fort Collins face the greatest development pressures and these two communities, like Boulder, also have instituted approaches to deal with the demolition of postwar resources. In 2007 the Aspen City Council approved an emergency ordinance requiring all buildings over thirty years old to be reviewed for historic integrity prior to issuance of either a building or demolition permit. Local residents, unhappy with this new requirement, convinced City Council to change course slightly. Aspen historic preservation staff created a list of modern resources deemed to have the greatest significance and integrity. The buildings on this list must wait ninety days to receive a building or demolition permit. During this waiting period preservation staff discusses the economic, social, and cultural values of historic designation. If the property owner still wants to move forward with alterations or demolition, they may proceed after the 90-day period has elapsed. This entire process ultimately led to the passage of an ordinance revision which created separate designation and design review criteria for properties labeled as either AspenVictorian or AspenModern; owners of AspenModern buildings may opt out of any designation proceedings.

Fort Collins' demolition review for recent past buildings appears to be similar to Boulder's. Although, in the absence of a review board such as the LDRC which meets weekly, the entire process could be extended longer than the demolition permit procedures in Boulder. In Fort Collins, staff makes the initial determination of eligibility and suitability of the demolition. If the property is not deemed eligible, then a demolition permit is issued. However, if the property is eligible and the demolition is not deemed appropriate, then the applicant appears before the Landmark Preservation Commission for a preliminary hearing to discuss alternatives to demolition. If the applicant and the preservation board agree, the demolition permit is granted. If the two parties cannot agree, then the applicant must get approval through Development Review; after this review is complete, the applicant schedules a final hearing before the preservation board. At this meeting the board members may direct the preservation staff to begin the designation process, at which time a 45- to 90-day (length depends on level of public and preservation board concern about demolition) hold is placed on the property seeking permission for demolition. At the designation hearing the Fort Collins preservation board makes a recommendation to its City Council for landmark listing.²⁰

Most of the NAPC comparison communities only review demolition of designated landmarks and buildings within historic districts. Table 12 details the review processes in these locales, noting, as available, who is responsible for the review and what type of resources are subject to such demolition review. Staff review appears, as with design review, to be relatively minimal. A staff role is mentioned only in Lake Charles, Independence, and Calvert County. Of the NAPC respondents, only Independence noted the review of non-designated resources less than 50 years old. In that Missouri city staff reviews demolition permits for resources both less than forty-five years old and between forty-five to 100 years which are also un-designated, recognized as potentially eligible, or are located within a potential historic area. The Independence Heritage Commission is responsible for reviewing demolition permits for all resources (including outbuildings) over 100 years old. The NAPC representative from Oak Park provided a thorough definition of demolition in that community; it refers to razing or destruction,

either “entirely or in significant part” but does not specify a certain percentage of the building or site.

Table 12: Comparison of National Demolition Review Processes

COMMUNITY	REVIEWERS	REVIEWABLE RESOURCES	OTHER
MONTGOMERY COUNTY, MD	Unspecified	“Identified” or designated resources	“We do not have authority to review demolition of ‘old’ buildings such as the Boulder provision.”
FREDERICKSBURG, VA	Unspecified	Resources within historic district zoning overlay	All demolition is reviewed, unless the Building Official has determined a hazard to the public exists. In those instances, public safety trumps review and hazard must be mitigated.
JEFFERSON, GA	n/a	No demolition review	“We are working on that (responsibility for demolition review) for 2013”
EATONTON, GA	Unspecified (but no staff)	Within one “tiny” historic district	Use same process as design review
PITTSFORD, NY	Architectural Preservation Review Board	All resources within historic district	Entire village within historic district, therefore, review for all demolitions
OAK PARK, IL	Unspecified	Contributing resource in historic district, landmark, or if government funding involved	Demolition includes “the razing or destruction, whether entirely or in significant part, of a building, structure, site or object. Demolition includes the removal of a building, structure, or object from its site or the removal or destruction of its facade or surface.”
FERNANDINA BEACH, FL	Historic District Council	All resources (contributing and non-contributing) within historic districts	n/a
MOBILE, AL	Architectural Review Board	Resources within historic districts (unclear if both contributing and non-contributing)	Demolition application includes supplementary information for resources within historic districts
LAKE CHARLES, LA	Staff	Resources outside historic districts (unclear if landmarks only or all demolition permits)	n/a
	District-specific committees	Resources within historic district	
INDEPENDENCE, MO	Staff	Resources less than 45 years old	Heritage Commission reviews all demolition permits, but adopted an “administrative review policy” for staff to share responsibility
		Resources 45-100 years old that not designated as historic, recognized as potentially historic, or within an identified potential historic area (from the Comprehensive Plan)	
	Heritage Commission	All resources (including outbuildings) over 100 years old	
SOUTH BEND, IN	Unspecified	Landmarks and properties in historic districts	n/a

CALVERT COUNTY, MD	Staff	All demolition permits	n/a
	HDC	Demolitions for designated properties	
VALDOSTA, GA	Unspecified	Only resources within historic districts	n/a

Enforcement

While Boulder’s historic preservation ordinance includes provisions for penalties, staff generally uses a proactive, educational approach to reduce not only violations but also the need for enforcement. Every effort is made to provide as much relevant information as possible. Details about the LAC and demolition review processes are posted on the city’s website, provided over the phone and in person, and also appear in specialized brochures and publications. Some new property owners within historic districts “learn the ropes” of the review process, or at least such regulations exist, from their neighbors. Planning staff also have sought to cooperate with other city employees to enhance the enforcement program. For example, in the mid-2000s there was a plan to train existing city inspectors to monitor historic preservation issues when making other types of routine examinations, such as checking into possible health and safety violations. This cross-departmental program, however, was not executed due to overall city budget cuts.

The more educational emphasis appears successful in protecting Boulder’s historic resources because most violations of the HPO are quite minor. For instance, the most prevalent issue: an owner either erects or alters a fence without first applying for a LAC. The enforcement process usually begins with a complaint and resulting notification to staff of a potential violation. After such notification preservation staff may either contact an Enforcement Office to investigate, and if warranted, issue a stop work order.. Then preservation staff writes a thorough, chronological report for the Enforcement Officer; this report includes supplemental documentation such as LAC proceedings, plans, and photographs. Upon receipt of the report, this officer opens a compliance case and that office issues a notice of violation to the offender. Thirty days is given to resolve the violation, except in the cases of demolition and relocation, with preservation staff. The case remains open while the violator works with preservation staff to resolve any issues and make a physical correction. The Enforcement Officer has the power, only at the request of preservation staff, to issue a summons if there is no attempt to resolve the situation or work on correcting the problem ceases. At this point, the Enforcement Officer reports about the case to the City Attorney’s Office (CAO). The offender must appear in court unless the CAO chooses to dismiss the charges. However, if this individual starts working with preservation staff prior to their court date and an LAC is issued, then staff may request the CAO drop all charges. In this case, the offender must still appear in court even if the violation has been resolved.

In the instance of an unlawful demolition or relocation of an historic resource, the Enforcement Officer issues both a notice of violation and a summons. The maximum penalty in Boulder for demolishing an historic resource without the proper review and permit is a fine of not more than \$5,000 per violation, incarceration for not more than ninety days, or both a fine and jail time.

Comparative Analysis

Boulder, in comparison with Aspen, appears to have relatively small penalties for preservation-related violations. Like Boulder, Aspen deals with significant development pressures and contractors are required to study a city-prepared training manual and take an examination which entitles them to a special license for completing work on historic resources within the city. In the case of significant violations, such as an unlawful demolition, these specially licensed contractors may lose their privilege to this certification and, therefore, any future preservation projects in Aspen. Fortunately, as in Boulder, Aspen preservation staff reports very few enforcement issues currently. According to a member of the preservation staff in Aspen, the historic preservation, zoning, building, planning, and construction management functions are all housed within a single municipal department in this small community. This arrangement has made coordination quite easy and cross-training to identify possible preservation violations has proven highly effective.²¹

Most of the NAPC communities seem to possess similar enforcement procedures and penalties as Boulder. Most of these areas make use of zoning officials or building inspectors to issue stop work orders and many mentioned the possibility of issuing summons or escalating to a court proceeding. The respondent from Fernandina Beach acknowledged the community's challenge with demolition by neglect and noted staff has implemented a more proactive monitoring process which has allowed these professionals to reach out to property owners in advance of any violation.

Adopted Rules

The historic preservation ordinance allows the LB to adopt rules and regulations as it deems necessary for its own organization and procedures. This capacity has been primarily used to establish design guidelines for historic districts and individual landmarks.

Design Guidelines

Design guidelines help to maintain the character of a defined area. They are intended to assist in the interpretation of the historic preservation ordinance and to offer assistance to property owners undertaking construction, rehabilitation, alterations, changes in exterior appearance, or any other development involving designated individual landmarks or resources within historic districts. In addition to assisting property owners, such guidance also helps the LB evaluate alterations in a consistent and equitable manner rather than basing their decisions on personal taste. Staff cites specific criteria or relevant sections from the design guidelines when preparing the memo, presentation, and board motion for public hearings where LAC decisions are made.

The City of Boulder has developed a total of eight design guideline documents (see Table13), with some publications prepared in-house and others created by professional consultants. In the early days of the Boulder historic preservation program, survey and designation were the primary focus. As more resources, especially historic districts, were listed and the property owners within them, inevitably, wanted to make changes to their homes and buildings, the need for some sort of guidance for both property owners and LB members became clear. For this reason the earliest prepared design guidelines,

such as those for Mapleton Hill and Chautauqua Park, were developed after designation of the local historic district.

The preference and later practice has been for staff to draft the design guidelines at the same time the historic district designation research and paperwork is being prepared. This approach allows the proposed design guidelines to be incorporated into the property-owner education and outreach process which occurs prior to City Council's passage of the ordinance officially designating new historic districts. Staff works closely with affected property owners when writing these guidelines. This methodology has proven effective in cultivating critical public support for an historic district. The LB is then able to adopt the prepared design guidelines as an administrative rule, making them ready to review LACs within any newly-listed historic district. The most recent design guidelines, the citywide document published in 2007, were created to provide guidance for designated resources where district-specific guidelines do not apply. These general guidelines were written to apply to a variety of designated resources across Boulder, but they still represent an upgrade from prior reliance upon the *Secretary of Interior's Standards*. The citywide design guidelines both apply to individual landmarks but also represent an overarching statement of appropriate treatments; on topics not addressed in the district-specific design guidelines, the citywide document provides additional assistance.

Whether consultant- or staff-prepared, Boulder's design guidelines all follow a similar format. Each document features a recap of the history and significance of the designated historic district, highlighting the reasons the area was listed and particular architectural styles and the general character of the area. Design guidelines, if they are to be useful, must address every type of conceivable change which might be made to a property. Therefore, these documents must feature passages about specific issues related to:

1. The site and landscape (sidewalks, fences, alleys, and parking)
2. Additions to the building (considerations of mass and scale, architectural character, and materials)
3. Rehabilitation of the historic fabric (care for original materials and specific guidance for porches, doors, roofs, windows, and other key building components)
4. New construction (similar issues to those addressed in additions and rehabilitations) and
5. Other general issues (accessibility, energy efficiency, mechanical systems, lighting, and signage)

Table 13: Boulder Design Guidelines

PUBLICATION DATE	REVISION DATE	HISTORIC DISTRICT	AUTHOR	FUNDING	DESIGNATION DATE
1985	1994	Mapleton Hill	1985: Allyn Feinberg	City budget	1982 2002 (expansion)
			1994: Landmarks Board subcommittee, Department of Community Planning & Development, citizens committee (includes Mapleton Hill residents)		
1986	2002	Downtown	1986: The Downtown Alliance	City budget	1999 (Local) 2003 (Local expansion) 1980 (NR)
			2002: The Downtown Alliance		
1989	n/a	Chautauqua Park	Landmarks Preservation Advisory Board, Department of Community Planning & Development	City budget	1978 (Local) 1978 (NR) 2006 (NHL)
1996	n/a	Chamberlain	Winter & Company	CLG grant	1995
1996	n/a	West Pearl	Kathryn H. Barth	SHF grant	1994
2005	n/a	Highland Lawn	Department of Community Planning & Development	City budget	2005
2006	n/a	University Place	Department of Community Planning & Development	City budget	2007
2007	n/a	Citywide	Preservation Partnership	CLG grant	n/a

At this time, there are no plans to develop design guidelines for Boulder’s smaller historic districts-- for these areas, the citywide guidelines have proven quite effective. The Downtown and Mapleton Hill design guidelines both were revised to reflect evolutions in historic preservation practice, such as greater emphasis on energy efficiency and sustainability, and changes in priorities within these historic districts and the community as a whole. Staff and the LB currently do not have an established process for reviewing the adequacy of the published design guidelines and revising existing documents; such a review seems warranted, however. Recently, issues related to the Chautauqua Community Guidelines and the discussion of possible new construction within the nationally significant site, have indicated the insufficiency of the existing design guidance for this historic district and NHL. For these reasons, the Chautauqua design guidelines may be one of the next guidance documents in need of revision. Over the years, staff and the LB have faced challenges with issues not addressed in the design guidelines. Some of these items include swimming pools, substitute materials, reconstruction of lost features, mid-century modern architecture, and energy-efficiency issues. Despite these identified inadequacies, preservation organizations outside Boulder have recognized the excellence of Boulder’s design guidelines. In 2008 the city received an honor award from the NAPC for incorporating sustainability into the community design guidelines.

Comparative Analysis

Four of the five comparison Colorado CLGs have at least one design guideline document; it appears only Longmont has not produced such a publication. Denver’s record in terms of design guideline production most resembles Boulder, with the capital

city possessing both general, citywide design guidelines and district-specific guidance for three selected historic districts. Aspen prepared its first design guidelines in 1980 to provide property owners, preservation staff, and commission members with more specific policies than the general criteria codified in the town's land use code. In 2000 Aspen revised these design guidelines; key changes included incorporation of experience from the review of substantial residential additions and modification of the language to address all time periods, not just the Victorian era. According to Aspen staff, these design guidelines need updating to reflect the more nuanced interpretations the commission has developed over the past thirteen years of design review decisions. Denver too recognizes the need for design guideline revisions. Although updates are not planned at this time, when revised these documents will need to address issues associated with both windows and sustainability plus feature illustrations to clarify the intentions of the guidelines. Fort Collins has created general design guidelines plus a separate document for the Old Town Historic District. In Pueblo, only one set of design guidelines, applicable to an historical commercial district, has been prepared. Pueblo also adopted "Standards of Appropriateness," which function like general design guidelines, in 2005. Pueblo preservation staff also expressed the need for revisions to existing design guidelines, noting challenges which currently arise when the guidance does not relate directly to proposed projects. In such situations it is difficult to avoid the perception of making reactive or inconsistent decisions.

All of the NAPC respondents possess some type of design guidelines, whether general, district-specific, or both. The comments on the national questionnaire mirror responses from preservation staff in select Colorado CLGs in terms of the advantages and challenges associated with existing design guidelines. Many communities appreciated how design guidelines facilitate a consistent review processes. The response from Jefferson, Georgia, expressed concern about property owners and design professionals failing to use the design guidelines before initiating a plan or proposed change to an historic building. Several of the NAPC replies also recognized the need for updates to their design guidelines. Oak Park is in the process of revising guidelines originally created in 1994 with a goal of not only addressing inconsistencies or missing items but also changing to a more user-friendly format. Fernandina Beach needs to revise design guidelines last updated in 1999, however, until that task has been accomplished staff and commission members will rely upon their new authority to issue policy statements which inform property owners about changes in interpretation of existing guidelines. In Calvert County the existing design guidelines do not address the issues of solar energy and wind-generation, making it difficult to encourage such sustainable practices at landmark properties or within historic districts.

SECTION 3: OTHER HISTORIC PRESERVATION PROGRAM ACTIVITIES

Boulder's HPO established the basic framework for the city's preservation program. The ordinance provided the legal authority to recruit and retain LB members, designate individual landmarks and historic districts, engage in design and demolition review, and enforce such decisions. However, the Boulder historic preservation program has evolved beyond the duties and responsibilities specifically enumerated in its enabling legislation. This section of the current program assessment looks at a variety of preservation-related activities in Boulder.

Certified Local Government (CLG) Program

An amendment to the National Historic Preservation Act in 1980 established the CLG program. Its purpose is to integrate local governments into the national historic preservation framework and to foster local-state-federal partnership. The National Park Service (NPS) and State Historic Preservation Offices (SHPO) in the individual states jointly administer the CLG program. Promoting historic preservation at the grassroots level represents the overarching goal for establishing and officially recognizing communities as CLGs. All CLGs must create local historic preservation ordinances, establish a qualified historic preservation commission, maintain a system for survey and inventory of local historic resources, and provide for public participation in the local historic preservation process. Benefits of this program include access to a nationwide preservation network, participation in state tax credit programs, and the opportunity to attend training workshops and other educational offerings. The majority of communities become CLGs in order to access an earmarked pool of federal grant money, an important source of funding for preservation projects across the United States.

There are currently 1,600 localities throughout the United States with CLG status. The City of Boulder officially was recognized as a CLG on September 4, 1985, making it the second community in Colorado, after nearby Longmont, to become a CLG. There are now fifty total CLGs in Colorado. Of these, seven, including Boulder, were certified in the 1980s. During the 1990s eighteen Colorado communities became CLGs. In the period from 2000 to 2009, a total of nineteen towns, cities, and counties joined the ranks of Colorado CLGs. Since 2010 six more Colorado CLGs have been added to this growing roster. The rather dramatic increase in the number of Colorado CLGs since the 1990s likely is related the SHF grants program. This program, established in 1990, was developed after passage of a state constitutional amendment assigned a portion of the proceeds from limited stakes gambling in the mountain towns of Black Hawk, Central City, and Cripple Creek to a statewide competitive grants program for historic preservation. SHF only grants money to complete physical work for designated buildings or sites. Of the three options for listing, local designation tends to be both the quickest and easiest in comparison to designation on either the NR or the SR.

The funding for the CLG grants program comes from the federal government. Each state is required to allocate 10 percent of its annual appropriation to CLG activities. Nationwide, CLGs receive approximately \$3 million each year in grants. Colorado supplements the available federal funds for CLG grants with additional funding from

SHF. CLG grant funding can be applied to a number of different types of projects. These include historical & architectural or archaeological surveys, nominations to the NR, staffing for historic preservation commissions, design guidelines and preservation plans, public outreach materials, training for historic preservation commission members and staff, and rehabilitation or restoration of NR-listed properties.

Boulder has been fortunate to receive CLG grant money each year, except for one (2011), since it qualified for such funding in 1985. CLG grant money is awarded on the basis of a competitive process, with this competition increasing exponentially as more and more Colorado communities become CLGs. A subcommittee of staff from OAHP makes all decisions regarding CLG grant awards. Unlike nearly all other types of grant programs, CLG grant applicants are allowed to request funding for multiple projects within a single application; applicants are asked to prioritize importance when requesting funding for more than one project. Each state is keen to use their complete federal funding allocation in order to demonstrate need to Washington. Members of the Colorado CLG grants committee have a great deal of flexibility, including the possibility of partial funding and redesign of submitted projects, in their decision making process in order to assure full usage of available funding. The projects the City of Boulder has completed with CLG funding appear in Table 14.

Table 14: City of Boulder CLG Grant Awards, 1985-2012

FISCAL YEAR	GRANT AWARD	PROJECT TYPE	PROJECT DESCRIPTION
1985	\$6,800	Survey	426 properties, including 126 in Goss-Grove neighborhood + Update of 1977 survey (234 properties)
1986	\$8,750	Survey	350 properties (Whittier)
		Outreach	1000 copies of "Preserving Boulder's Landmarks"
1987	\$11,675	Survey	333 properties (Whittier, West Pearl, Downtown)
		Outreach	750 copies of "Chautauqua Design Guidelines"
1988	\$10,900	Survey	252 properties (Highland Lawn)
1989	\$12,339	Survey	350 properties (Highland Lawn, University Hill)
1990	\$12,200	Survey	300 properties (University Hill)
1991	\$9,000	Survey	315 properties (University Hill, Geneva Park)
1992	\$7,000	Survey	160 properties (Mapleton Hill)
		Design Guidelines/Plans	Historic context
		Outreach	Library database link
1993	\$12,500	Survey	208 properties (Mapleton Hill)
		Survey	132 properties (Downtown)
		Design Guidelines/ Plans	Whittier Design Guidelines
1994	\$11,000	Survey	380 properties (Newlands Addition)
1995	\$23,000	Outreach	OAHP Site Files database
		Design Guidelines/ Plans	Historic Context
		Outreach	Enhanced database access project
		Survey	Update to North Mapleton Hill forms
		Design Guidelines/ Plans	Local historic district identification phase I
1996	\$10,000	Design Guidelines/ Plans	Chamberlain Historic District Design Guidelines
1997	\$7,000	Design Guidelines/ Plans	Local historic district identification phase II
1998	\$16,400	Design Guidelines/ Plans	General design guidelines
		Design Guidelines/ Plans	Historic context
1999	\$19,750	Design Guidelines/ Plans	Modern architecture historic context
		Survey	65 properties (Modern architecture)
2000	\$4,325	Training	Board member training
2001	\$33,000	Survey	800 properties resurveyed (University Hill)

2002	\$15,000	Survey	Photographs of all designated primary, accessory buildings
		Outreach	Interactive web-based database for surveys, photos
2003	\$11,000	Outreach	Video: preservation in Boulder
		Outreach	Handouts: preservation program
2004	\$13,500	Survey	Accessory buildings (in historic districts, individual landmarks)
2005	\$5,000	Outreach	Historic preservation week activities
2006	\$5,000	Training	National Alliance of Preservation Commissions (NAPC) Forum
2007	\$4,095	Outreach	Historic district signage
2008	\$8,700	Training	NAPC Forum
2009	\$5,303	Outreach	Digitize surveys at Carnegie Library
2010	\$1,730	Training	NAPC Forum
		Training	Colorado Preservation Inc. (CPI) conference
2012	\$23,800	Design Guidelines/ Plans	Historic preservation plan

As this table illustrates, Boulder has never requested CLG funding to complete a NR nomination, pay for staff, or execute a rehabilitation or restoration of a NR-listed property. The majority of requests, especially in early grant applications, were for survey of historic resources. Survey represents the foundation of all historic preservation and, therefore, represents a logical choice for early grant funding. The city was fortunate to complete a great deal of its survey projects at a time when the per resource cost was significantly lower than it is now; this timing allowed Boulder to document a majority of its sites both more quickly and in larger phases than most CLGs now can accomplish. The timing of numerous requests for design guideline development funding in the 1990s also is logical. Designation normally follows the survey process; once historic districts have been listed, then design guidelines detailing appropriate changes within such areas are needed.

Comparative Analysis

A comparative analysis of the chosen Colorado CLGs (See Table 15) indicates all of the programs have received grant funding for training and none of them have requested money from this source for rehabilitation or restoration projects. Only Aspen has not used CLG grant funding to finance surveys, however, this municipality is the only one which used this source for the preparation of a NR nomination. CLG grant funds have been used in both the preparation of videos and publications. The City of Pueblo has completed several historic contexts in their neighborhood documentation program thanks to CLG funding.

Table 15: Comparison of CLG Grant Awards, 2000-2011

COMMUNITY	CLG ESTABLISHED	TOTAL CLG GRANTS AWARDED	TYPES OF CLG GRANTS AWARDED	TOTAL CLG GRANT AMOUNT AWARDED
BOULDER	4 Sep 1985	11	Training, Outreach, Survey	\$89,083
ASPEN	5 Sep 1985	3	Training, National Register nomination	\$5,090
DENVER	23 Sep 1985	3	Outreach, Training	\$16,860
FORT COLLINS	31 Jan 1991	6	Survey, Training	\$78,540
LONGMONT	20 Aug 1985	4	Survey, Training	\$118,830
PUEBLO	18 Oct 2005	5	Design Guidelines/ Plans, Survey, Training	\$115,680

OAHP staff evaluates Colorado CLGs every four years. Table 16 summarizes recommendations from the evaluations for not only Boulder but also the comparison CLGs. It is important to realize, the number of recommendations noted in Table 16 do not necessarily correlate directly to overall CLG quality. More items listed in the final column of the table may be related to the experience of the CLG's staff person, with more experienced professionals likely having fewer areas in need of improvement. The number of items in the final column also may be a function of the age of the CLG. Yet, it is interesting to notice the items noted for Pueblo, the most recently established program, are, in many cases, the exact same changes recommended for the long-established CLGs. In tracing each community's evaluations, in many cases the issues OAHP noted in earlier visits were addressed over time.

Table 16: Summary of CLG Evaluations, 2001-2012

COMMUNITY	DATE OF POST-VISIT EVALUATION	RECOMMENDATIONS
BOULDER	1 September 2004	n/a
	3 April 2008	Public hearing: post process in meeting room
		Public hearing: staff develop motion citing specific criteria
	5 January 2012	Record-keeping: post Board minutes on website
		Record-keeping: post link to survey forms on Carnegie Library website
		Record-keeping: create physical files with designation, design review, other documents all in same place
		Public hearing: maintain formality/ treat every case as you would a controversial issue
Public hearing: motions cite specific criteria		
Public hearing: reference design guidelines rather than phrases "like"/ "don't like" so clear decisions not made based upon personal taste		
ASPEN	2 March 2001	n/a
	13 August 2004	Public hearing: post process in meeting room
		Public hearing: staff develop motion citing specific criteria
	13 June 2008	Public hearing: maintain formality/ treat every case as you would a controversial issue
		Public hearing: post process in meeting room
		Public hearing: reference design guidelines rather than phrases "like"/ "don't like" so clear decisions not made based upon personal taste
		Record-keeping: create link to commission minutes from city preservation website
	18 August 2011	Public hearing: post process in meeting room
Public hearing: reference design guidelines rather than phrases "like"/ "don't like" so clear decisions not made based upon personal taste		
Record-keeping: create link to commission minutes from city preservation website		
DENVER	4 January 2006	Record-keeping: concerns regarding survey of resources
		Public hearing: post process in meeting room
	7 June 2010	Public hearing: staff develop motion citing specific criteria
		Public hearing: post process in meeting room
		Public hearing: open, close public comment, even if no one in attendance
		Public hearing: consider time limits for all speakers
		Public hearing: if recused, then member does not vote
Record-keeping: poor record of annual report, minutes submission		
FORT COLLINS	11 December 2003	Public hearing: post process in meeting room
		Record-keeping: need for comprehensive surveys to aid decision-making
	15 May 2008	Public hearing: make sure board follows posted process
		Public hearing: open, close public comment, even if no one in attendance
		Public hearing: staff develop motion citing specific criteria
	3 January 2012	Public hearing: open, close public comment, even if no one in attendance
Public hearing: Board should recommend alternatives even if applicant seeks to demolish resource		
LONGMONT	10 November 2003	Public hearing: motions cite specific criteria
	9 May 2008	Public hearing: maintain formality/ treat every case as you would a controversial issue
		Public hearing: open, close public comment, even if no one in attendance
		Public hearing: post process in meeting room

		Public hearing: motion required prior to discussion
		Public hearing: staff prepare motion
	4 November 2011	Record-keeping: create link to commission minutes, agendas from city preservation website
		Record-keeping: scan all survey and designation paperwork for posting on website
		Record-keeping: post historic district boundary maps to website
		Outreach: contact Boulder, Fort Collins for examples
PUEBLO	26 March 2010	Public hearing: post process in meeting room
		Public hearing: staff develop motion citing specific criteria
		Public hearing: staff check all applications for completeness prior to meeting
	13 April 2012	Record-keeping: add contact information for commission members to website
		Record-keeping: link all documents (minutes, survey forms, reports, designations) to preservation page on website
		Record-keeping: insert link to preservation page from planning & community development page on website
		Public hearing: post process in meeting room
		Public hearing: staff develop motion citing specific criteria
		Public hearing: separate times for questions to applicant and commission discussion

All compared CLGs had the most recommendations regarding the public hearing process. Public hearings represent the most complicated, process-driven tasks which any landmark board or historic preservation commission must manage. Many of OAHP's comments relate to ways to improve this process, protecting the CLGs from possible legal challenges and assuring public participation is well-managed. The number of suggestions in the final column likely relate directly to the complexity of the particular meeting and public hearing OAHP staff attended. The most common comment made related to the need to post the public hearing process in the meeting room since this information is important for helping the public to better understand when they are and are not allowed to speak. It appears Fort Collins and Boulder do the best job of posting their processes. Fort Collins includes this information in an individual paper packet for each meeting attendee. In Boulder, these details appear on a video screen as part of staff PowerPoint presentations. Both commissions also start their public hearings with a summary of the process from either the staff or the board chair.

OAHP does not use a standard form for CLG evaluations. This approach offers the State a great deal of flexibility, yet it makes a like-for-like comparison somewhat challenging. Answers to a series of follow-up questions to OAHP regarding Boulder's CLG program indicated agency staff considers Boulder to have one of the better programs in the state for the following reasons:

- The preservation program is within the planning department, as OAHP recommends
- The city always has had qualified staff assigned to the program
- The LB always has done a fine job of conducting public hearings pursuant to Robert's Rules of Order and established local procedures

Boulder's historic preservation program has benefitted from CLG participation. The city has written numerous successful CLG grant applications and been awarded funding for surveys and resurveys, staff and LB member training, and public outreach. Feedback from OAHP evaluations have allowed the program to improve and evolve over time. The State also sponsors educational workshops, offering both staff and LB members the opportunity to learn, interact, and network with other CLG participants from across the state.

Staffing Resources

From its beginnings, the City of Boulder set ambitious goals for its historic preservation program and recognized the need for adequate staffing to support it. A 1975 grant application to HUD stated,

If historic preservation in Boulder is to succeed in any major way, it will be through a detailed and well-coordinated effort that goes far beyond the questions of historic significance. The impacts of preservation must be studied in detail as they affect the social, planning, legal, economic, and growth needs of Boulder. The city should not become a mausoleum of historic buildings, but rather the history of Boulder should be alive and integrated in meaningful way into the daily comings and goings of Boulderites.²²

While it was envisioned the LPAB would play a key role in achieving these aspirations, it is important to remember members of this board are volunteers who serve five year terms. Clearly, from the very beginning, the role of staff was viewed as crucial for both guidance and institutional continuity of the program.

The number of staff people for the preservation program has varied over time. The first LPAB worked with two FTE staff. The current staffing level is one-and-one-half FTE with part-time administrative staff support and a part-time intern. The City Attorney's Office also provides regular support, including memo review and meeting attendance, to the preservation program. The budget for all preservation staffing comes mostly from the city's general fund, supplemented with money from demolition fees. The charge for State Tax Credit reviews is devoted to special projects.

Currently, staff spends approximately 90 percent of its time on a standard list of twenty-two ongoing duties. Table 17 shows these tasks, dividing them into basic categories of review, LB-related, education and outreach, internal and external coordination, and other. The remainder of staff time is spent on special projects. Boulder's superior track record of earning CLG grant awards, supplemented with funding from SHF for other endeavors, means staff must plan to devote a great deal of time to the proposed project, perhaps assisting the consultant and facilitating specialized education outreach sessions. For example, historic & architectural survey projects normally begin with a community kick-off meeting to inform property owners of the purposes of the survey and end with another public session to share the project findings. It is the responsibility of staff to make logistical arrangements for such meetings. The current CLG grant to prepare an historic preservation plan for the City of Boulder has been and will continue to be quite labor-intensive for the staff.

Table 17: On-going Staff Duties

	TASK
REVIEW	LAC applications
	Demolition permits
	State Tax Credit applications
	Land Use Review applications
LB-RELATED	Individual landmark & historic district designations: research, memos, ordinances, plaques
	LAC review (LDRC and public hearings)
	Routine activities: meetings, postings, agendas, minutes
EDUCATION AND OUTREACH	Prepare Preservation Month flyers
	Focused education efforts (classes for press, realtors and contractors, inspections staff)
	Letters to new property owners in historic districts
	Participate in Preservation Month Activities
INTERNAL COORDINATION	With other city departments and boards on preservation issues
	Continued communication/ follow-up with EZEO staff
	Collaboration with Environmental Affairs on energy efficiency issues
	Disaster planning sessions with Public Works
	GIS data development with Information Resources
EXTERNAL COORDINATION	Attend HBI monthly preservation committee meetings
	Participation in Historic Preservation Roundtable (monthly meetings)
	Collaborate with BVSD on school rehabilitation/replacement
	Continued participation in Valmont Butte planning
OTHER	Routine CLG responsibilities (applications, quarterly reports, annual reports)
	Administrative duties

Survey and Historic Contexts

Historic & architectural surveys and historic contexts represent the foundation for a high-quality historic preservation program. Surveys collect and analyze information concerning physical remains from the past, providing the details necessary for designation, planning, and management of historic resources. The survey process involves both identification and evaluation; it tells a community what types of buildings it has and why they are important. Historic contexts are documents which provide the academic framework for particular resources, exploring the relevant themes, geographic distribution, and chronological period associated with its development. These publications assist in determining the importance of particular buildings for their association with key historic events or patterns, important people, and architectural styles or building types.

The Boulder Planning Department’s application for a 1975 HUD grant illustrated a clear understanding of the importance of creating a well-researched foundation for the city’s historic preservation program. The planners, instead of engaging in fieldwork too quickly, proposed a short and intensive training course for potential volunteer surveyors. The recommended course curriculum emphasized survey methodology, resources worthy of documentation, and Boulder’s architecture. The trained volunteers would be responsible for a visual survey²³ with all results mapped to indicate both concentrations of resources and areas particularly vulnerable to adverse effects from development. The

planners proposed creation of a set procedure and format for in-depth historical research; this approach was crucial, since these staff members recognized such research would be completed over several years by a wide variety of individuals and, therefore, consistency would be of utmost importance.

Historic & Architectural Survey

In 1977, Boulder implemented their survey program plan. Starting in 1985, when the city was first eligible to apply for CLG grants, Boulder began hiring professional consultants to complete the specialized identification and evaluation work intensive level surveys require. Table 18 lists the historic & architectural surveys completed in Boulder.

Table 18: Historical & Architectural Surveys in Boulder, 1985-2010

YEAR	SURVEY DESCRIPTION	PROFESSIONAL CONSULTANT
1985-6	Boulder Survey of Historic Places	Christine Whitacre and R. Laurie Simmons
1986-7	Whittier Neighborhood	Christine Whitacre and R. Laurie Simmons
1988	Whittier-West Pearl- Downtown	Front Range Research Associates, Inc.
1989	Highland Lawn	Front Range Research Associates, Inc.
1990	Highland Lawn-University Hill	Front Range Research Associates, Inc.
1991	University Hill	Front Range Research Associates, Inc.
1992	University Hill-Geneva Park-Grandview Terrace- Floral Park-4 th Street	Front Range Research Associates, Inc.
1993	Northern Mapleton Hill	Front Range Research Associates, Inc.
1994	Southern Mapleton Hill-Mountain Park-Hayden-Dewey Avenue-Portland Place-Scattered Resources-University Hill Commercial District	Front Range Research Associates, Inc.
1995	Newland Addition-North Boulder- Scattered Resources	Front Range Research Associates, Inc.
1996	Local District Identification: Central Area, Phases I and II	Front Range Research Associates, Inc.
2000	Modern Architecture in Boulder, Colorado, 1947-1977	Michael Paglia, Leonard Segel, and Dianne Wray
2001-2	Resurvey: University Hill	Kathryn H. Barth and Lara Ramsay
2004	Accessory Buildings: Mapleton Hill	Kathryn H. Barth and Lara Ramsay
2008-10	Post-World War II Residential Resources	TEC, Inc.
2009	Resurvey: University Hill Commercial District	Kathryn H. Barth and Lara Ramsay

It will be important for the City of Boulder to continue planning for future projects. Survey is never truly done because, as time passes, more and more resources reach the 50-year age threshold to be considered for designation and the historic context within which significance is judged evolves. In developing new survey projects, OAHF staff suggests comparing what Boulder already has accomplished with the list of threatened and under-represented resource types in the 2010 Colorado preservation plan, *The Power of Heritage and Place: A 2020 Action Plan to Advance Preservation in Colorado*. The City of Boulder already has tackled the documentation of many of these resource types, most notably post-World War II subdivisions. As a follow-up to this project it will be important to record Boulder’s later subdivisions, those planned and constructed in the late-1960s through the early-1980s. Other plan-referenced themes for future

surveys potentially relevant in Boulder include advertising signs, civil rights sites, early automobile resources, and vernacular building types.

Boulder also needs to consider resurvey. As time passes, previous survey records are in need of updating-- they require updates to physical condition and reassessments of eligibility for listing on the NR, the SR, or as local landmarks. At its 2006 retreat, the LB considered resurvey of all non-listed but NR-eligible properties a priority; the goal of such a project would be to reassess eligibility and encourage owners to pursue designation for those resources retaining sufficient significance and integrity.

OAHP advises routine resurvey every ten years and reevaluations of eligibility, ideally, every five years. In most communities, where very little survey has been completed, this state agency generally advises completion of initial survey projects rather than revisiting existing records. However, Boulder is in the enviable position of having completed surveys for most of its resources within the city limits. This fact, combined with high levels of development pressure, makes Boulder an excellent candidate for selective resurvey in areas where demand for new uses is highest and historic resources, therefore, may be most at risk. Other candidates for resurvey include survey areas that have changed dramatically since the initial project work. The goal is to maintain survey records which are sufficiently accurate to guide local planning efforts. According to OAHP officials, smaller communities without much building "improvement" or development pressure likely require only the most basic updates, such as current photographs and a check on eligibility. However, in areas like Boulder and Fort Collins, it may be appropriate to create new or significantly updated forms for areas "where preservation planning is necessary to keep new development from destroying large swaths of historic building stock."²⁴ Boulder should continue the digitation of survey records²⁵ and arrange for NR, SR, and local landmark eligibility assessments where not currently available or in need of updating. Staff collaboration with the City's Information Technology (IT) department to assure all survey records are incorporated into and accessible through the Boulder Geographic Information System (GIS) is commendable and should remain a priority.

Comparative Analysis

OAHP has recognized Boulder for commencing its neighborhood by neighborhood survey program immediately after becoming a CLG. According to officials at the state, Boulder has done the best job, among Colorado communities, of surveying and resurveying its historic resource.²⁶ Table 19 illustrates Boulder has completed a total of seventeen survey or resurvey projects, a number far exceeding those completed in the five other Colorado CLGs. It is interesting to note, while Denver has information from a total of eleven survey projects, the city has sponsored few of these identification and evaluation efforts. Instead outside groups, such as Historic Denver, Inc., (HDI) or the Denver Public Schools, commissioned nearly all of this recordation work and shared their results with city planning staff. The two city-commissioned endeavors are the 2010 SHF-funded plan for how to survey the entire city and the ongoing SHF project to launch a first pilot phase to test the developed survey plan. Denver has discovered recording each currently un-surveyed resource in accordance with OAHP standards will cost several million dollars. In this sense, Boulder was very prescient to start their grant-

funded survey efforts in the mid-1980s. First, they were able to spread their community survey work over several smaller, more affordable (and manageable) phases. Second, they applied for CLG grants at a time when the program had fewer participating Colorado communities, thus making the grant award process significantly less competitive than it is now. And, finally, the per-form cost of survey work has increased exponentially since 1985, making the early Boulder forms very affordable.

Table 19: Comparison of Colorado CLG Survey Projects Completed, 1984-2011

COMMUNITY	FUNDING SOURCE		DATES	
	CLG	SHF	CLG	SHF
BOULDER	15	2	1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1998, 2000, 2002, 2005	1995, 2010
ASPEN	2	0	1980, 2000	n/a
DENVER	2	9	1987, 1994	1999, 1999, 2001, 2003, 2006, 2007, 2008, 2010, ongoing
FORT COLLINS	5	3	1992, 1995, 1996, 2002, 2004	2001, 2004, 2011
LONGMONT	6	2	1984, 1984, 1986, 2003, 2006, 2010	1998, 2003
PUEBLO	2	1	2008, 2009	2007

All of the NAPC respondents have engaged in some historic & architectural survey efforts. However, levels of completion varied widely from community to community. Not surprisingly, the smaller areas had recorded much higher percentages of their resources. For example, the small village of Pittsford completed the identification and evaluation of all of its resources and is now engaged in an amendment and expansion of its NR/ SR designation. The two communities who established their preservation programs in the same year as Boulder, Independence and Calvert County, have documented only approximately 15 and 10 percent of their resources. In comparison, Boulder’s systematic completion of neighborhood-by-neighborhood surveys represents a key accomplishment and a real asset for community planning, designation, and interpretation. Mobile completed a survey of all of its resources in 1986 and now is engaged in resurvey efforts, using the revised information to engage in proactive promotion of historic district designation.

Historic Contexts

For a ten-year period, from 1988 to 1998, the City of Boulder received a series of CLG grants for the Boulder Valley Historic Context Program. The first year of funding covered establishing the project framework and the next year a consultant, Paul Friedman of Dames & Moore, completed five discrete tasks. He organized a committee to oversee context development, summarized the existing database for documenting Boulder’s history, defined broad historic themes, made recommendations for further community outreach, and identified possible funding sources for future phases of the context project. Friedman presented all these findings in a document entitled, “Boulder Historic Context.” The second consultant to work on the project, Nore Winter of Winter and Company, established the work program in 1990. Winter developed and prioritized a list

of general tasks corresponding with the themes defined in Friedman’s context document. In 1991 Cynthia Shaw McLaughlin developed the Historic Context Community Resource Program (HCCRP), an outreach-based scheme designed to recruit local volunteers to complete historic contexts. She tackled issues of data integration between various partners and contacted key individuals to assist with volunteer identification. McLaughlin’s community contacts included various CU professors, representatives of philanthropic organizations, and local design professionals. In 1992 the city rehired McLaughlin to produce a promotional video about the HCCRP for use in recruiting more context researcher-writers; this video and an exhibit were a prominent part of the city’s 1992 celebration of Historic Preservation Week.

This decade of directed emphasis on historic context development resulted in the creation of the fourteen documents listed in Table 20. An undated planning update, associated with one of the phases of the historic context project, presented three options for continuing this context development program. The first involved soliciting community volunteers, the second suggested recruiting volunteers with specialized professional or educational backgrounds, and the third proposed hiring trained historians to complete future historic context documents. These three options were presented in order in terms of likelihood to produce consistent results; in other words, professional historians were predicted to produce the most complete and accurate contexts. Ultimately, Boulder employed all three approaches for historic context development. Graduate students from CU and amateur historians wrote a few of the contexts. At least five of the context researcher-writers were well-known local history authors or other professionals with specialized knowledge. In 2000, the city used grant funds to hire a trio-- Michael Paglia, Leonard Segel, and Diane Wray-- to complete a survey of select examples of Modern architecture in Boulder. Most recently, in 2010, consultants Jennifer Bryant and Carrie Schomig of TEC, Inc., completed a survey of Boulder’s postwar residential subdivisions. These final two projects included detailed contexts within the survey reports and the city includes these historic contexts on their list of completed thematic studies.

Table 20: Papers Completed in the Historic Context Project, 1990-1998

YEAR	THEME	TITLE	AUTHOR
1990	Ethnic/ Cultural Groups	“Foreign Born Immigrants in Boulder, Colorado 1859-1884”	Lysa Wegman-French
1992	Agriculture, c. 1859-present	“The Grange Movement in Boulder County”	Anne Dyni
		“The Development of Boulder’s University Hill Neighborhood in Relation to Economic Factors”	Merle Adams
		“History of the Boulder County Poor Farm and Hospital”	Anne Dyni
	Landscape, c. 1858-present	“Boulder County Burial Sites”	Kay Lukoskie
		“Frederick Law Olmstead, Jr.: Maker of Parks, Planner of Cities”	Beverly Halpin Carrigan
Transportation, c. 1540-present	“Boulder County, Colorado: Major Transportation Routes, Pre-1860 to 1920”	Lara Juliusson	

1993	Ethnic/ Cultural Groups	“Northern Lights: Boulder’s Swedish Heritage”	Cynthia Shaw McLaughlin
	Religion	“Downtown Churches: Sacred Places”	Marilee Dunn
1996	Ethnic/ Cultural Groups	“The Black Community in Boulder, Colorado”	Dan Corson
	Transportation, c. 1540-present	“Roads of the Mountains and Plains”	Sylvia Pettem
	Transportation, c. 1540-present	“Tracking Down Boulder, Colorado’s Railroads”	Sylvia Pettem
1999	Mining, Minerals, and Extractive Industries	“Use of Native Stone in Boulder Construction”	Sylvia Pettem
	Transportation, c. 1540-present	“The Automobile Era in Boulder”	Sylvia Pettem

Since the late-1990s, preservation staff has not been able to devote the time and resources to historic context development initiatives and the existing historic contexts are not well publicized, used mainly for staff research for landmark designation application memos. Undated notes from the planning for HCCRP indicated the consultant suggested the city might seek funding for a staff person to oversee this program. The LB 2002-2003 work plan featured possible topics for additional historic contexts. These themes included: entertainment (theaters, restaurants, and bars); mining; ethnic communities (Italian, German, and Hispanic), Modern and post-World War II architecture, and fraternity and sorority houses. Of these suggested topics, contexts on both Modern architecture and postwar subdivisions since have been completed. The 2010 State Plan also includes a list of under-represented historic context topics. Possible thematic studies which may be appropriate in Boulder include the Cold War, fraternal organizations and halls, the landscape architecture profession, and racial tensions and civil rights (especially student protests involving the CU community). In addition, a look at the environmental movement, voter-approved ways to control growth and retain quality of life from the 1950s to the present, and scientific institutions might be worthy topics for Boulder historic contexts.

Public Outreach and Education

Whether designating a new historic district, revising the historic preservation ordinance, or dealing with contentious requests for demolition of historic resources, well-executed historic preservation does not take place without public support. High levels of public understanding and buy-in can elevate an historic preservation program from pedestrian to spectacular, as citizens become advocates for historic preservation and assist by sharing their positive opinions with their friends, neighbors, and associates. The concept of education and public outreach underlies several aspects of the Boulder preservation program and appears at the core of what preservation staff and LB members do for the city.

Key ongoing staff duties center around three program initiatives. Boulder always has sponsored a well-attended and diverse program for May’s celebration of, initially, Historic Preservation Week and, now, the expanded Historic Preservation Month. Staff works on coordinating and promoting these events, showing citizens the importance of historic resources to community vitality and quality of life. Despite the demands of demolition reviews, LACs, and other tasks, staff recognizes the importance of setting

aside time specifically to speak to community groups such as the Chamber of Commerce, the Landlord Association, the Boulder Area Renters Association (BARA), the membership of HBI, neighborhood associations, and CU classes. Reaching out to a variety of constituencies broadens support for historic preservation in Boulder. Also, a message tailored to a specific group and delivered in a proactive manner can be helpful. For example, making a presentation to realtors informs these professionals about the available incentives for new owners of homes in historic districts; they, in turn, might be able to more knowledgeably answer house-hunters' questions and better market such properties, therefore, making higher commissions. Staff also sends informational letters to new owners of properties within Boulder's historic districts. This practice, friendly and proactive, is meant to establish a relationship should the property owner need staff assistance, come before the LDRC board, or attend a LB public hearing in the future.

A number of the educational outreach functions of the Boulder historic preservation program are collaborative by design. For example, preservation staff attends monthly meetings of the Boulder Preservation Roundtable. This informal association is made up of representatives from preservation and cultural resource groups throughout Boulder County. The group sponsors an annual awards ceremony, giving the "Square Nail Award" to individuals who make a special contribution to archaeology, local history, or historic preservation in Boulder County. Other collaborative relationships exist between Boulder's preservation staff and HBI, the Boulder Valley School District (BVSD), and numerous other city employees-- such as individuals in code enforcement, public works, and environmental affairs-- with responsibilities which are tangential to historic preservation.

Table 14 in the CLG section of this document details Boulder's numerous successful grant applications to fund a wide variety of educational and outreach initiatives. These projects have included publications, web-based database records, videos, and signage for historic districts. Despite these successes, more public education in an historic preservation program always is desirable. Over the years, several ideas for expanded outreach have emerged from the LB annual retreats. Some of the proposed programs include letter writing campaigns to encourage designation among individuals living in NR-eligible properties; workshops co-sponsored with HBI on topics such as window repair, energy efficiency, and the impact of historic designation on property values; creation of walking tours for designated historic districts; and continued changes and updates to the city's historic preservation website.

Comparative Analysis

The Colorado comparison CLGs all engage in public education and outreach. The Fort Collins preservation program offers a variety of resources and educational tools-- such as a design assistance program, reliable sources about sustainability and historic preservation, and guidebooks for assistance with restoration and rehabilitation projects-- to property owners. Pueblo is recognized for its inclusive outreach program. Preservation staff adapts end-of-project presentations into walking and biking tours, community presentations, and YouTube video segments. Other successful efforts include partnering with the local chapter of AIA to develop a project-specific logo to increase interest in and visibility for grant-funded survey and historic context efforts and

making “welcome wagon” presentations to share Pueblo’s history and encourage civic pride. The Denver preservation program has worked in close partnership with Historic Denver, Inc. HDI has applied for numerous grants and completed a wide variety of projects to benefit historic preservation in Denver and assist preservation staff and the preservation commission with the execution of their duties. HDI used SHF grant funds to develop an expansive walking and bicycle tour through the city’s various neighborhoods; this informative heritage tourism offering, targeting visitors and residents alike, features colorful brochures, highly visible signage, and a smart phone app.

Like their Colorado counterparts, the NAPC respondents also engage in a wide variety of public outreach activities. Table 21 summarizes the efforts of the thirteen communities. Boulder is encouraged to study both Colorado and national examples of successful outreach in the development of an expanded public outreach and education program.

Table 21: Comparison of National Public Outreach and Education Efforts

COMMUNITY	TYPES OF PUBLIC OUTREACH AND EDUCATION EMPLOYED
MONTGOMERY COUNTY, MD	Education/outreach staff position; social media; public meetings with neighborhood associations, local preservation nonprofits, others
FREDERICKSBURG, VA	Historic District Handbook that contains design guidelines as well as general information on City’s history
JEFFERSON, GA	Publicity and promotion during May celebration of National Historic Preservation Month; host annual training session for property owners
EATONTON, GA	Newspaper articles; host design workshops; invite city officials to preservation training sessions
PITTSFORD, NY	Newsletter articles; encourage informal discussions prior to design process for larger projects; partner with local not-for-profit preservation advocacy organization to underwrite property owner consultations with local preservation architecture firm; history talks; walking tours
OAK PARK, IL	Create brochures and historic district guidebooks; publish quarterly newsletter; host educational workshops; collaborate with other local commissions (such as Planning, Community Design, and Environment & Energy) to coordinate goals and avoid opposing opinions; co-host annual awards for preservation, green building, and design
FERNANDINA BEACH, FL	Monthly news email; brochures; website; staff presentations; preservation awards program; property owner’s workshops
MOBILE, AL	Email newsletter; host six-week preservation course; staff presentations
LAKE CHARLES, LA	Host CLG workshops; sponsor local preservation meetings; conduct walking and virtual tours; exhibits; collaborate with local tourism bureau; social media; centennial celebrations
INDEPENDENCE, MO	Offer public programming to promote benefits of preservation; celebrate Historic Preservation Month
SOUTH BEND, IN	Sponsor annual workshop-expo-lecture series; blogs; social media
CALVERT COUNTY, MD	Books; brochures; multimedia historic driving tour; public programming; lectures; workshops
VALDOSTA, GA	Bi-monthly newsletter; website; educational presentations (both live and recorded for local government television channel); partnership with Main Street office; historic tours.

Preservation Incentives

Individual landmarks and historic districts contribute greatly to the sense of place in Boulder. These tangible resources help to tell the story of how the community grew from its humble mining supply town origins to a thriving and diverse social, cultural, economic, and educational center. These special buildings and neighborhoods enhance the quality of life and can encourage heritage tourism. The Boulder historic preservation program grew out of a concern about threats to historic buildings. Designation and the accompanying design review processes were established to preserve and protect significant historic resources. Preservation incentives have been introduced in Boulder, as elsewhere, to reward property owners for designating their buildings and making the commitment to lawful stewardship.

The Boulder historic preservation program has a total of fourteen incentives for owners of historic buildings (See Table 22). Some of these incentives, such as the federal and state tax credit programs plus the waiver of city sales tax, convey a direct financial benefit. The available exemptions and variances recognize the significance of historic buildings and the complexity involved with physical work on such resources. These provisions provide an added level of flexibility when restoring or rehabilitating the character-defining features of landmarks and properties within historic districts. The popular Boulder plaque program²⁷ represents a more intangible reward which honors property owners' individual contribution; the building "wears" the plaque, but the person holds the knowledge they have made a lasting commitment to Boulder's built heritage. Eligibility for SHF grants, although uncommonly awarded to private building owners, allows for larger preservation budgets, making it possible to improve the overall quality of a project in terms of materials used, trained professionals or artisans employed, or the selected treatments (for example, restoration of features rather than rehabilitation or renovation). The final Boulder incentive, review assistance, recognizes the complexity, especially for property owners who have never had any exposure, of the LAC process. Fortunately, staff and members of the LDRC are willing to share their expertise on behalf of both these property owners and their important historic resources.

Table 22: Incentives for Owners of Boulder Landmarks

INCENTIVES	PROGRAMS	DETAILS
TAX ADVANTAGES	Federal Income Tax Credit	For approved rehabilitations
		For commercial properties, including rental housing
		For NR-listed properties or contributing resources within NRHD
	Colorado Historic Preservation Income Tax Credit	For approved rehabilitations
		For individual landmarks, SR-listed properties, or contributing resources within local historic districts
	City Sales Tax Waiver	For construction materials
	At least 30 percent of materials value must be for building's exterior	
POSSIBLE EXEMPTIONS/ VARIANCES FROM SELECT BUILDING CODE & ZONING STANDARDS	Floodplain requirements	For NR-listed, SR-listed, or individual landmark
	Universal Building Code (UBC) provisions	For individual landmarks
		Corrects unsafe conditions
	Height requirements	Building must have historically exceeded 55-feet
	For individual landmarks and resources within	

		local historic districts
		Requires LB approval
	Solar requirements	For resources within a local historic district
		New roof design incompatible with historic district character
	Front porch setbacks	For individual landmarks and resources within local historic districts
		Must be restoration or replacement of historically significant porch
		Requires LAC
	Land use requirements	For individual landmarks and resources within local historic districts
		Compliance with land use regulations would have adverse impact on resource
	Rental house code for sprinklers	For individual landmarks and resources within local historic districts
	Residential growth management requirements	For individual landmarks
		Requires Planning Board public hearing
		Planning Board restricted to thirty exemptions per year
RECOGNITION	Plaque	For individual landmarks
		Free of cost to property owner
		Presented at public ceremony
GRANT ELIGIBILITY	State Historical Fund (SHF)	For NR-listed, SR-listed, individual landmarks, and resources within local historic districts
		Private property owners must apply through a municipality
		Private property owners must provide 50 percent (or higher) cash match
REVIEW ASSISTANCE	Support for LACs	For individual landmarks and resources within local historic districts
		City staff advice
		LDRC weekly meetings

By far, the most popular and most profitable incentive for Boulder historic property owners is the State Tax Credit program. This program reduces Colorado tax owed at a dollar for dollar rate. The available credit can be carried forward for ten years and there is no limit on the amount of tax which can be taken in a single fiscal year. All “hard costs” associated with physical preservation of an historic property represent allowable State Tax Credit program expenditures. Boulder, in its role as a CLG, reviews applications for the State Tax Credit program locally. Between 2003 and 2009 there were a total of thirty-nine approved applications, with a peak of thirteen in 2003. Among all Colorado CLGs, Boulder ranks second to Denver in the most State Tax Credit projects reviewed and completed.

Comparative Analysis

Among the Colorado comparison CLGs, both Aspen and Fort Collins appear to offer more financial incentives to encourage historic preservation than are available in Boulder. Both communities have zero percent interest loan programs. In Aspen applicants can request up to \$25,000 to complete work on any historic property in violation of current zoning codes, suffering from demolition by neglect, or for necessary rehabilitation work. To qualify for the Aspen loan program, applicants must demonstrate

financial need. The Fort Collins loan program is slightly different. The maximum available amount is \$7,500. These funds must be used for exterior rehabilitation of local landmarks. Although not among the comparison CLGs, the nearby community of Louisville has a different type of financial preservation incentive. In 2008 local voters approved an historic preservation sales tax. Revenue is used to fund rehabilitation and preservation of historic resources contributing to the character of Old Town. To receive funding, the buildings must be a landmark and enter into a preservation easement with the city.

The NACP replies mentioned incentives from nearly all of the categories listed in Table 22. However, none of these communities appear to offer any exemptions from building codes or variances like those available in Boulder. These types of incentives likely are most desirable in areas with high levels of development pressure and numerous building regulations. It is not clear if this situation applies for any of the thirteen communities responding to the NACP questionnaire. The NACP respondents do share one characteristic with Boulder; the majority of these communities seem to offer assistance with and/or review of State Tax Credits.

Historic and Pre-Historic Archaeology

According to a file search from OAHP, there are 122 records for surveyed historic and prehistoric archaeological resources within the Boulder city limits. Table 19 summarizes some of these findings, showing the majority of resources identified are canals and ditches. A variety of professionals from State agencies, such as OAHP and the Colorado Department of Transportation (CDOT), and private cultural resource management firms have completed these investigations; some of these survey forms also were completed by either professors or students at CU.

Table 23 - Selected Archaeological Surveys Within Boulder City Limits

RESOURCE TYPE	RESOURCE NAME	DATE(S) SURVEYED		
WATER FEATURES (DITCHES, LAKES, CANALS)	Bear Creek Ditch- Segment	1 May 1992		
	Anderson Ditch Reach 10	16 April 2007		
	Anderson Extension Ditch and Segments	July 1992	July 1992	
		6 October 1993	November 1995	
		26 July 1999	May 2004	
		October 1996	29 December 2000	
	Boulder & Left Hand Ditch and Segments	May 2004	20 June 2008	
		2 July 2008		
		May 2004	23 May 2005	
	Boulder & Whiterock Ditch- Segments	20 June 2008		
		April 1998	22 October 2007	
	Boulder Creek Supply Canal and Segments	21 August 1987	May 2004	
	Dry Creek #2 Ditch and Segments	July 2001		
	East Boulder Ditch- Segment	21 February 2000	11 April 2007	
	Farmers Ditch and Segment and Laterals	13 April 2008		
		21 August 1987	1 October 1993	
	Howard Ditch	May 2004		
	Leggett-Valmont Inlet (Feeder) Ditch~Wellmen Ditch~Wellman Feeder Ditch~Empson Ditch - Segment	4 October 1993	12 November 1996	
	Mcginn Ditch (Aka Mcginn Ditch #2)	16 April 2007		
October 1996				
North Boulder Farmers Ditch	September 1991	September 1994		
Silver Lake Ditch and Segments				

		1 October 1995	21 July 1999	
		22 July 1999	7 February 2011	
	South Boulder Canyon Ditch- Segment	May 2004		
	South Boulder Ditch and Segments	20 May 1992	February 1995	
		1 May 2004	20 June 2008	
	South Boulder Foothills Ditch	February 1992		
	Wellman Ditch	December 2000	15 May 2003	
	Wonderland Lake and Associated Ditches, Reservoirs	September 1991	February 1992	
ROADS AND TRAILS	Dakota Ridge Trail	8 September 1993		
	Denver/Boulder Turnpike~U.S. Highway 36 - Segments	5 February 1999	August 2004	
	Flagstaff Mountain/Kossler Lake Road	2 August 1994		
	Gordon-McHenry Road	12 April 1981		
	Mesa Trail	8 November 1992		
	Colorado & Southern Railroad- Segment~Boulder & Whiterock (Beasley) Ditch Bridge, Boulder Creek Bridge, Dry Creek Bridge	20 June 2008		
	Colorado Southern Boulder Creek Bridge~Burlington Northern Santa Fe Bridge	14 May 2004		
	South Boulder Creek Bridge D-16-J, E-16-Fd	19 March 2002		
	Burlington Northern & Santa Fe Railroad- Segment- Formerly Colorado & Southern Railroad	22 October 2007		
	Colorado & Southern Railroad ~Colorado Central Railroad~Burlington Northern & Pacific~Denver & Interurban Railway Extension	11 May 1981	20 June 2008	
	Denver, Marshall, & Boulder Railroad~Colorado Southern	20 November 1990	21 October 2005	
RAIL-RELATED	Union Pacific Railroad	6 May 1981		
	CCC Camp and Retaining Walls	10 December 1994	January 2001	
	Cobalt Gold Mining Company Smelter	13 June 1992		
SELECTED OTHER	Lee Hill Lime Kiln	13 April 1981	13 February 1992	
	Mckenzie Well~Boulder Oil Field's Mckenzie Well~Mckenzie #1-21~Mckenzie #1	21 April 1981		
	Valentine Hardware Store Powder House	12 September 1995		
	Valmont Butte (mining complex, open camp)	18 March 1981	15 November 1986	
		June 2001	July 2004	

Boulder's historic preservation program does not have procedures in place for how archaeological resources encountered in the course of completed physical work on a landmark property or resource within an historic district (such as additions to or disturbance of a building's foundation) should be handled. This lack of procedure is not unusual, however. Most local preservation programs rely upon existing federal and state provisions, most of which are only applied when either national funding or state grant money is involved in the project. For example, all SHF grants awarded for restoration or rehabilitation work must include a line item for archaeological monitoring.

Comparative Analysis

Some Colorado counties, most notably Boulder County, require individuals completing physical work on their properties to obtain an OAHF file search prior to breaking ground. OAHF also has received such requests from property owners in Adams, Douglas, and Jefferson counties. In the late-1980s, the City of Aurora, using funding from the CLG grants program, conducted archaeological predictive modeling for all lands within its city boundaries and created a series of maps showing the probability of building projects uncovering archaeological remains. This project, while appropriate for a sprawling city like Aurora with a great deal of open space within its city limits and the majority of development occurring on green-build sites, does not seem warranted in Boulder. A review of work plans from the Boulder LB indicates adopting "administrative regulations for archaeological sites" was one of the tasks not completed in 1999²⁸; this item does not appear as a LB priority going forward from that date.

Nationwide, it seems Alexandria, Virginia and Santa Fe New Mexico are at the forefront of local archaeological monitoring. The City Council established the Alexandria Archaeological Commission (AAC), the first such body in the United States, in 1975 and hired archaeologists to work for the city government. In addition the Alexandria City Council, in response to increasing development pressure which threatened archaeological remains, also passed, in 1989, an Archaeological Resource Protection Code; again, this was the first law of this type in the nation. The code requires a determination of potential for impacting archaeological resources for all development projects for which site plans are filed. There does not seem to be a fee associated with this staff review, which must be completed within seven days of application. However, if the staff determine the site is worthy of further study, the hiring of an archaeological consultant to conduct research, survey, and/or excavate prior to the start of physical work does represent an additional cost to the project. Much like the City of Aurora, it appears Alexandria has created predictive modeling maps to indicate particular regions of the city with higher potential for yielding archaeological remains. On smaller projects not requiring sites plans, such as small additions to private houses, city archaeologists request property owners invite them or volunteers on site either for excavation prior to construction or monitoring during the project.

Disaster Preparedness

The destruction Hurricane Katrina wrought on historic resources in Louisiana and Mississippi in 2005 brought the subject of disaster planning for significant historic buildings, structures, and landscapes to the forefront for all preservationists. In the absence of disaster plans being in place, the National Trust for Historic Preservation (NTHP) and other preservation-minded organizations mobilized volunteers on an ad hoc, emergency basis. These individuals, many of them preservation and design professionals from across the country, assisted local staff from the Louisiana and Mississippi SHPOs to survey destroyed resources, assess damage to historic buildings, and offer property owners much-needed rehabilitation and restoration advice. As the effects of global warming become more evident and major weather events, such as recent Super-storm Sandy, happen more frequently, the need for disaster plans which specifically address historic resources should remain a high priority.

The most recent version of the City of Boulder and Boulder County Emergency Operations Plan was updated in 2011. This document addresses the emergency management activities of mitigation, preparedness, and response and/or recovery. This plan ranks the types of disasters most likely to impact the city. The two most likely disasters to adversely affect historic buildings are wildfires and floods. In fact, the city is at the highest flash flood risk of any community in the State of Colorado.²⁹ Advice from the city urging flood preparedness notes even a relatively small amount of water will cause damage; it takes only three inches of rain over a few hours to trigger a 100-year flood.³⁰ While the immediate concern in any disaster is human life and safety, it is important for Boulder to consider how to mobilize for the post-flood period as a way to assure both historic buildings are not lost to overly hasty and possibly needless demolition and property owners have the appropriate level of support and advice.

The city is particularly fortunate to possess a very thorough and relatively up-to-date inventory of survey forms which document the vast majority of their historic resources. Even more fortunately, especially considering the particularly vulnerable location of the Community Planning & Sustainability Department offices in the portion of the floodplain beside the Boulder Creek, the city proactively arranged for scanning and electronic storage of all survey records, making sure this information is available should the paper versions be destroyed or damaged. The existing city-county operations emergency plan recognizes the importance of preserving essential records, specifically mentioning “resource inventories” among the list of document which require safeguarding. After a disaster survey records can both provide a permanent record and guide in recovery. Surveys represent a documentary record and lasting evidence about the location, history, architecture, and significance of destroyed resources; while such narratives and photographs have their limits, that level of documentation is much better than having no details at all about a once-treasured but now-lost historic building. The survey paperwork and the accompanying photographs offer a “snapshot in time” of how a particular building appeared when the survey was completed. Such information is essential for restoring the appearance and character-defining features of individual landmarks, buildings within historic districts, and other resources in the post-disaster period. Given the importance of survey records, it is crucial for the city to continue documenting areas not currently part of their inventory. It also will be important to resurvey routinely so these records reflect current conditions.

The availability of preservation professionals represents another post-Katrina preservation lesson learned. In the aftermath of the hurricane, local preservation advocates were preoccupied, understandably, with personal recovery of their own property and possessions. At the time when knowledgeable volunteers, such as members of the LB or HBI, and preservation staff are most needed for their specialized expertise and knowledge of local historic resources, they may not have the capacity to assist. For this reason, it is an excellent idea to recruit individuals with preservation skills from outside the Boulder metropolitan area who are willing to assist with post-disaster response. Given the sheer volume of requests for LACs, the LB and planning staff may want to consider some sort of expedited review which could be employed in the wake of a disaster.

Comparative Analysis

Boulder is not alone, among the comparison CLGs, in not having developed a specific plan for how to deal with historic resources after a disaster. A study of the websites for these communities indicated no information about the post-disaster period and historic preservation. In a follow-up questionnaire, Aspen, Denver, and Pueblo all indicated they have neither considered nor created a concrete response for how to handle disaster-related issues associated with historic resources. The majority of the NAPC replies also indicated having no preservation disaster plan in place. However, Montgomery County is in the process of developing such a plan and Fernandina Beach is even further along. Several years ago, their county developed a post-disaster redevelopment plan and preservation staff assured consideration of historic and cultural resources was included in the document; their recent ordinance revision also added processes for emergency actions for use in a post-disaster situation. Any community developing a preservation

disaster plan should consult the National Conference of State Historic Preservation Officers (NCSHPO) website. The section devoted to “Resources for Disaster Planning” includes a great deal of practical advice, best practice solutions, and draft plans. A preservation-specific disaster plan for Boulder also should consult the existing (2011) city-county emergency operations plan, assuring similar models for coordination and cooperation.

Boulder Valley Comprehensive Plan

Since 1970, the city and county have jointly adopted a comprehensive plan that guides land use decisions in the Boulder Valley. The current plan was first implemented in 1977. This document, along with an accompanying intergovernmental agreement, sought to concentrate urban development in the city and preserve the rural character of lands outside the city service area. The current plan acknowledges the fact “Boulder’s distinctive ‘sense of place’ and compact size did not happen by accident” and credits the “creative public policies and pragmatic planning decisions over many years” with producing and preserving Boulder’s unique character and physical beauty.³¹

Since the initial Boulder Valley Comprehensive Plan (BVCP), six major updates have been completed, in 1982, 1990, 1995, 2000, 2005 and 2010. Key sections of the most recent BVCP are devoted to core values, the built environment, the natural environment, energy & climate, the economy, transportation, housing, community well-being, and local food & agriculture. The BVCP identifies several “individual character areas” which define Boulder’s urban structure and “support its continuing evolution to a more sustainable urban form.”³² These areas, many of which are historic, are the downtown historic core and surrounding pre-World War II residential neighborhoods, the 28th/30th Street regional retail corridor, the University and federal lab campuses, the industrial areas in East Boulder and Gunbarrel, the post-World War II residential neighborhoods and the North Boulder neo-traditional/ New-Urbanist neighborhoods.

Not surprisingly, issues directly related to historic preservation in Boulder appear in the built environment section of the BVCP. The comprehensive plan provisions related to historic preservation both support existing programs and suggest possible new initiatives. Several of the BVCP guidelines support the current practice of individual landmark and historic district designation. This plan recognizes the established role of both the city and county³³ in designating resources of “historic, architectural, archaeological, or cultural significance with input from the community” and, in an apparent reference to Boulder’s procedure for the review of demolitions of non-landmarked resources over fifty years old, acknowledges the capacity to seek protection through the listing process “when a proposal by the private sector is subject to discretionary development review.”³⁴ The BVCP appreciates the challenges of protecting accessory buildings and encourages retaining and preserving historic buildings along Boulder’s alleys. This comprehensive plan states there are many resources deemed eligible for listing and encourages additional designations. The BVCP encourages local preservation advocates to employ available preservation tools as appropriate to specific situations; existing tools include incentives, designation, design review, and public improvements.

The plan also urges exploration of new measures such as conservation areas and easements to address emerging historic preservation trends or particular resource types. The BVCP advocates for an approach to identify, designate, and protect archaeological and cultural landscape resources; these include open ditches, street- and alley-scapes, railroad rights-of-way, and designed landscapes. Finally, this comprehensive plan supports the creation of a preservation plan not only for the City of Boulder but also for the entire Boulder Valley. According to the 2010 BVCP, a preservation plan for this larger geographic area meets three key objectives. It will “integrate historic preservation issues into the BVCP; ensure coordination between preservation goals and zoning, land use, growth management, transportation, or housing goals; and ensure consistency among governmental policies that affect the community’s historic, archeological, and cultural resources.”³⁵

Other provisions in the built environment section of the 2010 BVCP tangentially related to historic preservation deal with neighborhood issues. This plan refers to the city and county’s neighborhoods as the building blocks of the built environment. It encourages fostering the role of neighborhoods in community character, urban design, and other issues, recognizing these areas for their distinctive architecture, historic and cultural resources, varied topography, and uses. The BVCP also advocates collaboration between neighborhood residents and the city to not only enhance neighborhood character but also guide appropriate and compatible redevelopment. The housing section of the 2010 BVCP advocates preservation of existing housing stock and preservation of manufactured housing.

SECTION 4: PRELIMINARY CONCLUSIONS

This current program assessment is one of several steps that will aid in the process to develop an historic preservation plan for the City of Boulder. The assessment has traced the local preservation program from its idealistic origins to its mature status. Key successes of the program include a comprehensive survey program which has systematically recorded its historic and architectural resources citywide and a spectacular track record of CLG grant awards for a wide range of projects. Likewise, Boulder's designation record is impressive, with listing of 162 local landmarks and ten local historic districts to date. The design guidelines have proven quite useful for property owners, LDRC members, staff, and design professionals, with preservation staff and the LB identifying both documents in need of complete revisions and small additions required in all existing guidance publications. As the 1974 HPO set forth as a founding principle, the Boulder historic preservation program has maintained the balance between resource protection and property rights. An emphasis on public outreach and maintaining a transparent, inclusive approach remains a key guiding principle for Boulder's historic preservation program.

This report represents the first step in a preservation plan development process which will include input from a wide variety of stakeholders and supporters. While it is not the intention of this document alone to create a comprehensive list of goals to be pursued in the future, the assessment has highlighted the following preliminary priorities relative to best practices:

- Continue to survey currently undocumented resources, especially homes constructed from the 1960s to the 1980s
- Plan to resurvey, especially in areas experiencing high levels of development pressure, physical change, or demolitions
- Maintain adequate staffing to perform all regular duties of the program plus City Council- and LB-requested special projects
- Create post-disaster response and recovery processes to avoid losses to Boulder's historic and architectural resources
- Explore additional incentives to enable broader historic preservation efforts in Boulder
- Enhance outreach and education efforts to promote historic preservation in Boulder

NOTES

1. Thomas J. Noel and Dan W. Corson. *Boulder County: An Illustrated History*. (Boulder: Heritage Media Corporation, 1999), 143.
2. *Ibid.*, 156.
3. *Ibid.*, 146.
4. City of Boulder Ordinance #4000, passed 17 September 1974.
5. *Ibid.*
6. Details about the numbers of designations, SOM listings, LAC reviews, and demolition applications appear in the relevant text sections.
7. *Robert's Rules of Order*, written by General Henry Martyn Robert in 1876 and subsequently revised, contains guidelines for parliamentary procedure. The volume details a variety of processes, including how to make motions, call for seconds, and tally votes in an official meeting.
8. See http://www.bouldercolorado.gov/files/current_web_landmark_list_3.pdf for the complete list of Boulder Individual Landmarks.
9. Aspen studied the way Boulder used planning provisions to limit growth and development pressure, adopting similar but even more dramatic growth limits than Boulder.
10. Boulder Landmarks Preservation Advisory Board. "Administrative Regulation K," Adopted 14 September 1988.
11. *Ibid.*
12. City of Longmont. "Certificates of Merit," <http://www.ci.longmont.co.us/planning/ldc/designation/>
13. *Ibid.*
14. Title 9- Land Use Code- Chapter 11: Historic Preservation – 9-11-2: City Council May Designate or Amend Landmarks and Historic Districts.
15. Title 9- Land Use Code- Chapter 11: Historic Preservation – 9-11-23: Review of Permits for Demolition, On-Site Relocation and Off-Site Relocation of Buildings Not Designated.
16. *Ibid.*
17. This figure includes primary and secondary buildings and non-landmarked resources constructed both pre- and post-1940.
18. City of Boulder Community Planning & Sustainability Department. "Analysis of Demolition Trends," 2012.
19. Refer to Map 1 on page 17 for general reference.
20. Fort Collins preservation staff did not submit a response to the follow-up questionnaire prepared for the five Colorado comparison CLGs. Details about the demolition review process are based upon written material available on the city's website. It may be helpful to consult the flowchart illustrating the demolition review process in Fort Collins; it is available at <http://www.fcgov.com/historicpreservation/pdf/review-flowchart.pdf> -- See page 2.
21. Amy Guthrie. Email correspondence. 27 December 2012.
22. City of Boulder Community Planning & Sustainability Department files. HUD grant application, 1975.
23. Presumably, the term visual survey refers to a reconnaissance survey. A reconnaissance survey, sometimes called a "windshield survey," is a preliminary inspection of a given area to obtain data prior to a detailed or full survey. Reconnaissance surveys represent a good first step in the study of a community's historical and architectural resources. These types of surveys are particularly good for establishing follow-on intensive survey boundaries, determining the distribution of a particular research type (i.e. churches in Boulder) and recording only what the surveyor can see in the field. Reconnaissance surveys are not intended to be used for either determinations of eligibility for designation or establishment of historic district boundaries.
24. Liz Blackwell. Email correspondence, 17 December 2012.
25. Survey forms from the most recent project documenting Post-World War II subdivisions still need to be scanned and posted to the website, making these records available both to the public and the staff from the Carnegie Library.
26. Dan Corson. Email correspondence, 5 December 2012.
27. According to James Hewat, several property owners living in historic districts have pursued individual landmark designation for the express purpose of obtaining a plaque.
28. City of Boulder Community Planning & Sustainability Department files. 2000 LPAB Work Plan.
29. City of Boulder. "In a Flash," (flood preparedness)
http://www.bouldercolorado.gov/index.php?option=com_content&id=3493&Itemid=1253
30. *Ibid.*
31. *Boulder Valley Comprehensive Plan*, 2010. "Background- City Structure and Projected Growth"
http://www.bouldercolorado.gov/index.php?option=com_content&id=15375&Itemid=5169
32. *BVCP*, 2010, 18.
33. Boulder County, like the City of Boulder, is a CLG with a local landmark designation program.
34. *BVCP*, 2010, Section 2.24.
35. *Ibid.*, Section 2.26.
36. *Ibid.*

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