

CITY OF CORPUS CHRISTI Historic Preservation Plan 2021



MCDOUX
PRESERVATION LLC

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INTRODUCTION

The City of Corpus Christi embarked on the development of an action-oriented community-wide Historic Preservation Plan in Fall 2020. This plan builds upon the City's original 1976 Historic Preservation Plan and subsequent update in 1992.

The National Park Service defines preservation planning as “the rational, systematic process by which a community develops a vision, goals, and priorities for the preservation of its historic and cultural resources.” A successful preservation plan integrates preservation policy with other city goals and initiatives and is representative of community values. The development of such a plan requires us to consider how preservation is currently being practiced and perceived; to identify challenges that limit the community's ability to fully realize the potential benefits of historic preservation; and to identify opportunities for improvement in public policy, regulatory frameworks, collaborative public-private partnerships, and the allocation of funding.

In recent years, the City of Corpus Christi has taken steps to strengthen its preservation program. This includes joining the Texas Main Street Program in 2016, undertaking a historic resources survey of downtown in 2017, participating in the DowntownTX.org survey pilot project, and supporting the nomination of Old Bayview Cemetery to the National Register of Historic Places in 2020. This preservation plan expands on those activities by honoring Corpus Christi's past, identifying the community's preservation goals, and providing a roadmap the City can follow to achieve the desired outcomes. Each recommendation is supported by nationwide best practices and feedback from the community. We have also provided case studies to illustrate how other Texas cities have approached the same opportunities and challenges.

McDoux Preservation's work is always based on a review of best practices, solid data collection and analysis, and meaningful engagement with stakeholders. This project included a robust public engagement effort that connected with nearly 800 Corpus Christians through stakeholder interviews and an opinion survey; in addition, hundreds more residents participated in three Community Meetings. The City promoted and encouraged public participation in the preservation planning process through a dedicated webpage, social media strategy on multiple platforms, press releases, and printed materials.

A plan is only worthwhile if it is used, so this preservation plan includes a prioritized, stepwise approach for implementing the recommendations.

The City of Corpus Christi is well-positioned to effect a transformative change in its downtown and center-city residential neighborhoods through the pursuit of effective, proven historic preservation strategies. By providing residents with the framework and tools to individually engage in preservation activities, and undertaking selected demonstration projects to build community confidence in the city's potential, Corpus Christi will benefit from additional economic development, heritage tourism, and civic pride.

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PURPOSE AND OBJECTIVES

The National Park Service (NPS) defines preservation planning as “a process that organizes preservation activities (identification, evaluation, registration and treatment of historic properties) in a logical sequence.” NPS further identifies the following principles upon which preservation planning is based:

- “Important historic properties cannot be replaced if they are destroyed. Preservation planning provides for conservative use of these properties, preserving them in place and avoiding harm when possible, and altering or destroying properties only when necessary.”
- “If planning for the preservation of historic properties is to have positive effects, it must begin before the identification of all significant properties has been completed. To make responsible decisions about historic properties, existing information must be used to the maximum extent and new information must be acquired as needed.”
- “Preservation planning includes public participation. The planning process should provide a forum for open discussion of preservation issues. Public involvement is most meaningful when it is used to assist in defining values of properties and preservation planning issues, rather than when it is limited to review of decisions already made. Early and continuing public participation is essential to the broad acceptance of preservation planning decisions.”

To that end, this Historic Preservation Plan strives to:

1. Identify ways to integrate historic preservation activities into the city’s broader planning, environmental, social, economic, and sustainability goals.
2. Identify how historic preservation in Corpus Christi can promote heritage tourism, preservation-based economic development, and heritage education.
3. Identify how historic preservation can be utilized as an urban design strategy taking into consideration pedestrian friendly design, placemaking, income and land use diversity, and neighborhood character.
4. Review the city’s historic resources, their condition, and provide strategies for preservation, which could include prioritizing certain individual properties or contiguous areas for designation and preservation incentives.
5. Provide a public outreach component to stakeholders and the general public.
6. Review national best practices and recommend updates to the historic preservation provisions in the Unified Development Code as well as provide toolkits for substantial rehabilitation, including but not limited to economic and regulatory incentives.
7. Provide a cost/benefit analysis of potential local economic incentives using local substantial rehabilitation projects, showing schedule when ad valorem revenues would be recaptured, and other pertinent data related to proposed incentives.

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METHODOLOGY

McDoux's approach to every project involves a thorough grounding in historic and current conditions; robust community engagement, including both qualitative and quantitative research, as well as community meetings and ongoing updates; the analysis of gathered data, along with nationwide best practices and the development of illustrative case studies; and a stepwise plan for implementation. This one-year planning project thus involved the following five discrete activities.

1. Current State of Preservation

McDoux reviewed the history of preservation in the city, past preservation projects and reports, current challenges, and existing City planning documents to learn what happened in the past and how those actions and decisions shaped historic preservation in the city today.

2. Stakeholder Interviews

Stakeholder interviews are the first step in a data-driven, community-driven planning process. Interviews with 20 residents, representing the diverse communities that make up the city, allowed us to identify issues of concern to the most active and engaged members of the community, and this anecdotal information serves as a basis for further investigation to determine the extent to which these issues are prevalent throughout the greater community.

3. Community Meetings

Community meetings allow the project team to share information and gather feedback, while promoting open and transparent communication with the public. Community meetings typically take the form of public open houses or workshops, as well as meetings with community groups; however, due to the COVID-19 pandemic, all three meetings were held virtually and livestreamed on social media with video recordings published on YouTube and the City website.

4. Community Opinion Survey

In order to understand how community members prioritize the issues of concern gathered from the stakeholder interviews and initial community meeting, McDoux developed an opinion survey in both online and paper formats. A total of 752 residents participated in the survey, which was available in both English and Spanish. The results of the survey were used to develop the recommendations in this report.

5. Findings and Recommendations = Preservation Plan

Using the information gathered from the community during this project, McDoux developed this Plan document. City staff and members of the Landmark Commission reviewed the first draft, and McDoux made revisions before the second draft was published for community review and comment. Following additional revisions to address community comments, the Texas Historical Commission Certified Local Government staff reviewed the third draft.

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CURRENT STATE OF HISTORIC PRESERVATION IN CORPUS CHRISTI

In order to understand historic preservation in Corpus Christi today, we need to understand how it came to be this way. As Alan Lessoff explains in his book, *Where Texas Meets the Sea: Corpus Christi & Its History*, the current issues and obstacles to downtown revitalization are based largely on a historic lack of density in the central business district; the topographic constraints created by the Bluff; and the inability of the City and community to agree on a vision and direction for Corpus Christi and take steps to achieve it.

The City of Corpus Christi officially established historic preservation as a municipal undertaking with the adoption of a historical-cultural landmark preservation ordinance in 1974. A Preservation Plan in 1976, updated in 1992, was used to guide the City's efforts, identify areas of priority, and codify policies. In 1999, City Council designated as landmarks Artesian Park, Old Bayview Cemetery, Heritage Park, and the Greer-Young-Westergren House. After that, the City met with property owners of other potential historic landmark properties to discuss whether they would be willing to formally list their properties as "Potential Landmarks;" 27 property owners agreed. The list was adopted as part of the revised preservation plan in early 1999. An additional four landmarks were designated through zoning in 2003, and one was designated as a "potential landmark" in 2004. However, designating historic landmarks has not been a City priority.

Most of the growth in Corpus Christi took place after World War II. In the 1970s and 1980s, "historic" (at least 50-year-old) buildings were defined as those built prior to 1920 or 1930. While buildings from that era were present, they were scattered across the city, rather than concentrated in a particular area and perhaps, as a result, difficult to identify as a group. The idea that not much of the city was historic likely continues today, even though in 2021, "historic" now includes anything built before 1971, and each year more resources qualify.

In 2017, cultural resources firm Hardy Heck Moore (HHM) conducted a historic resources survey of the Downtown Management District area and part of Uptown west of Upper Broadway. This survey included approximately 280 properties constructed in or before 1970. Seventy of these had been previously documented in the 1991 historic resources survey by Sally Victor. HHM determined that:

- The uptown area had a "noteworthy" concentration of mid-century modern commercial buildings.
- **The downtown area was not collectively eligible for the National Register of Historic Places in its current condition but could be if, for example, individual tax credit projects brought enough buildings back into eligible status.**
- Thirty-three resources were individually eligible for the National Register.
- Thirty-seven resources were individually eligible for local designation.

No action was taken as a result of this survey.

Currently Designated Historic Properties in Corpus Christi

Property Name	Yr. Built	Address	NR	RTHL	SAL	LOCAL
Old Nueces County Courthouse	1914	1123 N. Mesquite St.	X	X	X	
Heritage Park (site)	1980s	N. Chaparral St.				X
Britton-Evans House (Centennial House)	1849	411 N. Broadway St.	X	X		
Simon Gugenheim House	1900	Heritage Park, 1601 N. Chaparral	X	X		X
S. Julius Lichtenstein House	1905	Heritage Park, 1617 N. Chaparral	X	X		X
Charlotte Sidbury House	1893	Heritage Park, 1609 N. Chaparral	X	X		X
French-Galvan House	1907	Heritage Park, 1581 N. Chaparral		X		X
Grande-Grossman House	1904	Heritage Park, 1517 N. Chaparral		X		X
Merriman-Bobys House	1851	Heritage Park, 1521 N. Chaparral		X		X
Littles-Martin House	1900	Heritage Park, 1519 N. Chaparral				X
Jalufka-Govatos House	1905	Heritage Park, 1513 N. Chaparral				X
Ward-McCampbell House	1908	Heritage Park, 1501 N. Chaparral				X
House at 1323 N. Chaparral	1890	1323 N. Chaparral St.				X
Hector Garcia Medical Office	1965	3001 Morgan Ave.				X
Broadway Bluff Improvement	1913	615 N. Upper Broadway St.	X	X		
Richard and Minerva King House	1925	611 S. Upper Broadway St.	X	X		
Wynn Seale Junior High School	1935	1701 Ayers St.	X	X		
USS Lexington (National Historic Landmark)	1942	2914 N. Shoreline Blvd.	X			
Sherman Building	1929	317 Peoples St.	X			
Galvan Ballroom	1950	1623 Agnes St.	X			
Temple Beth El	1936	1315 Craig St.		X		X

Currently Designated Historic Properties in Corpus Christi						
Property Name	Yr. Built	Address	NR	RTHL	SAL	LOCAL
600 Building	1963	600 Leopard St.	X			
Old Bayview Cemetery (a Historic Texas Cemetery)	1845	1202 Ramirez St.	X		X	X
Nuecestown Schoolhouse	1892	11429 Leopard St.		X		
Corpus Christi Cathedral	1940	505 N. Upper Broadway St.		X		
First Presbyterian Church of Corpus Christi	1930	435 South Broadway St.		X		
Grossman-Graham-Chatterton Estate	1935	821 Oak Park Ave.		X		X
Artesian Park	1854	813 N. Chaparral St.				X
Greer-Young-Westergren House	1875	234 Rossiter St.				X
South Bluff United Methodist Church	1926	1002 Elizabeth St.				X
House at 402 Clifford St.	ca. 1920	402 Clifford St.				X
House at 337 Clifford St.	ca. 1920	337 Clifford St.				X
House at 333 Clifford St	ca. 1920	333 Clifford St.				X
House at 324 Clifford St.	ca. 1920	324 Clifford St.				X
House at 313 Clifford St.	ca. 1920	313 Clifford St.				X
House at 310 Clifford St.	ca 1920	310 Clifford St.				X
House at 311 Clifford St.	ca. 1920	311 Clifford St.				X
Moser House	1930	1511 Ocean Dr.				X
Oso Dune Site (archaeological)			X			
Tucker Site (archaeological)			X			

HISTORIC DESIGNATIONS (as of 2021)

Local Landmarks: 26

Local Historic Districts: 0

Recorded Texas Historic Landmarks: 16

State Antiquities Landmarks: 1

Historic Texas Cemetery: 1

National Register of Historic Places: 15

National Register Historic Districts: 0

National Historic Landmarks: 1

Properties with more than one designation: 15

TOTAL INDIVIDUAL DESIGNATED PROPERTIES: 40

GLOSSARY OF TERMS

Some standard terms used in historic preservation practice and found in this Plan are defined below. Most of these definitions come from the Texas Historical Commission or National Park Service.

Certificate of Appropriateness. A permit allowing alterations (including additions), relocation, demolition, or new construction to historic resources within a locally designated historic district.

Contributing. A resource (building, object, structure, or site) within a historic district that supports the basis for significance under which the district was locally designated or listed on the National Register of Historic Places. A resource classified as Contributing may be reclassified as Noncontributing if enough alterations cumulatively remove too many character-defining features.

Cultural landscape. A geographic area (including both cultural and natural resources and the wildlife or domestic animals in that area) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. The four types of cultural landscapes include *historic sites* (such as battlefields), *historic designed landscapes* (like a park or formal garden), *historic vernacular landscapes* (such as a rural village or industrial complex), and *ethnographic landscapes*, which are identified by associated people as having historic and/or cultural significance.

Facade. The front wall of a building, also known as the primary elevation.

Historic context. A narrative created for planning purposes that groups information about historic properties based on a shared theme, specific time period, and geographical area.

Historic district. A contiguous area that contains a significant concentration, linkage, or continuity of buildings, structures, sites, or objects united historically or aesthetically by plan or physical development. Overall, the district as a whole must have historical, architectural, engineering, or archaeological significance, even if some or all of the properties lack individual distinction.

Historic resource. A building, structure, site, or object that is at least 50 years old and retains integrity.

Historic resources survey. An activity that captures data and photographs about the resources within a specified area, so that their historical and architectural significance can be evaluated using local, state, or federal standards.

Historic Texas Cemetery. An official state designation that recognizes graveyards and records their boundaries in county deed records but imposes no restrictions on the property.

Integrity. The authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic or prehistoric period.

Mid-century modern. The architectural, interior design, and product design movement that became popular following World War II, from about 1945 to 1969. Designs of this era are characterized by simple shapes, clean lines, and little decorative ornamentation.

Multiple Property Submission. A submittal to the National Register of Historic Places that establishes the historic contexts used to nominate individual resources or historic districts. A Multiple Property Submission (MPS) must be accompanied by one individual nomination. Some examples in Texas include "Farms and Ranches of Bexar County," "Historic Bridges of Texas," and "Route 66 in Texas." While MPS like these are based on themes, MPS can also be developed for cities or counties to identify eligible historic resources that may not all be located in a contiguous area (like a historic district).

National Register of Historic Places. A federal program administered in our state by the Texas Historical Commission in coordination with the National Park Service. Listing in the National Register provides national recognition of a property's historical or architectural significance and denotes that it is worthy of preservation. Buildings, sites, objects, structures and districts are eligible for this designation if they are at least 50 years old (with rare exceptions) and meet established criteria. The National Register designation imposes no restrictions on property owners.

National Historic Landmark. A historic resource that is nationally significant and illustrates the nationwide impact of events or persons associated with the property, its architectural type or style, or information potential. This is the highest recognition available from the National Park Service.

National Park Service. The federal agency responsible for administering historic preservation programs and funds. Some NPS responsibilities are delegated to State Historic Preservation Offices; in Texas, that state agency is the Texas Historical Commission.

Noncontributing. A resource (building, object, structure, or site) within a historic district that does not support the basis for significance under which the district was locally designated or listed on the National Register of Historic Places. A resource is often classified as Noncontributing because it is less than 50 years old or has been altered to the extent that its character-defining features are no longer visible or present. In some cases, a Noncontributing resource may be reclassified as Contributing, if inappropriate alterations are reversed or when the resource becomes old enough.

Period of Significance. The period of time (expressed as a year or range of years) during which a historic property attained the physical characteristics or associations with people or events that make it historically or architecturally significant.

Recorded Texas Historic Landmark. A building or structure that is at least 50 years old and has excellent architectural integrity; that is, it looks the way it did when it achieved significance.

Rehabilitation. The process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

State Antiquities Landmark. A cultural resource on non-federal public land that are legally protected under the Antiquities Code of Texas. Buildings and other aboveground resources must first be on the National Register to be eligible for SAL designation, but archaeological sites do not.

State historical (subject) marker. A large plaque that tells the story of a person, place, or event in Texas history. The state marker program is managed by County Historical Commissions.

Tax abatement. A direct reduction in the amount of property tax owed, for a specified period of time. This can take the form of an initial lowered tax rate that increases each year, until it reaches 100%; a lowered tax rate that stays the same for some number of years; or a tax "freeze," in which the amount of tax owed is frozen for a period of time.

Tax credit. A reimbursement of money spent to rehabilitate or improve a historic property, in the form of a credit on the federal income tax, Texas franchise tax, or Texas insurance premium tax. In some cases, tax credits can be sold or transferred; for example, a nonprofit organization that participates in the Texas historic tax credit program is exempt from paying franchise tax, but a for-profit business could purchase the tax credit from the nonprofit at a slight discount, benefiting both parties.

Tax exemption. A reduction in the appraised or assessed value of property, which indirectly results in a lower amount of property tax owed. This can take the form of a percentage reduction in the property value or a "freeze" on the value of the property, often for some specified amount of time.

Tax incentive. A reduction in property taxes intended to encourage economic activity.

HISTORY OF PRESERVATION IN CORPUS CHRISTI

Over the years, Corpus Christi has commissioned numerous plans for the improvement of downtown and the preservation of historic buildings. Few of those plans have been realized. The following timeline attempts to make clear the work that has been done.

- 1963** 1963 Corpus Christi Area Heritage Society forms to save the Britton-Evans (Centennial) House.
- 1974** City adopts its first historic preservation ordinance.
- 1975** City seeks public input for “local sites considered worth saving.”
- 1976** City creates its first Landmark Preservation Plan, which initially attempts to give Landmark Commission the authority to landmark not just buildings but natural resources, open land, and nearly everything in Corpus Christi. Planning Commission refuses to allow Landmark Commission to have the authority to designate a property over the owner’s wishes.
- 1979** City agrees to acquire and maintain the Sidbury, Lichtenstein, and Gugenheim Houses on Chaparral Street if private groups will raise the money to restore them.
- 1981** City hires Chicago planner Robert Grossman and local architect James Rome to survey potential historic landmarks and districts. They identify Old Irishtown, containing about 60 “noteworthy” buildings – mostly 19th-century wood-frame houses – as one of three potential historic districts downtown, along with the Blucherville and South Upper Broadway areas. Potential residential historic districts include South Bluff Park, Furman Avenue, and Cole Park/Del Mar, as well as Hispanic neighborhoods on the Westside.
- 1985** City moves more historic houses to the Chaparral Street property between 1982-1987. Heritage Park officially opens in 1985.
- 1988** Landmark Commission identifies 66 properties as potential landmarks, “concentrated in the south central area of the city and scattered through the west side.”
- 1989** City commissions historian Sally Victor to develop historic contexts for Corpus Christi, to help guide identification of historic resources. Victor identifies five historic contexts* for periods of the city’s development between ca. 1860-1945.
- 1991** City adopts South Central Area Development Plan, then commissions Victor to conduct a historic resources survey of 1,145 pre-1945 properties within the city limits and the extra-territorial jurisdiction (ETJ). The survey focuses on

Blucherville, the South Bluff area, Furman Avenue, the Leopard Street Corridor, Irish Town, and Saxet Heights. Recommendations include:

- Create a computerized database for information about historic properties.
- Continue to document, designate, and educate the community about historic landmarks and historic districts, including the South Central area, which Victor identified as containing the most historically significant resources in the city.
- Work with the Convention and Visitors Bureau to promote heritage tourism.
- Expand the local and state marker programs.
- Assist property owners who wish to seek National Register listings.
- Designate historic districts in Blucherville, the north half of Furman Avenue, and Upper Broadway near Park Street.

1992

City develops second Preservation Plan to protect the city’s significant areas, sites, structures and buildings of historic character and make sure citizens experience a high quality of life. Only 38 properties are identified as potential landmarks, mostly in the Beach Addition, with a few in the Bluff Addition, Blucher Tract, Blucher Arroyo Tract, Chamberlain Addition, and Rayne Tract. The Cross Roads Shopping Center and the “Northeast corner of Carancahua and Coleman Streets” were also included.

TOP 11 POTENTIAL HISTORIC DISTRICTS (as identified in 1992 Preservation Plan)		
Downtown	Cole/Del Mar/ Atlantic Area	South Upper Broadway
South Bluff	Blucher Park	Hillcrest
Saxet Heights	Upriver/Long View/Oak Park	Old Irish Town
Morgan Area/Port Corridor		Furman Street

Additional policy statements include the Commission’s intent to:

- Expand the public’s understanding of historic preservation to include adaptive reuse, not simply restoration.
- Improve the preservation ordinance by making it easier to read, stronger and clearer, and in compliance with the CLG program.
- Consider the contemporary use of a historic property (such as whether it is used for public or private purposes) when establishing zoning for adjacent properties. Also, use zoning to minimize “undesirable” development and to

requiring a greenspace buffer between historic properties and “undesirable uses.”

- Reconsider whether a property could be designated without the owner’s consent, depending on who owned the building and how it was used.
- Establish a 120-day delay before a historic property could be demolished, after which the owner could move forward. A “review process” by the Landmark Commission was supposed to help protect potentially eligible, but not yet designated, buildings.

Other policy statements focus on maintaining the integrity of archaeological sites and sites containing “wildlife/vegetation” and ensuring that residential neighborhoods are well-maintained.

OTHER RELEVANT PLANNING EFFORTS

2006 A goal of the 2006 update of the **Park, Recreation and Open Space Master Plan** of 2002 (also updated in 2008 and 2010) included a goal to preserve and protect unique natural open spaces, selected historic sites, river corridors, etc.

2012 The **2012 “Creating a Sustainable System” Corpus Christi Strategic Parks and Recreation Master Plan** made recommendations for parks, athletic fields, aquatic facilities, trails, natural facilities, and preservation of open space over a 10-year period. Recommendations included creating seven Park Planning Areas within the City to help guide future park maintenance and development and acquiring parkland and open space that will expand historical and cultural tourism opportunities.

2013 The **2013 Central Business Development Plan** (part of the City’s Comprehensive Plan), which updated and superseded the South Central Area Development Plan of 1991 and its 1995/2004 updates, was intended to facilitate the development/redevelopment of the Central Business Area as a mixed-use, pedestrian-oriented tourist destination.

2016

The “2016 Plan” **Comprehensive Plan** (which replaced the previous 1987 version) establishes a 20-year vision for development inside the corporation limits and ETJ and identifies a number of principles to follow to achieve that vision. Among those principles are “support diversity” and “respect private property rights.” Elements of that Plan’s pertinent to historic preservation include:

- Resilience and Resource Efficiency, Goal 6, “Reinvestment in existing communities,” Strategy 2: “Encourage the preservation and adaptive reuse of existing structures to reduce construction waste and conserve energy and materials”
- Housing and Neighborhoods, Goal 7, “Corpus Christi sustains and maintains established neighborhoods,” Strategy 1: “Support programs to encourage infill development and rehabilitate housing stock in established neighborhoods” and Strategy 2: “Support preservation and reuse of historically significant buildings, areas, and sites.”
- Diversifying the Economy and Strengthening the Workforce, Goal 4, “Corpus Christi is a community of choice for talented entrepreneurs and professionals,” Strategy 2: “Promote a community culture that embraces diversity, values new ideas, and welcomes new residents” and Strategy 4: “Encourage the development of cultural/artistic activities and programs that will promote the city as the cultural center of South Texas.”
- Future Land Use, Zoning, and Urban Design, Goal 1, “Corpus Christi development patterns support efficient and cost-effective use of resources and high quality of life,” Strategy 2: “Promote the stabilization, revitalization and redevelopment of older neighborhoods.” Also Goal 3, “Corpus Christi has well-designed neighborhoods and built environments,” Strategy 3, “Encourage residential infill development on vacant lots within or adjacent to existing neighborhoods.”

EXISTING HISTORIC PRESERVATION PROGRAM

The City of Corpus Christi's historic preservation program follows the structure outlined in the National Historic Preservation Act of 1966 (NHPA). The City of Corpus Christi currently participates in the National Park Service's Certified Local Government program, which requires it to:

- Enforce state legislation and local ordinances for the designation and protection of historic properties.
- Establish and maintain a qualified historic preservation review commission.
- Maintain a system for the survey and inventory of historic properties.
- Provide for adequate public participation in the local historic preservation program, including nominating properties to the National Register of Historic Places.

In Corpus Christi, as in most cities, historic preservation is managed through zoning. Because zoning primarily manages the use of a property (such as "single-family residential"), cities add a Historic Overlay that invokes the rules set forth in the historic preservation ordinance but does not restrict use.

CITY WEBSITE

The Development Services Department has been taking steps to improve its historic preservation web presence, and should continue to consolidate and develop more explanatory information about the City's historic preservation ordinance and programs in under the Landmark Commission link on the Development Services webpage (cctexas.com/landmark).

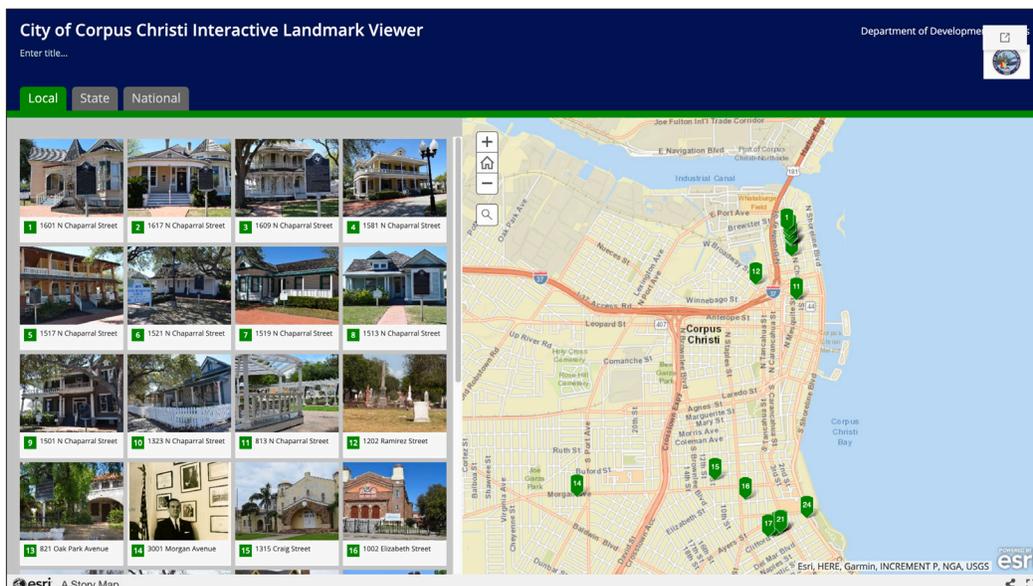


Figure 1. Screenshot of Corpus Christi Landmark Viewer in June 2021 (McDoux Preservation)

Many cities provide a helpful graphic to illustrate the Certificate of Appropriateness Application process, such as this one, from the City of Austin.



HISTORIC REVIEW PROCESS Applications for Certificates of Appropriateness

Required for Historic Landmarks and Contributing Properties and New Construction in Historic Districts (Local)

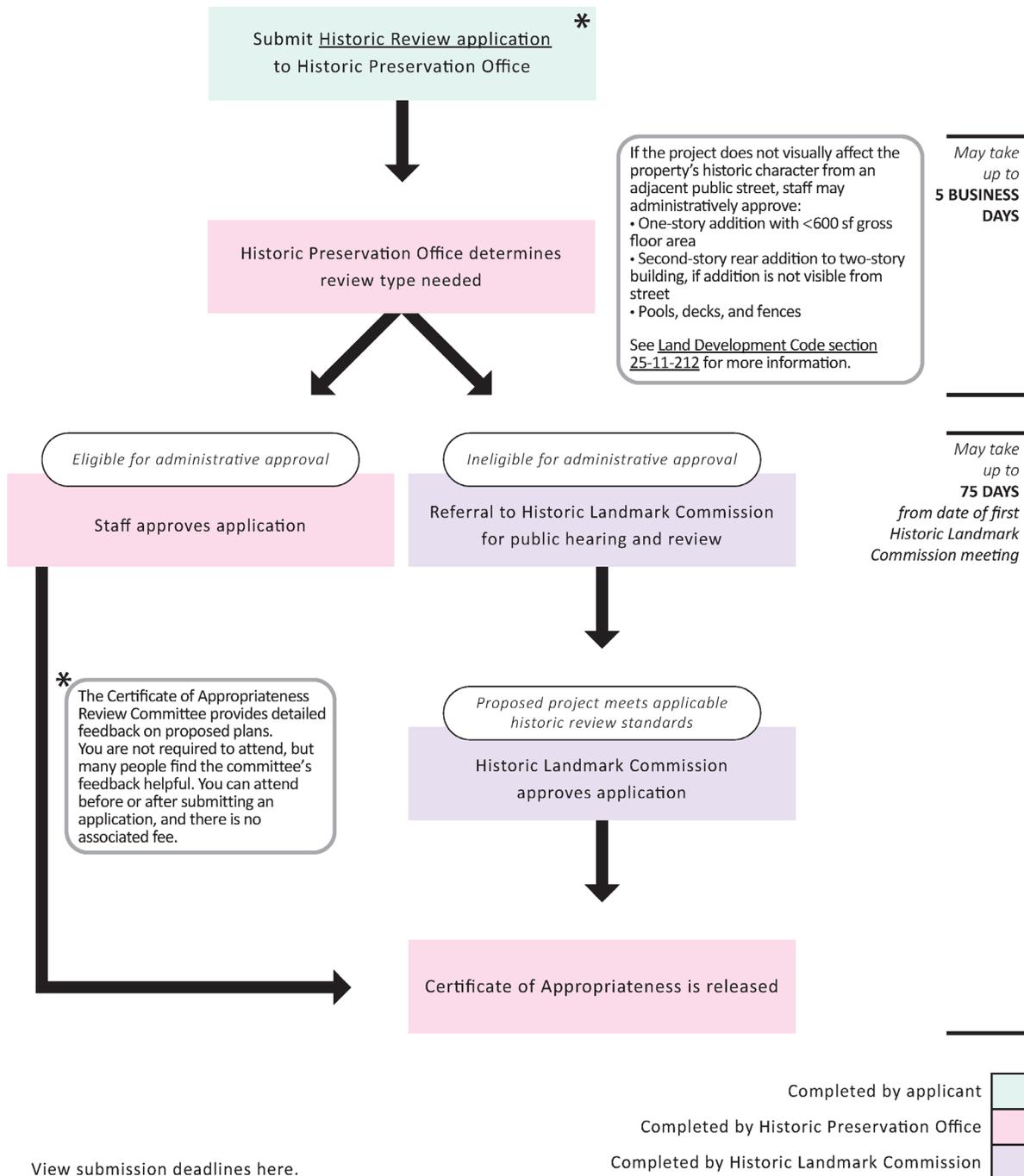


Figure 2. The City of Austin's Certificate of Appropriateness process flowchart (City of Austin)

HISTORIC PRESERVATION ORDINANCE

Corpus Christi's Preservation Ordinance is located in the Unified Development Code (UDC) (2.6, 3.4, 3.15, 3.16, and the City's Municipal Code (2-204 through 2-214).

We reviewed the preservation ordinance and found that, overall, it is generally ineffective and does not reflect best or even typical practices. If the City wants to preserve historic properties, it needs to stand behind the Landmark Commission's decisions, which are not currently binding.

Issues with the ordinance include:

- Preservation ordinance language is scattered throughout the UDC, rather than being in one place, where it would be easy to find. Having to piece the regulations together between the Municipal Code and the UDC is burdensome and confusing for the public.
- The ordinance lacks an introduction or "purpose" section and a list of definitions.
- Throughout the UDC, the City talks about coordination between permitting and the Landmark Commission, but it is not clear what system currently alerts planners or other city staff that a project or action must be reviewed by the Landmark Commission or how that is supposed to work.
- City staff have no option to administratively review applications for a Certificate of Appropriateness for minor projects, which would save significant amounts of time for staff, commission, and property owners.
- The Review Criteria for Certificate of Appropriateness (Section 3.15.3) are not helpful and do not offer any additional guidance past what the Secretary of the Interior Standard's for Rehabilitation provides. However, the SOI standards are not designed to be prescriptive or used for design review. Citizens, commission members, and City staff would benefit from clear and consistent guidance.
- Penalties for being in violation of the ordinance are defined in Article 10 of the UDC.
- The ordinance includes a demolition by neglect section (6.3.9 and 6.3.10), but it is very weak and does not appear to be effective.

LANDMARK COMMISSION

The Corpus Christi Landmark Commission is essentially an advisory body, due to the language about its role and limits of its authority currently contained in the historic preservation ordinance.

The original 1974 ordinance established the Landmark Commission's responsibilities:

- Create a Preservation Plan.
- Serve as a resource to property owners and provide comment on Capital Improvement Projects involving landmarks.
- Consider and recommend to Council the acquisition of landmark resources, if there is no other way to preserve them.
- Recommend designations and design review decisions to the Planning Commission, including review of "signs and other improvements" and the removal of mature trees and planting new ones. **Design review is a function of a Landmark Commission, but not typically in a purely advisory role.**
- Review and comment on all applications to the Board of Adjustment involving historically designated properties. **This is not typically where a landmark commission fits into the review process.**

The Commission's current constraints include:

- If the Landmark Commission denies a Certificate of Appropriateness, the owner is required to wait 90 days before proceeding. (In Houston, between 1995-2010, a similar ordinance resulted in the wholesale destruction of historic buildings and damaged the integrity of historic neighborhoods.)
- If a Certificate of Appropriateness for Demolition is denied, the owner may simply wait out the 360-day stay on demolition and then move forward.
- Members of the Landmark Commission are required to undergo training provided by the City prior to starting their term. Commissioners are also required to take a training every two years; however, it is not clear what this entails, for either initial or ongoing training.

Landmark Commission members are preferred, but not required, to have experience in one or more of the following categories: historians, licensed real estate salespersons, architects, structural or civil engineers, title search business, property surveyors, or members at-large. No one profession may constitute a majority of the membership. This ensures that the Landmark Commission is made up of qualified individuals with the expertise needed to serve the community in this role.

The Landmark Commission has 11 members, "insofar as possible, the numerical composition of the commission shall correspond to the ethnic, gender, and economic distribution of the city according to the last Federal Census report." (Sec. 2-204 of the Municipal Code.) Also, the Landmark Commission membership should represent all city council districts to the extent possible.

We analyzed data from the last decennial census in 2010 against the We evaluated the make-up of the current commission as follows:

Demographic	Population %	Target # for Commission
Female	50.5%	6
Male	49.5%	5
Hispanic	63.2%	7
White/not Hispanic	29.5%	3
Black	4.1%	1 either Black or Asian
Asian	2.3%	
Above median per capita income of \$28,025	50%	6
Below median per capita income of \$28,025	50%	5

It appears that the female/male proportion is on target, but it is likely that neither the ethnic or economic distribution targets have been met. People with different cultural backgrounds and income levels can bring a variety of perspectives to the work of the Commission. A training and development program for people interested in serving could be promoted through outreach to influencers and target populations.

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COMMUNITY ENGAGEMENT AND INPUT

This data-driven, community-driven planning process has produced recommendations that reflect the wishes of Corpus Christians who chose to participate in it. We recognize that those nearly 800 individuals, although statistically representative of the larger City population in terms of raw numbers, do not proportionally reflect the diversity of Corpus Christi. Specifically, participation in the community opinion survey was relatively low for people who consider themselves Hispanic/not White, and for African Americans. One of the goals identified later in this document is a commitment to include under-represented areas in historic preservation activities and results for all members of the Corpus Christi community.

COMMUNITY OUTREACH

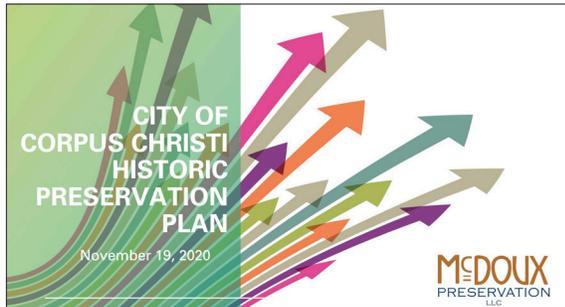
In order to make the community aware of this project and encourage participation, McDoux developed a public engagement plan that included press releases, social media posts, regular information updates on the City's website (including a separate webpage just for this project), and three community meetings. The press release prior to the community opinion survey was translated into Spanish and resulted in a news segment on the local Telemundo Spanish-language television station. Promotion for the community opinion survey also included the use of the City-managed electronic billboard on the Crosstown Highway (SH 286).



Figure 3. Screenshot of Telemundo news segment featuring the Corpus Christi preservation plan (McDoux Preservation)

COMMUNITY MEETING #1

The purpose of the first meeting was to tell the community about the project and how they could participate, and to gather feedback. McDoux Preservation consultant Steph McDougal made a virtual presentation to the Landmark Commission during a public hearing on October 25, 2020. The meeting was livestreamed and recorded for later viewing on the City's YouTube channel. Following her presentation, McDougal took questions from the audience, which could be submitted via email, phone, or Facebook. Several hundred people tuned in for the meeting in real time and more than 100 additional views of the video took place later.



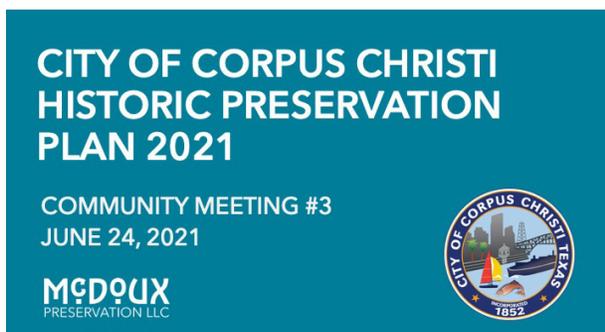
COMMUNITY MEETING #2

The second meeting took place on April 8, 2021. Following the Stakeholder Interviews and Community Opinion Survey, Ms. McDougal returned to present the results of those research efforts and next steps for the project, and to gather feedback from the community.



COMMUNITY MEETING #3

A final community meeting took place on June 24, 2021. The purpose of this meeting was to review the Draft Preservation Plan with the community, answer questions, and gather feedback.



STAKEHOLDER INTERVIEWS

The first part of the research effort for this project included talking directly to individuals to learn what the community values and whether/how residents wish to engage with historic preservation as a potential tool to accomplish their goals. Stakeholders selected for this activity included those who are already involved in historic preservation, such as members of the Landmark Commission or the Nueces County Historical Commission; business owners, architects, developers, civic and faith leaders, and homeowners; and members of different ethnic communities.

METHODOLOGY

With help from the City and the public, McDoux assembled a list of stakeholders to potentially interview. Because the resulting stakeholder list was so large, the consultants were not able to talk to everyone who was brought to their attention during this part of the project. During Fall 2020, McDoux conducted telephone or Zoom interviews with a total of 20 stakeholders.

FINDINGS

Who was interviewed?

Interviewees were asked for their ZIP Codes; they live in many areas of the city, as shown in the map below.

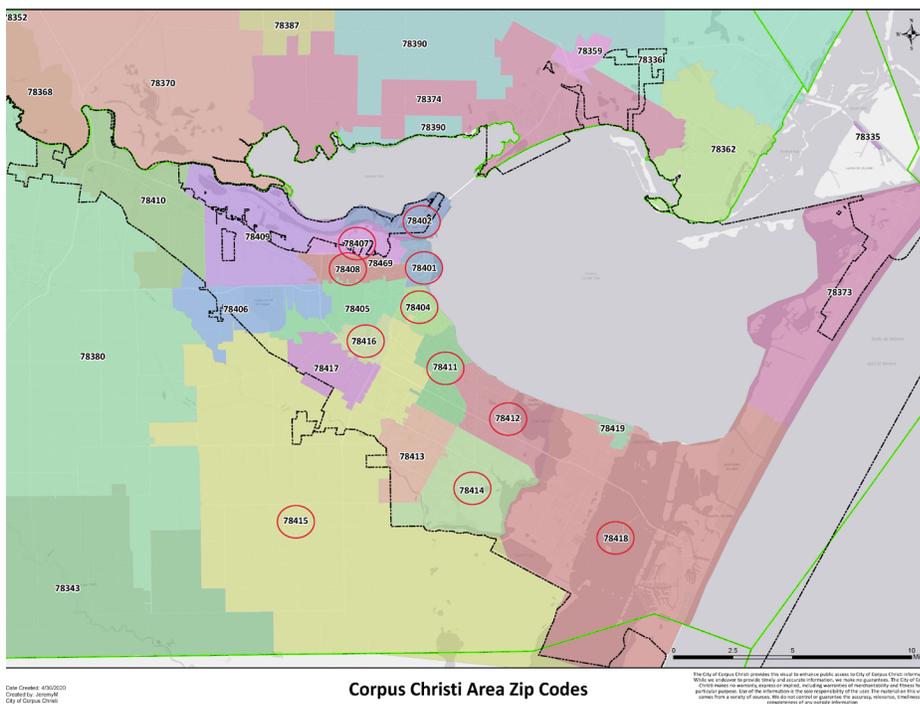


Figure 4. ZIP Code map of Corpus Christi, annotated to indicate the approximate ZIP codes of interviewees (City of Corpus Christi; annotations by McDoux Preservation)

Although we did not specifically ask interviewees to self-identify with an ethnic group, we sought to include White/Anglo, Hispanic, Black, Asian, and Native American/Indigenous people, as well as organizations that are led by or serve those populations. In some cases, the diversity of the pool of interviewees was affected by other factors, since we were also trying to engage people identified as primarily homeowners, business owners, architects or developers, those affiliated with nonprofit organizations, faith or community leaders, etc. The composition of the list of stakeholders developed in partnership with City staff, the response rate of individuals, and the limited number of interviews within our scope of work, also affected our ability to interview a selection of people who reflect the population of Corpus Christi.

Corpus Christi Demographics (2019 estimate) vs. Interviewee Demographics					
Ethnic Group	City Pop. %	# Invited	% Invited	# Interviewed	% Interviewed
Indigenous	0.5%	1	3.3%	1	5.0%
Black	4.1%	5	16.6%	4	20.0%
Hispanic	62.9%	11	36.7%	4	20.0%
White/Anglo	29.8%	11	36.7%	9	45.0%
Asian	2.2%	1	3.3%	1	5.0%
Undetermined	0.5%	1	3.3%	1	5.0%
Total	100%	30	100%	20	100%

What did they say?

Interviewees provided many helpful comments, suggestions, and insights, which are summarized as follows.

A Vision for Corpus Christi. Citizens told us that they want Corpus Christi to have a strong sense of identity, or—in marketing terms—a distinctive “brand” that is reflected in its physical fabric. Several people mentioned the city’s potential to become an “innovation hub” while others were interested in exploring the tourism potential associated with the city’s concentration of downtown Mid-Century Modern architecture.

Recognition. Although it was not necessarily articulated explicitly, a common thread running through interviewees’ answers was a desire for the history of their family, neighborhood, ethnic group, or contributions to the Corpus Christi community to be recognized by the City in a meaningful way. The City can draw from best practices in other cities and ask the community to indicate which options would be most appealing to them.

“I recognize that other priorities take precedence over historic preservation, but our history and culture allow us to promote Corpus Christi to visitors, which is a huge part of supporting improvements to our infrastructure.”

Downtown Revitalization. Many stakeholders commented on a need for the City to be more proactive about encouraging downtown revitalization.

Examples of Successful Preservation Activities. In response to various questions, interviewees told us that they felt the community at large would need to see preservation having a positive impact before they would become interested or support preservation-related activities. We agree that examples of success in one's own backyard can be the best way to promote civic initiatives. This can also help to focus staff's efforts, collaborations with community partners, and grant-seeking or the City budgeting/funding process

Vacant Buildings. Vacant buildings are a major concern for stakeholders, and they shared several different ideas for addressing this issue, both downtown and in residential neighborhoods.

Awareness-Building and Education. City staff and officials, as well as members of the community, need accurate information about historic preservation-related topics, not least to dispel misconceptions about how preservation works.

The Corpus Christi Literacy Council reports that 17% of Nueces County residents—nearly one in five people—are functionally illiterate. Census data indicates that, of adults over the age of 25 in Corpus Christi, nearly 25% have less than a high school education, more than 40% do not speak English at home, and more than 12% (mostly Spanish speakers) self-report that they do not speak English well. The City needs to plan how it will reach all segments of the population and make information accessible to everyone.

City staff and officials also would benefit from learning more about historic preservation so that they can provide accurate information to residents and can make better-informed decisions.



Better Communication. Stakeholders told us that the City could communicate with them more often and more effectively. For example, the City has been taking steps to improve its website to make information about historic preservation and the contents of the historic preservation ordinance easy to find. This should continue.

We also heard stakeholders say that staff could take more of a problem-solving approach to helping property owners prepare for or resolve issues with Certificate of Appropriateness applications.

Interest in Historic Preservation. We heard over and over again that people in Corpus Christi are “apathetic” or that they do not know about or care about historic preservation. We used that input to explore this further in the community opinion survey.

Obstacles to Historic Preservation. In addition to misconceptions about historic preservation and how it works, the community faces other challenges, including a lack of qualified local contractors, which may make it difficult to pursue historic preservation projects.

Skilled-trades training programs. The lack of qualified contractors to work on historic buildings was a hot topic among stakeholder interviewees. In cities with a strong preservation ethic, it is common for skilled-trades educational programs to partner with local nonprofit organizations and others to provide students with valuable hands-on field experience.

Preservation Partners. It was clear that the stakeholders recognized the need for community organizations to collaborate with the City on preservation activities. We also heard that they perceived a gap in leadership and a potential opportunity for a new nonprofit organization or coalition of existing organizations to come together and lead these efforts. We agree that City governments are best equipped to be successful in historic preservation when they have strong and engaged community partners.

Ordinance and Commission Authority. Stakeholders were interested in changing the historic preservation ordinance so the Landmark Commission would have the ability to deny incompatible alterations or demolitions.

In addition to the 20 stakeholder interviews, McDoux consultants spoke to an additional five people and received suggestions for many more who could be of assistance or are influencers.

“We can't neglect one side of town and have the other side beautiful, and then expect the community to respect where they live when we've done nothing for them.”

COMMUNITY OPINION SURVEY

Based on anecdotal information gathered during the stakeholder interviews in Fall 2020, McDoux developed and deployed a community opinion survey in January 2021. The purpose of this survey was to obtain directional data to inform the development of the Historic Preservation Plan. In order for the Preservation Plan to appropriately represent the entire community, it was critical to make sure that everyone who wanted to participate could do so, without regard for language, literacy, Internet connectivity, or computer access.

METHODOLOGY

Working closely with the City's Development Services staff and Public Information Office, McDoux created a survey engagement plan to promote participation to the entire Corpus Christi community. The survey document explained the preservation plan project and the purpose of the survey, provided basic information about historic preservation, and collected demographic data. The survey asked five questions about historic buildings and places, under the heading, "What do you care about in Corpus Christi?"; seven questions asking the respondent's opinion about historic preservation in Corpus Christi; and eight questions about the City's role in managing historic resources. The final two questions were open-ended, and asked, "What neighborhoods should be considered as a potential historic district?" and "What else do you want us to know?"

The survey was available in both English and Spanish, online and as paper copies at City Hall (utility payment windows) and at all branches of the public library system.

Librarians also were available to help library users access the survey on public computers and to provide assistance, if needed, to complete the online or paper surveys.



Because the illiteracy rate in Nueces County is relatively high, Development Services offered a telephone option, during which the survey would be read to the respondent and their responses recorded by City staff.

The survey was promoted to the community through the City website; multiple City social media posts to Facebook, Twitter, and Instagram;

flyers posted at City offices and library branches; a billboard on the Crosstown Expressway (SH 286); press releases to the media; and a news segment on Telemundo in Corpus Christi. A boost to one of the Facebook posts midway through the survey response period was very effective, increasing the daily response rates by 6–10 times over the previous week.

Development Services staff personally delivered flyers and surveys to a small number of Mexican restaurants around the city in an effort to reach members of the Hispanic community and, in one case, to a City staff member's neighbors, many of whom completed and returned their responses in paper form.

All paper copies of the completed survey were returned to Development Services, scanned, and emailed to McDoux for manual data entry into SurveyMonkey; the data was then exported and analyzed.

COMMUNITY SURVEY RESULTS

In addition to answering our questions, survey participants provided more than 12,500 unique comments! Two-thirds of the 752 respondents indicated that they support historic preservation activities in Corpus Christi and want to see the City do more to enable preservation of the city's built heritage.

Citizens of Corpus Christi were clear in their direction for the City's historic preservation program, as expressed in the 2021 Community Survey. They told us that:

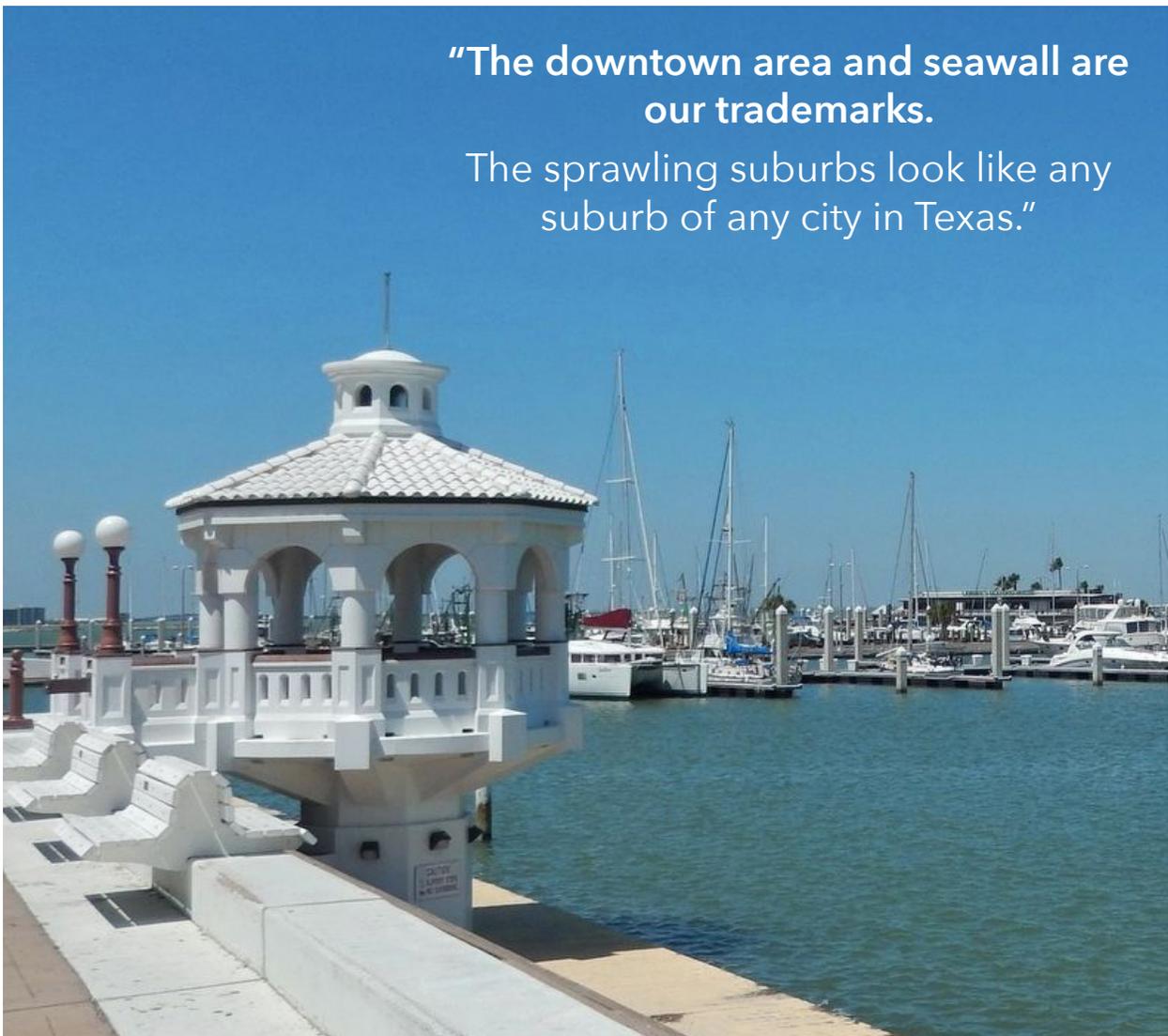
- They **support historic preservation** in Corpus Christi
- They **enjoy traveling to and staying in historic downtown areas** where many revitalized buildings offer a variety of dining, entertainment, and shopping options, particularly at "small local shops."
- The Ritz Theater was most frequently mentioned as the building that Corpus Christians would like to see placed back into productive use. It could serve as a catalyst for a **potential entertainment district**.
- The City's demolition of Memorial Auditorium is still **a sore spot** for many residents.
- A few comments mentioned buildings being allowed to become dilapidated. Whether that is the City's responsibility or not, citizens clearly think that the City is either allowing that to happen or should be taking steps to **address the rundown conditions of many buildings**, particularly (but not exclusively) in the downtown area.
- The City needs to **provide more outreach and information** about historic preservation programs and how they work. (Note: The Preservation portion of the City website has improved dramatically since this project started.)
- Corpus Christi should be **a welcoming destination** for both tourists and locals.
- In order to attract and keep more young people, professionals, and tradespeople, the City needs **a more diversified economy** that is not so dependent on the oil and gas industry; however, this will require good schools, infrastructure, etc. in order to attract businesses and corporate offices.
- This area lacks **qualified tradespeople** to do the work of historic preservation, and sourcing skilled labor from other cities makes projects more expensive.

More than 350 people said they would like to become more involved in historic preservation in Corpus Christi, and 239 of them provided either an email address or telephone number so that they could be contacted.

- The City should **prioritize existing neighborhoods** at least as much as new development. People currently living in existing neighborhoods should be able to stay there, but with the same level of services provided to newer neighborhoods.
- Respondents want the City to **protect historic neighborhoods and buildings** that property owners have voluntarily designated as historic districts or landmarks, including the authority to potentially deny inappropriate changes to or demolitions of locally designated historic buildings.
- Any new regulations should be **reasonable and clearly communicated** to property owners and prospective buyers (such as through the adoption of clearly written and illustrated design guidelines specific to a historic district).
- Residents need **consistent and clear communications** from the City that includes accurate information about historic preservation and the benefits and responsibilities of historic designations.
- If the City provides any financial incentives (including but not limited to Hotel Occupancy Tax funds) to encourage preservation activities, those should only be available to **qualified applicants**, distributed equitably **without encouraging gentrification** or the displacement of existing homeowners, and should prioritize the **repurposing of vacant buildings**.

“The downtown area and seawall are our trademarks.

The sprawling suburbs look like any suburb of any city in Texas.”



TOP POTENTIAL HISTORIC LANDMARKS

(as identified in the Community Opinion Survey, with number of mentions)

- 1 Heritage Park (45)
2. Ritz Theatre (43)
3. Downtown buildings generally (33)
4. Art Museum of Southern Texas (13)
5. Corpus Christi Cathedral (12)



Photo credits: 4,5: Gerald Moorhead, 2017, Buildings of South Texas.
1: Google Earth. 2: Howard Karsh (Cinema Treasures). 3: J.D. Page (iStock).

TOP 12 NEIGHBORHOODS THAT SHOULD BE HISTORIC DISTRICTS (according to the Community Opinion survey)		
Downtown (Central City)	Del Mar	Uptown
Ocean Drive	Morningside	Northside/Hillcrest/ Washington Coles
Saxet Heights/ Oak Park	Lamar Park	Bessar Park
Six Points	Westside	Furman Avenue



Figure 5. Map of historic neighborhoods identified as high priorities for preservation in the Community Opinion Survey (City of Corpus Christi)

"This city can re-establish itself as the jewel of the Gulf Coast and bring tourism back. We need to cut out the decay and modernize. Provide favorable tax incentives for businesses, reimagine what downtown can be, and make it a destination that is safe and family-friendly. Also, rein in the property squatters who are not doing anything with their properties."

VISION, GOALS, AND IMPLEMENTATION

Recognizing that, over the years, the City of Corpus Christi has identified opportunities for historic preservation but did not act on most of them, the Vision, Goals, and Strategies presented here are designed to be clear and actionable and to reflect the wishes of the community as expressed in the stakeholder interviews and Community Opinion Survey.

The Implementation Guide presents a stepwise approach to accomplishing these Goals, showing which items the City should start with and how it should proceed. Each Strategy includes an explanation of best practices and what needs to be done, as well as a list of Action Items, Responsible Persons, Resources Required, and Prior Preservation Activities Required to be completed before that Strategy begins, as well as Case Studies of other cities where similar programs have been successfully implemented. Action Items are numbered continuously throughout this Plan for clarity.

Of course, the City's actual sequence of activities will depend on and be influenced by factors outside the control of Development Services and the Landmark Commission. Therefore, these are illustrative examples of how the City might proceed, rather than prescriptive instructions for how it must.



VISION

By 2030, historic preservation in Corpus Christi will support a vibrant, multicultural community enjoyed by residents and visitors alike, with a thriving downtown, diversified economy, updated infrastructure, and equitable investment in new and legacy neighborhoods.

Figure 6. Historic district, downtown Pensacola, Florida (Michael Warren, iStock 1192938889)

<p style="text-align: center;">GOAL 1</p> <p style="text-align: center;">Build City capacity for historic preservation</p>	<p style="text-align: center;">GOAL 2</p> <p style="text-align: center;">Enable community- driven historic preservation</p>	<p style="text-align: center;">GOAL 3</p> <p style="text-align: center;">Support historic preservation as an economic development tool</p>
<p>STRATEGY 1: Hire a full-time historic preservation officer.</p>	<p>STRATEGY 6: Improve the City's historic preservation website to make information easier to find.</p>	<p>STRATEGY 11: Promote historic preservation as an economic development tool.</p>
<p>STRATEGY 2: Update the historic preservation ordinance to add Protected Landmarks and Protected Historic Districts where the Landmark Commission's decision is binding (although appealable).</p>	<p>STRATEGY 7: Improve community outreach and standardize the public engagement process.</p>	<p>STRATEGY 12: Fix the vacant building ordinance, which now encourages demolition instead of adaptive reuse and/or re-purposing.</p>
<p>STRATEGY 3: Update the Landmark Commission bylaws and training requirements.</p>	<p>STRATEGY 8: Support the creation of a local nonprofit organization to partner with the City, individual residents, and other organizations on preservation activities.</p>	<p>STRATEGY 13: Invest in historic resources surveys and multi-property listings to the National Register of Historic Places.</p>
<p>STRATEGY 4: Plan for disasters, including preparation, response, and recovery process, and help individuals develop and implement their own preparedness, resilience, and recovery plans.</p>	<p>STRATEGY 9: Include under-represented areas.</p>	<p>STRATEGY 14: Develop local tax incentive programs to support historic rehabilitation.</p>
<p>STRATEGY 5: Develop walking tours of historic areas in partnership with the City Convention and Visitors Bureau and the Downtown Management District (DMD).</p>	<p>STRATEGY 10: Work with Nueces County Historical Commission to develop a thematic approach to new historical markers that supports heritage tourism.</p>	<p>STRATEGY 15: Develop facade improvement programs to support historic rehabilitation.</p>
		<p>STRATEGY 16: Support a few select projects to demonstrate preservation's potential to spur economic growth.</p>

Foster Dr
Santa Fe St 3100

**GOAL 1: BUILD CITY CAPACITY
FOR HISTORIC PRESERVATION**



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STRATEGY 1: HIRE A FULL-TIME HISTORIC PRESERVATION OFFICER

This position should be filled by a preservation planner who meets the Secretary of the Interior's Standards for Professional Qualifications in Historic Preservation as outlined in 36 CFR 61 (see following page).

The ideal candidate will have experience with ordinance revisions, commission training, historic resource surveys, National Register nominations, and working collaboratively with the Texas Historical Commission, County Historical Commissions, other state agencies and city departments, and a preservation-focused nonprofit partner.

Once a full-time historic preservation officer is hired, that person can dedicate 100% of their time/responsibility to implementing the historic preservation plan.

ACTION ITEMS

- 1. Develop a new Preservation Planner position description.** The position description should explicitly call out basic requirements for preservation education and experience, as well as preferred characteristics. McDoux's experience with other cities has shown that using a generic planning position description should result in applications from candidates who do not have the preservation qualifications needed, which wastes everyone's time.
- 2. Post the position nationwide.** To reach experienced preservation planners, the City should post this opportunity to the PreserveNet job board and the Historic Preservation Professionals group on Facebook, as well as sending it to university preservation programs, which can circulate it to their alumni. All of those options are free of charge.

RESPONSIBLE PERSONS

Assistant Director of Development Services

RESOURCES REQUIRED

Human Resources assistance to create a new job description

PRIOR PRESERVATION ACTIVITY REQUIRED

None



THE SECRETARY OF THE INTERIOR'S STANDARDS FOR PROFESSIONAL QUALIFICATIONS IN ARCHAEOLOGY AND HISTORIC PRESERVATION

(Find this information online at https://www.nps.gov/history/local-law/arch_stnds_9.htm.)

The following requirements are those used by the National Park Service, and have been previously published in the Code of Federal Regulations, 36 CFR Part 61. The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed, depending on the complexity of the task and the nature of the historic properties involved. In the following definitions, a year of full-time professional experience need not consist of a continuous year of full-time work but may be made up of discontinuous periods of full-time or part-time work adding up to the equivalent of a year of full-time experience.

History

The minimum professional qualifications in history are a graduate degree in history or closely related field; or a bachelor's degree in history or closely related field plus one of the following:

- At least two years of full-time experience in research, writing, teaching, interpretation, or other demonstrable professional activity with an academic institution, historic organization or agency, museum, or other professional institution; or
- Substantial contribution through research and publication to the body of scholarly knowledge in the field of history.

Architectural History

The minimum professional qualifications in architectural history are a graduate degree in architectural history, art history, historic preservation, or closely related field, with coursework in American architectural history, or a bachelor's degree in architectural history, art history, historic preservation or closely related field plus one of the following:

- At least two years of full-time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; or
- Substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.

Historic Architecture

The minimum professional qualifications in historic architecture are a professional degree in architecture or a State license to practice architecture, plus one of the following:

- At least one year of graduate study in architectural preservation, American architectural history, preservation planning, or closely related field; or
- At least one year of full-time professional experience on historic preservation projects. Such graduate study or experience should include detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects

Architecture

The minimum professional qualifications in architecture are a professional degree in architecture plus at least two years of full-time experience in architecture; or a State license to practice architecture.

Archaeology

The minimum professional qualifications in archaeology are a graduate degree in archeology, anthropology, or closely related field plus:

- At least one year of full-time professional experience or equivalent specialized training in archaeological research, administration or management;
- At least four months of supervised field and analytic experience in general North American archaeology, and
- Demonstrated ability to carry research to completion. In addition to these minimum qualifications, a professional in prehistoric archaeology should have at least one year of full-time professional experience at a supervisory level in the study of archaeological resources of the prehistoric period. A professional in historic archaeology should have at least one year of full-time professional experience at a supervisory level in the study of archaeological resources of the historic period.

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STRATEGY 2: UPDATE THE HISTORIC PRESERVATION ORDINANCE

The City's historic preservation ordinance language can be found in two different locations: the Unified Development Code (2.6, 3.4, 3.15, 3.16), and the City's Municipal Code (2-204 through 2-214). All of this language should be consolidated into a single ordinance.

In addition, the Corpus Christi preservation ordinance is very weak compared to most cities in Texas. As currently written, the preservation ordinance only serves to slow down alterations to historic landmarks or the demolition process. An owner need only wait out the 90-day waiting period for Certificates of Appropriateness for alterations, or the 360-day stay on demolition, and then they can move forward with their plans. This provides no protection to historic resources and leaves neighborhoods vulnerable to incompatible development.

Rather than changing the rules that apply to existing local landmarks, the City should create a new option that gives property owners the ability to be assured of protections for their historic properties or neighborhoods.

In addition, the preservation ordinance treats the position of Assistant City Manager over Development Services as the Historic Preservation Officer (HPO). In a city the size of Corpus Christi, a position should be dedicated to running the preservation program. The role and duties of this position need to be defined in the ordinance, and to meet the requirements of the Certified Local Government program, the person in this position should meet the Secretary of the Interior's Standards for Professional Qualifications as outlined in 36 CFR 61.

ACTION ITEMS

3. **Plan and carry out** a fair and transparent ordinance update process incorporating robust public outreach that follows the City's standard community engagement process as defined in Strategy 7.
4. **Update the ordinance** based on the sample ordinances provided by the THC's CLG program to ensure that the City would not be out of compliance with that program. The City has a customizable ordinance development template created by McDoux, which the Texas Historical Commission shares with cities that wish to become Certified Local Governments. It includes all of the important basic regulations, including economic hardship and demolition by neglect clauses. The only thing to be added is the ability to designate Protected Landmarks and Protected Historic Districts, in addition to regular Landmarks and Historic Districts. This leaves the 90-day/360-day delay in place for Landmarks that were designated under those terms. Any changes to the historic preservation ordinance should be made with participation, input, and feedback from the community, which should require providing them in advance with the information they would need to share informed, thoughtful opinions.
 - **Consolidate the preservation ordinance.** All of the City's preservation ordinance language should be in one place. Having to piece the regulations together between the Municipal Code and the UDC is burdensome and confusing for the public. Once the ordinance is in one place, add an introduction or "purpose" section.

- **Define the role and qualifications for the historic preservation officer.**
- **Create new designation options that strengthen protections for historic properties.**
This should include a “Protected Landmark” and “Protected Historic District”; for these properties, the Landmark Commission’s denial of Certificates of Appropriateness for alterations or demolition would be binding, although it could be appealed.
For clarity, the ordinance should treat the process for designating a Protected Landmark separately from the process for designating a Protected Historic District. This new section of the ordinance should be written so that a property is treated and protected while the designation application is being reviewed by the Landmark Commission, Planning Commission, and City Council.
- **Remove language that treats City Council’s inaction after six months as a denial of designation.**
- **Add language that gives the Landmark Commission the authority to review new construction** in a historic district or Protected Historic District, specifically scale and massing, to ensure that the historic character of the district is maintained while allowing redevelopment.

Any changes to the historic preservation ordinance should be made with participation, input, and feedback from the community, which will require providing them in advance with the information they will need to share informed, thoughtful opinions.

RESPONSIBLE PERSONS

Historic Preservation Officer

Landmark Commission

RESOURCES REQUIRED

Funding for public meetings and other community engagement activities, such as letters to property owners of existing landmarks and in potential historic areas.

Administrative staff support for mailings, compilation of citizen comments, and other clerical tasks

Assistant Director of Development Services support to regularly brief Planning Commission and City Councilmembers

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 6: Improve the City’s Historic Preservation website.

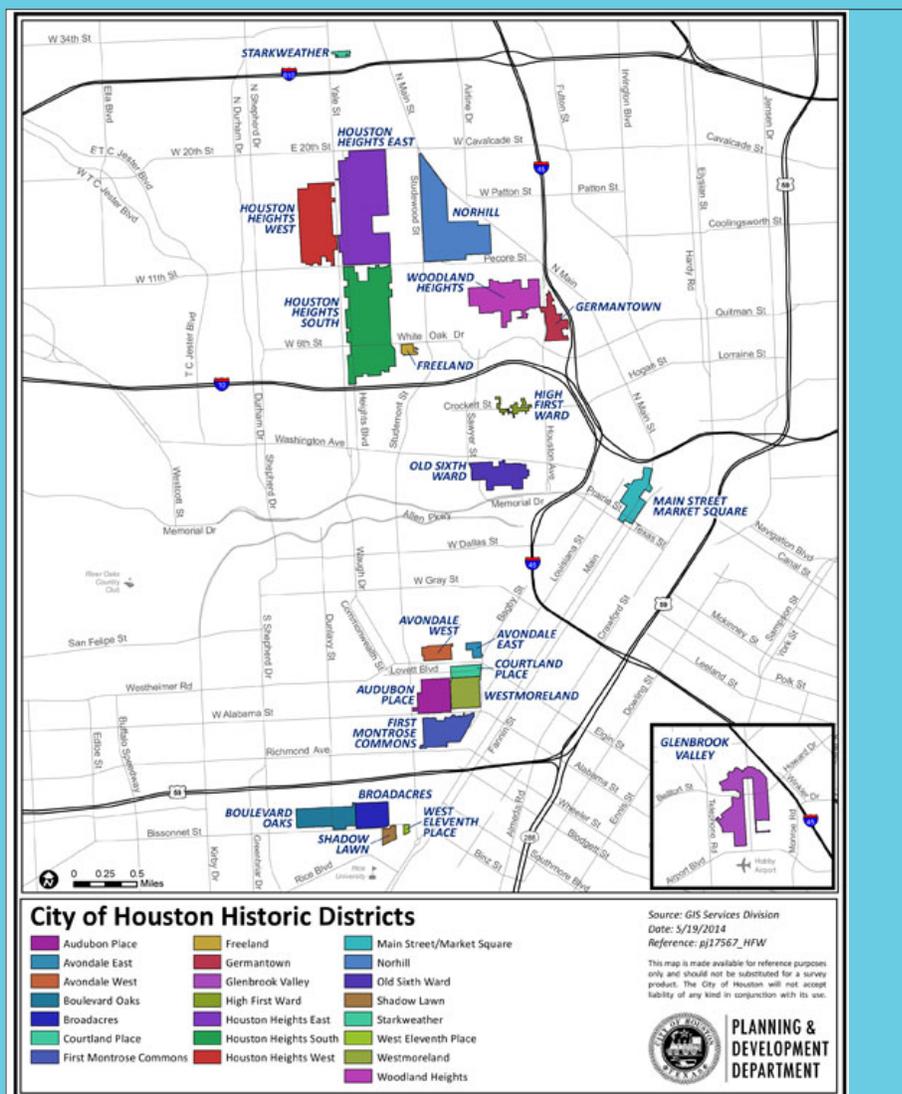
Strategy 7: Improve community outreach and standardize the public engagement process.

CASE STUDY: HOUSTON, TEXAS

The City of Houston's historic preservation ordinance was adopted in 1995, and for a decade, if a property owner wanted to alter or demolish their building and the Historic Commission denied the application, the applicant only had to wait 90 days before moving ahead. For 15 years, many historic buildings were lost or inappropriately altered, particularly in neighborhoods around Houston Heights, where bungalows were routinely relocated, razed, or overwhelmed by gigantic additions.

In 2010, the City updated the historic preservation ordinance to create a Protected Landmark designation that does not include a 90-day waiting period and instead makes Historic Commission decisions binding (with the option to appeal). The City already had a Protected Historic District in Old Sixth Ward, where protections have preserved the city's oldest surviving neighborhood.

Today, the City of Houston has designated more than 400 historic landmarks and 22 historic districts, including the 1,200+-home mid-century Glenbrook Valley subdivision, the largest subdivision ever listed on the National Register of Historic Places.



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STRATEGY 3: UPDATE LANDMARK COMMISSION BYLAWS AND TRAINING REQUIREMENTS

Ongoing preservation education and training helps Landmark Commission members make better-informed decisions on local designations and design review. This in turn leads to better outcomes for the City and for the applicant requesting a Certificate of Appropriateness (COA). Training is so important that the Texas Historical Commission (THC) requires each commission member to attend at least one training each year to maintain standing in the Certified Local Government (CLG) program, in which the City of Corpus Christi participates. Many different types of training are offered, including some at no cost or very low cost to the City.

The City is responsible for ensuring that commissioners have access to quality preservation education. For example:

- In the agenda for each Commission meeting, list a few preservation training links for the commissioners to review independently.
- The National Trust for Historic Preservation has multiple webinars each month that could be included. The THC's CLG webpage also has recorded webinars under the section "Preservation Boot Camp." These resources are extremely helpful. Try assigning a webinar to the commission and then discussing its content at the next meeting. During slower months when the commission has fewer Certificate of Appropriateness applications to review, they could watch a webinar or training video together and then discuss.
- Ask the Texas Historical Commission to present training on a topic that particularly interests or troubles the commission. Having an expert in the room to answer questions is invaluable, and the THC will provide these services for free.
- Attend a National Alliance for Preservation Commission (NAPC) Commission Assistance and Mentoring Program (CAMP). Typically, NAPC offers a handful of these around the state of Texas each year, and they are usually open to outside organizations for a fee. The City of Corpus Christi might also decide to host a CAMP training to discuss challenges specific to the commission.
- In the past six years, the THC has offered travel stipends to support commission member's attendance to "FORUM," NAPC's biennial national preservation conference. City staff should be in regular communication with the THC's CLG staff about opportunities like FORUM and CAMP so they are able to update commissioners of the latest training opportunities.

ACTION ITEMS

5. **Update the commission's bylaws** to clearly state the requirement for new commissioner training and any ongoing or periodic training that would also be required.
6. **Standardize new commission member orientation.** Currently, new Landmark Commission members are required to undergo City-led training prior to their first meeting. Many appointees to the preservation commission are likely to be unfamiliar with best practices in preservation, design review, and the City's preservation ordinance. Currently, staff must lead a thorough training for new commission members each time someone new is

appointed. To standardize this process, compile necessary information in a binder or flash drive, including (but not limited to) the City's preservation ordinance, the commission's bylaws, the Secretary of the Interior Standards for Rehabilitation, a sample Certificate of Appropriateness application and staff report, any applicable design guidelines or standards, and local, state, and national resources for additional information.

7. **Require annual training for commission members.** Per the preservation ordinance, Landmark Commissioners are currently required to attend one training every two years; however, the CLG program requires training every year.
8. **Establish a design review committee to participate in consultation with applicants.** Cities with a high volume of COA applications, or situations with recurring issues in design review, find it helpful to meet regularly between monthly commission meetings. This group is often referred to as the Design Review Committee and is made up of the Historic Preservation Officer, two or three members of the historic commission, and applicants who are thinking about applying for a COA. In this less formal setting, the applicant can bring conceptual designs, ideas, and questions to the committee for discussion before making major decisions or expending resources (on both the City and applicant's part). These meetings are also beneficial to commission members who can closely examine and explain the design standards to the applicant. Solving design challenges together before the commission meeting improves both applicant's experience and the likelihood that their application would be approved.
9. **Regularly take commissioners on a tour of recent projects.** Commissioners can become more effective at design review by visiting a recently completed project for which the commission approved a COA. By considering what they expected the end result to be, and comparing that to what actually happened, commissioners can better understand how to translate drawings and descriptions to finished construction. The City of Houston has employed this activity as part of commission training and has called it "eye-opening." During the tour, which can take place in the public right-of-way and does not require access to the property, allow time for commission members and staff to take photos and discuss what they expected from the design review process and what they are observing. This activity also may help to identify changes to be made in staff reports or information required/requested from the applicant as part of the COA.

RESPONSIBLE PERSONS

Historic Preservation Officer

Landmark Commission

RESOURCES REQUIRED

Staff time to coordinate and oversee design review committee consultation meetings (although ultimately the total investment of time, effort, and cost is expected to be reduced for all involved)

PRIOR PRESERVATION ACTIVITY REQUIRED

None

STRATEGY 4: PLAN FOR DISASTERS

Disaster planning and mitigation have shaped Corpus Christi's history and its built environment. The city's location on the Gulf of Mexico has been one of its main economic drivers over the years, as well as a tourist draw, but also makes the City vulnerable to hurricanes and tropical storms. According to the *Nueces County, Texas, Multi-Jurisdictional Hazard Mitigation Action Plan*:

"Nueces County and the jurisdictions therein are susceptible to a wide range of natural hazards, including floods, hurricanes and tropical storms, drought, extreme heat, lightning, coastal erosion, hailstorms, tornadoes, dam and levee failure, land subsidence, expansive soils, and wildfire. These life-threatening hazards can destroy property, disrupt the economy, and lower the overall quality of life for residence. The impact of hazards can be lessened in terms of their effect on people and property through effective hazard mitigation action planning and implementation. ... Nueces County and the other participating jurisdictions (can) evaluate successful mitigation actions and explore opportunities to reduce future disaster loss."

The City of Corpus Christi should strive to proactively implement disaster planning procedures that incorporate historic preservation considerations and preserve the community's historic resources. Personal and public safety are not addressed in these recommendations but should be the primary consideration in a disaster. Individuals should refer to City guidance about public safety through the Office of Emergency Management and the Ready Corpus Christi website.

This section uses the following terms that are specific to disaster planning and response:

- **Risk assessment** is the process of identifying threats and vulnerabilities to resources, predicting the severity of foreseeable consequences, and then identifying actions to reduce risk.
- **Hazard mitigation planning** is a process for state and local governments to identify policies, activities, and tools that will reduce the potential for damage from disasters. Mitigation planning takes place before, during, and after disasters.
- **Disaster response and recovery** includes both the activities that take place during and immediately after a disaster (the *response*) and the longer-term efforts to help a community recover. Agencies at the federal, state, and local level implement procedures as well as provide guidance and funding to assist, respond to, and recover from a disaster.

A City's disaster preparedness, response, and recovery involves more than just historic resources, obviously, but community-wide initiatives should be included in comprehensive planning documents. In this section, we focus on how that planning should be customized for historic resources in particular.

THE DISASTER CYCLE

Major disaster declarations, in which the state requests federal resources, follow these steps:

- Local government emergency services are the first to respond to a disaster, often with assistance from neighboring communities and volunteer agencies.
- When a local jurisdiction is overwhelmed, the state responds with resources such as the National Guard and state agencies. Damage assessments are taken by local, state, federal, and volunteer organizations to determine losses and recovery needs;
- When a state is overwhelmed by a catastrophic event, the governor can request a major disaster declaration based on the damage assessment and an agreement to commit state funds and resources to the long-term recovery;
- The Department of Homeland Security, through FEMA, evaluates the request and recommends action to the White House. The President approves the request or DHS informs the governor it has been denied. Assistance may address search and rescue, electrical power, food, water, shelter, and other basic human needs.

Source: FEMA, "How a Disaster Gets Declared," www.fema.gov

CHECKLIST FOR DISASTER PREPAREDNESS

The National Park Service has identified a four-item checklist for incorporating historic preservation into disaster preparedness, which we have customized in relation to Corpus Christi.

- **Establish relationships with Governmental Partners and make sure City staff understand the roles of each agency.** Federal, state, and local authorities are all responsible for emergency planning and response.

At the federal level, the Federal Emergency Management Agency (FEMA) disburses disaster-related funding and provides technical assistance and support to state and local officials. In response to presidentially declared disasters, Congress may make Community Development Block Grant (CDBG) funding available to states, local governments, and tribes through the Department of Housing and Urban Development (HUD). Other federal agencies, such as the U.S. Army Corps of Engineers, have active roles. The National Historic Preservation Act requires that these federal agencies consider the effects of their actions on historic properties through a consultation process involving the State Historic Preservation Office (or SHPO, which in Texas is the Texas Historical Commission), local agencies, and the public. Disbursement of federal funds for demolition and rebuilding are contingent on this review, codified in Section 106 of the National Historic Preservation Act.

At the state level, the Texas Division of Emergency Management (TDEM) administers the all-hazards emergency management plan for the state, working closely with local jurisdictions, state agencies, and federal partners. State agencies are also an integral part of the disbursement of federal funds for disaster projects. The Texas General Land Office (GLO) is responsible for determining the method of distribution of CDBG funds, including grant size limits and how funds will be allocated. The Texas Historical Commission (THC) also has disaster recovery funding available and, as the state agency for historic preservation, can be a valuable resource for technical preservation assistance. THC also has Programmatic Agreements in place with FEMA, the GLO, and other agencies to streamline the Section 106 review process for in the aftermath of a disaster.

At the county level, Nueces County has worked with the City of Corpus Christi and other entities to develop a Multi-Jurisdictional Hazard Mitigation Action Plan in 2017. The plan integrates hazard mitigation strategies into other planning mechanisms. The Coastal Bend Council of Governments (CBCOG) provides support for the mitigation action plan.

While all of these organizations have an important role in disaster planning and recovery, the local government plays the most vital part. In Corpus Christi, responsibility for emergency preparedness falls to the Office of Emergency Management (OEM), whose mission is to minimize loss of life and personal injury as well as damage to property and the environment from disasters. OEM develops and maintains an emergency management plan for the city which addresses all four phases of emergency management: mitigation, preparedness, response, and recovery.

The City of Corpus Christi's historic preservation staff should ensure that they are well-versed in these agencies' roles and have met with representatives, as appropriate. During disaster planning, city officials identify sites where response and recovery personnel, equipment, and activities can be accommodated (such as staging utility crews or storing debris removed from roadways). Historic preservation professionals and/or archaeologists can help identify appropriate sites for these activities that will not negatively impact historic resources.

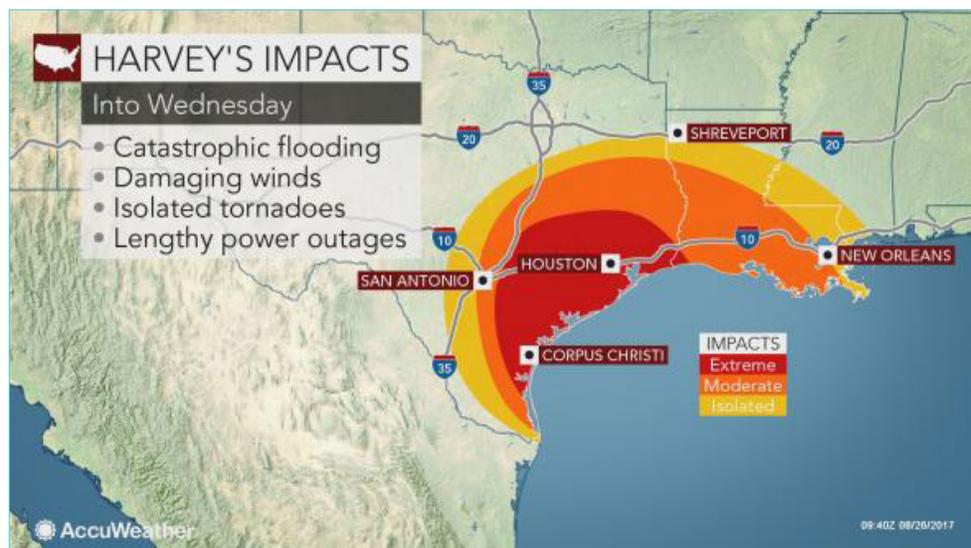


Figure 7. Graphic showing expected impacts of Hurricane Harvey in 2017 (Accuweather.com)

- **Integrate historic preservation into the City's hazard mitigation plan.** The Multi-Jurisdictional Hazard Mitigation Action Plan integrates hazard mitigation strategies into other planning mechanisms. The Plan states that the planning team sought to ensure that future growth, disaster recovery, historic preservation, flood response plans, and other planning mechanisms were consistent with the plan's goals. The City should work to ensure that disaster mitigation practices value historic resources and identify opportunities to work with planners to prioritize appropriate responses to historic areas and resources. The City may help with creating specific, measurable objectives with clear actions that will minimize risk to historic properties such as "Minimize loss of historic properties within historic districts."

Maintaining a comprehensive survey of historic resources may help planners in identifying what resources would be threatened in the event of a disaster, especially when the informational infrastructure is stored in a way that can be easily integrated with emergency planning efforts, databases, and mapping platforms. For example, maintaining Geographical Information Systems (GIS) maps with flood zone and historic resource overlays may help establish priority areas for disaster recovery.

- **Plan ahead for a local response that includes historic preservation.** City preservation staff should work with the City's Floodplain Manager, Public Safety Director, and Emergency Management staff to ensure that historic preservation is considered in disaster preparedness, response, recovery, and mitigation.

In preparing for a disaster, having a comprehensive historic resources survey creates an inventory of historic resources to use as a benchmark. Incorporate existing and future surveys into the City's GIS database, and create a historic resource overlay that includes historic districts, landmarks outside of districts, and up-to-date FEMA flood zones.

After a disaster, the City may want to consider expediting (but not suspending) reviews or allowing staff to act for the commission when necessary, while encouraging a preservation ethic and allowing for the evaluation of damaged resources by historic preservation experts. The City may also identify types of stabilization and repair that could be allowed temporarily without review after a disaster.

- **Be a resource for property owners before and after a disaster.** City historic preservation staff should serve as a resource for owners of historic properties. Property owners need to know best practices for preparing their buildings for a disaster, how to prevent damage such as mold development, where to seek funding assistance to repair their historic building, or how to find qualified contractors and building experts.

The City should consider developing guidance – such as a disaster recovery manual or dedicated website – to increase knowledge of appropriate interventions, prevent damage, and make the public response to disaster more involved. Identifying interventions and technical assistance information on cleaning, repair, in-kind replacement, and reconstruction that meet the Secretary of the Interior's Standards and Guidelines will help Corpus Christi's building stock withstand natural disasters. This information should be available to the public before and after a disaster.

The Texas Historical Commission has started the process of developing a new statewide preservation plan, which will include a historic property owners disaster handbook. The handbook will provide best practices for property owners in preparing for a natural disaster, immediate response, and long-term recovery including information on technical and financial resources. Once this handbook is developed, the City may wish to utilize its guidance as a resource for residents.

Corpus Christi's historic resources have withstood numerous natural disasters and, with appropriate planning, will continue to do so. A thorough disaster planning approach should take into consideration preparedness, response, recovery, and mitigation.

ACTION ITEMS

- 10. Establish relationships with governmental partners and make sure City staff understand the roles of each agency during disasters.** The Historic Preservation Officer should develop a list of government partners and collect/share information about each one, including the scope of their response/recovery plans and how to best work with them, with other City departments that interface with historic properties during or following disasters. For example, the Fire Department should check with the HPO or Permitting to avoid knocking down a historic landmark that has caught fire and may be considered a public safety hazard.
- 11. Integrate historic preservation into the Hazard Mitigation Plan.** The Historic Preservation Officer would need to work with the Development Services Director and other managers in the Office of Emergency Management, Fire Department, etc., to determine how Development Services or Permitting can provide support to quickly identify designated landmarks and districts before anyone demolishes historic buildings.
- 12. Plan ahead for local disaster response that includes historic preservation.** Obviously, this should include hurricanes but can also include heavy rain events that cause street flooding or riverine flooding; fires, including but not limited to arson; windstorms, including but not limited to tornadoes; hailstorms, ice storms, and other extreme winter weather; and prolonged periods of drought. Different types of disasters may require different potential responses.
- 13. Create a Windstorm Exemption Program for historic properties** using the Texas Windstorm Insurance Association process with the Texas Historical Commission, currently in use in Galveston and Brownsville.
- 14. Add information to the Historic Preservation portion of the City website to make property owners aware that the City provides for a variance from floodplain regulations** for properties listed on the National Register of Historic Places or designated as Recorded Texas Historic Landmarks.

RESPONSIBLE PERSONS

Historic Preservation Officer

RESOURCES REQUIRED

Support from Assistant Director of Development Services

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 2: Update the historic preservation ordinance.

Strategy 7: Improve community outreach and standardize the engagement process.



CASE STUDY: ST. AUGUSTINE, FLORIDA

St. Augustine's historic resources attract more than six million visitors annually. Part of the city's charm derives from its proximity to waterways and coastlines, which also put the city at risk of flooding from tides, storms, and sea level rise. In recent years, St. Augustine suffered significant physical and economic damage from Hurricanes Matthew and Irma within an 11-month period, and two years later, Hurricane Dorian. The city also suffers from nuisance flooding and will continue to combat rising waters from the impacts of sea level rise.

St. Augustine's 2018 Master Plan identified hazard mitigation as one of the major issues affecting cultural resources. The City determined that integrating historic preservation considerations into hazard mitigation planning was a necessary strategy for continued resilience and high quality of life. The City then undertook proactive measures to mitigate future impacts of disasters to historic resources. St. Augustine utilized federal funding from the National Park Service Emergency Supplemental Historic Preservation funds to develop a project, focused on its National Register Historic Districts, to survey hurricane damage, inventory historic resources, amend National Register listings, and develop preparedness measures for future disasters. The City also created *Resilient Heritage in the Nation's Oldest City*, a document identifying methods for prioritizing archaeological sites threatened by rising seas, outlining the economic impacts of previous and future flooding events, and recommending potential solutions such as mitigation strategies and policy revisions.

The City works with St. Johns County on its Comprehensive Emergency Management Plan, which addresses everything from sea-level rise to natural disasters. At the state level, Florida's Division of Historical Resources worked with other agencies to create guidance *Disaster Planning for Florida's Historic Resources* and *Disaster Mitigation for Historic Structures: Protection Strategies*. These documents, available online, provide local governments and building owners with detailed tools to help prepare for and recover from disasters. The City of St. Augustine cannot avoid future natural disasters, but they have worked with their partners to ensure that the City and its residents are prepared.

STRATEGY 5: DEVELOP WALKING TOURS OF HISTORIC AREAS

Many cities across the United States offer walking tours with both digital (smartphone) and paper-based options. In Corpus Christi, walking tours could be developed in partnership with the Convention and Visitors Bureau or potentially other organizations. Technology is constantly changing; the representative examples mentioned below are provided for illustration purposes only. No endorsement of any particular product is implied.

A user-selected approach is one common feature of these walking tours. For example, The Historic New Orleans Collection (THNOC) history museum offers eight themed walking tours in the French Quarter alone. Each tour enables the user to preview potential stops on each tour, select the locations they want to visit, and then be guided by the app through the resulting tour. THNOC built its own app for this purpose.

A combination of audio and visual content is also typical. For example, Preservation Austin used the Otocast app and volunteer content developers to create audio tours for seven different themes, including African American Austin, Iconic Music Venues, and Tejano Trail.

Many large cities seem to be using GPSMYCITY, an app that features self-guided walking tours. In addition to pre-planned tours, this app lets the user plan their own walking tour and print out a map of the tour they create. Downloadable maps and other in-app purchases are available for a small fee. This app seems well-suited for large cities with numerous historic districts.

ACTION ITEMS

- 15. Establish goals for potential walking tours**, such as distance covered, time required, and/or number of locations per tour.
- 16. Identify potential themes and associated locations.**
- 17. Research potential platforms/vendors, obtain quotes or estimates, and establish a budget.**
- 18. Work with Convention and Visitors Bureau to secure funding** for the digital platform and printing walking tour maps/brochures.
- 19. Develop, test, launch, and promote walking tours.**

RESPONSIBLE PERSONS

Historic Preservation Officer

RESOURCES REQUIRED

Funding for subscription to digital platform.

Volunteer assistance to develop content.

PRIOR PRESERVATION ACTIVITY REQUIRED

None.



CASE STUDY: ALPINE, TEXAS

Visit Alpine Texas! is both a webguide and a mobile app. The app includes a Historic Walking Tour with photographs and information about each of 43 highlighted locations. A complete brochure for the Historic Walking Tour is also available at the City's Visitor Center; the Visitor Center address is provided on the website, along with a downloadable PDF version of the tour map. A tour of the city's many outdoor murals is also available. Visit <https://visitalpinetx.com/alpine-web-guide-mobile-app/>

The website for *Visit Alpine Texas!* is user-friendly, and the Historic Walking Tour on the app is informative and allows you to create your own walking tour by choosing sites that you are interested in and saving the tour that you create.



CASE STUDY: EL PASO, TEXAS

The Official Visit El Paso app and website includes eight walking tours, and printed brochures are available for three of those at El Paso's two Visitor Centers.

- El Paso's Mission Trail and Visitor Center
- Magoffin Historic District Walking Tour
- San Elizario Walking Tour

The app includes detailed descriptions of the historic sites, and allows the user to select favorite sites and create their own itinerary. In addition, each introductory section of individual walking tours has a link that allows you to Facetime with a Visitor Information Specialist.

Audio versions of all eight walking tours listed on the website are available on the Visit El Paso app.



ENABLE COMMUNITY-DRIVEN HISTORIC PRESERVATION

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STRATEGY 6: IMPROVE THE CITY'S HISTORIC PRESERVATION WEBSITE

All information about the City historic preservation program should be on or linked from cctexas.com/landmark, so that a visitor to the City of Corpus Christi website can search and find what they are looking for.

ACTION ITEMS

20. Add a historic preservation landing page, to include a brief statement about historic preservation in the city and an overview of designations and requirements for Certificates of Appropriateness. The rest of the page should provide links, each of which focus on a single topic, such as:

- Historic preservation ordinance and any other ordinances that are pertinent to the owners of historic buildings
- Landmark Commission
- Landmark/Protected Landmark designation process and application form
- Historic District/Protected Historic District designation process and application form
- Certificate of Appropriateness process, flowchart, and application form
- Historical markers (with links to THC and NCHC websites)
- Financial incentives (with links to THC and DMD websites)
- Special projects and programs
- How to get involved, with links to local preservation and history organizations

21. Commit to public comment opportunities and a section with links to share citywide research, summary reports, and other historic preservation resources on the City website for the community's review and comments. This proposed departmental policy is essential for transparency and building trust.

22. Commit to providing information in English and Spanish. Historic preservation should be accessible for everyone.

RESPONSIBLE PERSONS

Historic Preservation Officer

RESOURCES REQUIRED

City Information Technology support to reorganize web pages and links

PRIOR PRESERVATION ACTIVITY REQUIRED

None

CASE STUDY: DALLAS

The Dallas Historic Preservation office webpage organizes everything related to historic preservation on one easy-to-navigate main page with clear and concise links to additional information.

HISTORIC PRESERVATION HOME
SUSTAINABLE DEVELOPMENT AND CONSTRUCTION HOME
APPLICATIONS
CONTACTS
DEMOLITION DELAY
DEVELOPMENT CODE
FAQS
HABS
HISTORIC DISTRICTS/BUILDINGS
HISTORIC PRESERVATION PROGRAM
LANDMARK COMMISSION
NATIONAL REGISTER
RESOURCES AND RESEARCH
RECORDS
TAX INCENTIVES
3-1-1

CONTACT INFO

Historic Preservation
 1500 Marilla Street
 Room 5BN
 Dallas, Texas 75201
 Phone: (214) 670-4209
 Fax: (214) 670-4210

City of Dallas Office of Historic Preservation



The Office of Historic Preservation provides services related to historic districts, historic structures, and potential historic districts and structures. These services include Landmark (historic) Designation, Certificates of Appropriateness (approval forms for work on landmark structures), and administering tax incentive programs within Historic Districts and on individual Historic Structures. [View the Historic Overlay District ordinance.](#)

DEPARTMENT UPDATES:

Office of Historic Preservation [Operation Procedures](#) During **COVID-19**

GET STARTED



[Explore Dallas Historic Districts and Structures](#)



[Apply for Landmark Review](#)



[About the Landmark Review Process](#)



[Landmark Commission and Committees](#)



[Demolition Delay Overlay](#)



[About the Historic Tax Incentive Program](#)

QUESTIONS?



[Contact Historic Preservation Staff](#)



[View Frequently Asked Questions](#)

STRATEGY 7: IMPROVE COMMUNITY OUTREACH AND STANDARDIZE THE PUBLIC ENGAGEMENT PROCESS

The Development Services Department would benefit from having a standard process for communicating with and receiving information from the community when the department is considering making changes to historic preservation programs or ordinances. The City must take visible steps to earn and maintain the community's trust if it is to be successful in administering equitable historic preservation programs.

Trust is based on communication, transparency, and accountability, all of which are inextricably intertwined.

- Communication includes providing citizens with meaningful information that helps them make informed decisions and participate actively in policymaking. It also means reaching out to citizens whose participation may not have been included in the past.
- Transparency means being responsive to citizen needs and requests, explaining how and why decisions are made, and (importantly) how public funds are being spent.
- Accountability includes being willing to admit mistakes, publicly discuss lessons learned and policy adjustments going forward, and take action to avoid repeating those mistakes in the future.

In many cities, public planning efforts, changes to the Code of Ordinances, the development of new programs, etc., involve meaningful public participation. While the Community Opinion Survey for this project garnered an impressive 752 responses, even more community members might have participated if they were accustomed to being engaged.

All of the activities outlined in this plan should follow a consistent public engagement strategy that both pushes information out to the community and seeks to collect feedback, input, suggestions, concerns, complaints, etc.

For example, whenever the City wishes to start a new program or make changes to the historic preservation ordinance or an existing program, it should employ a robust and transparent community engagement effort that includes:

- Regular meetings with the Landmark Commission, Planning Commission, and City Council to discuss the process and status
- At least three public meetings, live-streamed and recorded for later viewing at citizens' convenience
- If possible, additional meetings with neighborhoods, downtown property owners and businesses, civic groups, etc.
- Letters to property owners in historic areas, explaining the process and how individuals can participate
- A traditional, digital, and social media campaign to make citizens aware of the project and process, and to give them the opportunity to get involved

- Sufficient time for the community to review proposed programs/project deliverables and provide comments; a transparent reporting of all comments (compiled and anonymized) with response or action taken for each comment
- A final report and presentation to the Landmark Commission, Planning Commission, and City Council detailing the community engagement process, general trends in comments received, changes made as a result of citizen comments, etc.

ACTION ITEMS

- 23. Budget for more community engagement activities when a project could have a direct effect on individual property owners.** For example, if the City wants to change an ordinance, as recommended in this plan, that process should be highly community-oriented and give property owners the ability to participate in and shape the results.
- 24. Seek input from members of diverse communities** on how best to reach them.
- 25. Work with the Corpus Christi Literacy Council** to ensure that information is accessible to people who are not functionally literate (able to read at a sixth-grade level or higher).

Historic preservation should be accessible for everyone.

RESPONSIBLE PERSONS

Historic Preservation Officer

RESOURCES REQUIRED

Funding for outreach activities

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 6: Improve the City's historic preservation website.

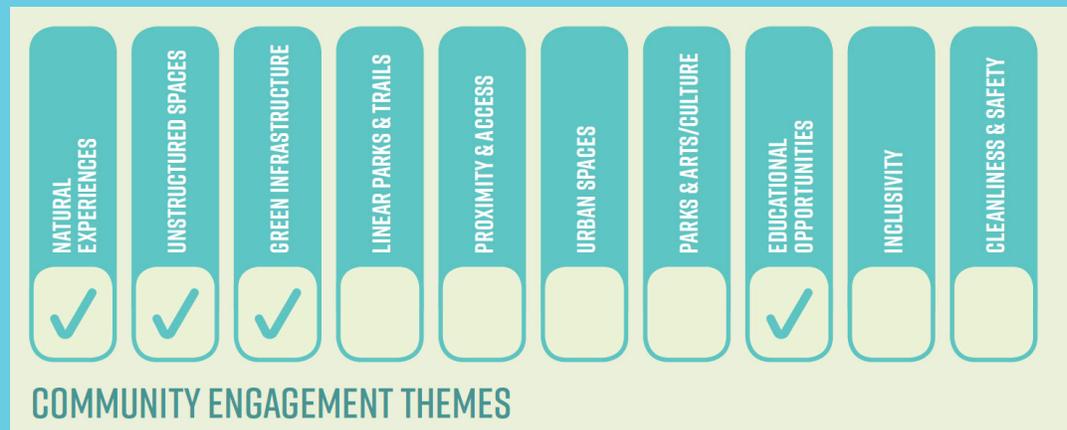
Strategy 9: Include underrepresented areas.

CASE STUDY: CITY OF AUSTIN PARKS & RECREATION

Austin PARD provides a model of community engagement in all their planning efforts. For example, the 2019 *Our Parks, Our Future* Long Range Plan development process included:

- Three different advisory groups
- 12 “open house” community meetings held throughout the city to be geographically diverse (622+ participants)
- Pop-up events mirroring the community meetings to “meet people where they are”
- Three different opinion surveys (4,400+ responses)
- Virtual meetings to accompany each round of open houses
- Six focus groups
- Stakeholder interviews
- Opportunity to comment online (9,000+ online comments received)

Obviously, this represents a significant investment in community engagement, but the more data that informs a plan, the more likely the community and City officials are to support it, because they know that the community is being heard. Transparency is another hallmark of Austin PARD’s planning work; all of the input, survey results, etc. is gathered, anonymized and compiled, and published on the project website, as well as communicated to the public.



Individuals can see their ideas and opinions reflected in the plan that results from their input and feedback. For more information, visit:

<https://austintexas.gov/page/our-parks-our-future-long-range-plan>

Or, in Spanish: <http://austintexas.gov/page/nuestros-parques-futuros>



CASE STUDY: CITY OF SAN MARCOS

The City of San Marcos hosts an annual visioning workshop for its preservation commission. At this full-day event, City staff leads the commission through a “Strengths, Weaknesses, Opportunities, and Threats” (SWOT) analysis, concluding by prioritizing preservation projects they want to focus on during the year. Typically, training is presented by an outside speaker during the workshop. In 2016 and 2017, the THC’s CLG staff led training during the workshop. A summary report of the SWOT analysis is developed by City staff in the days that follow the workshop and is sent to the commissioners and City Council.

In 2016, the commission expressed concern that properties in a neighborhood close to Texas State University were being torn down at an alarming rate. At the workshop, the commission decided to update the City’s historic resource survey, in order to gather more information about the specific neighborhood’s eligibility as a local historic district, as well as to evaluate other potential historic districts within the city. The summary report from the visioning workshop was presented to City Council when funds for the survey were requested, and the report was also used as part of a successful application for a CLG, which covers half of the cost of the survey. The survey is now complete and regularly used by commission members and City staff when recommending the designation of landmarks and districts.



Figure 8. Aerial view of Hays County Courthouse and downtown San Marcos (City of San Marcos)

STRATEGY 8: HELP LAUNCH A NEW PRESERVATION NONPROFIT ORGANIZATION

Corpus Christi contains a core group of people who support historic preservation, and the City should leverage these individuals and organizations to accomplish common preservation goals.

In Texas, County Historical Commissions (CHC) are responsible for reviewing and recommending State Historical Markers to the THC. The Nueces County Historical Commission (NCHC) has been responsible for many historic markers in Corpus Christi, which draw the public's attention to significant people, places, and events.

Other organizations with history-related missions include:

- Corpus Christi Museum of Science and History
- Old Saint Anthony's Catholic Church (museum in Robstown)
- Friends of Old Bayview Cemetery
- Tejano Civil Rights Museum
- Museum/collection of African American history in the Solomon Coles School building
- U.S.S. Lexington Museum

The Corpus Christi Area Heritage Society, LULAC Council No. 1, the NAACP, Junior League, Czech Society of South Texas, and Camp Fire Girls currently steward and present exhibits in buildings in Heritage Park and the Britton-Evans House.

While the good work done by all of these organizations is important, none of them function as an active advocate for historic preservation citywide. In many other cities of all sizes, a local preservation nonprofit organization either provides community-focused services and support that are outside the purview of the City preservation office or partners with the City to provide programming and services. The City of Corpus Christi needs such a collaborative local nonprofit partner.

In fact, the City might benefit from having more than one nonprofit partner, such as a more general preservation nonprofit organization and a local chapter of DOCOMOMO (the International Committee for Documentation and Conservation of Buildings, Sites and Neighbourhoods of the Modern Movement). For example, Houston has both a local preservation nonprofit (Preservation Houston) and a local DOCOMOMO chapter (Houston Mod).

ACTION ITEMS

26. Support individuals interested in starting a new preservation nonprofit. The City can help to jumpstart this process by taking responsibility for the following necessary tasks:

- **Convene a meeting of individuals interested in starting a local preservation nonprofit.** Personally invite all of the 200+ people who provided their contact information via the Community Opinion Survey, but also invite the entire community to attend. Staff can convene and facilitate a series of meetings to explain how preservation nonprofits operate in other cities (potentially with guest speakers from those nonprofits) and lead people who are interested in creating a new preservation nonprofit organization in Corpus Christi through the process of doing that. The City can provide a large space for these meetings; livestream the meeting for the benefit of people who are not able to be there in person; provide translation to Spanish and interpretation in American Sign Language; and provide an experienced facilitator to lead the group through brainstorming and planning exercises.
- **Engage a nonprofit consultant to help establish the organization** with the State of Texas and the Internal Revenue Service. An experienced nonprofit consultant can assist with this process and setting up the organization's bylaws, operating procedures, etc. An attorney is not needed and may not understand nonprofit requirements.
- **Identify funds to help establish the new organization.**
- **Pay the fees associated with establishing the organization,** about \$1,200.
- **Provide the nonprofit with a starting budget of \$5,000** so that it can begin to do more public outreach and provide letters of support for its initial grant applications.
- **Provide the nonprofit with all of the existing City research and planning documents** that identify historic resources eligible for local designation or nomination to the National Register of Historic Places.

RESPONSIBLE PERSONS

Historic Preservation Officer

RESOURCES REQUIRED

Funding to hire an experienced nonprofit consultant to facilitate meetings of interested individuals and complete the incorporation process and application for tax exempt status

Approximately \$1,200 for fees related to incorporation and the application for tax-exempt status

Start-up capital (\$5,000 proposed)

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 7: Improve community outreach and standardize the engagement process.

CASE STUDY: PRESERVATION AUSTIN

Although 40 years ago “historical societies” were more numerous, today many local preservation nonprofits include the word “Preservation” in their name to more clearly indicate their focus and the presence on their staff and board of preservation professionals.

Preservation Austin (PA) is the City of Austin’s local historic preservation nonprofit. Preservation Austin exists to empower Austinites to shape a more inclusive, resilient, and meaningful community culture through preservation. The City’s historic preservation office works hand-in-hand with PA to protect and promote Austin’s historic places.

PA works closely with the City to develop policies that guide historic preservation in Austin.

- In 2011, PA partnered with the City when Austin revised its preservation ordinance to provide enhanced financial incentives. These incentives encourage property owners living in designated City landmarks to be good stewards of their homes and support the rehabilitation of buildings in local historic districts.
- PA drafted design guidelines that were used as the starting point for the City of Austin’s recently adopted Historic Design Standards. With PA’s help, the City was able to create its new design standards almost completely in-house, for a significant cost savings.
- Today, PA is working with the City to realize a Preservation Plan that will establish goals for the Austin’s future; the plan will undoubtedly call on strong preservation partners, like PA, to play a role integral to its success.

A PA representative attends every Historic Landmark Commission meeting, and PA frequently advocates before the Commission on cases related to the organization’s advocacy priorities. This has included the designation of historic districts or city landmarks, rehabilitation and adaptive reuse projects, and new development that may affect historic resources and landscapes.

The City of Austin has also come to rely on PA to help educate the public on the benefits of preservation and promote Austin’s special historic places. In 2014, PA received a grant from the Austin Convention and Visitor’s Bureau to develop audio tours of historic neighborhoods for tourists and residents alike. Seven “Historic Austin Tours” are now available through the Otocast app.

PA also supports preservation projects through its quarterly matching grant program. PA

consults with the grant recipients to develop and vet the projects, which includes preparing Certificate of Appropriateness applications – a benefit to the applicant and the City.

CASE STUDY: THE CITY OF DENTON AND DENTON COUNTY

The City of Denton and the Denton County Historical Commission (DCHC) have partnered on many preservation projects within the city limits. Regular communication between the City's preservation office and the DCHC makes this partnership successful. The City invites a representative of the DCHC to every local preservation commission meeting, and the City's HPO often attends the DCHC's monthly meetings. In 2016, the DCHC dedicated a Texas Historical Marker for the 1927 Denton City Hall in partnership with the City's Historic Preservation Office. In addition, the two organizations regularly attend training together and support each other in the CLG grant application process.



Figure 9. Texas Historical Commission commendation to Denton City Council, 1980 (THC)

STRATEGY 9: INCLUDE UNDERREPRESENTED AREAS

In Corpus Christi today, only five of the city's 40 designated properties are associated with Mexican Americans, and only one (the Littles-Martin House) is associated with African Americans. No landmarks associated with Native American or Asian resources have been designated. In part, this may be due to the redevelopment of non-White/Anglo neighborhoods during the past century.

As the City of Corpus Christi considers how historic preservation can benefit all of its citizens, it must ensure that its policies and programs include underrepresented areas.

In addition, the City should identify underrepresented areas and make it a priority to address them. Fortunately, several other cities are paving the way for Corpus Christi and offer excellent models. One example is a San Antonio, Texas case study.

ACTION ITEMS

27. Add the pursuit to include underrepresented areas to the role of the Landmark Commission.

- **Provide training for City staff and Commission members.** City governments often start by holding a training workshop identifying these areas.
- **Actively pursue opportunities to document underrepresented historic resources** at the federal, state, and local levels, such as local designations, cultural landscapes, Recorded Texas Historic Landmarks or State Antiquities Landmarks, individual National Register listings, National Register historic districts, National Register Multiple Property Submissions, and National Historic Landmarks.
- **Make the process accessible to people regardless of language, literacy, or ability.** Translating information into Spanish and having translators available at public meetings, whenever possible, as well as American Sign Language interpreters, not only makes it possible for everyone to participate in the process, it also makes a statement that everyone is welcome.
- **Listen to stakeholders.** Encourage people in underrepresented areas to tell the City what they value and prioritize. The Council itself should decide what it wants to work on, such as geographic or thematic focus areas, with the City providing support in service of their goals.
- When the City pursues multiple-property nominations to the National Register of Historic Places, **community stakeholders should have input to prioritized focus areas**, such as:
 - Long-standing Hispanic or Black businesses
 - Archaeological sites, cultural landscapes, and extant historic resources associated with Native American people
 - Sites associated with the Civil Rights Movement
 - African American churches



Figure 10. Accordion player (Sergio Cruz Pérez/Restafoto, iStock 505910728)

- **Focus on a story-based approach to preservation**, rather than the high-style architecture. In some situations, a cultural landscapes approach or foregoing a strict adherence to National Register criteria for the evaluation of significance can expand the possibilities for historic preservation at the local level.
- **Don't just listen ... take action.** When community members of underrepresented areas identify what is historically and culturally significant to them, the City needs to create a plan for addressing those issues. If nothing happens, it is likely that community members would not trust the City to take action in the future, and they may not be willing to get involved in anything else.

28. Be prepared to make specific suggestions to help illustrate examples of types of local designations, Recorded Texas Historic Landmarks or State Antiquities Landmarks, individual National Register listings, National Register historic districts, National Register Multiple Property Submissions, and National Historic Landmarks. Rather than use a single property for multiple examples, identify different properties associated with various groups in geographically distributed areas of the city to be as inclusive as possible.

29. Create a Preservation Grant program to help pay for the historical research needed to designate or nominate underrepresented properties and to help fund repairs or disaster resilience measures. Even small grants can make a big difference, and by making that program open to the public, the City could have more opportunities for meaningful outreach.

30. Develop new programs or opportunities for local designation, such as Cultural Heritage Districts, Legacy Business Landmarks, Conservation Districts, and Cultural Landscapes that can be used to identify, recognize, and protect a more diverse range of historic resources. For example:

- The City of Denver, Colorado, created the Five Points Cultural Historic District to preserve both buildings and the cultural identity of the previously segregated African American neighborhood. Design guidelines for the district now include character-defining features related to Culture, not just architecture, such as the district's history as a hub for jazz music, African American-owned businesses and African American-serving organizations and institutions.

- The City of Dallas, Texas, has made possible the designation of Conservation Districts since 1988. This tool differs from historic district designation in that conservation districts seek to maintain certain standards, established in collaboration with the community, rather than preserving architectural features of buildings. Applications for alterations in Dallas conservation districts are administratively reviewed by City staff, rather than a commission.
- The City of San Antonio's Office of Historic Preservation maintains a Legacy Business program to recognize and promote businesses that have been in operation for at least 20 years. A StoryMap showcases businesses in 16 different categories, including art, banking, fashion, florists, food, hotels, industry, military, mortuaries, museums, music, press, radio stations, ranching, theaters, and "traditions" (such as specialty stores and a miniature golf course dating back to 1929).
- History Colorado has recently prioritized cultural resources and cultural landscapes in its statewide preservation planning efforts through *The Power of Heritage and Place: A 2020 Action Plan to Advance Preservation in Colorado*. It looks beyond built heritage to consider "social history, ethnic and racial heritage, and gender relationships to historic preservation, and the fostering of public memory."

RESPONSIBLE PERSONS

Historic Preservation Officer

RESOURCES REQUIRED

Meeting spaces

Funding for a Preservation Grant program

PRIOR PRESERVATION ACTIVITY REQUIRED

None

CASE STUDY: SAN ANTONIO, TEXAS

The City of San Antonio launched its Living Heritage social media program, called *Con Safo*, in 2015 to capture the personal and shared experiences that give places meaning. *Con Safo*, which is used to mean “this is protected, don’t mess with it” (among its other meanings), enables San Antonians to identify places that matter to them, regardless of whether those places meet the criteria of the National Register or local ordinance. This helps the City Historic Preservation Office identify potential areas or resources that merit further investigation; in fact, a new local landmark—the Pedro and Juanita Delgado House at 4537 Monterey Street, on the City’s Westside—was identified through the campaign. Mrs. Delgado was 100 years old and still living in the house in 2015.

The City of San Antonio recognizes that “For many cultures, historical value is structured around buildings and their architectural significance. But for others, like our local Indigenous, Latino, and African-American cultures, what happens or happened in that place is more important than the bricks and mortar. The *Con Safo* campaign was intended to democratize preservation efforts by allowing the San Antonio population to tell the City which places matter to them, using a term that is part of the heritage of San Antonio.”



Figure 11. Undated photo of Juanita Delgado in front of her home at 4537 Monterey Street (City of San Antonio)

“Preservation in San Antonio isn’t just about preserving old buildings. It’s about people, sustainable development, sustainable cultural identity and ultimately about creating a future by respecting our heritage.”

STRATEGY 10: DEVELOP THEMATIC APPROACHES TO HISTORIC MARKERS

The Nueces County Historical Commission (NCHC) is responsible for administering the state historic marker programs on behalf of the Texas Historical Commission.

- State historic (subject) markers tell the story of people, places, and events that shaped local history.
- Recorded Texas Historic Landmark (RTHL) markers identify buildings with a high degree of architectural integrity (that is, they still look like they did when they achieved significance).
- Historic Texas Cemetery (HTC) markers identify family and community burial grounds that have been designated and recorded in county real property records.
- State Antiquities Landmark (SAL) markers identify either sites or buildings on non-federal public land.

NCHC has an active ongoing marker nomination and review program, with nearly 100 markers already placed around the county and more in process. Historic markers can highlight important people, places, and events even when aspects of the city's built heritage no longer remain to help tell those stories. For example, a state subject marker would be appropriate at the site of the former D. N. Leathers housing complex in the Hillcrest neighborhood and at other locations associated with the African American community on the Northside. Other themes that would support multiple markers might be at the current or former sites of las colonias, the locations of significant and long-running Hispanic businesses, cultural sites associated with Native peoples (such as the Native burial ground at Hans and Pat Suter Park), or LGBTQ+ history.

The Texas Historical Commission has an "undertold marker" program that helps to address historical gaps, promote diversity of topics, and proactively document significant underrepresented subjects or untold stories. To date, Nueces County has received funding under this program for markers about George Owens, Robstown Migrant Labor Camps, and the Corpus Christi Longshoremen's Unions.

A small amount of ongoing City funding for developing and fabricating markers, particularly for underrepresented histories, would help NCHC tell the full history of Corpus Christi. This could be part of the Landmark Commission's role but should be led by the Historic Preservation Officer.

ACTION ITEMS

31. **Initiate conversations with NCHC** about possible partnership/collaboration.
32. Work with NCHC and a diverse group of community stakeholders, through an inclusive and transparent public process, to **develop a list of potential themes** and historic contexts.
33. Develop a historic context narrative for each theme and use that to **identify potential marker topics**.
34. With NCHC and the community, **prioritize marker topics** for application to the THC Undertold Marker program and, secondarily, City funding.

RESPONSIBLE PERSONS

Historic Preservation Officer

RESOURCES REQUIRED

A small amount of annual funding (perhaps \$2,000 per year) to support marker application and fabrication fees

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 7: Improve community outreach and standardize the public engagement process.



**GOAL 3: PROMOTE ECONOMIC
DEVELOPMENT AS A HISTORIC
PRESERVATION TOOL**

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STRATEGY 11: PROMOTE ECONOMIC DEVELOPMENT THROUGH HISTORIC PRESERVATION

In its broadest sense, historic preservation is the utilization of the past to inform the future. This is carried out in many ways, but the ethos of maintaining the use of buildings, sites, landscapes, and other cultural traditions for future generations is at the center of historic preservation practice.

Many people hear the words “historic preservation” and think it means freezing a building in time. In reality, historic preservation is a tool to help achieve economic development goals through the reuse and rehabilitation of older buildings. Historic preservation aligns with the City’s economic development objectives (published on the City’s Economic Development website at <https://www.cctexas.com/businessliaison>, as discussed below.

City of Corpus Christi Economic Development Objectives	Achieved through Historic Preservation/Building Reuse
Improve the Quality of Life of Our Residents	✓
Diversify the City’s Economy	✓
Increase Business Recruitment and Retention	✓
Attract Talent and Develop Our Workforce	✓

- Improve the Quality of Life of Our Residents.** Preserving Corpus Christi’s historic buildings and sites maintains its unique character, builds civic pride, and helps residents feel connected to the place they call home. In *Why Old Places Matter*, author Tom Mayes wrote, “Old places foster community by giving people a sense of shared identity through landmarks, history, memory, and stories, by having the attributes that foster community, such as distinctive character and walkability, and by serving as shared places where people meet and gather.”
- Diversify the City’s Economy.** The process of historic preservation inherently promotes a diversified local economy. The economic multiplier impacts from rehabilitating just one building reach far beyond the construction phase. A rehabilitated building can provide space for a new business, attract tourists, or serve as a background for downtown festivals.
- Increase Business Recruitment and Retention.** Research from the National Trust for Historic Preservation *Atlas of Reurbanism* shows that places with a mix of older, smaller buildings attract more jobs per square foot, pedestrian traffic, start-up businesses, and women- and minority- owned businesses. Small businesses need small spaces to start out, and these are most often found in historic or older buildings.
- Attract Talent and Develop Our Workforce.** Historic preservation, through the rehabilitation of existing buildings, is a major job creator. Numerous studies have shown

that rehabilitation produces more jobs per \$1 million spent than new construction. Rehabilitation jobs are also local jobs that cannot be exported; skilled craftsmen are trained locally and are knowledgeable about local materials and conditions.

Economic development patterns in the 21st century show that workers are now choosing a place to live and then looking for a job. For Corpus Christi, the character-rich downtown areas with older buildings form the basis of its economic advantages and differentiate it from peer communities.

OLDER BUILDINGS = ECONOMIC OPPORTUNITIES

Just over a third of Corpus Christi's buildings were built more than 50 years ago (as of 2021), as shown on the map below. The 50-year mark is important because that is generally a requirement for eligibility for the National Register of Historic Places.

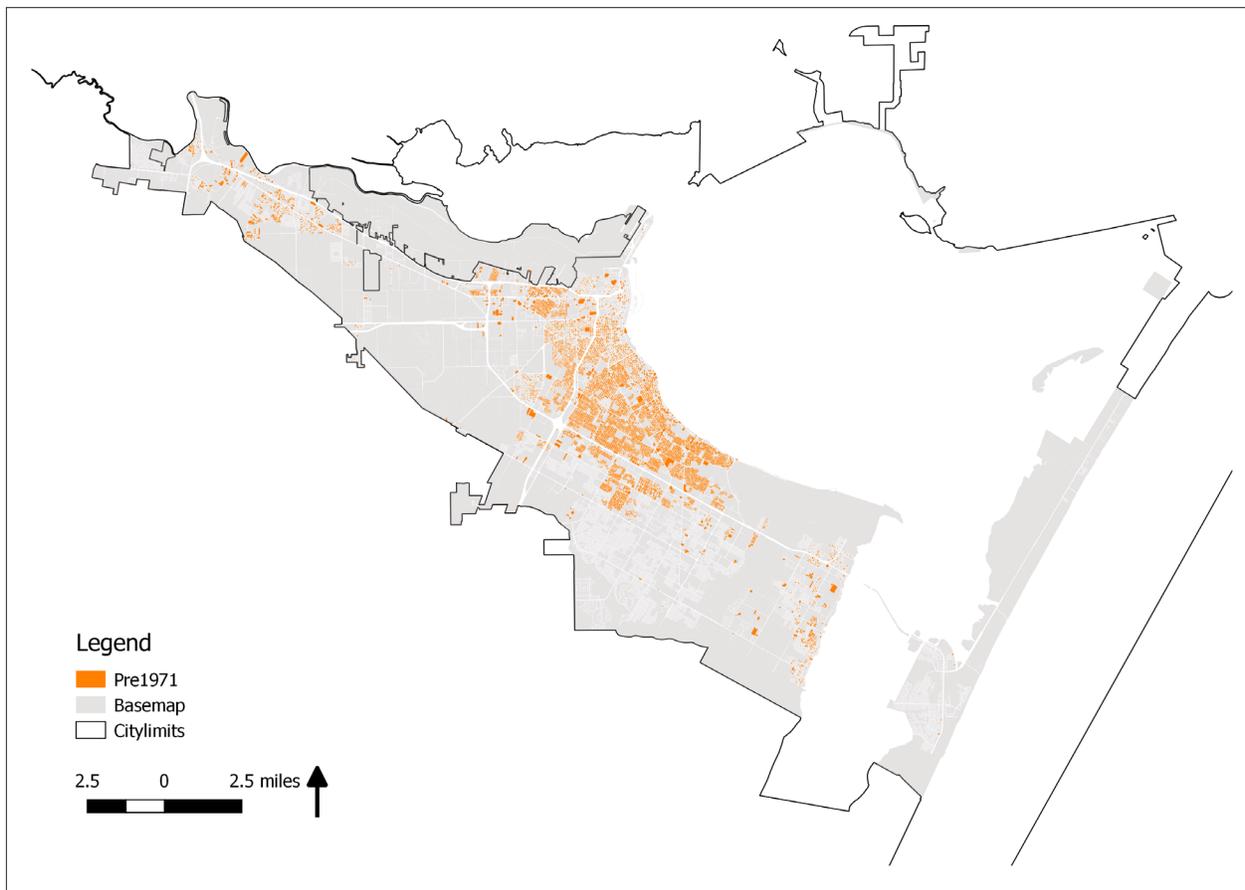


Figure 12. Map of Pre-1971 buildings in Corpus Christi as of May 2021 (Briana Grosicki)

Listing on the National Register makes a building eligible for federal and state tax incentives that can return up to 20% and 25%, respectively, of historic rehabilitation expenses. At the state level, a National Register listing also exempts the property owner from paying sales tax on construction labor (for non-residential buildings only). A business located in a historic building that is designated as a Recorded Texas Historic Landmark or is listed on the National Register also is exempt from paying sales or excise tax on “amusement services” (amusements, entertainment, or recreation, including “membership in a private club or organization that provides entertainment, recreational, sports, dining, or social facilities to its members” but excluding “coin-operated machines that are operated by the consumer”; Texas Tax Code Sec. 151.3101).

The City of Corpus Christi currently offers no local tax exemption or abatement program for historic properties, an incentive which many other cities offer and can be layered with state and federal incentives.

A 2017 survey of downtown identified 280 buildings that may be eligible for the National Register of Historic Places. However, even if every resource identified in that survey was listed, it would only bring the percentage up to 0.4% of the buildings in Corpus Christi. The downtown survey and plethora of **unsurveyed/unlisted potentially historic resources in Corpus Christi represent significant unrealized economic opportunities.**

In comparison to other larger cities and other peer cities, Corpus Christi’s pre-1945 building stock is scarce. Consider these comparisons from the National Trust for Historic Preservation’s *Atlas of Reurbanism* (<https://forum.savingplaces.org/act/research-policy-lab/atlas/atlas-factsheet>):

Year Built by Period	Corpus Christi	50-City Average	San Antonio	Houston	Tulsa OK	Tampa FL
Pre-1920	0.2%	15.7%	1.4%	<1.0%	1.2%	2.7%
1921-1945	3.2%	22.2%	9.9%	11.4%	16.4%	13.2%
1946-1971	33.4%	27.9%	27.0%	35.5%	38.2%	41.4%
1972-2021	63.2%	34.2%	61.7%	52.7	44.2%	42.6%

Building owners in Corpus Christi are not taking advantage of the benefits of listing on the National Register of Historic Places, and few properties are locally designated, which protects them from demolition.

	Corpus Christi	50-City Average
Listed on the National Register of Historic Places	<.01%	6.8%
Locally Designated	<.01%	4.3%
Federal Tax Credit Projects	1	27

The Sherman Building at 317 Peoples Street is currently the only property in Corpus Christi (at the time of publication) to have utilized the federal historic tax credit.



Figure 13. Nueces Lofts (DowntownTX.org)

The Downtown Management District is already actively working on downtown revitalization, and the Strategies associated with Goals 1 and 2 will supplement their good work. The DMD

currently receives City financial support from the General Fund Match to DMD Property Owners Levy and the TIRZ#3 Service Agreement.

The City's Historic Preservation Office can, however, more proactively partner with the DMD to support their efforts and help property owners take advantage of all the programs available to them. We strongly encourage City Council to continue supporting the DMD in its efforts and to prioritize investing in downtown, where infrastructure already exists, over new development that requires new infrastructure.

The City of Corpus Christi's **Downtown Management District already has a robust, dynamic economic revitalization incentives program** specifically designed for downtown revitalization to activate vacant buildings, increase housing supply, and new businesses. Instead of creating any new local financial incentives for downtown commercial properties at this time, the City should encourage property owners to use all of the existing programs – along with the federal and state incentives – to return vacant buildings to productive use.

The example below illustrates how a \$1 million rehabilitation would be impacted by the syndication of the combined state and federal historic tax credits, which can provide upfront capital for rehabilitation costs. The historic tax credits coupled with the reimbursable TIRZ programs could mean the difference between a project being financially viable or not. The City should do a full-court press between now and 2028 to take advantage of these layered incentives.



Rehabilitation Costs \$1,000,000

	Without Tax Credits	With State + Federal Tax Credits
Bank Loan	\$700,000	\$700,000
Owner Equity	\$100,000	\$100,000
Tax Credit Equity	\$0	\$360,000
Total Funds Available	\$800,000	\$1,160,000

The incentives available for properties in Downtown Redevelopment Zone (Tax Increment Reinvestment Zone #3, or TIRZ#3) are available until 2028, when the zone expires. The TIRZ#3 programs are all reimbursement-based programs that would help close financial gaps on the operation side of the redevelopment. For property owners or developers, layering the federal and state historic tax credits could provide capital during the reinvestment at no cost to the City.

Program	Possible Incentive	Qualifying Categories	Availability
New Commercial Tenant Finish-Out Grant Program	Up to \$10/sq. ft. Reimbursement	<ul style="list-style-type: none"> Dining, Entertainment, or Mixed-Use Development First-Floor, Active Street Location Wall, Floor, and Permanent Fixtures Currently Vacant 	\$100,000 Annually
Chaparral Street Property Improvement Grant Program	Up to 50/50 Reimbursement Grant	<ul style="list-style-type: none"> Building Improvement Costs Related to Occupying a Vacant Structure 	\$200,000 Annually
Downtown Living Initiative	Up to \$10,000 Rebate per Multi-Family Unit	<ul style="list-style-type: none"> Minimum 10-Unit Development 	100 Units Annually
Project-Specific Development Agreement	Up to 75% of 10-Year Reimbursement Tax Grant	<ul style="list-style-type: none"> Environmental Remediation Code Compliance Historic Preservation Structured Parking Urban Design/Landscaping Public Improvement/Utilities Residential Developments over 100 Units (\$10,000 per Unit) 	Based on Project Cost

The DMD annual report shows the existing incentive programs have facilitated more than \$125 million in investment since 2015, and reimbursable tax incentives allocated to these projects total \$6.3 million. This means that, for every \$1 the City of Corpus Christi forgave in reimbursable tax incentives, the private sector spent \$20. Since 2015, the downtown area ad valorem tax value has increased by \$33 million, thanks to these investments. This has resulted in a gain of \$218,000 in property taxes since 2015.

DMD, as part of their reporting requirements for the Main Street America accreditation, track vacancy in the downtown commercial district. In 2020, they reported more than 164,000 square feet of vacant existing building space in the downtown area. Hypothetically, if all those spaces were rehabilitated and returned to productive use, the ad valorem tax value could increase by an additional \$21 million, resulting in approximately \$138,600 in increased tax revenue per year.

Because Corpus Christi's downtown is very much in the recovery phase of real estate development, investing in core existing properties will add value to the market, improve occupancy rates, and elevate rents to levels that can justify new infill construction to add density where today the downtown area is oversupplied with vacant lots and surface parking.

Based on an analysis of property tax data from Nueces County Appraisal District, 18% of properties in the downtown TIRZ#3 zone contain buildings that are more than 50 years old. A large concentration of those building exists in the Marina Arts District and were surveyed in the 2017 historic resource survey. Of the 280 properties surveyed in 2017, 81 contain buildings—39 of which were ranked "high priority" to nominate to the National Register of Historic Places. Actively promoting the rehabilitation of these 39 properties, which may be able to layer incentives like the state and federal tax credit with the TIRZ#3 funding, would facilitate catalytic changes to the DMD.

Information about these programs and how they can work together should be actively advertised to building owners, local investors or developers, and the public.

ACTION ITEMS

- 35. Promote use of the TIRZ#3 incentive programs before 2028.** The City should actively market these programs, ensure that they are easy to apply, and publicize projects that utilize these incentives to encourage their use before 2028.
- 36. Discourage a buy-and-hold strategy for vacant buildings.** Respondents to the Community Opinion Survey expressed repeatedly their desire to have vacant buildings brought back into productive use. However, as of publication, DowntownTX.org only lists three available properties – three spaces for lease and one building for sale – and the commercial real estate website LoopNet only shows three buildings and three vacant lots for sale downtown. Speculative purchases and property owners reluctant to divest themselves of buildings that have been owned by their families for generations contribute to this issue. The Downtown Management District is actively working with property owners, but recommended changes to the Vacant Building Ordinance can help address this problem.
- 37. Routinely evaluate and adapt the TIRZ#3 incentive program to meet the changing needs of downtown property owners.** In the vacant building program update dated January 2020, only two (2) properties out of the twelve (12) have taken advantage of the TIRZ#3 incentives. The City should regularly evaluate the incentives offered and determine whether or not they are meeting the needs of downtown property owners. Regularly surveying all property owners in downtown would allow the City to make more informed decisions about how to structure various incentives.

38. Invest in downtown where infrastructure already exists, rather than expanding the city in ways that requires building new infrastructure. This strategy could deliver a higher Return on Investment (ROI) and support increased private investment where it is needed the most.

RESPONSIBLE PERSONS

Downtown Management District

Historic Preservation Officer

RESOURCES REQUIRED

Support from Development Services Director, City Council

PRIOR PRESERVATION ACTIVITY REQUIRED

Task 2: Make preservation information easy to find on the City website.

Task 4: Develop a standard community outreach process.

Task 5: Update historic preservation ordinance.

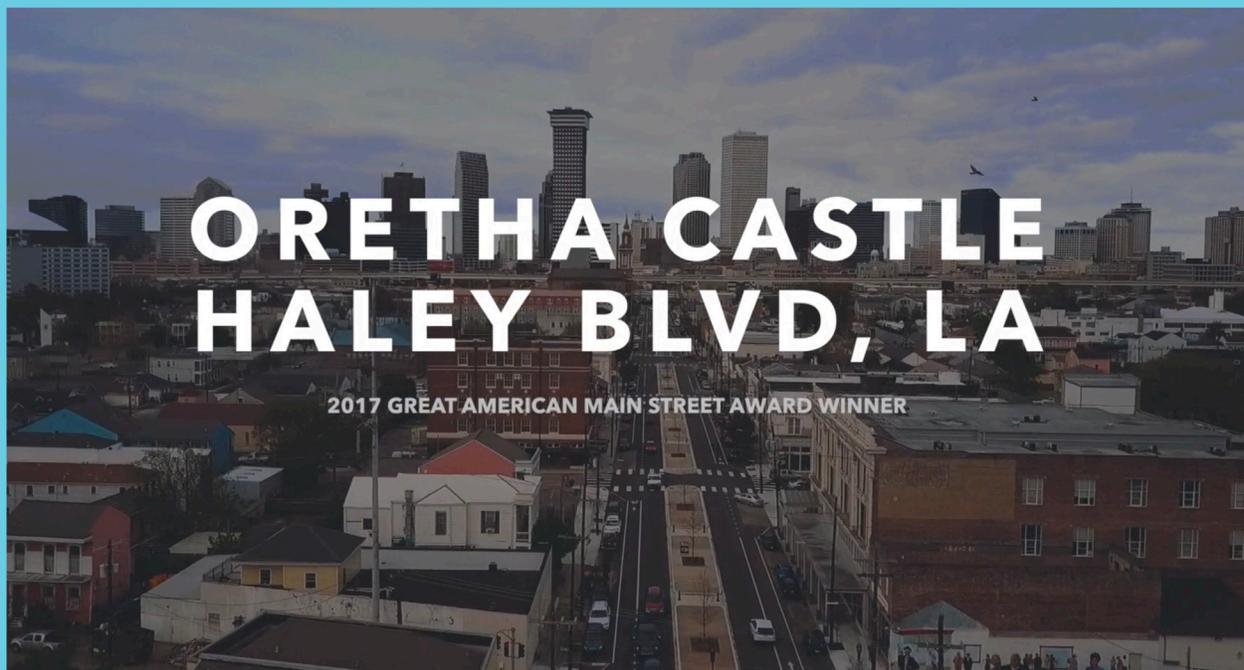
CASE STUDY: ORETHA CASTLE HALEY BOULEVARD, NEW ORLEANS

The revival of Oretha Castle Haley Boulevard commercial corridor in New Orleans, LA has been led by the nonprofit Gulf Coast Housing Partnership and supported by the New Orleans Redevelopment Authority (NORA). This 24-square-block area (then known as Dryades Street) was a diverse Jewish and African American commercial district in the 1930s and became a mecca of African American activity by the 1960s. Like many central-city commercial districts, “the Boulevard” suffered from the growth of shopping malls in the 1960s and 1970s; vacant and deteriorating buildings became the norm.

The Oretha Castle Haley Boulevard commercial district joined the Louisiana Main Street program in 2006. According to the Preservation Resource Center of New Orleans, at that time, “the building occupancy rate in the district was only 14%. Since 2006, the district has seen the creation of 176 new jobs, 32 new businesses, 24 building rehabilitations, and more than 11,000 volunteer hours, in addition to significant new building construction, creating varied housing, retail and cultural opportunities. The current building occupancy rate is 46%.”

Between 2007-2017, the corridor saw a combined \$152 million in investment through rehabilitations and new construction. Projects used public-private partnerships, historic tax credits, NORA Façade grants, low income house tax credits, new markets tax credits, and TIF funds to invest in this neighborhood. The results include over 450 housing units, 58% increase in jobs, 24% decrease in vacancy, decrease in police calls, and importantly 153% population growth. The district brings 30,000-40,000 visitors a year to their events.

O.C. Haley Boulevard won a 2017 national Great American Main Street Award for revitalization. (More information at <http://www.ochaleyblvd.org/home>)



CASE STUDY: GALAXIE TACOS, NEW ORLEANS

The 1949 Texaco Gas Station at 3060 St. Claude Avenue in New Orleans was in rough condition during its previous incarnation as a vehicle inspection station. It was listed on the National Register of Historic Places in 2017.

In 2018, investor/restaurateur Patrick Finney purchased the property. During the removal of a stone veneer and mansard roof (added during a “modernizing” renovation in the 1970s), the project team quickly realized that the building retained many of its historic character-defining features. These included the curved canopy topped with distinctive fins, evidence of horizontal banding, and the building’s original green and white paint scheme, as well as “ghost” impressions of Texaco stars and historic signage visible above the service bays (e.g., the channel lettering that spelled out “WASHING” and “MARFAK LUBRICATION”). These items were restored, and one existing roll-up garage door was replicated during the building rehabilitation.

The project successfully adapted the gas station for use as a taqueria/bar, with roll-up doors providing access between the dining room and outdoor patio during the COVID-19 pandemic. It used both state and federal tax credits, and won a preservation award in 2020 from the Louisiana Landmarks Society.



Figure 14. Before and after photos of Galaxie Taco (MacRostie Historic Advisors)

STRATEGY 12: UPDATE VACANT BUILDING ORDINANCE

Corpus Christi's vacant building ordinance was adopted in 2018 and requires owners of property in the downtown TIRZ#3 district to stabilize and secure their vacant buildings so that they do not become eyesores or fall into disrepair. The Downtown Management District, in 2018, researched and proposed an ordinance that incorporated many best practices from around Texas and the United States, including a vacant building registration program such as the one which has proven to be tremendously successful in San Antonio. However, the Corpus Christi Association of Realtors opposed the registration program, and ultimately City Council stripped that provision from the ordinance. The resulting compromise has, unfortunately, incentivized the demolition of vacant properties that could have been rehabilitated, returned to productive use, and actively contributed to the City's tax rolls.

While the vacant building ordinance forces property owners to stabilize their property or risk fines from the City, it does nothing to **encourage property owners to re-occupy the building**. The best way to prevent a building from being demolished is to return it to use; therefore, the City should seek to fully occupy the buildings downtown, not just physically stabilize them. The City can take three steps to achieve this goal:

- Proactively work with property owners to develop a plan and schedule to re-occupy the building.
- Discourage demolition through an amendment to the preservation ordinance.
- Routinely evaluate and adapt the TIRZ#3 incentive program to meet the changing needs of downtown property owners.

The vacant building ordinance charges the Assistant City Manager of Development Services with administering the ordinance and ensuring that minimum maintenance standards are upheld. These standards are known in the ordinance as the "Standard of Care" and require that the owner of a vacant property to:

- Protect the building from further deterioration.
- Clearly identify the building's address so that it can be easily located by emergency services.
- Secure all doors and windows (boarding the building's openings is not allowed).
- Adequately light the building at night.

If the owner of a vacant building applies for a demolition permit and the building is 50 years of age or older, it is treated as a local landmark and the owner must obtain a Certificate of Appropriateness for Demolition from the Landmark Commission.

Note: The City's preservation ordinance must be amended in order for the vacant building ordinance to be successful. Under 3.16 of the Unified Development Code, once a property owner is denied a Certificate of Appropriateness for Demolition, they simply need to wait 360 days before moving forward with razing the property. The Landmark Commission should have the authority to deny demolition outright. It is further recommended that the City proactively designate the downtown area as a local historic district instead of using the vacant building ordinance as a substitute designation tool for vacant properties 50 years or older.

As the historic preservation and vacant building ordinances are currently written, the only consequence to tearing down a historic building is a delay in the schedule, which increases the public's perception of preservation as an obstacle that one must overcome in order to arrive at a predetermined outcome. This also encourages property owners to circumvent the ordinances by occupying the building just long enough to apply for a demolition permit and avoid the 360-day demolition delay.

According to an update on the status of the vacant building program dated January 2020, 12 vacant downtown buildings had been issued citations. Six of those citations (50%) led to the release of a demolition permit. This demonstrates that the vacant building ordinance is not leading to higher rates of occupancy; it is leading to higher rates of demolition.

By strengthening the Landmark Commission's authority to deny demolition and working with vacant property owners through an annual registration process, the City can encourage historic preservation as well as higher occupancy in its downtown.



Figure 15. A vacant, boarded-up building in 2018 (Corpus Christi Business News)

ACTION ITEMS

- 39. Ensure continued dialogue between the property owner and the City to explore ways to re-occupy the building.**
- 40. Identify areas of high priority for the program's initial focus**, such as Staples Street, Leopard Street, Port Avenue, Laredo Street, and Agnes Street. Collect information about qualifying buildings and work directly with building owners to address these issues; the City should serve as a resource for building owners, not just a regulator.

RESPONSIBLE PERSONS

Downtown Management District

Historic Preservation Officer

RESOURCES REQUIRED

Support from Development Services Director, City Council

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 2: Update the historic preservation ordinance.

Strategy 6: Improve the City historic preservation website.

Strategy 7: Improve community outreach and standardize the public engagement process.



Figure 16. A vacant, boarded-up building at the corner of Chipito and Staples Streets, as it appeared in September 2020 (McDoux Preservation)

CASE STUDY: CITY OF SAN ANTONIO

San Antonio was the first city in Texas to pass a vacant building ordinance in 2014; the program has been administered with measurable success since that time. San Antonio's vacant building ordinance differs from the City of Corpus Christi's in that it requires the building owner to register the property with the City each year. Registration requirements include the following:

- Property and owner information
- Proof of liability insurance (no less than \$100,000)
- A plan to re-occupy the building with an associated timeline, which is updated every six months
- Complete floor plan for use by first responders
- Criminal trespass affidavits for the posting of "no trespass" placards
- An annual fee of \$750 for commercial properties
- An annual inspection fee



Figure 17. A property brought back into productive use by the Vacant Buildings program (City of San Antonio)

STRATEGY 13: INVEST IN HISTORIC RESOURCES SURVEYS AND NATIONAL REGISTER LISTINGS

Along with an effective ordinance, historic resources surveys are the building blocks of any preservation program. A historic resources survey gathers information about individual resources (buildings, structures, sites, or objects) within a specified area, and uses that data to identify potential individual landmarks or historic districts. Less typically, surveys can seek to identify specific kinds of resources within a large area, such as Mid-Century Modern Architecture or sites associated with military history or Hispanic entrepreneurs.

The Texas Historical Commission (THC) maintains a database of historic resources surveys and specifies the data to be collected if a survey is paid for by federal or state funding, such as Certified Local Government program grants. If federal funding is not involved, a city may choose to collect whatever data they want, although we recommend following standard protocols to ensure that the data is usable.

In any case, historic resources surveys should capture information about every historic resource in the survey area. Although “historic” resources are typically those aged 50 years or older, that means that each year, more resources qualify as “historic.” Early surveys in the 1980s did not collect data about (then relatively new) buildings or structures, which have now become historic in their own right, but because no information was collected about them in the 1980s, we now have no record of what they looked like 40 years ago. Capturing data about every resource provides a benchmark for future surveys.



TEXAS HISTORIC SITES INVENTORY FORM - TEXAS HISTORICAL COMMISSION (rev. 8-82)

1. County Bell 5. USGS Quad No. _____ Site No. 278
 City/Rural Belton, Texas 78613 UTM Sector _____
 2. Name Edna Love Residence 6. Date: Factual _____ Est. 1870s
 Address 810 N. Main 7. Architect/Builder _____ Contractor _____
 3. Owner Eugene Pierce 8. Style/Type Creek Revival 9. Original Use Residence
 Address 224 Blumond, TX 76629 Present Use Residence under renovation
 4. Block/Lot 2 1/2 of Lot 1 Block 2, Entries & Key 15
 10. Description 1-story frame residence with hall parlor plan, side gable roof with small front gable over entry porch with separate roof; asphalt shingles and cornice returns. At each corner of structure is frame pilaster; windows are 6/6 double hung; door has transom and side lights; concrete porch with frame columns, incised with cut-out design. Foundation is partially rock and being repaired.
 11. Present Condition Fair
 12. Significance Home of G. Charlie Love, a local rancher. It is a very good example of the style; on the 1881 Koch map. Significance is in the areas of agriculture and architecture.
 13. Relationship to Site: Moved Date _____ or Original Site (describe) _____
 14. Bibliography Belton Tax Appraisal cards 15. Informant Edna Pierce, Lena Armstrong
 16. Recorder SSV/LDH Date 2/8/85

DESIGNATIONS PHOTO DATA

TNRIS No. _____ Old THC Code _____ B&W 4x5i _____ Slides _____
 RTHL HABS (No.) TEX: _____ 35mm Negs. _____
 NR: Individual Historic District
 Thematic Multiple-Resource

YEAR	DRWR	ROLL	FRME	to	ROLL	FRME
1985	12	12		to	12	16
1985	8	14		to	8	15

Other _____

Figure 18. Photo of 810 N. Main Street, Belton, Texas: (top) as it appeared in 2012 (McDoux Preservation); (bottom) survey information card from 1985 (Texas Historical Commission)

Another recent change in historic resources surveys is the ability to use mobile digital applications instead of paper forms and black-and-white film photographs, and the storage of survey data in a city's Geographic Information Systems (GIS) geodatabase instead of hard copy binders or (more recently) a Microsoft Access database. The National Park Service (NPS), in partnership with the National Alliance of Preservation Commissions (NAPC), has developed a mobile survey tool called CR Surveyor that works with a City's existing GIS geodatabase to collect data and easily create maps for analysis. First pilot tested in Alexandria, Virginia, CR Surveyor can be deployed on mobile phones or tablets for use by members of the community, after a short training workshop. For a fee, NAPC can help a city set up CR Surveyor to work with the city's GIS system. Otherwise, the city can hire a historic preservation consultant or cultural resources management firm to conduct a survey and provide the GIS files to the city as a separate layer in the GIS geodatabase.

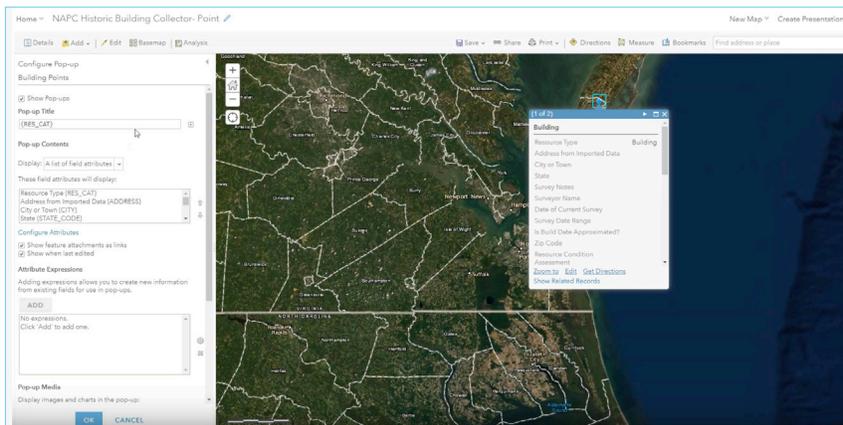


Figure 19. Screenshot of the CR Surveyor tool (National Alliance of Preservation Commissions)

Previous surveys of Corpus Christi's historic neighborhoods captured data in 1988, 1991, 1999, and 2017 (downtown only). All of that data could be digitized and used to create additional layers in the GIS geodatabase, enabling the City of Corpus Christi to consolidate all building-level information about historic properties in one place. This will then provide an excellent reference for City staff, the Landmark Commission, and owners of historic properties, and can be added to Corpus Christi's DowntownTX.org website for the benefit of potential investors in rehabilitation projects.

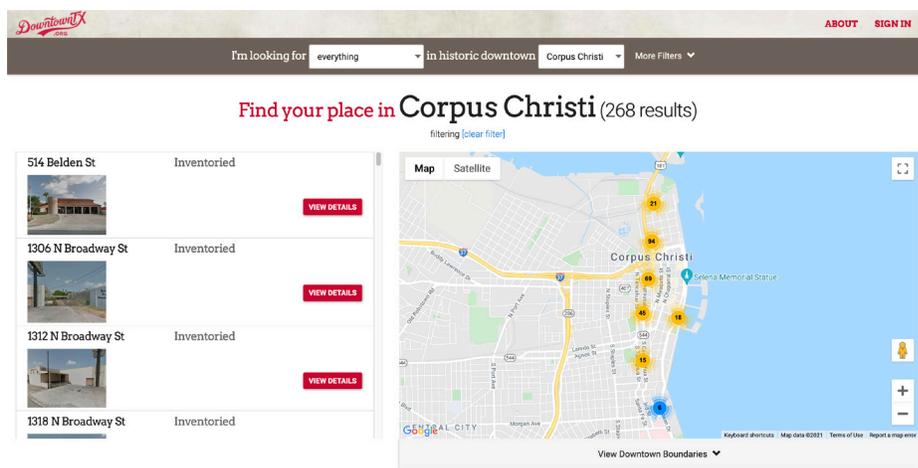


Figure 20. Screenshot of the DowntownTX.org website (Texas Historical Commission)

Cities often use ArcGIS StoryMaps to publish this data for public viewing; for example, McDoux worked with the City of Paris to create a StoryMap that tells the history of the downtown historic district and enables viewers to learn more about specific buildings (<https://cityofparis.maps.arcgis.com/apps/Cascade/index.html?appid=12f1ed6b13f048aa884e7a4bfd5ad8d1>).



Figure 21. Screenshot of the City of Paris "Exploring Paris History" StoryMap (McDoux Preservation)

Other Corpus Christi neighborhoods that were not previously prioritized for survey should be surveyed now, particularly the Hillcrest/Washington Coles and Westside neighborhoods. Although the Texas Department of Transportation conducted a survey of Hillcrest/Washington Coles as part of their required compliance with federal law, the City of Corpus Christi is not bound by the narrow criteria that compliance projects use to define "historic" and "significant" properties. The City would benefit from understanding what remains in those neighborhoods and the opportunities to conserve and interpret African American history that is important to the community, including those who have been relocated across the city.

By surveying more of Corpus Christi and adding survey data to the City's GIS geodatabase, the Historic Preservation Officer and Landmark Commission will be able to easily identify potential individual landmarks, boundaries for potential historic districts, and potential Multiple Property Submissions to the National Register of Historic Places. As mentioned in earlier sections of this Plan, the National Register creates no new regulations and does not restrict property owners in any way, but it does make individual properties eligible for existing federal and state tax incentive programs and could be one of the qualifying criteria for any new local financial incentives, as discussed in the remaining Strategies.

Importantly, Multiple Property Submissions (MPS) establish eligibility for individual properties to be nominated to the National Register, but an MPS is only required to be accompanied by a single individual nomination; property owners can then pursue tax credits and individual nominations for their own properties without further City investment.

All historic resources surveys and subsequent nominations to the National Register of Historic Places or applications for local designations enable additional historic preservation activities, including heritage tourism, economic development, civic pride, etc. Further, historic resources surveys and National Register nominations can be funded through federal funding including Certified Local Government grants (which require a match) and Underrepresented Communities grants (no match required).

ACTION ITEMS

- 41. Digitize legacy survey data.** The City's investment in historic resources surveys should begin with digitizing legacy survey data and moving that into the City's existing GIS system. Having this consolidated before beginning future surveys could help to prevent issues with misaligned property names/addresses going forward.
- 42. Invest in a data collection tool** like CR Surveyor that enables participation by the hundreds of community members who indicated they want to become more involved in historic preservation in Corpus Christi. Alternatively, the City's GIS department could develop its own field survey data collection app using the tools currently available through its ArcGIS license.
- 43. Determine who could collect and analyze data.** For example, it may be more cost effective to deploy community members to update legacy survey data while hiring historic preservation professionals to conduct new historic resources surveys. The analysis of survey data and recommendations for potential new historic landmarks, districts, or Multiple Property Submissions is probably best handled by professionals. This activity could help to organize new local preservation nonprofit organizations.
- 44. Prioritize areas to be surveyed or resurveyed.** Resurveys (with data collected by community members) and new surveys (conducted by historic preservation professionals) could happen in parallel. One is not dependent upon the other. Areas that are especially threatened by redevelopment should receive the highest priority. Work with community members to identify high-priority areas.
- 45. Seek funding (where necessary) for professional assistance.** Grants for federal funds are typically awarded once per year and require months of lead time. Local grants from philanthropic organizations may be available for a more rapid turnaround.
- 46. Share information gathered with the community and other City officials.** This can provide an opportunity to discuss tax credit programs and other benefits of historic preservation, as well as dispel any misconceptions about the nature of the National Register program.

RESPONSIBLE PERSONS

Historic Preservation Officer

GIS program manager

RESOURCES REQUIRED

Support from GIS department

Funding for GIS data collection survey tool, additional surveys

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 2: Update the historic preservation ordinance.

Strategy 6: Improve the City historic preservation website.

Strategy 7: Improve community outreach and standardize the public engagement process.

STRATEGY 14: DEVELOP LOCAL TAX INCENTIVE PROGRAMS

During the Community Opinion Survey, more than 60% of respondents indicated that the City should offer financial incentives to help property owners rehabilitate historic buildings. The same number agreed that some rules should apply to those receiving incentives, as long as those rules were reasonable, clearly communicated, and established upfront.

In 2016, McDoux completed a research project for the City of Belton, Texas, which was considering adding a tax exemption program. The following information is excerpted from that project's summary report of findings and recommendations, with permission from planner Tina Moore, City of Belton.

During that project, McDoux identified 33 Texas cities that offer local tax incentives. These programs vary a bit but, overall, were quite similar. All included information about:

- Whether tax is exempted, abated, or refunded (or some combination of those)
- If the tax exemption is transferable with the property in the event of sale
- The type of tax affected, the percentage of tax exempted, and how tax exemption is calculated
- The number of years the tax exemption may be taken
- Whether participation also freezes the taxable value of the improvement/property, and if so, for how long
- If an annual review/inspection is required, and if so, who conducts it
- Any other action/activity required by applicant in order to maintain exemption
- Potential reasons for losing exemption

APPLICATIONS

All of these programs require an application, which may be submitted on a rolling basis throughout the year. Supporting documentation may be required to substantiate the historic significance of the property, the need for the improvement, a proposed list of work to be done, estimated schedule and budget, etc.

Applications are generally submitted to the Planning Department and reviewed by the Planning staff and/or the Historic Commission. Some cities allow the Historic Commission to approve applications, with the potential for an appeal to City Council, while others require applications to be approved by City Council. There is generally no application fee associated with these programs.

Participation in the tax exemption program is always recorded with the County Appraisal District, and exemptions transfer with the property in the event of a sale. The property owner may be required to submit an application for renewal by a certain deadline each year. Most of the time, that is submitted to the City; less commonly, the application goes to the County Appraisal District.

ELIGIBILITY

Both residential and commercial buildings are usually eligible for local tax exemption programs, and only a few programs exclude owner-occupied or non-income-producing properties.

Many of these programs require that the property must have a historic designation of some type before the application for the historic tax exemption may be submitted or, if the proposed work reverses inappropriate alterations and results in the property becoming eligible for a historic designation, that the designation must be in place before the tax exemption can be claimed. However, historic designations are not always required.

Across the state, eligibility requirements vary and may require properties to be:

- Listed on the National Register of Historic Places as an individual landmark or contributing to a historic district
- A Recorded Texas Historic Landmark or State Antiquities Landmark
- A local landmark or contributing to a local historic district
- Identified as “High Priority” on a credible survey of historic resources, which has been formally accepted by City Council
- Constructed before a specified year, such as 1900

TYPE OF IMPROVEMENTS REQUIRED

The improvements required in order to receive a historic tax exemption are typically based on the activity that the City is trying to encourage, such as:

- **Major renovation/restoration of historic properties.** This type of program requires a “substantial improvement” of the property in order to qualify for the tax exemption. The threshold for “substantial improvements” is often quantified by establishing a minimum project cost and/or a minimum percentage of the pre-improvement assessed value. For example, a typical requirement might be a minimum investment of \$5,000 or 25% of the pre-improvement assessed value of the structure (excluding the value of the land), whichever is greater. The expenses that can be included in the calculation of minimum investment are generally defined clearly and include only those which constitute permanent improvements to the structure (i.e., not temporary fixtures or appliances), as well as architectural or engineering fees, and sometimes construction-related expenses, such as dumpsters or protective site fencing.
- **Ongoing maintenance to prevent or address blight or deterioration.** This “neighborhood stabilization”-type program does not require an upfront investment in improvements to the property; instead, the tax savings afforded by the exemption is intended to be used to perform maintenance and repairs. This requires Planning staff or Historic Commission members to inspect the property during the initial application period and identify needed improvements, which then must be addressed by the following year’s inspection in order to maintain the tax exemption.
- **Historic designations.** If a city is struggling to encourage historic preservation at all, a tax exemption may be used to reward those property owners who choose to designate their buildings as local landmarks or contributing to a local historic district. This provides an economic incentive for a property owner to accept the City’s oversight of their building, through the COA process, when they or future owners wish to make exterior alterations.

OVERSIGHT REQUIRED

In most programs, property owners receiving the local tax incentive may not undertake changes to their property without review through the Certificate of Appropriateness (COA) process; an approved COA is typically required before the property owner can claim the tax exemption. In addition, after the work is completed, the property may be inspected to ensure that the work was performed as proposed in the COA, before the tax exemption is certified to the county tax appraiser. Some cities limit the time available to complete the proposed work (such as two years for a residential property or five years for a commercial building).

On an ongoing basis, an annual review or inspection is often required to ensure that the property has not been demolished or allowed to deteriorate. A failed inspection, which may be (but is not always) based on specific criteria outlined in the ordinance, may result in a warning with opportunity to resolve the problem, or it may result immediately in the loss of the tax exemption.

Failure to pay delinquent taxes or follow local building codes, the Secretary of the Interior's Standards for the Treatment of Historic Buildings, or other applicable rules may also result in the loss of the tax exemption. Some cities specify a recapture period during which any deterioration (i.e., demolition by neglect), inappropriate alterations, or demolition of the property will result in the property owner having to repay all exempted taxes.

VALUE OF THE TAX INCENTIVE

A tax exemption or abatement may be claimed for 5, 10, or 15 years and may be based on the value of the improvements to the building as a percentage of the pre-improvement assessed value. For example, if the value of improvements is 25-50% of base value, the tax exemption might be good for five years, while improvements over 50% would result in a 10-year exemption period. This can be used to encourage more extensive restoration projects.

Options include:

- A tax exemption applied to the entire value of the building, following the improvements.
- A tax exemption applied only to the increase in the value of the building.
- A tax abatement, where the taxable value is frozen at the pre-improvement value for the exemption period
- Some combination of the above

The total annual value of the tax exemption may be capped (for example, up to \$30,000 per year). In some cases, the tax incentive may not be time-limited; for example, the City of Houston offers a special tax exemption in perpetuity for buildings converted from an original non-residential use to at least residential units and which are designated as Protected Landmarks.

Only one city offers a refund of property taxes paid.

Planning staff across Texas have noted that complex formulas can be difficult for the public to understand, and several existing programs are currently being revisited with the goal of simplifying them.

EXAMPLE 1: TAX ABATEMENT FOR DISTRICT DESIGNATION

The Morningside neighborhood provides an example of a cost-benefit analysis for the impacts of a tax incentive given to property owners in newly designated Protected Historic Districts who remain in their homes during a 10-year tax incentive period.

A tax abatement, in this example, would freeze a portion (20%) of the appraised value of the entire property for 10 years, resulting lower property taxes.

The calculations for this example used Nueces County Appraisal District data for all properties within the Morningside neighborhood boundaries, as defined by the City of Corpus Christi Development Services department.

- A total of 130 properties are contained within the Morningside neighborhood boundaries, representing \$21.6 million in total appraised value. In 2020, a total of \$109,368 in property taxes was due from the neighborhood as a whole.
- If a 20% tax exemption for owner-occupied residences were enacted as a new historic district was established, 91 properties would be eligible (as determined by matching owner address and mailing address). The average appraised value of those 91 properties at the time of publication was \$171,456.
- Those 91 properties would freeze at \$15.6 million assessed value and a total of \$100,833 in taxes due in year 0.
- The average increase in residential property values in Nueces County between 2014 and 2018 was 11%. Assuming a 10% annual increase in assessed value, the following table shows the fiscal implications over the 10-year period.

Year	1	2	3	4	5	6	7	8	9	10	Total
20% Tax Value Frozen	\$ 20,167	\$ 20,167	\$ 20,167	\$ 20,167	\$ 20,167	\$ 20,167	\$ 20,167	\$ 20,167	\$ 20,167	\$ 20,167	\$ 201,667
20% Tax Value if no exemption	\$ 20,167	\$ 22,183	\$ 24,402	\$ 26,842	\$ 29,526	\$ 32,479	\$ 35,727	\$ 39,299	\$ 43,229	\$ 47,552	\$ 321,405
Foregone Revenue Over Ten-Years											\$ 119,738

CONCLUSION: A 20% exemption would result in a total of \$119,738 in foregone revenue over the next 10 years, an average of less than \$20,000 per year. The average tax savings per household would total \$1,315 over the 10-year period, or an average annual tax savings of about \$110 per year per household.

This program would be applied automatically to any Protected Historic District (commercial or residential) once designated.

EXAMPLE 2: TAX ABATEMENT FOR SUBSTANTIAL REHABILITATION (RESIDENTIAL)

A tax abatement for substantial rehabilitation could be made available for residential properties in need of repair. Only designated Protected Landmarks would be eligible for the 10-year freeze on appraised value of the improvements (i.e., the building, not the land). Property owners would need to present a rehabilitation plan for Landmark Commission approval, with investments totaling more than 50% of the value of the improvements. Following the verification of the completed rehabilitation work, the City would notify the Nueces County Appraisal District that the tax freeze is approved.

The fiscal implications would vary on the amount of private investment into the property. If a property owner spent the minimum amount of 50% plus \$1 of the improvement value, the City would recover the taxes in 7 years after the freeze expired (assuming a 0% annual increase in assessed value). Two examples are provided below.

Large Historic Property

821 Oak Park Ave

Year Built 1929

Square Feet: 5,930

Appraised Value (2021): \$349,042

Improvement Value (2021): \$279,806

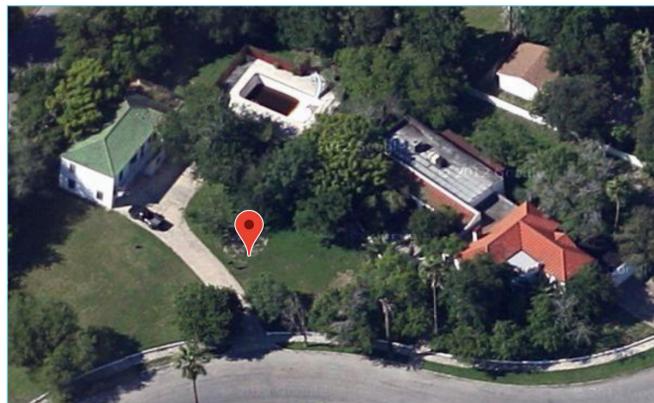
Substantial Rehabilitation Cost: \$139,904

Ten-Year Tax Revenue foregone: \$22,557

Post-Rehabilitation Appraised Value: \$488,946

Post-Rehabilitation Annual Taxes: \$3,160

Years to Recover Foregone Revenue: 7.14



Average Substantial Rehab

317 Katherine Drive

Year Built 1938

Square Feet: 2,030

Appraised Value (2021): \$208,117

Improvement Value (2021): \$153,457

Substantial Rehabilitation Cost: \$115,000
(based on 75% of improvement value)

Ten-Year Tax Revenue foregone: \$13,453

Post-Rehabilitation Appraised Value: \$323,117

Post-Rehabilitation Annual Taxes: \$8,088

Years to Recover Foregone Revenue: 6.44



EXAMPLE 3: TAX ABATEMENT FOR SUBSTANTIAL REHABILITATION (COMMERCIAL)

A tax abatement (freeze on appraised value) for substantial rehabilitation could be made available for historic commercial properties in need of repair. Only designated Protected Landmarks would be eligible for the 10-year tax abatement. Property owners would need to present a rehabilitation plan for approval, with investments totaling more than 50% of the appraised value of the improvements (not land). Following the verification of the completed rehabilitation work, the City would notify the Nueces County Appraisal District that the tax freeze was approved.

The fiscal implications would vary, based on the amount of private investment into the property. If a property owner spent approximately \$130/square foot to rehabilitate a vacant or underutilized property, based on the following example, the City would recover the foregone tax revenue in 8.69 years.

Downtown Historic Commercial Property

1102-1104 Leopard Street (Welch-Tcheidel Building)

Year Built 1926

Square Feet: 7,822

Appraised Value (2021): \$138,290

Improvement Value (2021): \$97,040

Substantial Rehabilitation Cost: \$1,016,860

Ten-Year Tax Revenue foregone: \$59,444

Post-Rehabilitation Appraised Value: \$1,058,110

Post-Rehabilitation Annual Taxes: \$6,383

Years to Recover Foregone Revenue: 8.69



If the City were to lower the abatement to 50% of appraised value after 5 years, the City would recover the foregone revenue in 4.35 years.

This program would be available for any historic commercial property designated as a Protected Historic Landmark.

ACTION ITEMS

- 47. Determine the goals for local tax incentive programs.**
- 48. Identify programs in other cities that can serve as good models.** Discuss the programs with historic preservation/planning staff in those cities to gather lessons learned about program development, implementation, and ongoing opportunities or challenges.
- 49. Develop a proposal** (including economic analysis for the specific types of tax incentive, value, and duration in each program) for consideration by City staff.
- 50. Engage with the community** through multiple meetings (as appropriate) to explain the goals, proposed responsibilities and benefits associated with each program, and implementation plan/schedule; answer questions and gather feedback. Make revisions as necessary,
- 51. Bring proposal to the Landmark Commission, Planning Commission, and City Council for consideration.** This may be an iterative process.
52. After approval, **develop a communications strategy** to make property owners aware of the program and to encourage participation, measure interest and response, etc.
- 53. Plan to collect data that is needed for annual reports to City officials.**

RESPONSIBLE PERSONS

Historic Preservation Officer

RESOURCES REQUIRED

Support from Development Services Director, City Council

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 2: Update the historic preservation ordinance.

Strategy 6: Improve the City historic preservation website.

Strategy 7: Improve community outreach and standardize the public engagement process.

CASE STUDY: HOUSTON, TEXAS

The City of Houston's Economic Development Department offers two tax incentive programs that encourage historic designations.

The original **Historic Site Tax Exemption program** is available to local landmarks, Protected Landmarks, and buildings that are classified as Contributing to a locally designated historic district. A Certificate of Appropriateness approved by the historic commission is required for exterior improvements. The property owner has five years to complete improvements.

If qualifying expenditures are at least 25% but less than 100% of the base value, then the exemption for each year on the assessed value of the structure equals the amount of the qualifying expenditures. If qualifying expenditures are 100% or more of the base value of the improvements, the value of the exemption depends on the type of property:

- For single-family residential properties that are not within qualifying census tracts, the exemption is equal to the qualifying expenditures.
- For properties other than single-family residential properties within qualifying census tracts, the exemption is 100% of the assessed value of the historic structure or improvements not including the value of any land associated with the historic site.

The exemption will begin on January 1st after the date the Director of Economic Development makes the determination the owner has met all the requirements of the Ordinance. The exemption will last 15 years, if the project receives no financial incentive from municipal hotel occupancy taxes; otherwise, it is good for 10 years. The exemption amount will not exceed the initial amount during the historic site exemption.

The exemption automatically continues as of January 1st of each year unless the Economic Development Department Director finds, during their annual review of the property, that taxes assessed on the property are delinquent; the historic site has deteriorated, has been demolished or destroyed; or that the property has been the subject of a Certificate of Appropriateness issued for demolition or because the applicant waited out the 90-day delay for changes to regular (not Protected) historic landmarks, in which case the tax exemption will be revoked.

If sufficient restoration work has not been completed to satisfy the percentage of tax exemption within 5 years of the passage of an historic site tax exemption ordinance the within 5 years of the passage of an historic site tax exemption ordinance then the exemption ordinance will expire.

The applicant must re-apply for the exemption each year before April 30th with the Harris County Appraisal District.

A second **Historic Tax Exemption program** is limited to locally designated Protected Landmarks that are at least 50 years old and individually listed in the National Register of Historic Places, designated as a Recorded Texas Historical Landmark, or referenced as having historical significance in an authoritative survey conducted by a non-profit or governmental agency. In addition, if the property is currently residential, it must have more than four units and originally have been built and used for non-residential purposes. These significant historic buildings may be exempted from City of Houston ad valorem taxes for both improvements and land, up to \$30,000 per year in perpetuity.

CASE STUDY: ROUND ROCK, TEXAS

Since 1982, the City of Round Rock, Texas, has offered a partial tax exemption program for historically significant properties, with the goal of encouraging owners to undertake regular maintenance and repair. Initially, properties did not have to be designated historic to participate; today, eligibility is limited to properties on the National Register of Historic Places, Recorded Texas Historic Landmarks, locally designated with the City's historic overlay zoning, or those properties which participated under the previous incarnation of the program.

This program exempts 75% of the appraised value of land plus improvements from the City property tax. Only that portion of land which is necessary for access to and use of the historic structure(s) is eligible for the tax exemption; the rest of the land is taxed at the regular rate. The Historic Preservation Officer determines the amount of land to be included in the tax exemption.

Owners must apply to the County Appraisal District each year and allow an inspection of their property to determine if it meets minimum property, health, and safety standards, which are clearly defined in the ordinance. The Historic Preservation Commission recommends recipients to City Council, which holds a public hearing, after which it considers and adopts each year's slate of tax exemptions by ordinance.

Beginning in 2016, if a property owner demolishes a historic structure for which they received a partial tax exemption during the previous five years, the owner must pay the City an amount of money equal to the total value of the tax exemption granted during the previous five calendar years, and the City can pursue the owner for delinquent taxes if needed to recapture those funds.



Figure 22. Aerial view of downtown Round Rock, Texas (DowntownRoundRockTexas.com)

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STRATEGY 15: DEVELOP FAÇADE IMPROVEMENT PROGRAM OUTSIDE TIRZ#3

Façades are typically defined as the front or side of a commercial building that faces a public street and is visible from a public right-of-way (excluding alleys). Façades may be storefronts, as well as upper stories above storefronts. In this section, the word “façade” applies exclusively to commercial buildings.

The Corpus Christi Downtown Management District currently administers a façade improvement program for properties within TIRZ#3 and could potentially add a second facade improvement program – for commercial buildings outside TIRZ#3 – to their portfolio if the City were to provide both the improvement funds and funding for staff time to administer the program.

The following information was developed for the City of Austin in 2018 and is summarized here with permission from development services manager Elizabeth Brummett, City of Austin.

TYPICAL PROGRAM GUIDELINES

Program guidelines/policies for façade improvement programs often include language allowing the administrator to decline to fund, or otherwise exclude certain business activities if the use and/or project is not consistent with the City’s development or redevelopment plans.

Façade improvement programs may require an application fee, usually less than \$100.

Other general requirements that typically apply include:

- All rehabilitation work and design features must comply with all applicable city codes and ordinances, as well as state and federal law.
- All applicable permits and licenses must be obtained, including permits and Certificates of Occupancy required by the City and all other state and local permits.
- Work must follow plans and specifications approved by the administrator. After approval, any changes to the project (no matter how minimal) must be approved by the administrator.
- Land use must conform with applicable zoning regulations. If current land uses, sites, or structures are nonconforming at the time of application, they must be brought into compliance through the grant-assisted project.
- Buildings with existing code violations or deficiencies must include their remedy as part of the proposed investments.
- The program recipient must communicate with the administrator about project progress when requested to do so, and must resolve any issues or questions.
- The administrator must have the right to make site visits and, should anything be discovered that is not consistent with the approved application, withhold or recapture grant funds or take any other available remedy to maintain compliance with program guidelines.

Most programs require that the project must begin within a certain amount of time (such as 90 days or six months) following notification of funding and be completed within a certain amount of time (such as one year). "Completion" may require occupancy. If extensions are allowed, the program usually stipulates how those must be requested and approved, and what will happen if the project is allowed to lapse. If projects lapse or applications are denied, the City may prohibit re-application within a certain time period (such as six months or a year).

Programs often require the display of signage acknowledging the program's role in the façade improvement project for some period of time, as well as the right to use the recipient's name and photographs or video recordings of the project for any lawful purpose.

FUNDING SOURCES

Cities use a variety of funding sources, singly and in combination, to pay for façade improvement programs.

Economic Development Corporations (EDCs) are the most common administrators of and funding sources for façade improvement programs. These nonprofit organizations are separate from local governments' economic development departments. EDCs obtain their funding primarily through sales tax receipts, although – as a tax-exempt 501(c)(3) organization – they are also able to:

- Seek grants and accept tax-deductible contributions
- Take loans or issue bonds against future sales tax receipts
- Lend money to businesses (in connection with projects) and earn interest
- Collect user and admission fees from public facilities, such as sports venues that are operated as economic development projects
- Earn income from the sale of property for business development purposes.
- Make grants to for-profit private entities for charitable purposes, according to the Internal Revenue Service

General Revenue Funds or Bond Funds are another option. The Texas Main Street Program notes that: "Under its general authority, a municipality may opt to pay for public improvements in the downtown through its tax-supported general revenue fund. There are also numerous types of bonds a city can use to fund projects, some of which require voter approval and some which do not. Projects funded in these ways may or may not result in a tax increase to the community at large."

Community Development Block Grant (CDBG) funds are primarily used for economic development, and the rehabilitation of historic buildings can improve property values, spur investment in downtown commercial areas, and create job opportunities. CDBG funds may be used for the following eligible activities, per 24 CFR 570.202(d) :

- Financial and technical assistance to private, for-profit businesses that involves historic properties
- Designing façade improvements
- Façade rehabilitation for privately owned commercial buildings
- Technical assistance, including façade improvement workshops; educational programs that encourage private initiatives such as private investment, the use of tax incentives, etc.; and training for municipal and community leaders on historic preservation strategies and techniques.

CDBG funds also may be granted or loaned to subrecipients, including small business investment companies and local economic development corporations, for eligible activities. CDBG funds may be used to make up the non-Federal share of local matching requirements for Federal grants-in-aid.

Note: Projects using CDBG funds are required to bring all building systems up to code. Additional regulatory approvals may include, but not be limited to, an environmental assessment and impact review, as well as review by the Texas Historical Commission under Section 106 of the National Historic Preservation Act.

Tax Incentive Reinvestment Zone (TIRZ) and Tax Increment Financing (TIF) are authorized by the Tax Increment Financing Act and Chapter 311 of the Texas Property Tax Code and can be used to spur downtown development. Some programs (such as Amarillo, Texas) provide funding through a TIRZ, which is the real property that is taxed when the city creates a TIF zone or district. When a TIRZ is created, a baseline of property value is established. As tax values increase, the increment over the baseline is returned to the city to finance projects and activities within the district.

Hotel Occupancy Tax (HOT) Funds generated through hotel occupancy taxes imposed by city governments (as authorized by the Texas Tax Code) are used to promote tourism and the convention/hotel industry; the allowable uses for those funds include historical restoration and preservation projects.

Special Assessments Districts are authorized through statute. Once established, property owners in the district pay an added assessment, which is in turn used to provide services in the district.

Private 501(c)(3) Foundations that make grants may be able to provide funding to an economic development corporation, which then can manage the façade grant program. In some instances, the foundation itself may be able to provide grant funding.

FAÇADE IMPROVEMENT GRANTS

Façade improvement grants are, by far, the most common funding mechanism used by cities to encourage, support, and manage the revitalization of historic commercial districts. Of the 70 city façade improvement programs reviewed in 2018, only one did not use grants: Oklahoma City, which has a revolving loan fund. Forty-two of those cities were participants in the Texas Main Street Program, which provided information from its 2017 annual survey of member cities for the research project. All of the façade grant programs studied were available to for-profit property owners.

Applications and program guidelines tend to be quite simple for many cities, regardless of the maximum amount of the grant. The most detailed program materials come from Albany, New York. Most of these programs have similar characteristics, which are described below. *Note: Examples are provided for reference purposes and should not be considered recommendations.*

1. Minimum Investment

A few programs require a minimum project investment, but those that do have very low thresholds, with requirements that applicants must propose to invest at least some amount (e.g., \$600; \$2,000; or \$5,000) as their share of project costs.

2. Maximum Value of Financial Incentives

The value of façade grant programs, and specifically what those grants can fund, vary widely. Interestingly, the maximum grant amounts did not seem to be driven by the size of the city or its downtown area. Some larger cities offered small grants, while some small cities capped their grants at higher values.

About 25% of façade grant programs can fund paint-only or sign-only projects, in addition to full-façade improvement projects. Typical paint-only grants range from \$250–\$5,000, with \$1,000 being the most common value; sign-only grants range from \$250–\$1,000, with \$500 or \$1,000 being the most popular limits. When the grantor offers separate façade, paint, and sign programs, these usually can be combined and may be capped at a higher total value.

The most popular grant limits were \$5,000 (10 cities); \$10,000 (17 cities); and \$25,000 (9 cities). Nine cities have limits under \$5,000, with \$1,000 being the lowest cap for a façade (rather than a paint-only or sign-only grant). The highest limits found were \$50,000 (2 cities), \$40,000; \$37,500; and \$30,000 (2 cities).

Some programs base the grant on the area or linear width of the façade, with values such as:

- \$60 per linear foot of façade per floor, with a \$4,500 cap
- \$400 per linear foot of façade, up to \$20,000
- \$18 per square foot of street-facing façade, up to \$15,000
- \$20 per square foot of street-facing façade, up to \$50,000

A few programs allow the inclusion of non-façade items, including interior rehabilitation; some specify what those may be, such as electrical and plumbing improvements.

One program offers a higher maximum grant for buildings/centers that are at least 10,000 square feet in area and have three or more tenants.

3. Required Matching Funds

Façade grant programs typically require a \$1-to-\$1 cash match, although grantor/grantee ratios of 90/10, 80/20, 75/25, 60/40, 50/50 were also seen. In two cases, the grantee-to-grantor contribution requirements were \$3-to-\$1 and \$4-to-\$1.

In Laredo, Texas, business owners are only required to match \$500 (for a grant up to \$25,000). Mission, Texas, awards up to \$3,000 with no required match, or up to \$10,000 for matching grants.

In-kind or donated services generally are not counted toward a required match.

4. Reimbursement Grants

Most façade grants are reimbursements; programs typically make a single reimbursement payment after the project is completed.

Reimbursement requirements may include:

- Copies of all permits, inspections, and approvals by the Building Department
- Copies of all vendors' itemized invoices/receipts and proof of payment (canceled checks, credit card statements, etc.) to prove that vendors have been paid; if employees rather than contractors are used, copies of payroll documentation and employee paychecks
- Photographs showing completed work, per the approved scope of work
- The applicant (property owner or lessee) may be required to submit a completed W9 form (Request for Taxpayer Identification and Certification) prior to payment.

Cost overruns are not eligible for matching funds/reimbursement.

5. Design Principles/Standards

Some façade grant programs provide specific guidance or standards for the design of improved facades.

6. Application Requirements

Applications for façade grant improvement programs may require legal agreements between grantor and grantee, as well as documentation such as:

- Completed application form
- Project plan, including detailed scope of work, architectural drawings, and conceptual images or renderings showing proposed materials and colors and their anticipated location on the facade
- Color photographs showing existing condition of building, including:
 - Entire building façade
 - Specific items to be addressed within scope of work
- Color samples/swatches (if painting is planned)
- Material samples/swatches that indicate the quality of finishes
- For signs, renderings that accurately depict dimensions and lettering size/style
- Site plan/map showing location of property
- Sealed statement by a qualified structural engineer, affirming that the existing structure can support the proposed façade improvements; engineering calculations may be required, if requested
- Budget/cost worksheet
- Up to three estimates from licensed/insured contractors, architects, and/or engineers

showing work to be done and costs. The grantor may require estimates to be current (e.g., dated no earlier than 90 days prior to the application submittal date).

- Pre-qualified contractors may be required, or any contractor submitting a competitive, detailed estimate may be used; the lowest bidder may or may not be encouraged/required.
- Contractors may be required to supply additional information, such as business license, tax ID number, etc.
- Self-contracted work may or may not be eligible, in whole or in part (e.g., eligible expenses may be reimbursable, but not labor costs).
- Copies of building permits, if already issued, or a letter from the Building Department stating that the project does not require a permit
- Documentation of commitment of funds for the project (bank statement or commitment letter)
- A copy of the property tax bill or deed to confirm ownership
- If owner is not an individual, a copy of the organizational documents showing all principals and partners
- A list of all properties owned by all owners, including partners and principals
- Signed statements of agreement from each lienholder
- For lessees, a property owner declaration of consent for the project, including the approved scope of work and design review terms/conditions; may take the form of a letter from the property owner, or the application may include a place for the owner to co-sign with the applicant/lessee.
- For lessees, a legally valid and binding lease for a period that, at a minimum, does not expire prior to the anticipated project completion date
- Proof of current property and casualty insurance
- Letter or Certificate of Appropriateness signed by the City Planning Director, confirming that the project conforms to any/all city design standards for the historic district or overlay area
- Termite inspection report performed within the past six months
- Asbestos survey performed within the past six months
- Estimated number of jobs to be created by the project work
- Estimated number of jobs to be created as a result of the façade improvement

7. Review and Award Process

- Application is reviewed for completeness and eligibility.
- Applicants are notified of any missing items, which must be submitted within a stated timeframe following notification, or the application will be considered incomplete and not subject to further consideration.
- All eligible, complete applications will be evaluated on a case-by-case basis using the specified scoring process and criteria, such as:

- o Alignment with the program’s eligibility requirements and overall goals
- o Quality and completeness of application
- o Aesthetic impact and storefront design
- o Corrections to existing building code violations
- o Compliance with ADA and/or creation of barrier-free access
- o Preservation of historically significant architecture
- o Total private investment
- o Applicant’s readiness to proceed
- The grantor reserves the right to reject any project.
- Submission of a complete application does not guarantee funding; the grantor is not required to make any award.
- The grantor reserves the right to request more information, and request specific design or operating changes at any time throughout the review process.
- The grantor may award funds on a first-come, first-served basis until available funding is exhausted, or applications may be evaluated on the basis of pre-established criteria and selections made at one time.
- Successful grantees are required to execute a grant agreement and other security documents, which may include:
 - o Promissory note (forgivable on meeting all grant requirements)
 - o Personal guaranty for the note (if the applicant is an entity)
 - o Mortgage (subordinated to certain other mortgages, at the grantor’s discretion)
 - o Lien filings
 - o Commercially reasonable indemnification/insurance obligations on the part of the applicant, intended to protect the grantor from any potential liability related in any manner to the grant
 - o Additional documentation as determined by the grantor

8. Application Period

The time period during which applications may be submitted varies from city to city. For example:

- Applications may be accepted on a rolling basis throughout the year.
- Applications may be accepted during a specified application window.
- Applications may accepted until the application window closes or until available funding is exhausted, whichever comes first.

9. Building Eligibility

Some of the various eligibility requirements for buildings include:

- Must be a current place of business for the applicant's small business or nonprofit entity.
- May or may not include residential use; this may include or exclude hotels and other commercial lodging businesses.
- Must be located within the City limits and, in most cases, within a specified area or areas.
- Must have an existing storefront or a location for a new storefront, that meets the definition of façade.
- The façade to be improved must provide public access to a business or businesses within the building.
- Priority may be given to buildings that:
 - Are architecturally or historically significant
 - Are visually prominent
 - Have inappropriately applied non-historic facades
 - Are unsightly
 - Are in need of repair

10. Applicant Eligibility

Many programs require applicants to provide proof that they meet certain criteria. The list below includes compiled requirements for various programs. It is not intended to be read as recommended eligibility criteria, but rather as suggested options from which the City of Corpus Christi may draw inspiration.

Separate from the eligibility requirements, disadvantaged, minority, and woman-owned business enterprises are often encouraged to apply.

Established Entity

- Must be a legal entity, which is properly registered (and, if necessary, licensed) to operate in the State.
- Must be an independently owned, operated, and controlled small business; for example, with 25 or fewer employees at the time of application.
- Must be currently operating or committed to operate a business in the City.
- Must be an existing or new business that currently occupies or plans to occupy first- floor space with street-front presence and access.
- Membership in a downtown, Main Street, merchant association, or economic development organization may be required in order to apply.

Ownership or Tenancy

- Must be the legal owner of the subject property or a commercial tenant of the property in possession of a current lease that will not expire prior to the anticipated completion of the

façade improvement project.

- If not the owner, must have written consent from the property owner giving permission to conduct the improvements.
- Property owned by any government entity is not eligible for grants.

Owner or Business Type

Some programs exclude from eligibility specific types of owners or businesses, such as:

- Religious groups
- Nonprofit organizations that pay no property tax
- Properties on which taxes are being paid, but which have a nonprofit use, such as schools, charities, clubs, organizations, etc.
- Daycare facilities
- National franchises of retail chain stores (to promote local business development)
- Funeral homes

These types of exclusions might be used to shape the downtown district; consult with the City attorney to determine whether such exclusions are permitted.

Organizational Stability

- Must commit to remain in the subject location and maintain the façade improvements for a minimum period of time (e.g., six months; two, three, or five years). A recapture period may apply. The subject business must not be closed, sold, transferred, downsized, or relocated during that time.
- If relocating an existing business from another location within the City, the applicant must show evidence of business expansion or the inability to continue to operate at the existing location.

Financial Stability/Ability to Complete Project

- Must show evidence that the applicant (and building owner, if different) is current on all federal, state, local, business, property, sales, and payroll taxes and not in default on any mortgage or other lien against the property.
- At the time of application, must be able to document the availability and commitment of the funds necessary to complete the project, including matching funds amounting to at least 50% of the total project cost.
- The grantor may require that the grantee accept the funding as a loan, against which a lien will be secured on the eligible property, subordinate to the mortgage lien; a set percentage of the loan is then forgiven on a yearly basis until the end of the recapture period, unless the applicant/owners or subsequent owner fail to comply with the requirements of the program, in which case the balance of the loan becomes immediately due and payable. Alternately, a deed of trust that self-amortizes proportionally each year through the recapture period may serve the same purpose.

Other Requirements.

Applicants who have received previous façade grants or other public assistance for the same property may not be eligible to apply for new projects for some period of time (e.g., three or five years).

- Applicants who own multiple buildings/businesses may be limited to one application per year or funding cycle.
- The applicant may be required to discuss their plans with appropriate City department(s) prior to submitting the application.
- Only one grant is be awarded per building/parcel per funding window/round.
- A building that has an active Façade Improvement application and/or award is ineligible.
- One city requires that, if the applicant seeks funding for a building that will house a convenience retail store, they must document and certify that the business will maintain an inventory of fresh produce for sale for the term of the grant, in the interest of eradicating food deserts within the city. If the building contains an existing convenience retail store which does not currently sell fresh produce, the applicant must sign an agreement indicating that they will contract with a produce distributor in order to provide fresh produce at the assisted business location.

11. Types of Improvements Funded

Some programs explicitly require that the improvements must be appropriate for the building and consistent with the current business use, in addition to preserving the building's architectural integrity and restoring, if possible, the original façade.

Eligibility criteria may mention the Secretary of the Interior's Standards for the Treatment of Historic Properties, and local Main Street Program grant guidelines frequently include a copy of the Standards, as well as a one-page list of "Rehabilitation Tips" (see Appendix C).

Qualifying project expenditures may include the repairs, replacement, and installation of the following, if they are part of an approved exterior façade improvement project. Please note that list is compiled from all 70 comparison cities and does not represent the projects eligible for grants in any one city.

Examples of eligible projects include:

- ADA compliance (may or may not include sidewalk improvements)
- Architectural and engineering fees (only for those services related to the approved façade improvement process)
- Asbestos remediation
- Awnings
- Cornices (repair or replacement)
- Corrections to code violations
- Decorative details
- Demolition and/or site preparation costs (exterior)
- Doors (repair or restoration, or replacement of nonconforming), framing, trim, hardware

- Gutters and downspouts
- Lead remediation
- Lighting (building-mounted lighting that illuminates the façade or signage)
- Masonry cleaning, repair, and repointing (includes brick, stone, and tile)
- Paint (exterior only; does not include painting previously unpainted brick, stone, or tile; may include murals; may include conservation of ghost signs)
- Parapets (repair or restoration)
- Reconstruction of original architectural elements, based on documentary photographic evidence of the subject building (not based solely on similar buildings)
- Removal of non-historic materials and/or elements that cover historic architectural details, such as slipcovers or roll-down security gates
- Removal of paint from brick (restoring it to its natural condition)
- Roof repair and replacement, where the effects will be visible from the public street or public parking lot (e.g., sloping roofs rather than flat roofs)
- Security systems (including surveillance cameras) and interior security gates (new roll-down, open-grid style)
- Shutters
- Sidewalks
- Sidewalk cafes, including balconies, decks, and planters
- Signage (including lettering, projecting sign, sign boards, window sign, hanging sign, awning/canopy sign); may specify that signs advertise the business, not a product
- Street furniture (benches, trash cans, bike racks)
- Street trees
- Structural improvements (may or may not include foundation leveling)
- Transom windows (uncovering, reopening, repairing, restoring, etc.)
- Walkways (private and for pedestrian use only), in conjunction with other front entrance improvements
- Windows (repair or restoration, or replacement of nonconforming), framing, trim, hardware

Some programs allow exterior work to be combined with interior capital improvements including:

- Electrical or plumbing upgrades
- Fire monitoring and/or suppression systems
- Permanent interior fixtures

Examples of Ineligible Project Expenses

- Acquisition of land or buildings

- Awnings or canopies; may stipulate conditions, such as “may not be backlit”
- Building permit fees and related costs
- Burglar bars
- Decks, patios, or courtyards (unless used as a primary entrance)
- Driveways, parking areas, or access routes to these
- Installation of stucco or Exterior Insulation Finishing System (EIFS, aka “synthetic stucco”) over existing materials
- General maintenance items or deferred maintenance
- HVAC improvements
- Interior building improvements
- Inventory, furniture, equipment, moving expenses, or working capital
- Mechanical equipment enclosures
- New construction
- Outbuildings, garages, and storage sheds
- Personal property/equipment
- Pest control treatments
- Project costs incurred or improvements made prior to grant approval
- Purchase of a business
- Removable items, such as furniture
- Resurfacing of parking lots
- Roofs
- Routine building or site maintenance projects
- Security or alarm systems
- Signs (permanent and/or temporary)
- Site improvements, such as sidewalks or vegetation
- Structural foundation improvements
- Synthetic or aluminum siding
- Temporary improvements
- Upper-story additions to existing buildings
- Window/door treatments (interior)
- Work that is not performed by a licensed contractor or subcontractor
- Work that is being covered by an insurance claim

12. Administration and Oversight

Examples of the organizations or individuals typically responsible for these programs include:

- City Planning Department

- City Economic Development Department
- City Historic Preservation Office (most often in an advisory/design review capacity)
- Economic Development Corporation
- Texas Main Street Design Committee (if a Main Street program)

FAÇADE GRANT PLUS DESIGN SERVICES

Both the Texas Main Street Program and the City of San Antonio's former Operation Facelift program combined financial incentives with free design consulting and/or services for façade improvements. Operation Facelift, which was HUD/CDBG-funded, has been discontinued; the City of San Antonio is now focusing on affordable housing. The program was intended to:

- Reverse the deterioration of commercial structures
- Promote consistency in design
- Create aesthetically pleasing environments while assisting property owners with the appropriate exterior rehabilitation of their buildings and bring them up to City Code

The applicant was required to work with a City-selected design professional and the City's pre-selected list of contractors. The City selected architects and contractors based on lowest bid/most comprehensive responses to an RFQ. The resulting contract for the architect was for two fiscal years, up to 12 designs per year, and paid per design. The City provided conceptual designs only (not architectural renderings) to reduce their liability. The City also provided the applicant with three bids, per the scope of work, from pre-selected contractors. The City-selected contractor then did the work and was paid by the program.

Texas Main Street Program

Optional, rather than mandatory, design assistance is offered by the Texas Main Street Design Center to building owners in Main Street communities, including Corpus Christi. This can include:

- Conceptual renderings to show what a façade might look like, once improved
- Preservation assistance to identify historic materials, areas of the building that need attention, and historically sensitive design options
- Consultation on color choices, based on the design of the historic building and proposed business use
- Sign design

ACTION ITEMS

54. Determine the goals and focus area for a new façade improvement program.

55. Review and evaluate options with Development Services staff and Downtown Management District.

56. Develop a proposal (including economic analysis for specific incentives, value, and duration m) for consideration by City staff.

57. **Engage with the community** through multiple meetings (as appropriate) to explain the goals, proposed responsibilities and benefits associated with each program, and implementation plan/schedule; answer questions and gather feedback. Make revisions as necessary,
58. **Bring proposal to the Landmark Commission, Planning Commission, and City Council for consideration.** This may be an iterative process.
59. After approval, **develop a communications strategy** to make property owners aware of the program and to encourage participation, measure interest and response, etc.
60. **Plan to collect data that is needed for annual reports to City officials.**

RESPONSIBLE PERSONS

Historic Preservation Officer

Downtown Management District Executive Director

RESOURCES REQUIRED

Funding

PRIOR PRESERVATION ACTIVITY REQUIRED

Strategy 2: Update the historic preservation ordinance.

Strategy 6: Improve the City historic preservation website.

Strategy 7: Improve community outreach and standardize the public engagement process.

CASE STUDY: PUEBLO, COLORADO

One example is the Historic Arkansas Riverwalk of Pueblo (HARP) Foundation in Pueblo, Colorado, which secures funding to enhance and enrich the infrastructure of the Riverwalk in that city. The HARP Foundation is a 501(c)(3) charitable foundation, but it is also a part of the Pueblo city government. (Its board of directors are appointed by City Council, County Commissioners, Board of Water Works, Pueblo Conservancy District, Urban Renewal Authority, and HARP Authority.) Established in 1995, its mission is “to accept and disburse funds for the planning, design and construction of the Historic Arkansas Riverwalk of Pueblo.” Its initial \$32 million in funding came from a general public bond election, private donations, grants, Great Outdoors Colorado (GOCO) funding, and corporate donations, and leveraged another \$120 million in public and private investment.



Figure 23. Historic Arkansas Riverwalk in Pueblo, Colorado (Pueblo Riverwalk)

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STRATEGY 16: DEMONSTRATION PROJECTS

Perhaps because so little historic preservation has happened in Corpus Christi over the past 45 years, community members seem to lack confidence in the City's ability or willingness to pursue it. To change that perception, the City should work with the owners of one or two high-profile properties that have the ability to be catalysts for private investment and demonstrate how well the federal and state tax credit programs can work – especially when combined with local financial incentives.

When buildings have been vacant for years, deferred maintenance can create a significant financial gap between the rehabilitation cost and building value. The combined public incentive programs can help narrow that gap.

Probably the highest-profile building in Corpus Christi today is the Ritz Theater, which has been languishing for decades. The Ritz is critical to creating a vibrant entertainment district downtown—not just because it is a historic building but because its revitalization can bring more business, retail trade, and entertainment downtown.

For example, theaters often provide the kind of high-profile project needed to jumpstart downtown revitalization, and public investment in those projects is proven to pay off for the city. A 2019 study provided by the League of Historic American Theaters showed that a single historic theater in a medium-sized city (pop. 250,000–499,000) has the potential to:

- Sustain 155 full-time equivalent jobs
- Create \$4.9 million in event-related spending by the theater operator and its audiences
- Generate \$505,000 in revenue for state and local governments as a result of those expenditures
- Add \$3.3 million in household income to the community as a result of expenditures by the operator and its audiences

In some cases, city governments have stepped in to assist with the revitalization of historic theaters while those buildings were stewarded by nonprofit organizations or have purchased the buildings. However, the City of Corpus Christi need not buy the Ritz Theater, but instead should partner with the owner of the property and invest in the project.

ACTION ITEMS

61. Make a demonstrable commitment to the preservation of a potentially catalytic building in downtown Corpus Christi. For example, the City could commit to paying for a structural assessment of the Ritz.

62. Invest in activities that advance the rehabilitation of properties but are not dependent on specific owners. For example, before a potential developer makes a commitment, the City could earmark funds for a subsidy, making it easier for the developer to decide to move forward. Similarly, the City could pay for a consultant to help the current owner of the Ritz Theater develop a realistic business plan or create a pitch to potential investors showing the total financial incentives (local, state, and federal) that would be available if the building was transferred to a for-profit entity.

RESPONSIBLE PERSONS

Downtown Management District

Historic Preservation Officer

RESOURCES REQUIRED

Support from Development Services Director, City Council

PRIOR PRESERVATION ACTIVITY REQUIRED

Task 2: Make preservation information easy to find on the City website.

Task 4: Develop a standard community outreach process.

Task 5: Update historic preservation ordinance.



CASE STUDY: QUEEN THEATRE, BRYAN, TEXAS

The Queen Theatre was originally built as a hotel in the late 1800s and soon began to screen silent films on the ground floor. After an extensive reconstruction in 1939, the property reopened as a movie theatre. It closed without much fanfare in 1978 and remained shuttered until the Downtown Bryan Association (DBA) purchased the property in 2010. DBA recognized that it needed support from the public to make the project happen; for example, the \$75,000 down payment to purchase the building was raised by accepting private donations no larger than \$1,000 per person. The theatre reopened in 2018 after eight years of persistence and hard work.

The City of Bryan purchased the property during the COVID-19 pandemic, and the theatre has proven that – even during difficult times – a historic space can bring the community together.

The March 2021 reopening was made possible because of strong community partnerships with organizations representing a wide variety of interests (including roller derby). The theatre now screens older movies and is available to rent for private events. The theatre's beautifully restored sign, complete with a crown, attracts residents and visitors to the building, which also houses the city's visitor center and DBA offices.

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APPENDIX A: 50 COMPARISON CITIES WITH NATIONAL REGISTER LISTINGS

Anchorage	New York City
Atlanta	Newark
Austin	Orlando
Baltimore	Pasadena
Boise	Philadelphia
Boston	Phoenix
Buffalo	Pittsburgh
Charlotte	Portland ME
Chicago	Portland OR
Cleveland	Providence
Columbus	Raleigh
Dallas	Salt Lake City
Denver	San Antonio
Des Moines	Seattle
Detroit	Spokane
El Paso	St. Louis
Francisco	Tampa
Ft. Lauderdale	Tucson
Ft. Worth	Tulsa
Honolulu	Virginia Beach
Houston	Washington DC
Jacksonville	Winston-Salem
Lauderdale	
Long Beach	
Los Angeles	
Louisville	
Miami	
Milwaukee	
Minneapolis	

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APPENDIX B: CITIES WITH LOCAL TAX INCENTIVE PROGRAMS

A list of Texas cities, which offer some form of local property tax incentive for historic preservation, is provided below, with a link to the information on that city's website (as of time of publication) where available.

1. Abilene (<https://abilenetx.gov/543/Historic-Preservation>)
2. Austin (<http://www.austintexas.gov/page/incentives-and-grants>)
3. Belton (https://www.beltontexas.gov/departments/planning_department/historic_preservation_commission.php)
4. Brownsville (<https://www.brownsvilletx.gov/1965/Property-Tax-Exemption>)
5. Corsicana (<https://www.cityofcorsicana.com/350/Available-Incentives>)
6. Dallas (https://dallascityhall.com/departments/sustainabledevelopment/historicpreservation/Pages/tax_incentives.aspx)
7. Denton (<https://www.cityofdenton.com/en-us/historic-preservation>)
8. Ennis (<https://ennistx.com/incentives/historic-landmark-tax-exemption>)
9. Fort Worth (<https://historicfortworth.org/resources/tax-incentives-and-education/>)
10. Galveston (<https://www.galvestontx.gov/646/The-Financial-Incentive-Program>)
11. Georgetown (<https://www.wcad.org/wp-content/uploads/2017/12/50-122.pdf>)
12. Glen Rose (no link available)
13. Granbury (<https://www.granbury.org/634/Tax-Exemptions>)
14. Grapevine (no link available)
15. Houston (https://www.houstontx.gov/ecodev/historic_site_tax_exemption.html)
16. Killeen (<https://www.killeentexas.gov/documentcenter/view/307>)
17. Lubbock (<https://ci.lubbock.tx.us/storage/images/CyOOjiU8BR8tiesJFIoLv0vHCAOz9eMaAXBu8Vai.pdf>)
18. Mansfield (<https://www.mansfieldtexas.gov/1167/Historic-Preservation>)
19. Marshall (<https://www.marshalltexas.net/318/Incentive-Programs>)
20. McAllen (https://library.municode.com/tx/mcallen/codes/code_of_ordinances?nodeId=PTIICOORSUGGEOR_CH98TA_ARTIADVATA_DIV3HIPR)
21. Nacogdoches (<https://nedco.org/historic-downtown-property>)
22. New Braunfels (<https://www.nbtexas.org/1091/Benefits-Incentives>)
23. Palestine (<http://cityofpalestinetx.com/departments/development-services/historic-preservation/benefits/>)
24. Paris (<https://www.paristexas.gov/552/Historic-Property-Incentives>)
25. Plano (<https://www.plano.gov/1186/Tax-Exemption-Program>)
26. Rockwall (<http://www.rockwall.com/planning/planningTax.asp>)
27. Round Rock (<https://www.roundrocktexas.gov/departments/>)

- planning-and-development-services/historic-preservation/historic-tax-exemption/)
28. San Angelo (<https://www.downtownsanangelo.com/historic-incentives>)
 29. San Antonio (<https://www.sanantonio.gov/historic/About-Us/WhyPreserve/incentives>)
 30. Seguin (https://www.seguintexas.gov/departments/main_street/historic_preservation.php)
 31. Tyler (<https://www.cityoftyler.org/government/departments/development-services/services/historic-preservation>)
 32. Uvalde (<https://www.mainstreetuvalde.com/incentives-information>)
 33. Waco (<https://www.waco-texas.com/planning-hlpc-information.asp#gsc.tab=0>)
 34. Waxahachie (<https://www.historicwaxahachie.com/new-tax-exemption-incentive-programs-available-for-historic-homeowners/>)

APPENDIX C: CITIES WITH FAÇADE IMPROVEMENT PROGRAMS

Outside Texas

Albany, New York

Athens, Georgia

Baltimore, Maryland

Knoxville, Tennessee

Milwaukee, Wisconsin

Oklahoma City, Oklahoma

Pueblo, Colorado

Raleigh, North Carolina

South Bend, Indiana

Sioux Falls, Idaho

Topeka, Kansas

In Texas

Amarillo

Denison

Laredo

Sherman

Athens, Texas

Denton

Levelland

Taylor

Bastrop

Eagle Pass

Longview

Terrell

Baytown

Elgin

Lufkin

Tyler

Belton

Ennis

Mercedes

Vernon

Bowie

Farmersville

Mission

Victoria

Bridgeport

Ferris

New Braunfels

Waxahachie

Brownsville

Fort Worth

Palestine

Buda

Gainesville

Pilot Point

Caldwell

Georgetown

Pittsburg, Texas

Canton

Gonzales

Rockwall

Childress

Greenville

Rosenberg

Clarendon

Henderson

San Angelo

Cleburne

Hutto

San Antonio

Corpus Christi

Killeen

San Marcos

Cuero

La Porte

Sealy

Del Rio

La Grange

Seguin

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