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Pervasive Preservation: Redefining the Role and Placement of the Preservation Commission in Local Government

by Jeremy C. Wells

The historic preservation commission has a long tradition of helping to protect local historic resources through designation and design review. There are, however, a number of other services that a preservation commission and its staff can offer to internal customers that can potentially benefit all stakeholders and citizens. This article will explore some of these services in relation to how the structural placement of the preservation commission can impede or facilitate this goal. An argument can be made that the historic preservation commission should play a central role in all local government activities rather than being relegated to a small corner of the planning department.

The overall bureaucratic structure of many local governments—how agencies, departments, offices, boards, and commissions are charged with their tasks—has changed little since the early part of the twentieth century. One reason for this situation is that change in bureaucracies, such as local governments, can be difficult because these environments tend to “promote the sufficiency of mediocrity” and encourage a “don’t rock the boat” mentality.¹ City government tends to be organized into groups by primary function or service provided and so, across the country, it is common to have organizational entities that focus on planning, parks, human resources, public works, libraries, and fire safety among other possibilities. The stability of many of these entities has been remarkable over the past seventy-five years. For instance, a survey in 1935 of Pennsylvania local government found that a third-class city’s typical organizational structure consisted of departments of public affairs, accounts and finance, public safety, streets and public improvements, and parks. These entities were politically created and, as is the case today, the heads of these departments and agencies are

political appointees.² Even though the names of some of these departments have changed over the years—streets and public improvements became public works and public safety became planning and zoning, for instance—the overall duties of these departments have remained relatively stable over time.

In the past two decades, however, there has been an effort to consolidate activities across departments in order to reduce duplication and waste and to provide better customer service. Such change has been driven by critics such as Alan Karcher who wrote a scathing critique of New Jersey’s municipal framework that he characterized as being “the opposite of everything [we have] learned about effective management, efficient control [and] economy of scale.”³ In reaction, cities have created interdisciplinary departments and offices with the ostensible charge of working across departments, agencies, and offices toward common goals.⁴ Examples include the “development services” department that combines the functions of planning, permitting, zoning, inspections, and economic development as well

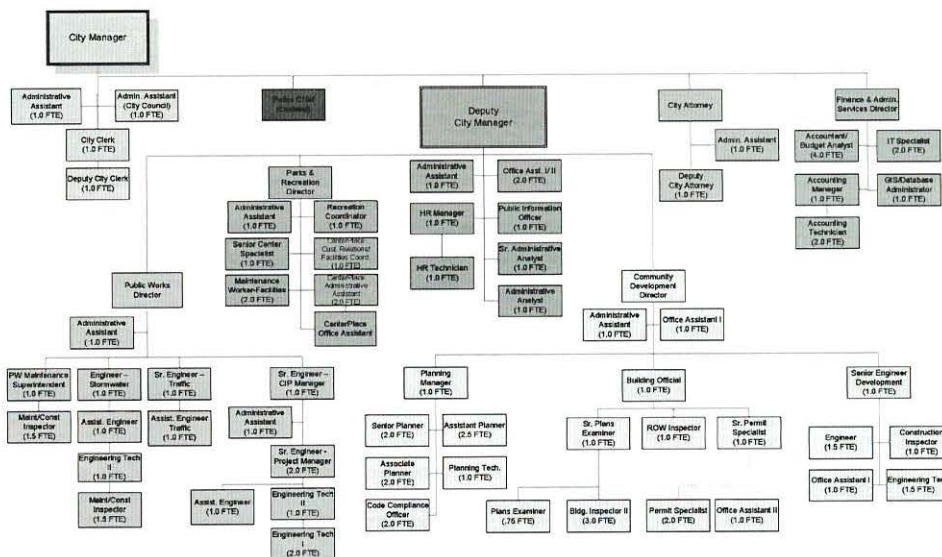


Photo 1: Traditionally, local government structure has been a complex network of departmental entities, often leading to inefficient operation

as sustainability offices created as part of cities' efforts to promote environmental leadership. Examples of these departments and offices can be found in Denver, San Diego, San Antonio, Phoenix, and Dallas among many other cities.

Historic preservation has always been an interdisciplinary activity, bringing disciplines as diverse as architecture, history, and materials science together. In city government, however, the typical home for the preservation commission is the planning department. There is an historical precedent for this placement as early preservation commissions, such as Charleston's in 1931

and New Orleans in 1933, were exclusively focused on designation and design review and as such, found natural alliances with the city agencies involved in planning and permitting. Today there are a few exceptions to this unwritten rule, such as in Milwaukee where the commission is located in the city clerk's office.⁵ As historic preservation diversified in the decades since the establishment of these early commissions, other activities, such as tax credits, arts and tourism, and sustainability are pushing the artificial bounds of the planning department into natural alliances with other city departments and agencies (see table 1 for details).

Preservation commission and staff activity	Closest affinity in city government
Historic resource surveys	Planning department
Designation of structures and districts	Planning department
Design review	Building permitting and inspections department
Tax credit reviews	Economic development department
Environmental (Section 106) review	Building permitting and inspections department
Cultural landscapes	Parks department
Changes to city-owned buildings	Building maintenance and operations department
Sustainability issues	Sustainability and "green" offices and commissions
Culture, arts, tourism	Arts and culture offices and commissions

Table 1: Preservation commission and staff activities and closest departmental affinities

Internal customers

For good reason, much of the focus of the work of a preservation commission and its professional staff is externally driven by the needs of stakeholders and constituents. What is lost in this emphasis, however, is the role that the preservation commission can play in providing internal services within city government. These activities happen to some extent with all commissions, but are rarely formalized much less officially acknowledged. Technically, the core of preservation expertise in city government is the staff that supports its preservation commission and then secondarily with the commission members themselves, yet outside of the home department in which the commission is based, this subject matter expertise may be rarely tapped. Typically, commissions are included at the very last stage of the intervention planning process, a point at which changes can be very difficult and costly to make. There exists, therefore, an opportunity for preservation commissions to provide internal customer service across departments, agencies, and offices within city government. Table 2 summarizes some possibilities.

Preservation commission and staff activity	Department that could benefit
Identification, planning, and treatment of historic resources (including cultural landscapes) within park systems	Parks department
Advisement of economic development incentives related to historic preservation	Economic development department
Preservation and sustainability	Sustainability offices and commissions
Advisement of issues with materials conservation and historic integrity	Building maintenance and operations
Promotion of a municipality's historic resources to citizens and visitors	Parks and culture and arts departments/offices

Table 2: Potential services to internal city clients

For instance, parks departments provide their citizens with recreational opportunities, green space, and often facilitate access to historic resources; they are also charged with maintaining these resources. Examples include the Beaux-Arts structures in Denver's Civic Center Park, the entirety of New York's Olmsted designed Central Park, and the cast-iron fountains in Portland's (OR) Washington Park. Unless there is a design review case that is required by ordinance to be processed, the preservation commission and its staff are usually only tangentially involved in these projects, if at all. One reason for this situation is the artificial separation between departments—the planning department and the parks department are separate entities with different enabling charters, different power structures, and separate levels of accountability. Not only is such collaboration difficult because of these boundaries, but staff who engage in cross-departmental engagement without high-level sanctions from management are putting themselves into difficult situations with little institutional support. Preservation staff could offer advice and assistance with the identification, planning, and treatment of historic resources (including cultural landscapes) within park systems. The preservation commission could be utilized in an advisory capacity where design review is not required by ordinance, and, in situations where design review is required, early collaboration could be beneficial in mitigating adverse effects at a stage where they are less costly to address.

Similar opportunities exist with partnerships between the preservation commission and the economic development department. There is a large body of knowledge on the links between preservation and economic development, including the relationship between “sense of place” and building an economy based on the creative class and restoration.⁶ Preservation staff are knowledgeable about these connections and can provide insightful advice that can inform economic development plans and individual projects. For instance, all development projects that may involve historic resources could benefit from expertise on preservation economic incentives such as federal and state rehabilitation tax credits, tax-abatement programs, and other funding opportunities that will vary from state to state and different municipalities.

A similar potential exists in collaboration with offices of sustainability and “green” operations, where preservation could play a leading role in making cities more sustainable. A leader in this kind of activity is the city of Boulder, Colorado, where historic preservation is being promoted as a way to integrate historic preservation and environmental sustainability across the city.⁷ Citizens receive a unified message from the city that unambiguously links preservation and sustainability; even city staff from other departments can

benefit through learning about how preservation and sustainability are linked and secondarily through becoming aware of the greater range of activities that their municipality's preservation commission conducts.



Photo 2: The historic cast-iron fountains in Portland's (OR) Washington Park are maintained by the city's Parks & Recreation Department

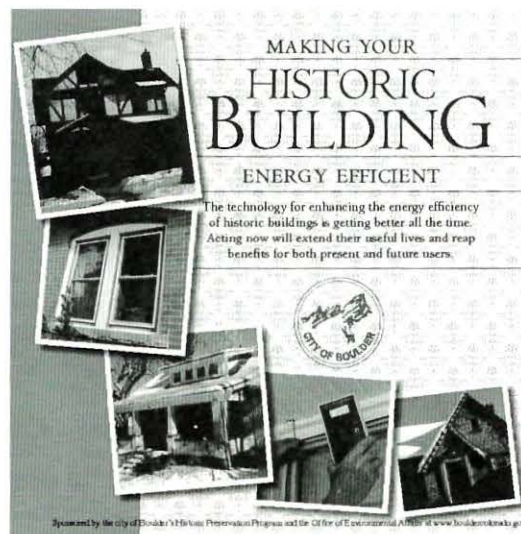


Photo 3: The City of Boulder, CO promotes historic preservation as an environmentally sustainable practice

Even in situations where cities own historic (or older) buildings, preservation staff and commissions could provide expertise and advice on materials conservation and design issues to preserve the historic integrity of buildings and places that are arguably iconic and of great importance to a community. As is often the case, however, the preservation commission and its staff tend to only be involved when there is a regulatory requirement to do so and at a late stage in the planning process. The early involvement of the commission could help facilitate creative solutions to issues with high profile, city owned buildings.

The Future

The future of the preservation commission and its potential in city government brings us back to where we began: the structure of local government. It has long been recognized that departments in government tend to operate as “sovereign entities” that discourage rather than promote collaboration and information sharing.⁸ This overall trend in dissolving traditional barriers among departments is nearly universal among all types of organizations, including private business.⁹ While integrating planning, zoning, permitting, and inspections under the “development services” roof is one way of dealing with this issue, the larger question remains as to locating the best fit for the preservation commission and its staff within local government. If we recognize that planning is only a part of what a commission and its staff performs, the placement of a preservation commission within a planning department may not be the best option; indeed placing the preservation commission within any department may compromise its potential and ability by firewalling it from the rest of the city.

An example of a city that redefined the placement of its preservation commission is Boston. Boston’s Landmarks Commission was created in 1975 in the Boston Redevelopment Authority office, but by the 1990s, had been moved into the Environment Department along with the Boston Conservation Commission, the City Archaeology Program, the Air Pollution Control Commission, and Environmental Review/Impact Assessment.¹⁰ Whether or not this has been more effective than the traditional placement in a planning department has

Lastly, agencies focusing on arts, recreation and tourism would benefit from a partnership with a preservation commission and its staff toward the common goal of promoting the historic buildings, structures, and places in a community. It is surprising how few city’s arts and culture and parks web sites focus on promoting historic assets within their community. This activity could easily expand to partnerships with local preservation advocacy organizations that are often the only entity in a city that promotes these places for the enjoyment of its citizens and visitors.

not been established conclusively—there does not appear to be any studies addressing this unique structure—but it does offer an alternate template that proves that the status quo is not necessarily the only option.

But even Boston’s placement of its preservation commission is within another department and it is likely that any city that places a commission within an existing department will still encounter siloing issues between departments. One option is to organize the preservation commission into its own department or office, which, because of the political and power structures in city government, would help upper-level management to more regularly engage with preservation solutions and issues. A more radical change would be to do away with the concept of departments and instead organize people into teams addressing common issues, an idea that has been discussed within higher education organization, but has yet to be implemented to any significant degree. The concept works around self-directed dynamic teams that are reformed on a regular basis to address different problems and issues as they arise.¹¹

While it would be fallacious to think that a one-size-fits-all ideal structural placement for a preservation commission within local government exists, surely we can begin to question the traditional placement of commissions within planning departments. It is also time to recognize the broader scope of potential roles that the commission and its staff can provide to other departments, agencies, and offices within local government. ■

¹ Marc Holzer, Vache Gabrielyan, and Kaifeng Yang, “Five Great Ideas in American Public Administration,” in *Handbook of Public Administration*, eds. Jack Rabin, W. Bartley Hildreth, Gerald J. Miller (Boca Raton, FL: Taylor & Francis, 2007), 85.

² H. F. Alderfer et al., “Report of the Pennsylvania Local Government Survey,” *Transactions of the American Philosophical Society*, 25 (1935).

³ Alan J. Karcher, *New Jersey’s Multiple Municipal Madness* (New Brunswick, NJ: Rutgers University Press, 1998), 17.

⁴ Two early examples of combining disparate functions of city agencies into a new department were driven by urban renewal in the 1960s. Both the cities of Milwaukee and Boston consolidated their redevelopment authorities and planning commissions into departments of city development; see Mel Scott, *American City Planning Since 1890* (Berkeley, CA: University of California Press, 1971), 570-72.

⁵ In Milwaukee, the historic preservation commission was originally located in the Department of City Development (which includes planning functions), but was moved to the city clerk’s office in reaction to firing threats against the commission staff if they did not alter their reports; see Tom Daykin, “Council Shifts Historic Preservation Staff,” *Journal Sentinel*, July 28, 2009.

⁶ Examples include Donovan D. Rypkema, *The Economics of Historic Preservation: A Community Leader’s Guide* (Washington, DC: National Trust for Historic Preservation, 2008); Richard L. Florida, *The Rise of the Creative Class* (New York: Basic Books, 2002); and Storm Cunningham, *The Restoration Economy: The Greatest New Growth Frontier* (San Francisco: Berrett-Koehler, 2002).

⁷ See http://www.bouldercolorado.gov/index.php?option=com_content&task=view&id=3501&Itemid=490

⁸ Roger L. Kemp, *Forms of Local Government: A Handbook on City, County, and Regional Options* (Jefferson, NC: McFarland, 1999), 222.

⁹ Richard L. Daft, *Management* (Mason, OH: South-Western Cengage Learning, 2010), 260.

¹⁰ Richard C. Collins et al., *America’s Downtowns: Growth, Politics & Preservation* (Washington, DC: Preservation Press, 1991), 48; the Environmental Department is overseen by the Environmental and Energy Services Cabinet, whose mission is to “preserve and enhance the resources of [Boston’s] built and natural environment” (from <http://www.cityofboston.gov/environmentalandenergy/>).

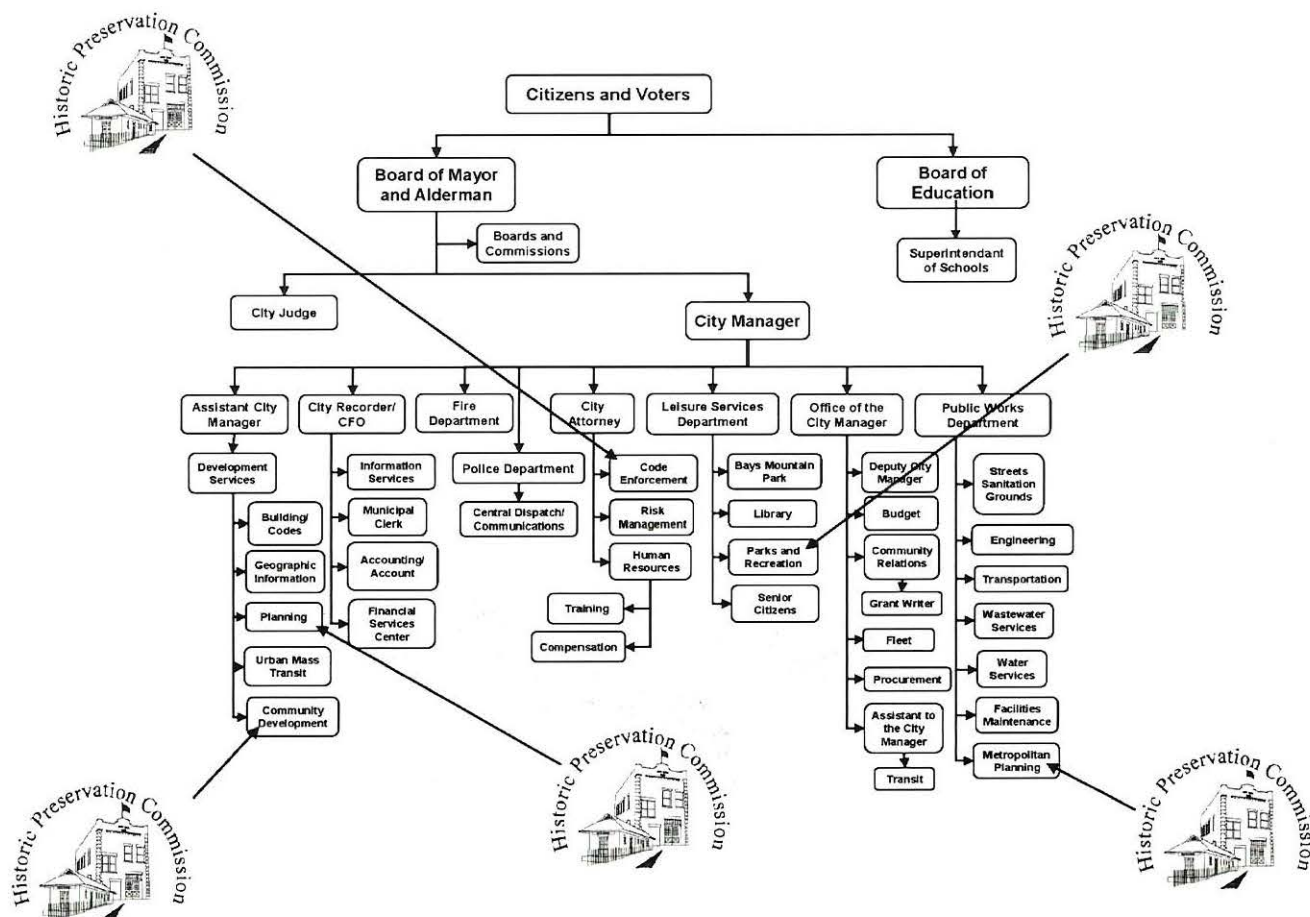
¹¹ Richard L. Daft, *Organizational Theory and Design* (Mason, OH: Thompson/South-western, 2007), 30.

Photo 1/image source: http://www.spokanevalley.org/filestorage/124/938/321/Organizational_Chart.JPG

Photo 2/image source: <http://www.panoramio.com/photo/52849314>

Photo 3/image source: http://www.bouldercolorado.gov/files/PDS/historicpres/HistoricPreservationBrochure_web.pdf

Historic Preservation Commissions and Local Government Structure



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