

# Observations and suggestions for the Legacy CHPP Draft

Madison Alliance for Historic Preservation, 08-19-19

## INTRODUCTION

We feel bad that HPPAC did not see our report in February when we sent it to staff with the request that you see it. We say this because if you had seen it five months ago—before the consultant and staff did substantial additional report drafting—it may have prompted changes to the report’s format and content. Now, in mid-August, our February report must seem like a where-did -this-come from late hit!

We feel bad for three reasons: (1) This is Madison’s first CHPP; (2) Madison deserves and requires a sophisticated historic preservation guidance system for the next 10 years, a state-of-the-art CHPP; and (3) we have one chance to do it right. Indeed, this is why we wrote our report.

All of our observations and suggestions are based upon our report (“The Comprehensive Historic Preservation Plan: An Analysis of Best Practice Qualities”) and upon our research.

## PART I. KEY POINTS OF DEPARTURE

### **1. The RFP requires a comprehensive historic preservation plan**

The RFP dated September 9, 2016 clearly states (page 10) that the consultant is expected to produce the following deliverable: “A creative and forward-looking “*comprehensive* (italics added) Historic Preservation Plan...”” The RFP then goes on to define this product in great detail.

### **2. The unique capstone role of CHPPs**

Among professional preservation consultants the CHPP is widely considered to be the most complicated and sophisticated product of their repertoire. There are four reasons for this. First, they require an in-depth knowledge of national CHPP trends. Second, the CHPP is the only document in the preservationist’s repertoire that is truly comprehensive in scope, and uses every tool in the preservationist’s toolbox and a broad spectrum of strategies, policies, and actions to achieve preservation goals. This is why best practice CHPPs use the term “comprehensive” in their title. Third, the CHPP requires an in-depth understanding of local problems and opportunities and what changes are needed to create an effective master plan. And finally, all of these factors must be artfully stitched together in a clear and compelling report.

### **3. The purpose of a CHPP**

Although CHPP authors use slightly different statements of purpose, all follow a remarkably similar pattern and use many of the same words. Here is our rendition of a best practice statement of purpose:

*The purpose of a CHPP is to provide more effective identification, preservation, protection, interpretation, and promotion of the historic resources that define the city’s distinctive character by organizing diverse historic preservation efforts into a coherent plan.*

## PART II. THE HIERARCHICAL STRUCTURE OF CHPPS

One of the most important decisions that you—HPPAC—must make is how the CHPP should be structured. Appearing below are five decisions that you should consider making to optimize CHPP structure.

## 1. HPPAC should determine what taxonomy should be used for structuring the CHPP.

In our study of best-practice CHPPs we noticed that all used a hierarchical system to sequence master plan recommendations. Further analysis caused us to conclude that the most compelling system was based on a hierarchical system beginning with strategies, then policies, and finally actions. Our definitions of each appear in the right-hand column below. The Legacy definitions appear in the left-hand column.

Legacy system	Alliance system
<p><b>Goal</b> An overarching statement to guide preservation-based decisions</p> <p><b>Objective</b> A more specific statement to guide preservation decisions and policies</p> <p><b>Strategy</b> An action to address the objective</p> <p>[10-2-18 Legacy document]</p>	<p><b>Strategy</b> <i>A cluster of logically-related top-of-the-hierarchy goals whose scope and content comprehensively cover the most important components of historic preservation and whose achievement requires multiple policies and actions, and collaboration among disparate groups.</i></p> <p><b>Policy</b> <i>A logically distinct method to achieve a strategy.</i></p> <p><b>Action</b> <i>A method for achieving a policy that can be measured, prioritized, and calendarized.</i></p>

Additional research showed that several rules should govern the use of strategies:

- A CHPP should be composed of the fewest number of relatively short, clear, optimally discrete, logically-related, and coherently sequenced *statements of strategic direction* that cover all of the territory in today's expanded definition of historic preservation and provide the most effective protection for historic resources.

- Totally independent statements of strategic direction are neither possible nor desirable. In fact, all strategy statements overlap to some degree. The goal is to achieve *minimal* conceptual overlap between statements of strategic direction.

- Each strategic statement should be broken down into clearly-stated policies and actions as defined in the above table.

The Legacy system uses another taxonomy that can work if it is used consistently. That said, we believe our system is better.

## 2. Once the taxonomy issue is settled, HPPAC should determine whether certain rules should govern the sequencing of strategies.

Based upon our analysis, we believe the following sequence possesses great merit:

- Begin with “leadership” because without it no CHPP can succeed.
- Cluster and sequence the *three fundamental functions* of historic preservation:
  - Identifying, evaluating and designating historical resources
  - Preserving and protecting *designated* historical resources
  - Preserving *undesignated* areas with unique architectural, urban and spatial characteristics that enhance the character of the built environment.

- Recognize two essential “support” functions:
  - researching, writing, and publishing of local history
  - historic preservation education and outreach
  
- Recognize the need to end preservation’s all too common “orphan” status in city hall by integrating historic preservation planning into the city’s decision-making and administrative processes.
  
- Remind civic leaders that historic preservation should play a large but often unrecognized role in helping the city achieve economic development, sustainability, and inclusivity goals.
  
- Recognize that metropolitan and even regional policies play significant roles in achieving historic preservation goals.
  
- And, finally, focus on the need to provide preservation with the financial resources and incentive programs it requires.

**3. HPPAC should recognize that CHPP methodology matters and that the different ones used by Legacy and the Alliance to prepare the basic CHPP framework produce very different contents.** This is evident from the table below.

	Legacy	Alliance
Method used to develop content	Primary dependence upon community meetings using sticky notes and chart pads to distill results	Primary dependence upon a framework derived from a study of best practice CHPPs
Content	<p>Lots of good ideas, many in the form of activities such as:</p> <ul style="list-style-type: none"> <li>▪provide an online calendar of historic and cultural related events</li> <li>▪List the top 10 buildings to be preserved</li> </ul> <p>Citizen ideas were then collected, distilled, and prioritized by HPPAC into 6 goals.</p>	10 comprehensive strategies needed to achieve effective historic preservation

**4. HPPAC should decide what CHPP outline—Legacy’s goals or Alliance’s strategies—is best.** The two systems are shown in the table below.

Legacy goals	Alliance strategies
<p><b>1. Promote historic preservation</b></p> <p><b>2. Preserve places that represent architecture, events, and people important to Madison’s history</b></p> <p><b>3. Promote historic preservation as part of economic development</b></p> <p><b>4. Coordinate municipal policies to protect historic resources</b></p> <p><b>5. Engage the community in determining ongoing historic preservation priorities</b></p> <p><b>6. Educate the public about Madison’s history and the value of and benefits of historic preservation</b></p>	<p><b>Strategy 1. Provide spirited historic preservation leadership</b></p> <p><b>Strategy 2. Identify, evaluate, and designate historic resources</b></p> <p><b>Strategy 3. Preserve and protect <i>designated</i> historic resources</b></p> <p><b>Strategy 4. Preserve and protect <i>undesigned</i> areas with unique architectural and contextual qualities that enhance the character of the built environment</b></p> <p><b>Strategy 5. Recognize and encourage researching, writing, and publishing of local history.</b></p> <p><b>Strategy 6. Increase the effectiveness of historic preservation education and outreach</b></p> <p><b>Strategy 7. Integrate historic preservation planning into the decision-making and administrative processes of the city.</b></p> <p><b>Strategy 8. Harness historic preservation to achieve city goals in economic development, land use, tourism, sustainability, and inclusivity</b></p> <p><b>Strategy 9. Address historic preservation needs in a metropolitan context</b></p> <p><b>Strategy 10. Strengthen and promote financial support and incentives for historic preservation</b></p>

These alternative systems pose two questions:

- Which system provides the most comprehensive coverage of the key topics a CHPP requires?
- Which system provides the clearest, most precise categories with the least overlap?

We believe the Legacy goals system suffers from several shortcomings, which we will outline below. However, before we do, we need to explain that in Legacy’s system, goals are the big “overarching” statements; therefore, they should call attention to the most important CHPP recommendations. We do not believe they do this. Remember, we are talking only about “goals” and not “objectives” and “strategies” in Legacy’s system.

Our concerns with Legacy’s goals are as follows:

**A. Legacy’s goals *omit* several important topics (strategies in our system):**

- Provide spirited historic preservation leadership (our Strategy #1)
- Preserve and protect *undesigned* areas with unique architectural and contextual qualities that enhance the character of the built environment. (our Strategy #4)

- Recognize and encourage the importance of researching, writing, and publishing local history (our Strategy #5)
- Address historic preservation needs in a metropolitan context (our Strategy #9)
- Strengthen and promote financial support and incentives for historic preservation (our Strategy #10)

Yes, Legacy mentions some of these topics but only in subordination to other objectives; therefore, they are not as visible and prominent as they should be.

**B. Some of Legacy’s most important goals such as achieving inclusivity are *scattered* among Legacy’s 4 goals, 3 objectives, and 8 strategies.**

We believe that historic preservation should be seen as an effective strategy for solving some of the City’s most challenging problems such as how to achieve inclusivity. The truth is, few city officials understand that historic preservation as *any* role to play, much less a large one in achieving inclusivity. However, when they read the consultant’s “Underrepresented Communities: Historic Resource Survey Report,” they will see that there are dozens of buildings out there that should be considered for designation. And there are steps the City should take that go beyond buildings—all of which should be collected in one place to make historic preservation’s role easier to see and understand.

In our system, inclusivity is a key part of Strategy #8.

**C. Some of Legacy’s goals are too general to be clear and effective.**

For example, the first Legacy goal, “promote historic preservation,” suffers from this problem. We believe that achieving this goal requires all 10 of our proposed strategies.

**5. HPPAC should determine whether and how the two basic structures—Legacy’s goals and our strategies—should be *blended*.**

We believe the best results for Madison will result from blending the many good ideas from Legacy’s bottom-up community engagement process and our top-down best practice CHPP analysis. We believe such a blend will produce a document that is clearer, has less overlap, and is more sequential, and is more comprehensive in scope.

To allow you to better understand whether a blend of both methodologies is a good idea, we have prepared a detailed outline based on an explication of our strategy, policy, and action system. It is entitled “Preliminary CHPP framework proposed by the Alliance for structuring strategies, policies, and actions” and is provided in Appendix 1.

**Part III. MISCELLANEOUS CONCERNS**

- 1. Legacy has never done a CHPP but argues that this is not a problem for two reasons:** (1) no other Wisconsin consultant has done one either; and (2) Legacy can compensate this fact by basing its CHPP content upon extensive community engagement.

We disagree with both reasons. Experience matters. Consultants must be familiar with the structure and rationale of best-practice CHPPs so that they can use them as a template for organizing their CHPP. Also, it is important that Legacy assures the City that the CHPP they are delivering is state-of-the-art.

There can be no doubt that community engagement is an important *component* of a good CHPP and that many good ideas will trickle up from this process, but these good ideas must be supplemented by professional knowledge of *best practice* CHPPs. This knowledge will ensure that Madison is getting its best ideas organized in a clear, logical, and comprehensive framework.

## **SUMMARY**

This document—Madison’s first CHPP—will become a sophisticated guidance system for Madison’s historic preservation program for the next 10 years. Therefore, now is the time to take all reasonable steps to cause this document to the best it can be.

Our group, the Madison Alliance for Historic Preservation, recognizes that finalizing a CHPP is a lot of work and we will be happy to be of further assistance to HPPAC if called upon to do so.