



HERITAGE PRESERVATION COMMISSION AGENDA

PUBLIC MEETING ROOM

WEDNESDAY, DECEMBER 20,
2023

6:00 PM

1. Call to Order
2. Approval of the Minutes of November 15, 2023
3. General Heritage Preservation Items
 - A. Citizen Comment Period
4. Design Reviews
5. Items for Discussion
 - A. Boundary Proposal
 - B. Relevancy Project
6. Adjournment



HERITAGE PRESERVATION COMMISSION MINUTES

PUBLIC MEETING ROOM

WEDNESDAY, NOVEMBER 15,
2023

6:00 PM

Meeting Items

1. Call to Order

Chair Temple called the regular meeting of the Heritage Preservation Commission to order at 6:02 p.m. in the 2nd Floor Library of City Hall. This location was due to scheduling conflicts. Present at the meeting were Cori Weems, David Sauer, Ron Dwyer, Colton Hogan and Chair Sam Temple. Also present at the meeting were Mathias Hughey, Community Development Coordinator, Kari Casper, Administrative Assistant II and Joe Varley.

2. Approval of the Minutes

Motion by Cori Weems, seconded by Coltan Hogan to Approve. Motion Passed.

3. General Heritage Preservation Items

A. Citizen Comment Period

None.

4. Design Reviews

A. 322 and 324 Central Avenue

Sauer stated that he was a bit taken aback by the writers' inclusion of diversity in the preservation movement of which groups were, as she put it underrepresented and has a need to amplify those underrepresented groups in preservation.

Motion by David Sauer, seconded by Ron Dwyer to Approve. Motion Passed.

B. 216 and 218 Central Avenue Update

The HPC does not approve of the work at 216 & 218 Central Ave. The CoA issued clearly states that the signboards must cover the Concrete Masonry Units (CMU) that were installed and that they must create the appearance of a "square and level façade." They felt that the sign boards appeared to be off-center and out of level. The HPC feels that they should re-install the signboards to make sure they are level, centered, and cover the CMU. They were supposed to have this work done in June and it took them until October to get it done. Temple inquired if there was a possibility of using the new "Administrative Citation". Hughey stated that he would speak with David Wanberg and update the HPC at the next meeting.

5. Items for Discussion

A. Relevancy Project

Sauer mentioned that he was surprised about the author's mention of the relevancy of the underrepresented groups in the preservation movement. He would be interested in hearing examples of what she was referring to. Stated that in today's climate, do people care about historical preservation? Temple added that by telling you about the various underrepresented groups, maybe that's a way to get people to care.

B. Commissioner Appointments

Both Commissioners, Cori Weems and Ron Dwyer, whose terms are up have submitted applications for renewal.

C. CLG Annual Report

Hughey prepared the reports for the last two years. The board appreciated looking back at the work that has been done in the past.

6. Adjournment

Motion by Coltan Hogan, seconded by David Sauer to adjourn at 7:08 p.m. Motion Passed.

By: _____
Kari Casper, Recording Secretary



Request for Action

TO: Faribault Heritage Preservation Commission
FROM: Mathias Hughey, Community Development Coordinator
THROUGH: David Wanberg, Director of Community and Economic Development
MEETING DATE: December 20, 2023
SUBJECT: Boundary Proposal

BACKGROUND:

The HPC should prepare a recommendation to resolve the discussion about the local Heritage Preservation District and National Historic Register District boundaries.

In 2022, the National Historic Register District (NHRD) expanded, concluding a process that started almost a decade earlier. Please note a National Historic Register (NHR) designation does not provide protection of historic buildings, as owners may alter, demolish, remodel, or otherwise change their building any way they see fit with the only consequence of potential removal of the NHR designation. Local governments through Heritage Preservation Commissions (HPC) and Heritage Preservation Districts (HPD) are empowered to protect historic structures from demolition or inappropriate alterations.

14 buildings are included in the expanded NHRD but not within the local Heritage Preservation District (HPD). An additional five buildings that are historic and adjacent to the HPD may be suitable for incorporation into the local district.

The HPC's proposed work plan for 2023 included an examination of the boundaries of the HPD. City Council asked several questions that must be addressed in the final district boundary proposal, in addition to targeted engagement with affected property owners.

The first question seeks clarification on why certain buildings that appear significant are not included in the NHRD or the HPD. These buildings could be incorporated into the HPD, and were excluded from the NHR nomination based on SHPO feedback for the following reasons:

28 4th St NE (10,000 Drops) – The NHRD is a commercial district and 28 4th St NE historically served industrial uses. The building was left out of the National District for historical, thematic continuity.

303 1st Ave NE, 112 3rd St NE, 311 Heritage Pl – These buildings include the Rock Island Depot and Depot Square buildings. The Rock Island Depot and Depot Square buildings were left out of the nomination to simplify the geometric boundaries of the district. One building owner indicated they were interested in being included in the HPD.

The City Council's second question is whether the southern boundary of the HPD should be redrawn to match the NHRD, thereby eliminating protection for several commercial and residential properties. The city does not have design guidelines for historic residential properties or a historic residential district. Cities may designate historic residential districts and develop appropriate guidelines for the buildings in those districts separately from commercial districts.

One historic property owner in the HPD responded via phone indicating they were happy to be included in the HPD and took great pride in their historic home. Some building owners find the protection offered by a local designation a compelling reason to invest in building restoration. Faribault is home to many historic homes, both listed and unlisted, with some concentrated in older areas of town and others scattered across the city. The value of and approach to creating residential historic districts should be evaluated as a separate matter.

The NHRD does not include the historic Alexander Faribault House or the Ivan Whitlock Studio building. These buildings would no longer be protected and redevelopment would not be guided by HPD guidelines. Currently, these blocks along 1st Ave NE do not retain their historical character, making the two remaining historic structures outliers, and the street character significantly different from that of Central Ave.

City Council's third question is how affected building owners may respond to removal or inclusion in the HPD. The Community Development Coordinator conducted community outreach and engagement by sending two letters to affected property owners inviting them to participate in an online survey or to reach out in person, through email, or via phone to discuss a potential adjustment of HPD boundaries. Of the 18 affected property owners, three responded to the letters; two by the online survey and one through a phone call.

One owner expressed indifference to inclusion in the HPD. The other two respondents are strongly interested in being included in the local district. One single-family building owner indicated they would prefer to stay in the

HPD.

Options to resolve the matter of adjusting the southern district boundaries include:

1. No change to the boundary line. This option will subject many non-contributing structures to additional scrutiny when applying for building permits, but will not prevent the development of multiple new structures.
2. Adjust to remove buildings with no frontage along Central Ave or all buildings not used for commercial purposes. This option allows guideline application to maintain a cohesive commercial strip along Central Ave and 1st St NE.
3. Align HPD boundary with NHRD boundary. This option removes the 000 block of Central Ave, several historic homes, the Ivan Whitlock Studio, and the Alexander Faribault House Museum.

The options to resolve the northern and eastern boundary include:

1. Loop in only the buildings within the expanded NHRD that have not been demolished.
2. Loop in the buildings included in the expanded NHRD, including the 10,000 Drops building, Depot Square block, and Rock Island Depot building.

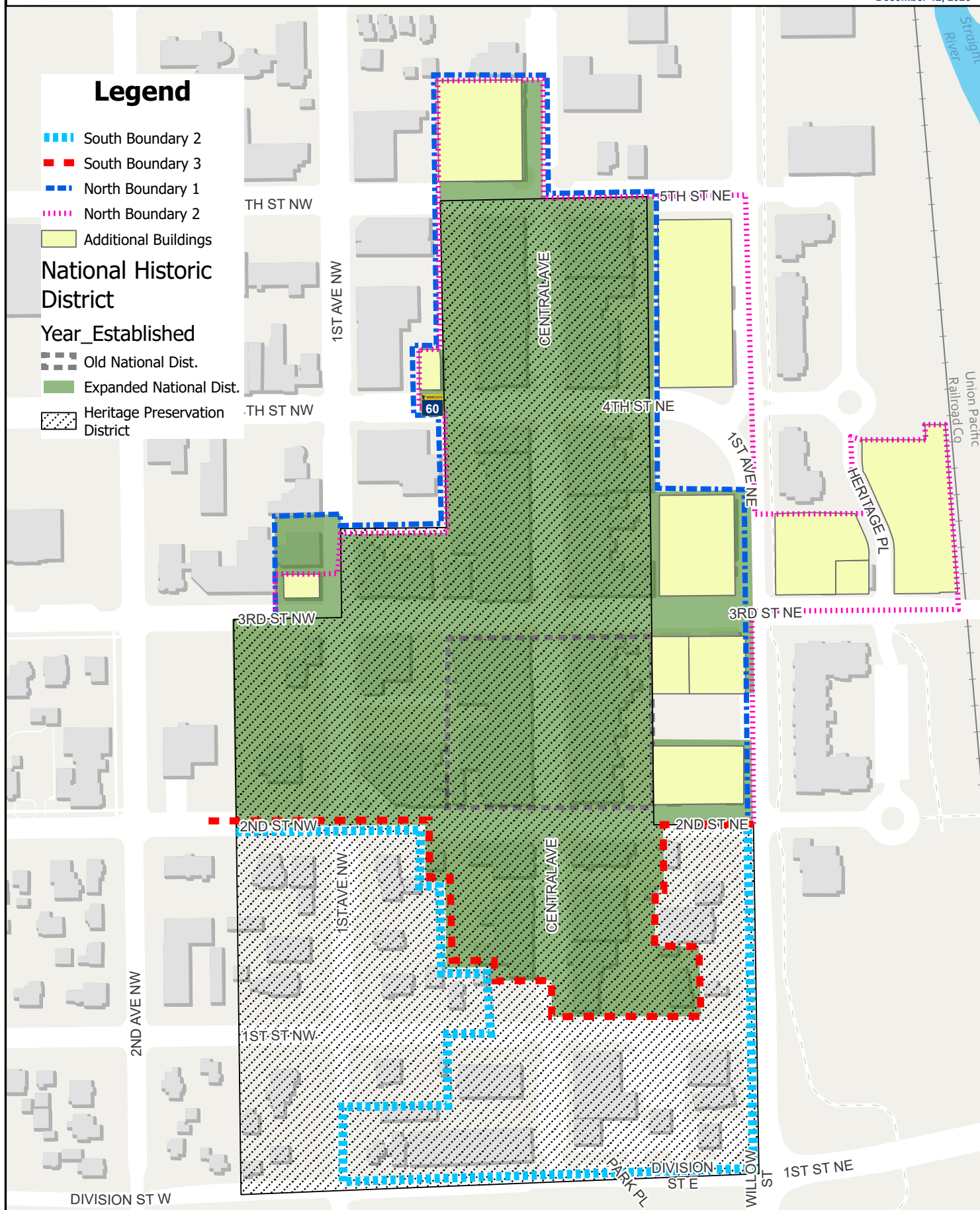
The Unified Development Ordinance establishes the HPD and details the process of requesting local historical designation. Historic designation follows a similar process to adopting a zoning amendment, including the HPC making a series of findings to justify inclusion. After HPC, the Planning Commission reviews the request and makes a recommendation to the City Council, which has final authority.

REQUESTED ACTION:

The HPC should discuss the options presented and prepare a recommendation to complete the discussion about the local Heritage Preservation District and National Historic Register District boundaries. The Commission should hold a voice vote on preferred boundaries, and clarify their stated reasons for any proposed changes.

ATTACHMENTS:

1. Historic District Boundaries





Request for Action

TO: Faribault Heritage Preservation Commission
FROM: Mathias Hughey
THROUGH: David Wanberg, Director of Community and Economic Development
MEETING DATE: December 20, 2023
SUBJECT: Relevancy Project

BACKGROUND:

Continuing the discussion begun in November, this month, the essay titled "The Culture of Preciousness" is attached. The essay is short and contains questions for discussion at the end.

As a reminder, Bonnie McDonald, President and CEO of statewide nonprofit Landmarks Illinois and immediate past Board Chair of the National Preservation Partners Network was the keynote speaker at this year's Preserve MN conference on Historic Preservation. Her 24-year preservation career includes working for national and state preservation nonprofits, lobbying coalitions, state and local governments, historical societies, and house museums.

Beginning in 2022, Bonnie began a series of essays titled The Relevancy Project that sought to "make visible the problems [she sees] in preservation" with the intent to "join with others to do something about them." After more than 40 years of Heritage Preservation in the Faribault, the city faces many challenges with its historic properties including neglect, deterioration, and demolition. Despite this, Faribault prides itself on its historic properties and downtown commercial district.

REQUESTED ACTION:

Commissioners should read the attached essay, reflect on the included questions, and bring any thoughts for discussion to the meeting.

ATTACHMENTS:

1. The Culture of Preciousness

THE CULTURE OF PRECIOUSNESS



The Frank Lloyd Wright-designed Frederick Bagley House in Hinsdale, Illinois was put on the market by private sale in July 2021 leading preservationists to believe it was being marketed as a teardown. A couple from out-of-state learned about the sale at the 11th hour and purchased the home intent on its preservation. They sought National Register listing, which would make them eligible for Illinois' historic homeowner property tax assessment freeze program. However, the State Historic Preservation Office suggested that the home can't be nominated to the National Register for Historic Places for architectural significance until the replacement aluminum siding is removed that covers the original wood shakes underneath. Photo courtesy of Jean Follett.

JULY 7, 2022

BY BONNIE MCDONALD, PRESIDENT & CEO, LANDMARKS ILLINOIS

A NOTE ABOUT THIS AND FUTURE BLOG POSTS

Blog post topics from here on forward begin to explore, question and challenge longstanding preservation philosophy, pedagogy and practice. Some may find the assertions difficult, irresponsible or even dangerous to the preservation field. Others will be encouraged that these criticisms are getting continued daylight and discussion. All of the ideas you read in this and future blog posts are an aggregate of points raised by The Relevancy Project interviewees. These assertions do not reflect the beliefs and opinions of all interviewees and not everyone will agree with the concerns and conflicts being raised. The project's purpose is to continue to foster inclusive dialogue about our challenges and opportunities in order to help develop solutions that will make preservation relevant to more people.

IT STARTED WITH SOME WINDOWS...

I remember the first time that I felt disappointment and disbelief about preservation practice. The subject of this rising doubt was a long vacant, deteriorating historic building that, because of its original form, had limited reuse options. Many preservationists spent years trying to attract a new user. One finally came along proposing housing units, but that use required installing windows into a windowless brick wall.¹ These windows were necessary for the building's reuse and to comply with building code. The regulatory reviewer determined that the proposed openings didn't meet the Secretary of Interior Standards for Rehabilitation and prevented the project qualifying for Federal Historic Tax Credits. The developer walked away. I too walked away, asking if a windowless wall was worth more than saving the building and providing homes. The reviewer was just doing their job and following the regulatory framework and their training.² But, didn't we all become preservationists to save places? Are we missing the forest for the trees?

Herein lies one systemic issue inhibiting preservation's relevance: using integrity as a gatekeeper to designation and incentives puts too much weight on the materiality of significance. If you consider yourself part of the "we" in these blog posts, namely preservation professionals, then you learned that the integrity criterion measures how much original material remains to tell the story of the place's significance. Our practice assesses when these changes cross what is essentially a subjective line of when a property does, or does not, convey its significance – that is, if a person can, or cannot, understand why a place is historic.³ Inevitably, places change over time, whether actively or passively. Someone could argue that these changes were preservation by investing in the building's material and long-term usability. To that building owner, it could seem counterintuitive that by maintaining or improving the building, it has been ruined for designation purposes. This might seem like an oversimplification, but it is essentially the message that we are delivering. And, when we use the term "integrity" to explain this, it can be offensive to hear your property doesn't have enough to make the cut. It becomes one of the number of narratives used to label preservationists as out of touch with reality, "hysterical preservationists," who are always saying "no" to change. Public opinions matter as they are shared with others, including elected officials and the media.

Our regulations are designed to protect historic material rather than prioritize the needs of people living in and using these places today. We don't expect people to live and work in museum-like settings, so why mandate that places arrive relatively untouched in order to receive protection? According to the National Register for Historic Places criteria for listing, "historic places either retain integrity (that is, convey their significance) or they do not."⁴ We leave ourselves no middle ground. This focus on a subjective, yet rigid definition of material integrity turns historic places from things that are venerated

¹ For those wanting additional detail, this was what would be labeled a "secondary façade." The windowless wall was designed as such because of its original industrial function. Those labels should have their own discussion

² I do want to raise how the reviewer responded to my and others' disbelief, as have regulatory reviewers in other states and at the National Park Service level in other similar scenarios that I heard about in these interviews. Reviewers point to the fact that building owners are not forced to use the Federal Historic Rehabilitation Tax Credit. The credit exists to incent completing a project that complies with the standards, which were codified in 1977 to establish federal preservation practices. Building owners can pursue projects that don't comply with the standards, but without the Federal Historic Rehabilitation Tax Credit as a financial tool.

³ "The evaluation of integrity is sometimes a subjective judgement, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance." United States Department of the Interior, National Park Service, Cultural Resources. "[National Register Bulletin: How to Apply the National Register Criteria for Evaluation](#)." 1997. 44.

⁴ Ibid., 44.

for the stories they can tell into things that are precious. This “culture of preciousness” elevates historic material as the deciding factor for what gets saved, and what doesn’t.

“We assume the material is telling the story. That’s not the case.”

- Relevancy Project interviewee
January 15, 2021, New York

ISN’T PRESERVATION’S PURPOSE TO SAVE MATERIAL CULTURE?

Preservationists preserve historic places, which are largely material.⁵ But why do we do this? Our field originated to preserve history, heritage, and architecture and has evolved to preserve culture, lifeways, identity, memory and story through place. One only need look back at “[With Heritage So Rich](#),” the 1966 report of the U.S. Conference of Mayors Special Committee on Historic Preservation that created our current preservation regulatory framework, to see that material culture was not our primary mission:

“If the preservation movement is to be successful, it must go beyond saving bricks and mortar. It must go beyond saving occasional historic houses and opening museums. It must be more than a cult of antiquarians. It must do more than revere a few precious national shrines. It must attempt to give a sense of orientation to our society, using structures and objects of the past to establish values of time and place... In sum, if we wish to have a future with greater meaning, we must concern ourselves not only with the historic highlights, but we must be concerned with the total heritage of the nation and all that is worth preserving from our past as a living part of the present.”

– With Heritage So Rich, 1966⁶

The culture of preciousness values integrity over significance, which flies in the face of this framing document that was written nearly sixty years ago. If we are truly about saving places and their stories, significance must be considered independent of integrity. That is, the stories that took place in a building and about its design or construction, are present even if original materials and details are compromised. If our charge is to preserve “the total heritage of the nation”, then significance must be inclusive of all people who are, and have been, on this land. For places to be “a living part of the present,” then adherence to a strict integrity standard, as it is currently interpreted, is incongruous. For a place to be “living” it must evolve to meet present needs. Material changes that happen over time are a part of the story. The presence of changes that reflect a building’s evolution should not prevent its historic designation; in fact, they enrich the building’s story.

**“The value of a community is not based on the material of the buildings or places they lived.
Don’t value the materials over the history of that place.”**

- Relevancy Project interviewee
September 11, 2020, Virginia

⁵ For the purposes of this discussion, I am referring to our designed and built environment while recognizing that we also work to preserve intangible culture and heritage, natural and sacred landscapes and resources below ground level.

⁶ United States Conference of Mayors Special Committee on Historic Preservation. “[With Heritage So Rich](#).” Originally published by Random House, New York, 1966, reprinted by the National Trust for Historic Preservation, 1999. 193-194.

The culture of preciousness also perpetuates a lack of inclusion and equity in preservation. Properties that do not meet the integrity standard are not designated and are ineligible for incentives like historic preservation tax credits. We also know that low-income homeowners can be negatively impacted by the requirements for like-designed replacement materials for locally designated properties if the guidelines are inflexible or omit claims of economic hardship. The Harvard Joint Center for Housing Studies tabulated results from the Department of Housing and Urban Development's 2019 American Housing Survey. Amongst their findings are that repairs and improvements made by low-income homeowners represent three times as much of their income as higher-income homeowners.⁷ Preservationists must work together with homeowners to ensure affordable building operations, maintenance and hazardous material remediation.⁸ For property owners that are under-resourced, local designation should be accompanied by more flexible replacement guidelines, free or affordable financing for maintenance and improvements and accessible information about the permitting process and other resources. Preservation will continue to be irrelevant, or a threat, to under-resourced property owners and renters if they are not engaged in the designation process, if the designation increases maintenance costs or triggers code enforcement without any accessible financial incentives, or if the designation brings no tools to prevent gentrification and displacement.

"When we get so precious, we lose a connection."

- Relevancy Project interviewee
November 14, 2019, Washington

To be seen as relevant, preservation has to move beyond the culture of preciousness to put greater priority on the people interacting with historic places today and tomorrow.

Your thoughts on this and forthcoming topics are not only welcomed, they're imperative to ensuring this project is inclusive, with well-considered outcomes. So post away on Landmarks Illinois' [Facebook](#) and [Twitter](#) feeds and my [LinkedIn](#) page (blog comments are not enabled)! I'll collect and consider your comments to inform future blog posts and the project's outcomes published in the forthcoming Relevancy Guidebook to the U.S. Preservation Movement (working title).

DISCUSSION QUESTIONS

1. How would you characterize preservation's culture? What aspects of the work are prioritized and should they be?
2. Do you believe that historic places are treated as precious? Is the way that we assess, review and preserve historic places appropriate? How would you do this work differently?
3. What is gained and what is lost by the culture of preciousness?
4. How could the preservation designation process work differently?
5. Could preservation practice remain legally defensible without a strict integrity criteria?

⁷ Wedeen, Sophia. "[Home Repairs and Updates Pose Considerable Burdens for Lower-Income Homeowners.](#)" Harvard Joint Center for Housing Studies, June 16, 2022.

⁸ Two homeowner assistance programs in Illinois are worth noting. The statewide [Historic Residence Assessment Freeze](#) program helps defray increased tax assessments for after homeowners make property improvements for a 12-year period. In Chicago, Landmarks Illinois also supported successful pilot legislation allowing [accessory dwelling units](#) as a way to generate income and increase affordable housing availability without demolition.

6. Can there be a more nuanced approach that still preserves historic places and tells their stories while also ensuring today's user has an affordable, accessible, safe, comfortable place that reflects their own identity and culture?
7. If we shifted our focus to people living in a place today, how would preservation be different?

HERE ARE SEVERAL IDEAS RAISED BY INTERVIEWEES FOR TACKLING THIS ISSUE

- Follow the work of [Beyond Integrity](#), a coalition of advocates in Seattle and King County, Washington, looking for more equitable preservation practices.
- Reevaluate the assessment measurements for the integrity criteria using a justice-based design framework such as the [Just City Index](#), designed by the Harvard University Graduate School of Design.
- Consider a sliding integrity scale, especially for properties listed under National Register of Historic Places Criteria A and B.
- Study heritage conservation designation criteria across the globe to identify and assess other methods.
 - Consult the 1994 International Council on Monuments and Sites (ICOMOS) Nara Document on Authenticity. The document affirms, "All judgements about values attributed to cultural properties as well as the credibility of related information sources may differ from culture to culture, and even within the same culture. It is thus not possible to base judgements of values and authenticity within fixed criteria. On the contrary, the respect due to all cultures requires that heritage properties must be considered and judged within the cultural contexts in which they belong."⁹
 - The [Canada Register of Historic Places](#) designation process requires that a [Commemorative Integrity Statement](#) (CIS) be completed as part of the nomination process. The CIS helps to establish one of the nation's listing criterion, which is that the resource and its respective associated values are "respected." This criterion appears to provide awareness around the need for flexibility on the issue of integrity for properties not in good condition. "In the case of resources not in good condition, respect means efforts to enhance the condition of the resources and associated values are based on the historic values of the resources. This outcome places attention on the state of the resource itself."¹⁰ Canada also includes in its "[Standards and Guidelines for the Conservation of Historic Sites in Canada](#)," a conservation decision-making process that includes developing an understanding of the site that includes its "evolution over time," "past and current importance to its community," "traditional practices associated with the historic places" and "the interrelationship between the historic place, its environment and its communities should also be considered."¹¹ This dedication to looking at the place could be a relevant model.
 - Patrice Frey in her February 8, 2019 Bloomberg CityLab article, "Why Historic Preservation Needs a New Approach," referenced [Historic England's gradient designation system](#) as an example.

⁹ International Council on Monuments and Sites. "[The Nara Document on Authenticity](#)." Nara, Japan, 1994. 47.

¹⁰ The National Parks and National Historic Sites of Canada. "[Guide to the Preparation of Commemorative Integrity Statements](#)." February 2002. 14.

¹¹ Canada's Historic Places. "[Standards and Guidelines for the Conservation of Historic Places in Canada](#)." Her Majesty the Queen in Right of Canada, 2010. 3.