## Dear Mayor Adler and City Council,

At a recent multi-neighborhood meeting on the LDC held in Hyde Park, I asked Mayor Adler to look into the Preservation Incentive he told the assembled crowd was included in the new code as a benefit to central city neighborhoods that would protect their historic character. I told him I had heard it was just a repeat of the current "remodel" provision in the code that requires builders to retain a percentage of the existing walls to quality for a remodel permit rather than pay a higher permit fee on new construction. The Mayor asked for my contact info, which I gave him, and said he would investigate and get back to me. He has not done so to date.

So, onerous as it was, I dug into the sections of the new LDC that reference the so-called preservation incentive and found that it offers an even greater incentive for developers to actually \*target\* historic buildings for redevelopment, more so than if they built on a vacant lot, because they get an extra housing unit on the site if they agree to "preserve" at least 50% of the exterior walls on the existing building.

OK, I said to myself, but does preservation mean the same thing as presented in the new code as it does to professionals who study and work in preservation as their career? Such fields include restoration architecture, architectural history, history, cultural geography, landscape architecture, and archaeology, to name a few. Or to the National Park Service which administers and qualifies historic properties and districts for listing in the National Register of Historic Places? As a professional historic preservation consultant myself – historian and architectural historian - with a 34-year career, I wondered if the city's interpretation was the same or similar to my own.

Reading the new code further, it appears that builders or developers only have to "preserve" 50% of the wall outline, including 50% of the studs, and the floor and top plates, but it doesn't address which walls or wall sections, so it could be the rear wall or parts of walls, not necessarily the primary, street-facing façade, which is the almost always the most important wall in terms of preserving the historic character and appearance of a building. The preservation incentive doesn't preserve height or size, so a one-story bungalow may be remodeled into a 2-3 story – or more - dwelling and still qualify for the incentive.

Neither does the "preservation" incentive apply to the roof - the ridgeline, form or pitch - which are important character-defining features of historic buildings. So, a historic gabled or hipped-roof house can be remodeled with a flat roof, or with steeply pitched jagged, trapezoidal-shaped roof like so many of new houses being built as infill in our historic neighborhoods.

Legendary preservation guru, Virginia McAlester, defines them as "21st Century Modern" and "21st Century Modern: Decoupage," the latter being a house that has multiple siding types covering the walls in combinations of glass, metal, cement stucco, stone and wood – very modern, very un-preservation.

Almost inconceivably, the incentive doesn't require the preservation of any "exterior finishes" such as siding, character-defining

architectural details such as "gingerbread" on Victorian houses or classical columns on Classical Revival style homes. It doesn't apply to doors, windows, or window patterns, porches or significant porch features such as decorative turned posts on Victorian houses or tapered wood posts on piers found on Craftsman bungalows. The "preservation" incentive doesn't protect or preserve any of the elements most people, professionals and laymen, associate with historic buildings and architecture.

So, you might ask, as I did, what does the preservation incentive actually preserve? From my reading of the new code as a 34-year professional historic preservation planner and consultant, the answer is "Nothing." Nothing of any real value or meaning in terms of the preservation of historic buildings – it doesn't preserve their design, materials, decorative details, or character-defining features.

From my reading, the "Preservation Incentive " in the new code seems more of a ploy intended to lull us into believing the city has thrown a lifeline to its historic central city neighborhoods when, in fact, it is intended to encourage developers to target existing homes for redevelopment instead of vacant lots because they don't actually have to preserve anything to get an additional unit on the site – a bonus they wouldn't receive if they built new construction on a vacant lot. In fact, the so-called "preservation incentive" is an incentive to demolish historic houses and replace them with new construction, albeit by retaining a few studs from the original dwelling.

As I said at a special called meeting of our neighborhood association. This is not preservation, it is facade-omy.