



## CITY OF ST. AUGUSTINE HISTORIC PRESERVATION MASTER PLAN: HISTORIC PRESERVATION STRATEGY RECOMMENDATIONS

Planning and Building Department  
75 King Street  
St. Augustine, FL 32084  
(904)825-1065

# What is a Preservation Plan?

“...a proactive means of planning for the preservation and protection of a community’s character and historic resources. The preservation plan can be organized to identify goals, a definition of the historic character, summary of past preservation efforts, survey of historic resources, explanation of the legal basis, discuss the relationship between historic preservation and other land-use and growth management authority, explanation of public sector responsibilities, discussion of incentives, summary of the relationship between historic preservation and local education programs, and an agenda for future action. A preservation plan will vary depending on the community’s stage of development, the size, the number of historic resources, awareness of local historic resources, and existing protection and incentives for the preservation of historic resources. No two preservation plans are the same. Just as a preservation ordinance evolves in response to particular local conditions and needs, so too must a preservation plan be a unique document that responds to the goals of a particular community. These preservation plans are used as the basis for the community’s preservation program and may be adopted as an element of the community’s comprehensive plan.”

*(excerpted from “Preparing a Historic Preservation Plan,” Bradford J. White and Richard J. Roddewig)*

# What have we accomplished?

There have been 11 public meetings and workshops beginning in March 2015 to gather community input and generate discussion on the preservation planning process. During one workshop, an expert speaker from the National Alliance of Preservation Commissions provided examples of historic preservation plans from across the country to help us understand the inherent components of a preservation plan. Additionally, a public survey was conducted that resulted in 475 respondents participating. Leading the process now is a combined effort between city staff and project consultant Preservation Design Partnership. The consultant listened to the public discussions to generate recommendations for the historic preservation master plan. Based on the information gathered about historic preservation plans, public input, staff and consultant expertise, draft sections of the plan have been developed.

# What is the next step?

The consultant has drafted portions of the preservation plan. The essential component of the plan is the *Strategies and Recommendations* section which is attached for your review. As a reference, the *Table of Contents* is provided to identify all of the elements of the preservation plan. During the April 20<sup>th</sup> HARB meeting the consultant will lead a discussion and comment session on the historic preservation plan focusing on the *Strategies and Recommendations*. Recommendations that require administrative and legislative action such as policy modifications and budget appropriations will still require future action for implementation. The *Strategies and Recommendations* is intended to be a guide for this future action by identifying ways to improve the historic preservation program of the city as a whole from the local government, private sector, non-profits, and individuals. The Historic Preservation Master Plan, as stated above, is a set of comprehensive goals for the city and will be the basis for the future of St. Augustine’s preservation program.

*Please visit the City’s website and project page to find related documents, meetings, and the public survey. Additionally, the calendar on the City website will be updated with public and community meetings related to the plan:  
[http://www.citystaug.com/government/planning\\_and\\_building/HistoricPreservationMasterPlan.php](http://www.citystaug.com/government/planning_and_building/HistoricPreservationMasterPlan.php)*

City of St. Augustine  
Historic Preservation Plan

## TABLE OF CONTENTS

### ACKNOWLEDGEMENTS

### EXECUTIVE SUMMARY

- Plan Approach
- Current Conditions
- Summary of Plan Goals / Strategies

### INTRODUCTION

- Plan Purpose
- Planning and Development Process
- Preservation Opportunities and Challenges

### HISTORIC CONTEXT / DEVELOPMENT

- Pre-Spanish Settlement
- Early Colonial Periods – Old City (1565-1822)
- Statehood to Boom Time (1822-1926)
- The Depression to World War II
- The Modern Era

### THE CITY TODAY

- Commercial
- Residential
  - Institutional areas
  - Natural environment
  - Community boundaries/edges

## HISTORIC PRESERVATION IN ST. AUGUSTINE

History of Preservation

Identifying Historic Districts and Cultural Resources

Current Regulatory Process

## HISTORIC PRESERVATION STRATEGIES

Overview

**City-Wide Planning**

**Historic Resource Inventory**

**Historic Preservation, Conservation and Zoning**

**Reducing Historic Building Demolition**

**Economic**

**Hazard Mitigation**

**Archaeological Program**

**Education and Advocacy**

- Summary (of correlation between zoning and historic preservation/link between architectural and zoning tools...)

As indicated on the cover page, this section is attached for your review, this table of contents is provided for reference only.

## STRATEGY IMPLEMENTATION MATRIX

List of strategies, Action Steps and Potential Participants

## PRESERVATION RESOURCES & BIBLIOGRAPHY

Publications

Web Sites

Local and State preservation resource contact information

## APPENDIX

Public Comments

**DRAFT 03/31/2017**

**St. Augustine Historic Preservation Strategies**

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# Historic Preservation Strategy Overview

The City of St. Augustine is recognized throughout the United States for its unique confluences of history and culture. Investment in the protection of the City's historic resources began early, in 1834, with "repair and preservation of Ft. St. Marks" – now known as Castillo de San Marcos – utilizing funding from the Florida Legislative Council, and the 1883 formation of the St. Augustine Institute of Science and Historical Society, dedicated to the research and documentation of the City's history, culture and architecture. Since that time, the City has greatly expanded its preservation efforts, including the following designations:

- National Historic Landmark - 1 Historic District and 5 Individually Designated Resources
- National Register - 6 Historic Districts and 36 Individually Designated Resources (including 1 cemetery, 1 bridge and 5 archaeological sites sites)
- Local Historic Preservation Zoning Districts - 5

In addition, nearly 800 archaeological projects have been undertaken, providing insight into the City's early inhabitants. These, and subsequent historic preservation activities, have served to enhance the livability and commercial vitality of the City and contributed to making St. Augustine a travel destination unlike any in the United States.

Despite the historic preservation and archaeological efforts noted above, significant challenges remain in safeguarding the City's historic resources. Moving forward, the City and its preservation advocates will need to work in tandem to enhance historic preservation and archaeology tools to protect the character of the City's neighborhoods while balancing economic growth, tourism and the potential impacts of sea level rise.

This Historic Preservation Plan is organized by sections, each including goals, strategies and recommendations to address critical preservation and archaeological issues. These sections include:

- City-Wide Planning
- Historic Resource Inventory
- Historic Preservation, Conservation and Zoning
- Reducing Historic Building Demolition
- Economic
- Hazard Mitigation
- Archaeological Program
- Education and Advocacy

Implementation of the recommendations will require partnerships between the Historic Architectural Review Board, the City Archaeologist, the Planning and Zoning Board, City Staff and the City Commission and the support of institutions, organizations, advocacy groups and individuals dedicated to the long-term preservation of St. Augustine's historic resources.

This Plan should represent the City's official policies regarding the City's historic preservation and archaeological efforts. It can be used as a workplan to implement programs to meet the desired goals. The historic preservation and archaeological policies and recommendations in city-wide plans, such as Comprehensive Plans and Hazard Mitigation Plans, should incorporate the goals, strategies and recommendations found in this Plan.

## A. CITY-WIDE PLANNING

1. Incorporate Historic Preservation Elements in All Neighborhood, District and City-Wide Planning Initiatives
2. Incorporate Historic Preservation and Archaeology in all City Planning Initiatives

The City of St. Augustine has developed numerous City-wide planning documents that include historic preservation and archaeology goals and strategies, including the identification and preservation of historic buildings and archaeological sites, as well as the preservation and adaptive reuse of buildings. The City should continue to promote preservation and archaeology in all its plans, including hazard mitigation planning, as well as implement initiatives that promote the protection of its historic and cultural resources.

## B. HISTORIC RESOURCE INVENTORY

1. Historic Resource Documentation
2. Utilize Documentation to Prioritize Designations and Resources
3. Utilize Documentation to Identify Endangered Properties, Landscapes and Vistas
4. Increase Access to Documentation
5. Prepare Detailed Documentation of the Most Significant Resources

A clear understanding of the location and significance of historic resources is key to planning for their protection. Many of the City's neighborhoods have been surveyed, but in some cases the available information is outdated and does not include designations identifying the level of significance, nor has it been incorporated into the City's GIS mapping. Accurate survey information can provide the basis for assessing potential Historic Districts or HP Conservation Districts; inform recommendations in proposed planning projects and hazard mitigation plans; and identify properties that are subject to historic preservation review or might take advantage of preservation-based financial incentives.

## C. HISTORIC PRESERVATION, CONSERVATION AND ZONING

1. Correlate Historic Preservation and Zoning Designations and Requirements
2. Consider Form-Based Zoning for National Register Historic Districts
3. Establish Zoning Overlays to Protect Vistas around Historic Resources
4. Balance Extreme Building Elevations and Historic Neighborhood Character
5. Revise HARB Application Review Procedures
6. Revise Architectural Guidelines for Historic Preservation

HARB review should be provided for all designated Landmarks. In addition to HARB review, zoning tools can be utilized to promote the suitability of new construction in all historic City neighborhoods by regulating height, setbacks and building footprints. Also, the historic preservation division of the Zoning Ordinance should be modified to allow greater



flexibility in the design of buildings outside of the historic Colonial city. The administration process for local Historic Districts by HARB should be improved to streamline and increase transparency in the Certificate of Appropriateness review process. Updating the Architectural Guidelines for Historic Preservation can serve to assist HARB, facilitate expansion of Staff review, and allow property owners to make informed decisions when proposing modifications to historic buildings and sites.

#### **D. REDUCING HISTORIC BUILDING DEMOLITION**

1. *Limit Properties that are Eligible for Demolition*
2. *Supplement Financial Hardship Review Process*
3. *Reduce Demolition-by-Neglect*
4. *Limit Replacement Building Size*
5. *Discourage After-the-Fact Demolition Applications*
6. *Clarify Pre-Demolition Documentation Requirements and Review Process*

The desirability of St. Augustine as a place to live and conduct business has resulted in a surge in property values and a consequent increasing number of Certificate of Demolition applications. At the sites of most prior demolitions, the resulting new construction is larger, yielding a higher rate of return for owners, but also adversely affecting historic neighborhood character. Applications for demolition of properties outside of the local and national historic districts can be considered for local Landmark designation through HARB's evaluation of the demolition application. There is a lack of clarity for the property owner to know whether or not their property could be designated as a local landmark. Categories of historic buildings are recommended in the Historic Resource Inventory Strategy section of this plan will make publicly-available the criteria that will be used by the City in reviewing demolition applications. This will identify the probable outcome of a demolition application at any particular property.

#### **E. ECONOMIC**

1. *Integrate Preservation into Commercial Revitalization*
2. *Create Preservation Reinvestment Opportunities*
3. *Promote Preservation Programs and Incentives*
4. *Promote Preservation Programs to Encourage Affordable Housing in Historic Neighborhoods*

The historic character of the City of St. Augustine is a draw for residents, businesses and visitors, and as such, should be considered an important economic driver and opportunity for the future. The City currently has economic-focused preservation programs that benefit its residents, namely the ad valorum program, as well as the Lincolnville Community Redevelopment Area, but programs could be expanded to encourage affordable housing and associated historic preservation activities. Businesses could benefit from improvements that encourage patrons to spend more time, and thus more funds, in the City's shops and restaurants. It also should be recognized that tourists, although providing an economic benefit, also have a negative impact on the City's historic resources

and infrastructure, and the City should explore ways of recouping the associated expenditures.

## **F. HAZARD MITIGATION**

1. *Participate in the Disaster Mitigation Planning Process*
2. *Plan Historic Preservation Disaster Response*

Hazard mitigation planning and response is an issue that impacts many decision-making bodies in the City, affecting environmental conservation efforts, infrastructure improvements, emergency response procedures and the associated required funding. Protection of the City's historic resources and environments should be considered in the larger context of the City's hazard mitigation planning efforts. On a smaller scale, individuals need guidance on ways to protect their properties. To that end, the promotion of hazard mitigation options that support the long-term protection and preservation of the City's historic buildings, sites and archaeological resources should be encouraged.

## **G. ARCHAEOLOGICAL PROGRAM**

1. *Expand Archaeological Program*
2. *Enhance Support of Archaeological Program*

St. Augustine's Archaeological Ordinance establishes one of the most robust City-sponsored regulatory processes in the country, addressing early indigenous settlement as well as the first European settlement in the United States. In many cases, archaeology represents one of the few glimpses into the daily lives of the City's early inhabitants and, through the collection of transportable artifacts, provides an opportunity to study direct historic evidence of the City's development. Currently, the program is challenged by the need to respond to rising sea levels, which can make threatened deposits inaccessible, and an increase in new construction associated with demolition applications. Expanded funding and support are necessary to adequately implement an archaeological program that responds to the unique below-grade resources in St. Augustine.

## **H. EDUCATION AND ADVOCACY**

1. *Increase Awareness of the Value of St. Augustine's Architectural, Archaeological and Cultural Resources and Their Benefits*
2. *Increase Awareness of How Historic Preservation Positively Affects the City*

Local education and advocacy initiatives supporting historic preservation and archaeology are currently undertaken by many entities including the City, Flagler College, the St. Augustine Historical Society and the St. Augustine Archaeological Association. These efforts should continue and be expanded to demonstrate how historic preservation and archaeology can benefit the City's economic revitalization, hazard mitigation and sustainability goals. An expansion of education and advocacy initiatives will require strong participation from institutions, organizations, advocacy groups and individuals and can include a wide range of activities such as presentations, walking tours, workshops, and school tours, all taking advantage of new technology and communication methods.

# Strategies and Recommendations

## A. CITY-WIDE PLANNING

The preservation and enhancement of historic and archaeological resources is affirmed within the City's Comprehensive Plan (June 16, 2011 Prepared by the Northeast Florida Regional Council), which state that the goal of historic preservation is to:

Maintain and enhance the historic integrity and ambiance within the City of St. Augustine while encouraging economic growth and the identification, preservation, continued use and adaptive reuse of existing historic structures.

As indicated in the Comprehensive Plan, the City-wide objectives to support this goal include:

1. Continuing to identify and preserve historic neighborhoods
2. Continuing to identify and preserve archaeological resources
3. Continuing to identify, preserve and encourage the adaptive reuse of historic structures in all areas of the City

As part of the City's ongoing commitment to meet its historic preservation goals, since the adoption of the Comprehensive Plan, Fullerwood Park, North City and Nelmar Terrace have been listed on the National Register of Historic Places, Lighthouse Park has considered applying for National Register listing, and a historic resources survey was completed for Davis Shores. Additionally, Neighborhood Zoning Workbooks were developed by the City providing both information and tools to equip property owners to identify local needs and goals within the context of historic preservation. The Workbooks provide a starting point to evaluate current zoning with respect to historical development and future needs.

**A.1 Goal:** Preserve and protect the historic sites and culture of St. Augustine, including its neighborhoods, districts, structures, buildings, landscapes and cultures.

**A.2 Goal:** Preserve and protect the archaeological record in terms of its cultural and scientific value.

**A.3 Goal:** Balance encouraging economic growth and the preservation, continued use and adaptive reuse of existing historic structures by:

- Educating property and business owners about the benefits of a balanced approach between historic preservation and economic development
- Compiling a comprehensive historic resource inventory, including designations at the National, state and local level, of districts, Landmarks and archaeological sites that is readily accessible by the other City departments and the public
- Promoting policies that encourage historic preservation by streamlining reviews and encouraging the use of financial incentives

### **A.1 Strategy: Incorporate Historic Preservation Elements in All Neighborhood, District and City-Wide Planning Initiatives**

The importance of protecting St. Augustine's unique architectural, archaeological and cultural resources, as well as the distinctive character of its neighborhoods, is recognized by residents, businesses, government

officials and visitors. As an essential part of protecting the City's resources and character, future development should be considered in the context of historic preservation goals.

## **A.2 Strategy: Incorporate Historic Preservation and Archaeology in all City Planning Initiatives**

Although the locally and nationally designated historic districts in the City are well documented, several undesigned neighborhoods have not benefited from a basic evaluation of building and landscape elements, which can be in the form of a windshield survey. Additionally, the current archaeological zone map does not reflect the existing archaeological database and available historical records. These evaluation and zoning measures are necessary because, without these tools, increasing development pressure and infrastructure improvements may unwittingly destroy significant historic resources, undermining local cultural identity.

### **A.2.1 Recommendation – Complete Historic Resource Surveys**

To be eligible for historic designation, it is generally accepted that a building or structure must be at least 50 years old. Based upon data provided from the St. John's County Property Appraiser's Office, an overwhelming percentage of all buildings across the City of St. Augustine were constructed prior to 1970, having reached, or will soon reach, 50 years of age.

To properly understand the potential impact of planning initiatives on historic properties, it is critical to understand where historic resources are located and their distribution across the City. This includes not only documentation of new resources, but also updating existing surveys more than 20 years old. Moving forward, local surveys should categorize properties as significant, contributing and non-contributing, establishing a hierarchy that can facilitate streamlining the historic preservation review process. This documentation effort will necessitate a comprehensive survey of the City, completed at a reconnaissance level, supplemented by intensive level surveys befitting the level of significance.

In addition to buildings, surveys should record historic character-defining landscape elements and sites. These features can include walls, fences, tree canopies and open spaces at individual properties and along streetscapes.

The historic resource survey information should be linked to City GIS mapping. An accessible format could inform public and private planning initiatives, and eventually be made available to the public via a City web-based Historic Resources Inventory. (Refer to Historic Resource Inventory Strategies.)

### **A.2.2 Recommendation – Identify Locations Potential Archaeological Remains**

Revise archaeological zone map to reflect current archaeological database and known historical records and link to City GIS mapping. (Refer to Archaeological Strategies.)

### **A.2.3 Recommendation – Identify Threatened Properties**

A comprehensive review can provide an opportunity to identify properties that may be experiencing significant deterioration or code violations, allowing faster intervention before the situation is irreparable. It may also serve to identify property owners who may benefit from financial or social assistance programs and initiatives. (Refer to Historic Resource Inventory Strategies and Economic Strategies.)

### **A.2.4 Recommendation - Include Historic Preservation Staff in Planning Initiatives and Activities**

Early in the planning stages of a project, the historic preservation Staff should have the opportunity to review all plans and initiatives that may impact designated districts, landmarks and archaeological sites. Following an assessment of the type of project and potential level of impact, it can then be brought to HARB and/or Archaeological Staff for review as appropriate.

### **A.2.5 Recommendation – Increase Interpretation and Preservation of Archaeological Resources**

Increase interpretation and preservation of archaeological resources whenever possible to promote awareness of St. Augustine's early history. In addition to continuing existing interpretive efforts, such as the provision of signage and exhibits, interpretation can also include informal presentations adjacent to dig sites, podcasts and formal presentations as part of a lecture series. (Refer to Archaeological Strategies and Education and Advocacy Strategies.)

### **A.2.6 Recommendation – Install Signage to Identify Historic Districts, Landmarks and Select Archaeological Sites**

Expand the installation of signage identifying each historic neighborhood or place beyond the locally-designated Historic Districts and Lincolnville. This can include decorative street signs, directional signs, gateway signs, historical markers at significant sites, etc., and should be undertaken utilizing consistent graphics for clear visual identity. Signage can be linked to podcasts describing the unique characteristics of the area, supplemented by smartphone access to the City's Historic Resource Inventory and publicly accessible archaeological sites.

### **A.2.7 Recommendation – Restrictive Covenants on City-Property Transactions**

Require a restrictive covenant be placed on property sold by the City of St. Augustine to protect historical architectural and archaeological resources. Based upon the nature of the property, the covenant could include limiting construction areas to protect archaeological resources, requiring HARB review of exterior alterations and/or a demolition prohibition of significant features or elements.

## B. HISTORIC RESOURCE INVENTORY

Although there have been many historic resource survey and documentation projects in St. Augustine, certain areas, such as the western portion of the City, have not benefited from a cultural resources survey. In addition, several existing surveys are over 20 years old and in need of re-evaluation. Sharing historic survey information is also a priority, as well proactively preserving historic properties.

A Historic Resource Inventory can provide a means of collecting and organizing information about a property, particularly if incorporated in a GIS database. Information collected can include historical information such as the date of construction, occupants and building style, as well as current information related to its physical condition, use and materials. In addition, historic and present-day images can be linked and accessed through the property record.

Documentation for inclusion on the Historic Resource Inventory can be completed by various interested parties including trained volunteers and students and through community partnerships, as long as there is a process in place for vetting accuracy. However, classification related to level of significance or adoption as part of the City's regulatory review process should require City Commission approval.

**B.1 Goal:** Complete a Historic Resources Inventory across the City to:

- Produce current records for all regulated historic properties
- Link historic property and archaeological database records to City GIS mapping
- Classify existing local Historic District properties as significant, contributing or non-contributing
- Identify potential concentrations of historic properties that may be eligible for National Register or local Historic District designation
- Identify individual properties that may be individually eligible for National Register or local Landmark designation
- Identify properties eligible for preservation zoning relief and incentive programs
- Inform the planning process of the potential impact of proposed construction on historic resources
- Inform the hazard mitigation planning process in identifying the potential impact of a disaster on historic resources

**B.2 Goal:** Make the City's history as inclusive and accessible as possible in an effort to increase local pride and community support of historic preservation activities.

### B.1 Strategy: Historic Resource Documentation

Great strides have been made in the documentation of St. Augustine's historic resources, which, in addition to the seven designated National Register Districts, includes preliminary historic documentation for surrounding neighborhoods such as Lighthouse Park and Davis Shores. Despite all the work that has been completed, there are some areas, such

as the western part of St. Augustine, where there has been little to no documentation.

Depending on the significance of resources, historic resource documentation can take many forms: from a windshield survey, more in-depth recordation for inclusion on the Florida Master Site File or the National Register of Historic Places and for potentially local designation. To offset the cost of documentation, funding can be obtained by applying for Certified Local Government grants or the documentation can be completed in collaboration with the Historical Society, Flagler College and/or neighborhood associations.

#### **B.1.1 Recommendation – Complete A Reconnaissance-Level Survey of the City**

It is recommended that a comprehensive windshield survey of the City be completed to identify both potential Historic Districts as well as potential individual Landmarks. If additional documentation is warranted, the Florida Division of Historic Resources provides funding for the recordation of historic sites for the Florida Master Site File as well as the National Register of Historic Places.

#### **B.1.2 Recommendation – Develop Character Studies for Historic Neighborhoods**

The neighborhood workbooks provide a good starting point for identifying some of the important physical and historical development patterns of an area. The preparation of neighborhood character studies can serve to inform planning projects, foster a greater sense of pride by property owners and provide the basis for historic neighborhood walking tours. (Refer to Education and Advocacy Strategy 1.)

#### **B.1.3 Recommendation – Prioritize Surveys for Re-evaluation**

A prioritized list should be developed for re-evaluating and updating historic resource surveys due to changes at properties and missing or out-of-date information and to reassess significance. The re-survey effort will also provide the opportunity for current photographic documentation, which can be incorporated into the City's GIS database.

#### **B.1.4 Recommendation – Identify and Document Thematic Surveys**

Thematic surveys can provide a means of documenting a part of the City's cultural history that is tied to more than one geographic location. For example, the history and contributions of African Americans in St. Augustine may have had its roots in Lincolnville, but now has a significant presence in West Augustine. Cultural documentation is often far richer if written and oral histories are included as part of the effort. Thematic-based approaches can also provide the basis for expanding heritage-based tourism.

#### **B.1.5 Recommendation – Document the Recent Past**

St. Augustine benefited from the post-World War II boom in Florida as a whole, and has neighborhoods such as North Davis Shores with high concentrations of mid-century modern architecture. Although

currently not as appreciated as Colonial buildings, the susceptibility of 19th and early 20th century buildings to being torn down makes them a preservation and, therefore, a documentation priority.

#### **B.1.6 Recommendation – Document Oral Histories**

Efforts should be made to collect oral histories representing the wide range of St. Augustine's citizens and their impact on its development.

### **B.2 Strategy: Utilize Documentation to Prioritize Designations and Resources**

Following survey efforts, a list of properties potentially eligible for historic designation should be maintained and regularly updated. This list can serve to prioritize designation efforts as well as reduce uncertainty in the early planning process for property owners, developers and other City Departments as they consider potential uses or alterations to a property.

### **B.3 Strategy: Utilize Documentation to Identify Endangered Properties, Landscapes and Vistas**

Historic resources can be endangered due to a physical threat of loss or damage, or loss of the integrity of the surrounding area that impacts the view or appreciation of its context. They can include those that exhibit signs of significant deterioration or neglect and those that have been regularly cited for building code violations, as well as those that face development pressure.

#### **B.3.1 Recommendation – Develop and Maintain an Endangered Property List**

Develop a list of endangered properties, and make it available to other City Departments and the public. The list can be compiled from:

- Historic resource and archaeological surveys
- Demolition permit applications
- City inspections or citations

To be effective, the list should be maintained to reflect current circumstances. To focus City resources, the level of threat should also be prioritized from most endangered to least vulnerable.

#### **B.3.2 Recommendation – Develop Intervention Strategies for Threatened Properties**

The appropriate interventions will be determined by the:

- Property significance
- Property conditions
- Type of threat
- Options available to address threat
- Participation of the property owner

Intervention strategies can include providing:

- Design and technical assistance to owners
- Information on financial incentives or assistance
- Information on pursuing unnecessary hardship classification



(Refer to Economic Strategies for additional options.)

#### **B.4 Strategy: Increase Access to Documentation**

Historic resource survey inventories and information should be available to the City staff and the public, ideally in an interactive, GIS-based, web application that can also be accessed by a smartphone. The Staff can utilize the information in the planning and building permit review process to identify designated historic properties, and potentially “flag” them for supplemental review. The information, or select portions of the information, can be made available to the public for historic research.

#### **B.5 Strategy: Prepare Detailed Documentation of the Most Significant Resources**

Although there is significance in all historic resources, St. Augustine benefits from the richness of its Colonial-era development – unmatched by any other City in the United States. The Colonial core of the City is particularly rich in history, but it is also highly vulnerable to damage from both flooding and storms. (Refer to Hazard Mitigation Strategies section.)

St. Augustine is not unique in seeking to address this dilemma. Other cities with irreplaceable sites have recognized that a disaster, whether natural or man-made, could destroy unique archaeological and architectural resources. To provide a record of a property in the event of a disaster, detailed documentation techniques should be employed such as laser scanning, orthophotography and photogrammetry. In addition to providing a record of present-day conditions, depending on the level of precision of the documentation methodology, a historic resource could be accurately reconstructed from the data collected. As technology progresses, more options will become available to complete detailed documentation of historic sites, with a relative decrease in cost. This level of documentation should be considered for the Colonial core of St. Augustine, and be expanded as funding allows.

## C. HISTORIC PRESERVATION, CONSERVATION AND ZONING

Zoning is a mechanism utilized by municipalities to regulate land use in districts or zones. This regulation typically limits a property's use, to residential, commercial or industrial, but it can also identify specific design standards or restrictions, such as maximum building heights or impervious surface coverage. In areas with concentrations of historic resources, it can be used to establish historic areas, in order to protect the overall character of the district or zone.

In the City of St. Augustine, there are currently five local Historic Districts, all subject to review by the Historic Architectural Review Board (HARB). The Historic District boundaries, administrative and review procedures for HARB can be found in the administrative section of the City of San Augustine Zoning Ordinance (Division 3).

Zoning ordinances provide the regulatory review framework for HARB review, but they can also be used to protect the general character of an area by zoning an area as a History Preservation (HP) Conservation District overlay. An advantage of this approach is that overlay districts would require only Staff planning review with appeal to the Planning and Zoning Board (PZB), and would not require HARB review. This protection can include identifying the types of permitted uses as well as establishing design standards unique to each neighborhood. Like a local Historic District, a HP conservation district requires clearly defined boundaries and administrative and review procedures. Boundaries can follow the defined boundaries of a National Register Historic District, or be locally defined.

Depending on the nature of the overlay, incentives can be provided in exchange for the preservation of the overall historic character of the area, and the maintenance of the rhythm and scale of its buildings and landscape features. This can be implemented on a sliding scale, with the local HP Conservation District provided access to some incentives, while the local Historic Districts, which are subject to HARB, receiving the greatest opportunity for incentives.

The establishment of any overlay district, whether a local Historic District or a HP Conservation District, requires support of the property owners within its boundaries and adoption by the City Commission. To be effective, each level of designation should be coupled with zoning incentives that support preservation of the resources and the interests of property owners.

Understanding that not all National Register Historic Districts will be designated locally as Historic Districts or HP Conservation Districts, alternatively, existing zoning tools can be utilized to ensure that the height, footprint and setbacks of new construction or additions are consistent with the surrounding neighborhood character.

The three potential types of historic areas are:

- Local Historic Districts
- Local HP Conservation Districts
- National Register historic districts



**C.1 Goal:** Encourage preservation of the overall character of historic areas.

**C.2 Goal:** Preserve and protect the overall character of historic areas by maintaining visual continuity along streetscapes and at vistas.

**C.3 Goal:** Encourage preservation, rehabilitation and adaptive reuse of historic buildings in lieu of replacement with new construction.

**C.4 Goal:** Streamline the HARB review process to expedite application review, encourage more community participation and reduce the time burden on Members and Staff for meeting preparation and participation.

**C.5 Goal:** Provide clear guidance to HARB applicants regarding the type and level of review required and anticipated outcome of proposed applications.

## **C.1 Strategy: Correlate Historic Preservation and Zoning Designations and Requirements**

Although the locally and nationally designated Historic Districts in the City are well documented, undesignated neighborhoods have not benefited from a careful evaluation of preservation and archaeological resources. Thus, increasing development pressure and infrastructure improvements may put significant historic resources at risk.

### **C.1.1 Recommendation – Revise Zoning Consistent with Neighborhood Character**

New construction within locally designated historic areas should be planned to preserve archaeological resources, sites, landscapes, development patterns and buildings. In many instances, the demolition of an existing building is driven by the desire to build a new, larger building on a site. Often, the resulting building is out of scale with its neighbors both in height and footprint.

The construction of new buildings that are in scale with their surroundings can be achieved by ensuring that zoning designations for allowable new construction are consistent with a streetscape's or district's existing character. (Some adjustment will likely be needed to address the need to construct above the 1% floodplain.) Also, by regulating that the size of new construction be compatible with neighboring construction, demolitions may be reduced.

### **C.1.2 Recommendation – Ensure Use Designation Promotes Preservation and Reuse of Existing Buildings**

As populations have changed, buildings originally constructed for one purpose may no longer be suited to the needs of the citizens. Adaptive reuse can be a valuable tool in protecting historic buildings that have outlived their intended uses.

Some of the City's buildings have been successfully adaptively reused. The Excelsior High School in Lincolnville has been repurposed as the Lincolnville Museum and Cultural Center. The Ice Plant is now a favorite restaurant and a gas station on Anastasia Boulevard was adapted into a coffee shop. Through sensitive adaptive reuse, these buildings have been saved and continue to play an active role in the community. Zoning should continue to promote the creative reuse and repurposing of buildings in the City.

### **C.1.3 Recommendation 1.3 – Ensure Zoning Promotes Preservation and Reuse of Existing Buildings**

The use of zoning incentives, coupled with historic preservation review, can encourage future sensitive adaptive reuse projects at properties located outside designated Historic Districts. Zoning incentives can include rezoning and easing setback and lot restrictions for projects at properties in which the historic character will be reinforced. Thus, these incentives would likely be limited to properties within locally designated HP Districts, a local Landmark or a contributing or significant property in a National Register Historic District.

Land use rezoning can encourage the retention of a building with a non-viable initial use by permitting a new use for which the property can be easily adapted, such as reclassifying a large single-family home as multi-family housing. Any property rezoning would need to be consistent with the underlining land uses as defined in the City's Comprehensive Plan. Zoning can also be modified to permit a reduction in required setbacks and impervious surface coverage, such as a maximum 20% reduction in a setback, as an incentive to preserve historic buildings. Zoning incentives should be approved by both the PZB and the City Commission, as well as necessitate a deed restriction ensuring long-term preservation.

In exchange for zoning incentives, the property owner must protect the historic character of the resources on the property for the benefit of the community at large. A means of achieving this objective would be designating the property as a local Landmark, mandating HARB review of not only the impact of the proposed zoning incentives, but also and any future exterior alterations to the property within their jurisdiction.

### **C.1.4 Recommendation – Consolidate Sliver Lots**

Some neighborhoods, such as North Davis Shores, benefit from regularly spaced homes that appear to have generous side yard setbacks. In many cases, multiple adjoining lots may belong to a single owner with a home occupying one parcel, and the side yard occupying an adjoining sliver parcel. Sliver lots with as little as 25' street frontage that are grandfathered from the current zoning regulations could each be developed as a single-family home, which would result in a dramatic increase in density and accompanied by a likely significant increase in building height. The development of these sliver parcels would significantly alter the density and character of streetscapes in historic neighborhoods, with the possibility of obliterating the historic preservation value.

In addition to the potential impact on historic character, new construction on sliver lots can also have environmental impact by increasing building density, thus reducing the neighborhood's impervious surface coverage and potential soil absorption. Thus, it should be considered with respect to the City's environmental conservation goals and its hazard mitigation planning. Although understood to be controversial, it is recommended that consideration should be given to consolidating sliver lots into larger parcels.



## **C.2 Strategy: Consider Form-Based Zoning for National Register Historic Districts**

The City has several districts listed on the National Register of Historic Places but not subject to historic preservation review by the City of St. Augustine. Currently, these include Lincolnville, the Abbott Tract, North City, Nelmar Terrace, Fullerwood Park and large portions of the Model Land Company. Each of these neighborhoods has a unique and distinctive architectural character worthy of preservation.

Consideration should be given to designating each of these neighborhoods a local HP Conservation District and utilizing form-based zoning to maintain the relationship of buildings along the streetscape and to each other. This approach can guide and encourage compatible new construction without requiring review by HARB. Some of the basic elements typically reviewed as part of form-based zoning include:

- Building Height – Adjusted for required flood elevation
- Footprint / Street width
- Setbacks – Primary and secondary buildings
- Porches / Porch depth
- Roof form

If supported by each neighborhood, the zoning requirements can be expanded to include basic design elements such as materials and fenestration patterns.

To be successful, the boundaries of zoning overlay districts, and what is regulated, should be identified by each neighborhood and include support from property owners, the PZB and the City Commission. In addition, providing clearly illustrated, neighborhood-based design guidelines can assist property owners in understanding building terminology and the character-defining features of their neighborhood.

## **C.3 Strategy: Establish Zoning Overlays to Protect Vistas around Historic Resources**

Consideration should be given to incorporating vista restrictions to mitigate the impact of new development on historic resources including districts, sites and individually designated National Register historic properties. Vistas can be defined as bordering, leading to and between historic resources.

## **C.4 Strategy: Balance Extreme Building Elevations and Historic Neighborhood Character**

Like most cities along Florida's coastline, St. Augustine is susceptible to flooding from storms and rising water. Communities in flood-prone areas are struggling to balance an owner's right to protect their property by elevating their building with the effect of extreme building elevations on the surrounding neighborhood character. (Refer to Hazard Mitigation Strategies.)

As new residential buildings are constructed, and existing buildings elevated, it is not uncommon for property owners to set the lowest

occupied floor, (i.e. first floor), at a height that allows grade-level parking beneath the structure. The resulting first floor height will often exceed the 1% flood level (a.k.a. 100-year floodplain), defined by FEMA maps by several feet and is considered “bonus” space by property owners and streetscapes.

The resulting buildings are often significantly taller than their neighbors with extended vertical proportions. In addition, former porches and stoops along streetscapes are typically replaced with parked cars and garage doors, altering the character of the neighborhood. From a parking perspective, the often wider curb cuts required to accommodate multiple vehicle access, can reduce available on-street parking.

#### **C.4.1 Recommendation- Limit Height of Floor Level of First Occupied Floor to Reduce Overall Building Height**

As an alternative to establishing a maximum overall height of a locally designated historic building within a 1% floodplain, a requirement could be established to limit the height of the first occupied floor either to the base flood elevation (BFE), as identified on FEMA maps, or at a design flood elevation (DFE), which is generally one to two feet above BFE. This would exceed current FEMA requirements for flood protection while minimizing extreme elevations, therefore protecting the historic context.

#### **C.4.2 Recommendation – Limit Curb Cut Widths for Residential Properties and Street-Facing Garage Doors**

Limiting the width of curb cuts can reduce the visual impact of parked cars and garage doors along a streetscape, particularly where buildings are located close to the street.

#### **C.4.3 Recommendation – Require Screening for Elevated Foundations and Raised Equipment**

The elevation of a building and associated equipment in a floodplain generally includes exposing more of a building’s foundation and increasing the visibility of equipment such as air conditioners and generators. Screening should be required to minimize the impact on historic areas and designated historic properties.

### **C.5 Strategy: Revise HARB Application Review Procedures**

Zoning overlays crafted with the goal of historic preservation provide more review of proposed projects in an effort to ensure historic sensitivity and compatibility with the surrounding neighborhood. Local Historic Districts are formally adopted by the City Commission with neighborhood support. The Historic Architecture Review Board (HARB) responsibilities, powers and procedures are contained in Division 3 of the administrative section of the City of St. Augustine Zoning Ordinance. It outlines the requirements of the membership and members’ role and responsibilities, as well as the procedures for reviewing Certificate of Appropriateness (COA) and Certificate of Demolition (COD) applications for compatibility with the existing buildings and surrounding district character.

It is not uncommon for local historic preservation review processes to operate in a specific way as a manner of tradition. It often takes a fresh



set of eyes to be able to draw on the experiences of other communities in the review process to make suggestions that might benefit HARB, their Staff and the applicants alike. In most cases, the modification of review processes should be taken incrementally to allow adjustment, and might require the input of an outside professional to provide guidance during the process.

**C.5.1 Recommendation – Ensure Designated Properties Are Clearly Identified as Historic Resources**

Identify historic resources in a GIS database of all city properties, indicating the need for HARB and/or archaeological review as part of a permit application process. The database can also be used to record information from cultural resources surveys, and be made available to the public online and via smartphones.

**C.5.2 Recommendation – Require Submission of Digital Photographs and Application Materials**

Establish a requirement for applicants to provide both paper and digital photographs and application materials at the time of submission. This will facilitate sharing of information with HARB members and the public, while minimizing Staff time associated with scanning. For applicants who do not or are unable to comply, a scanning fee could be imposed or waived as appropriate.

**C.5.3 Recommendation – Make HARB Application Materials More Publicly Available**

Posting HARB application materials online can allow neighbors to understand proposed property alterations and allow them to choose whether or not to attend and participate in the HARB meeting, voicing either support or opposition. This would increase the transparency associated with the HARB review process and, in cases in which HARB recommends design alterations, can serve to demonstrate the benefit of the process.

**C.5.4 Recommendation – Project Photographs and Drawings on Screens During Meetings**

During HARB meetings, audience members do not typically have access to photographs and drawings of proposed work, making it difficult to follow discussions. To allow the audience to be more engaged in the process, it is recommended that the images from the application be projected on television screens during the meeting. Similarly, this information could be shared on-line via web-streaming. This would require Staff access to computers linked to video equipment as application summaries are presented.

**C.5.5 Recommendation – Prohibit Ex-Parte Communications with HARB Members**

Although HARB members are diligent about disclosing ex-parté communications related to applications under review, these discussions can be perceived by some as possibly influencing the process. Even if these communications do not represent a conflict, they can be perceived by the public as eliciting preferred treatment.

A simple way to remove the appearance of a conflict would be for all communications related to ongoing applications under review to be directed towards Staff. This information could then be shared either in a written or oral format prior to or at the time of the meeting, giving all Board members the same information to consider as they evaluate an application. This would also allow the communication to become a part of the application review record.

#### **C.5.6 Recommendation – Clarify Historic Architectural Review Board Ordinance**

Although there are certain practices that have become routine for HARB, they are not clearly defined in the Historic Architectural Review Board Ordinance. These include:

- Definitions of terms associated with the Historic Architectural Review Board Ordinance
- The process for designation of local Historic Districts
- The process for designation and administration of local Landmarks
- The administrative process for gathering neighborhood support for National Register Historic Districts
- The extent of proposed demolition at a property that triggers the HARB process – Entire buildings and structures, or certain portions of buildings and structures (Refer to Reduce Historic Building Demolition section)

The Ordinance should be updated to provide clarification.

#### **C.5.7 Recommendation – Establish Design Review Procedure for Local Landmarks**

When HARB currently reviews demolition applications, they can designate properties as significant by conferring local Landmark status. In practice, this designation allows HARB to deny demolition, but does not offer any additional protection. It is recommended that the Ordinance be amended and clarified to allow HARB to conduct design review of designated local Landmarks and allow property owners the ability to take advantage of the City's Historic Preservation Property Tax Exemption Program, the Federal Preservation Tax Credit Program, and Zoning incentives available to designated properties in support of their long-term preservation.

### **C.6 Strategy: Revise Architectural Guidelines for Historic Preservation**

Although the Architectural Guidelines for Historic Preservation (AGHP) have served HARB well for many years, they do not necessarily address the challenges currently part of the review process. These issues can include the range of new technologies, from non-traditional replacement materials to generators, as well as mitigation measures to address storm and/or flood protection. In addition, the current AGHP does not adequately address historic sites, landscapes and vistas as well as architecture of the recent past.

#### **C.6.1 Recommendation – Revise AGHP to Be More User-Friendly**

To be as useful as possible, AGHP should provide property owners an expectation of what will and will not be approved by HARB as part of



the review process. To make this a reality, the AGHP should address the issues relevant to today's property owners, clearly indicating what will and will not be approved typically. This is often best accomplished via numerous illustrations of appropriate and inappropriate alternatives, supplemented by descriptions in layman's language, rather than preservation or architectural terminology.

#### **C.6.2 Recommendation – Create Guidelines for Individual Historic Districts as Needed**

Historic district guidelines written specifically for that district can often best address local character and issues. Although core preservation philosophy and concepts are consistent across historic neighborhoods, comingling the architectural style, materials and siting of historic resources in Nelmar Terrace with those in Colonial city can be confusing for a layperson. Design guidelines for individual neighborhoods can be "chapters" added to the City-wide AGHP.

#### **C.6.3 Recommendation – Address Newer Materials and Technologies**

Since the publication of the current AGHP and subsequent updates, new building materials and technologies have either been introduced or gained in popularity, increasing the likelihood that they will be considered by owners and their design professionals as well as contractors as they make improvements to properties. These include alternative wood and window products as well as technology such as generators. Although perhaps not appropriate in all locations, instances in which they could be accepted should be identified.

#### **C.6.4 Recommendation – Remove Mandates for Specific Building Styles for New Construction in HP-1, HP-4 and HP-5**

As stated in the AGHP, the purpose of the District designations includes:

4. *to develop an atmosphere and feeling of old, historic St. Augustine by encouraging the preservation and restoration of historic structures within the districts*

Until this time, the strategy used to meet this goal was to require that new construction in each Historic District be designed in pre-defined styles mandated by the AGHP. Although it can also be argued that this approach has served to promote a specific ambience within each of the five districts, it can be argued that it creates poor imitations of historic buildings and a false sense of history.

The success of the current style-based policy appears to vary by District. In HP-2 and HP-3, which includes the area of the early settlement and the early 20th century reconstruction of Colonial buildings, this policy has generally worked well to provide a cohesive historic setting enjoyed by St. Augustine's residents, business owners and visitors alike. In contrast, historically, there has been a greater diversity of architectural styles in HP-1, HP-4 and HP-5. This continues to this day. Similar architectural diversity is present in many of the other historic neighborhoods in the City. For HP-1, HP-4 and HP-5, and any likely future District, it is recommended that specific style requirements be removed.

As indicated in the AGHP, new construction should complement a historic property and comply with the *Secretary of the Interior's Guidelines for Rehabilitation*, Standard 9:

9. *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*

In layman's terms, new construction should be reviewed for compliance with the following design principles relative to neighboring properties:

- Scale
- Form and Massing
- Setback
- Site Coverage
- Orientation
- Fenestration Patterns
- Architectural Projections
- Façade Proportions
- Trim and Details
- Materials

#### **C.6.5 Recommendation – Incorporate Flood and Storm Mitigation**

##### **Alternatives**

As Hurricane Mathew demonstrated in the Fall of 2016, St. Augustine is susceptible to flood and storm damage. It would be helpful if AGHP provided review criteria for property modifications to reduce flood and high wind damage associated with storms. At a minimum, this could include window protection; the elevation of buildings (refer to Zoning Strategies) and associated modifications to address stairs, lifts and extended foundations; barrier systems at doorways of commercial buildings; site improvements; etc.

#### **C.6.6 Recommendation – Include Sustainable Design Methods and Techniques**

Sustainable practices should be incorporated in the AGHP wherever possible to assist property owners in making educated decisions to improve their property's energy performance and reduce environmental impact. This can include the selection of building materials; windows and window glazing systems; and heating and cooling options, as well as conducting energy audits and recommending native plantings. The implementation of recommendations that promote historic properties should be evaluated in tandem with the City's overall environmental conservation goals and approach to sea level rise.



### **C.6.7 Recommendation – Expand Staff Review of Minor Applications**

The City of St. Augustine benefits from a highly-qualified Staff whose duties could be expanded to address more responsibilities in order to reduce the burden on HARB. In addition to providing guidance for property owners, the revised AGHP could provide the criteria for Staff review of specific minor applications.

The benefits of broadening the Staff review process include:

- Expediting review time for applicants, thus encouraging compliance with HARB-desired outcomes
- Reducing the amount of Staff time associated with preparing and presenting application materials to HARB
- Reducing the amount of time required for HARB meetings, thus reducing the burden on the membership

The eligibility factors for Staff review could include the:

- The location, either in or outside of specific Districts (i.e. HARB review might be required for all applications in HP-2, but not in HP-1)
- The level of significance of the property (Local survey efforts should classify properties as significant, contributing or non-contributing. Refer to Historic Resource Inventory Strategies.)
- The existing conditions
- The location and extent of the proposed alteration

The Historic Architecture Review Board Ordinance should also include a provision that Staff, at its discretion, can direct an application to HARB for review if Staff determines that the proposed work does not meet all requirements for Staff approval. This would serve to both protect the historic property and encourage owners to comply with the AGHP to expedite their application review.

### **C.6.8 Recommendation – Allow Broader Use of Staff Approval Following a Hazardous Event**

In the aftermath of a hazardous event such as a flood or storm, decisions must be made quickly to protect people and property. Depending on the nature and severity of the event, review officials will need to be nimble to facilitate the recovery process. Clear AGHP language, in conjunction with an expedited review process, can provide the basis for the Planning and Building Department to issue permits for proposed work that is consistent with the AGHP without the need for a HARB meeting. This could both expedite stabilization and provision of a weather-tight building enclosure and reduce the administrative burden on property owners. (Refer to Hazard Mitigation Strategies.)

## D. REDUCING HISTORIC BUILDING DEMOLITION

The historic increase in property values has resulted in a desire to maximize property values. With the City of St. Augustine processing an ever-increasing number of Certificate of Demolition (COD) applications for properties over 50 years of age, demolition threatens to erode the historic character of neighborhoods across the City.

Currently, HARB has jurisdictional review of demolition applications for buildings and structures located within locally designated Historic Districts as well as those across the City that are 50 years of age or older or recorded on the Florida Master Site File. However, there is a range of demolition application response options available to HARB within the two categories. In its review of COD applications, HARB can approve, approve with conditions, approve with postponement, continue, evaluate for local Landmark status or deny the request.

HARB is authorized to deny a COD application when a resource is determined to be of exceptional significance, if the applicant fails to prove the denial will cause undue hardship. HARB may approve the demolition with a postponement of up to 12 months after which the owner must reapply and a second postponement could be ordered of up to 12 months. The postponement period is an opportunity to consider alternatives that balances the city's interests in preserving the structure and the owner's interest in the property. (It is not limited to any location, status, or zoning district).

If a historic resource is not determined to be of exceptional significance nor does it meet Landmark status, the HARB has approved applications for demolition and may add conditions to document the structure, salvage materials, and delay the demolition permit until plans for the replacement structure are submitted to the Planning and Building Department.

In establishing new policies for the review of demolition applications, it will be necessary to clarify the extent of HARB jurisdiction based upon a property's designation and level of significance. In addition, it is necessary to clarify how much proposed removal constitutes a demolition under the current Ordinance, that is, whether it is defined as demolition of all or a portion of a building or structure. (Refer to Historic Preservation, Conservation and Zoning Recommendation 6.5.6.) As a part of determining whether a property should be allowed to be demolished, its designation should be considered. The most historically significant designation types and levels that should be considered for higher review standards. Designations can include:

Local designation:

- Historic District: Significant
- Historic District: Contributing
- Historic District: Non-contributing
- Landmark

National Register (NR) designation:

- Historic District: Significant
- Historic District: Contributing



- Historic District: Non-contributing
- Individually designated

These designations should be correlated with updating the City's Historic Resource Inventory. (Refer to Historic Resource Management Strategies and Demolition Strategy/Recommendation Matrix at the end of this section.)

**D.1 Goal:** Preserve and protect the historic character of St. Augustine by minimizing the demolition of historic buildings and structures.

**D.2 Goal:** Provide clear guidance to applicants regarding the type and level of review required and the anticipated outcome of proposed applications based upon a property's designation and level of significance.

**D.3 Goal:** Provide an alternative to HARB review of non-contributing properties listed on the Florida Master Site File or are 50 years old or older.

### **D.1 Strategy: Limit Properties That Are Eligible for Demolition**

*It is recommended that this limitation be applied to properties with these designation types and levels:*

- *Local Designation: Historic District significant and contributing; Landmark*
- *National Register Designation: Historic District significant, individually designated*

Demolitions are often precipitated by a developer's desire to create a "higher and better use" of a property for financial gain, or in the case of an individual property owner, to replace what exists with new construction more in keeping with an owner's aspirations. Although both of these desires is legitimate, in the case of the demolition of historic resources, valuable community history can be lost.

In lieu of demolition, zoning opportunities should be identified to incentivize adaptive reuse in a manner that is both sensitive to the historic character and provides a greater financial benefit to the owner.

### **D.2 Strategy: Supplement Financial Hardship Review Process**

#### **D.2.1 Recommendation – Require Exploration of Reasonable Adaptations**

*It is recommended that a requirement for hardship identification be applied to properties with the following designation types and levels:*

- *Local Designation: Historic District significant and contributing; Landmark*
- *National Register Designation: Historic District significant, individually designated*

For a property to be sensibly adapted, it might have an alternate use consistent with its preservation. To determine whether an alternate use exists, the owner would need to identify reasonable alternative uses that would not require substantial modification to the historic character of the property. It is also helpful if these alternative uses are supported by the surrounding property owners. Documentation of this exploration, as well as supporting financial information, should be submitted to HARB for their consideration as part of a demolition review application.

#### **D.2.2 Recommendation – Establish a Separate Financial Hardship Review Process**

*It is recommended that a requirement for hardship identification be applied to properties with the following designation types and levels:*

- *Local Designation: Historic District significant and contributing; Landmark*
- *National Register Designation: Historic District significant, individually designated*

As part of current demolition application review procedures, applicants often present their statement of financial hardship simultaneously with a proposed replacement design. Although this process is convenient for applicants, it can co-mingle the decision-making process concerning the ‘case’ for demolition with the desirability of the proposed design possibly influencing the financial hardship determination.

As an alternative, it is recommended that the decision related to financial hardship be made on its own merits and precede review of any proposed design. Ideally, HARB would determine as to whether the criteria for financial hardship have been met at one meeting, and at a subsequent meeting review proposed designs. To prevent premature demolition, a demolition permit should not be approved until all required design reviews are completed unless there is a compelling public interest such as life-safety.

#### **D.2.3 Recommendation – Demonstrate That the Sale of Property Is Not Feasible**

*It is recommended that this demonstration be required for properties with the following designation types and levels:*

- *Local Designation: Historic District significant and contributing; Landmark*
- *National Register Designation: Historic District significant, individually designated*

As an alternative to demolition, owners who claim that a property poses a financial hardship make a good faith effort to sell the property or find tenants to reduce the financial burden until another use can be found for it. For this to be effective, the property must be priced comparably to similar neighboring properties, appropriately listed and advertised for sale, and the buyer should provide reasonable assurances that they will preserve or restore the property in a manner consistent with the AGHP.

#### **D.2.4 Recommendation – Establish Mechanism for City-Engaged Expertise**

*It is recommended that this mechanism be applied to properties with the following designation types and levels:*

- *Local Designation: Historic District significant and contributing; Landmark*
- *National Register Designation: Historic District significant, individually designated*



For more complex projects, it may be desirable that an independent assessment of a property proposed for demolition be prepared on behalf of the City. This assessment could evaluate overall condition and structural soundness, as well as potential costs associated with rehabilitation or adaptive reuse.

To offset the City's expenditures associated with these assessments, the demolition section of the Ordinance should be modified to defer the costs of city-requested experts to the applicant – with a defined limit – for properties above a certain property value, or exclude certain property types such as owner-occupied single family homes.

### **D.3 Strategy: Reduce Demolition-by-Neglect**

The characterization of demolition-by-neglect is typically associated with a building or structure that is determined to be in a hazardous condition. Examples of unsafe or hazardous conditions include:

- A building or portions of a building are at risk of falling and causing injury
- A building's structural elements are no longer able to carry loads safely
- A condition exists such as an opening in a roof or wall making a building susceptible to water damage

#### **D.3.1 Recommendation – Require Correction of Unsafe Conditions**

*It is recommended that these requirements be applied to all buildings and structures in the City of St. Augustine.*

Require maintenance of properties in a manner that prevents them becoming unsafe or hazardous. If a property owner fails to correct the unsafe or hazardous condition within a stipulated period, such as 30 days, daily fines could be levied to encourage compliance. If fines are unpaid and the work is not completed, the City could engage a contractor to complete the necessary repairs and place a lien on the property for the value of the work.

#### **D.3.2 Recommendation – Require Mitigation Bank Funding for City Historic Preservation and Archaeology Projects**

*It is recommended that this requirement be applied to the following designation types and levels:*

- *Local Designation: All parcels*
- *National Register Designation: All parcels*

If the property falls into such disrepair as to necessitate the demolition of a building or structure, the community will lose a historic resource while the owner will often benefit through the ability to construct a new building that will likely provide a higher rate of return. To offset the community loss, the owner should be required to fund other City historic preservation and archaeological projects. To be effective, this requirement would need to be tied to a property's deed. (Refer to Economic Strategy 5.)

To bring the property back into compliance, the property owner could be required to reconstruct the demolished building envelope. (Refer to Recommendation 5.2.)

#### **D.4 Strategy: Limit Replacement Building Size**

*It is recommended that this limitation be applied to the following designation types and levels:*

- *Local Designation: All parcels*
- *National Register Designation: All parcels*

One method of reducing the incentive for demolition is limiting replacement new construction. This can be addressed in the same manner as form-based zoning, with Staff review of criteria identified in a checklist and the option of PZB appeal. (Refer to Historic Preservation, Conservation and Zoning Strategy 2.) For example, if a replacement building is limited to be only 10% to 15% larger than an existing building in any direction, applicants might be more likely to consider an addition rather than full demolition and new construction.

#### **D.5 Strategy: Discourage After-the-Fact Demolition Applications**

*It is recommended that the recommendations below be applied to the following designation types and levels:*

- *Local Designation: All parcels*
- *National Register Designation: All parcels*

##### **D.5.1 Recommendation – Require Mitigation Bank Funding for City Historic Preservation and Archaeology Projects**

If a historically designated building or structure is demolished without proper approvals, the community will lose a designated historic resource while the owner will often benefit through the ability to construct a new building that will likely provide a higher rate of return. To offset the community loss, the owner should be required to fund other City historic preservation and archaeological projects. To be effective, this requirement would need to be tied to a property's deed. (Refer to Economic Strategy 5.)

To bring the property back into compliance, the property owner could be required to reconstruct the demolished building envelope. (Refer to Recommendation 5.2.)

##### **D.5.2 Recommendation – Require the Reconstruction of Building Envelope**

A property owner would be less likely to demolish a building without prior approvals if they were required to reconstruct the building envelope to match the previous conditions, hence gaining no additional square footage. To be most effective, the owner would be required to duplicate the building's footprint, height (with possible adjustment for floodplain elevation), form, materials and details. By providing the opportunity for a potentially larger replacement building by following the required application process, there would be little for a property owner to gain by demolishing a building without approval. To be effective, this requirement would need to be tied to a property's deed.

##### **D.5.3 Recommendation – Delay Permits and Certificate of Occupancy for Replacement Building**

One means of reducing unapproved demolition is creating a waiting period for the owner prior to the submission of an application for a building permit and/or a Certificate of Occupancy. The delay period could be waived if the Building Department is satisfied that the demolished building posed a threat to public safety.

## **D.6 Strategy: Clarify Pre-Demolition Documentation Requirements and Review Process**

As part of its approval process for COD applications, HARB often requires documentation of the property prior to allowing demolition to proceed.

### **D.6.1 Recommendation – Clarify Pre-Demolition Documentation Requirements**

The specific level of necessary documentation, including photography and drawing requirements and formats, should be detailed. The level of required documentation could be adjusted based upon the significance of the historic resource.

### **D.6.2 Recommendation – Establish a Procedure for Staff Review of Non-Locally Designated Properties**

*It is recommended that this procedure be limited to the following designation types and levels:*

- Undesignated property over 50-years-old*
- National Register Designation: Historic District all properties excluding significant*

As part of its review of demolition applications for non-Landmark properties located outside local Historic Districts, HARB should decide whether the property qualifies as a local Landmark. For properties that are potentially eligible, HARB would then request that Staff research the subject property and provide a recommendation for HARB consideration at a subsequent meeting. In an overwhelming number of cases, based upon the research presented, the subject properties will be determined to be ineligible for local Landmark status, and the subsequent decision from HARB will be to request documentation prior to demolition. This process requires the applicant to appear before HARB for one or more meetings prior to an outcome.

As an alternative, it is recommended that a Staff review process be established to make a preliminary determination as to whether a property that is 50 years old or older is potentially eligible for local Landmark listing prior to HARB review.

This process would require the property owner to submit an application with current photographs of the building or structure and the portions proposed for demolition. Upon receipt of the information, Staff could review the available information in the Florida Master Site File to as part of their determination for potential Landmark eligibility. Staff could then present their recommendations to HARB as part of a consent agenda, providing HARB the opportunity for review without requiring the applicant to appear. If it is determined that the property is potentially eligible for local Landmark designation, the Landmark review process can be scheduled and the

applicant can be invited to appear at the Landmark review meeting. If the property is not eligible, the demolition permit can be issued following receipt of the required documentation by the Planning and Building Department.



DEMOLITION STRATEGY / RECOMMENDATION MATRIX		LOCAL DISTRICT SIGNIFICANT	LOCAL DISTRICT CONTRIBUTING	LOCAL DISTRICT NON-CONTRIBUTING	LOCAL LANDMARK	UNDESIGNATED OVER 50-YEARS OLD	NATIONAL REGISTER DISTRICT SIGNIFICANT	NATIONAL REGISTER DISTRICT CONTRIBUTING	NATIONAL REGISTER DISTRICT NON-CONTRIBUTING	NATIONAL REGISTER INDIVIDUALLY DESIGNATED
D.1 Limit Properties Eligible for Demolition		●	●		●		●			●
D.1.2 Require Exploration of Reasonable Adaptations		●	●		●		●			●
D.2.2 Establish a Separate Financial Hardship Review Process		●	●		●		●			●
D.2.3 Demonstrate that the Sale of a Property is Not Feasible		●	●		●		●			●
D.2.4 Establish Mechanism for City-Engaged Expertise		●	●		●		●			●
D.3.1 Require Correction of Unsafe Conditions		●	●	●	●	●	●	●	●	●
D.3.2 Require Mitigation Bank Funding for Historic Preservation and Archaeology Projects		●	●	●	●	●	●	●	●	●
D.4 Limit Replacement Building Size		●	●	●	●		●	●	●	●
D.5 Discourage After-the-Fact Demolition Applications		●	●	●	●	●	●	●	●	●
D.6.1 Clarify Pre-Demolition Documentation Requirements		●	●	●	●	●	●	●	●	●
D.6.2 Establish a Procedure for Staff Review of Non-Locally Designated Properties					●			●	●	

## E. ECONOMIC

The historic character of St. Augustine is appreciated by both residents and visitors alike, providing a tool for economic development through the maintenance and revitalization of historic properties and neighborhoods. Given the significant impact of its historic properties on the economic vitality of the City, preservation should be at the forefront of the City's economic development and revitalization strategies.

St. Augustine's tourism industry is largely based upon visitation to the Colonial core of the City. This industry could be strengthened by encouraging heritage tourism to commercial and institutional destinations in the surrounding neighborhoods. Utilizing preservation as a tool to strengthen neighborhoods, in improving both the built environment as well as telling the story of the City's diversity and development, can serve to increase neighborhood pride and reinvestment as well as encourage tourists to extend the boundaries of their experiences.

**E.1 Goal:** Expand tourism outside of Colonial core.

**E.1 Goal:** Provide financial tools to protect historic resources.

### E.1 Strategy: Integrate Preservation into Commercial Revitalization

#### E.1.1 Recommendation – Provide Preservation Assistance to Commercial Thoroughfares and Nodes

Roadways such as King Street, San Marco Avenue and Anastasia Boulevard are important commercial and transportation thoroughfares through the City and its historic neighborhoods. Revitalization of these thoroughfares could serve to improve the shopping and dining experiences of residents as well as encourage tourists to experience the City beyond the Colonial city by providing them with a visually appealing destination. It is recognized that properties along Anastasia Boulevard, King Street or San Marco Avenue are subject to Design Standards and HARB review is generally limited to those properties located within the historic preservation zoning districts. However, a variation on the Main Street program could be developed to encourage façade improvement through:

- Regular maintenance
- Storefront improvements
- Quality sign and awning design
- Streetscape improvements
- Storefront merchandizing

The program can be tailored to the available resources of the City, and could include private volunteer design professionals to augment typical advisory role of City Staff, who can provide advisory services at a basic level and sharing information on preservation tax credits.

#### E.1.2 Recommendation– Encourage Compatibility of Commercial Corridors and Residential Neighborhoods

When updating their commercial properties, owners should be

encouraged to develop new uses and buildings that are compatible with the surrounding historic residential neighborhoods. The redeveloped properties should be low-impact, and appropriate to scale of the surrounding area. (Refer to Education and Advocacy Strategies.)

## **E.2 Strategy: Create Preservation Reinvestment Opportunities**

Property owners in the City of St. Augustine currently have access to economic incentive programs that are underutilized. These include the Historic Preservation Property Tax Exemption (ad valorum) program, the Federal Preservation Tax Credit program for commercial properties, and the 2012 Lincolnville Community Redevelopment Area. Lincolnville has a mission to support and preserve the quality of life for residents by eliminating blight, while protecting and enhancing the characteristics that make the community unique (i.e. history, architecture, the natural and built environments, culture, and diversity) through community planning, redevelopment activities, and effective partnerships with neighborhood organizations.

The City should strive to identify other financial incentive programs that can benefit historic preservation, City economic development and neighborhood revitalization. This can include strategically pairing funding available through the St. Johns County Housing and Community Development Division with local funding incentives to encourage reinvestment. Programs currently available through the County's Housing and Community Development Division include:

- Affordable Housing Grant Program
- SJC Homeownership Program
- Community Development Block Grants
- Rehabilitation Program
- Housing Finance Authority
- Community Redevelopment Program

These new incentives should be focused to address specific areas so that they serve to generate private growth and investment in the surrounding area in a manner that fits the larger planning goals of the City. For existing or new incentive programs to be effective, they must be utilized. This will require providing clear information and guidance to property owners about the availability of the incentives, as well as educational materials that explain the limitations and restrictions of the programs.

### **E.2.1 Recommendation – Tourist Impact Tax**

Solicit St. Johns County to allow a Tourist Impact Tax to be levied in the City of St. Augustine to promote historic preservation and archaeological activities consistent with the City's goals. These funds could be utilized to purchase threatened historically designated properties. (Refer to Recommendation 2.2.)

### **E.2.2 Recommendation – Establish a Historic Preservation Revolving Fund**

Develop and operate a revolving fund that purchases endangered historic properties and resells them to new owners committed to their rehabilitation. Funds from sold properties can be utilized to purchase future properties. City assistance could be supplemented with low-interest loans or grants to new owners for the costs of rehabilitation, as well as design assistance by volunteer architects and design professionals. (Refer to Education and Advocacy Strategies.)

### **E.2.3 Recommendation – Create Budget to Offset Building Permit Fees**

Create a fund to offset building permit fees for projects that take advantage of the City's financial incentive programs. This could both encourage use of financial incentives and demonstrate the City's support.

### **E.2.4 Recommendation – Establish a Preservation and Archaeology Mitigation Fund**

Establish a mitigation bank to be funded by property owners seeking new construction on a parcel that adversely impacts historic buildings or archaeological features such as following a case demolition-by-neglect or an after-the-fact demolition application. The use of mitigation funds should benefit the City's historic preservation and archaeological goals and can include:

- Supplementing the City's Historic Resource Inventory
- Stabilizing a property for its preservation
- Purchasing a property for historic preservation
- Preserving an archaeological site
- Investigating an archaeological site
- Processing artifacts from an archaeological investigation

## **E.3 Strategy: Promote Preservation Programs and Incentives**

### **E.3.1 Recommendation – Develop Informational Brochures**

Develop historic preservation incentive brochures that describe available local incentive programs in detail and provide information regarding St. Johns County Property Tax exemption and Federal Historic Preservation Tax programs. Make these brochures available for download and include web links for additional information and application materials. Printed brochures should be made available in City Hall as well as at local preservation education programs, as part of a welcome package to new property owners and new businesses who might benefit from a façade improvement program.

### **E.3.2 Recommendation – Revise the City's Historic Preservation Webpage**

Revise the historic preservation website to include information and direct links to initiatives and programs that benefit historic preservation. This is particularly necessary with regard to the ad valorem tax exemption program, which is not currently linked to the Historic Preservation webpage.

### **E.3.3 Recommendation – Conduct an Education Program about Preservation Incentives**

Provide an education session on available incentive programs. (Refer to Education and Advocacy Strategies.)

## **E.4 Strategy: Promote Preservation Programs to Encourage Affordable Housing in Historic Neighborhoods**

### **E.4.1 Recommendation – Develop Partnerships with Community Housing Associates**

Develop partnerships with community housing organizations to encourage affordable and low-income housing in historic neighborhoods. Preservation funding incentives can be used in combination with housing financing to rehabilitate properties and provide financial assistance to lower income residents in historically designated properties.

### **E.4.2 Recommendation – Establish an Unnecessary Hardship Review Procedure**

Compliance with historic preservation standards can place an undue burden on low and moderate income households by requiring the installation of specific materials when there are less costly options available. Providing a means for HARB approval in instances where conformance would place an unnecessary hardship on an owner, could encourage the preservation of the basic form and rhythm of a building instead of its restoration, meeting the objectives of the ordinance if not the literal execution, thus allowing a homeowner to make improvements that may sustain their residency.

This approach allows areas with higher percentages of low- to mid-income households to enjoy the benefits of preservation regulation without bearing a disproportionate financial burden. It can also provide relief for households addressing unforeseen expenses such as extraordinary medical care.

## F. HAZARD MITIGATION

Hazard mitigation planning and response is an issue that impacts many decision-making bodies in the City, affecting environmental conservation efforts, infrastructure improvements, emergency response procedures and the associated funding required. The protection of the City's historic resources and environments should be considered in the larger context of the City's hazard mitigation planning efforts. To that end, the promotion of hazard mitigation options that support the long-term protection and preservation of the City's historic buildings, sites and archaeological resources is encouraged.

**F1 Goal:** Make the protection of the City's historic resources from potential hazards a priority.

**F2 Goal:** Develop procedures to expeditiously respond to hazards at historic resources in a manner that preserves historic fabric and character.

### F.1 Strategy: Participate in the Disaster Mitigation Planning Process

Although the hazard mitigation planning process can be daunting, there are several steps that the City and HARB can take to plan for, mitigate and respond to disasters.

#### F.1.1 Recommendation: Engage in the Hazard Mitigation Planning Process

St. Johns County's Division of Emergency Management is charged with development of the Local Mitigation Strategy Plan (LMS), with the objective of eliminating or otherwise limiting the loss of life and property in the event of a disaster. Two of the responsibilities of the LMS Taskforce include the identification of resources vulnerable to hazards and prioritization of mitigation projects that are eligible for funding. The Taskforce holds quarterly public meetings, which can provide preservation advocates a forum to emphasize the importance of the protection of historic resources in St. Augustine. (Information regarding the Local Mitigation Strategy Plan and meeting notices is available at [www.sjcemergencymanagement.org/lms.html](http://www.sjcemergencymanagement.org/lms.html).)

#### F.1.2 Recommendation: Documentation of Historic Resources Related to Potential Hazards

Documentation of historic resources, such as historic resource surveys, is an essential step in protecting historic properties. It typically includes identifying the key historical and physical attributes of a property, including the address, date(s) of construction, designer, style, arrangement and materials. (Refer to Historic Resource Inventory Strategies.)

The documentation of historic properties in preparing for a potential hazard includes many of the same elements used by preservation professionals, but also includes information specifically associated with the likelihood and potential financial impact of specific hazards including floods, high winds, fire and tornados. This information can be incorporated into a Hazard Mitigation Plan and be utilized to help prioritize mitigation options as well as to assess financial



impacts after a disaster. Although it is typically necessary to engage professional firms with hazard mitigation expertise to complete the required documentation for a FEMA-approved Hazard Mitigation Plans, there is a certain amount of information that is readily available to communities and property owners to better understand their level of risk from the specific hazards that have a higher likelihood in St. Augustine, including flooding and storms.

For example, FEMA approved Flood Insurance Rate Maps (FIRMs) delineate the 1% and 0.2% floodplains (a.k.a. 100- and 500-year floodplains). These maps are used to identify flood risk zones and in calculating flood insurance premiums. (FIRMs can generally be obtained through local or county floodplain managers as well as through FEMA's website at <https://msc.fema.gov/portal>.) Review of the FIRMS can quickly identify those areas most vulnerable to flooding.

A tool that can be utilized for financial impact calculations is FEMA's HAZUS software ([www.fema.gov/hazus](http://www.fema.gov/hazus)) which provides models for estimating potential losses from earthquakes, floods, and hurricanes utilizing Geographic Information Systems (GIS) technology. Having historic resource information keyed to a GIS database through a Historic Resources Inventory facilitates the documentation process.

#### **F.1.3 Recommendation: Prepare Design Guidelines for Flood Mitigation**

Flood and Wind Mitigation Design Guidelines can be a stand-alone document or a chapter in the AGHP. (Refer to Historic Preservation, Conservation and Zoning Strategies). If incorporated into the existing AGHP, the AGHP should be reviewed and updated so its recommendations and requirements are consistent and do not conflict with flood mitigation recommendations.

As a starting point, in their contributions to Flood and Wind Mitigation Guidelines, preservation advocates, and stakeholders can identify clear policies that address both flood mitigation and preservation in their community. Policies can include statements such as:

- Defining acceptable building elevation heights relative to the Base Flood Elevation (BFE) or Design Flood Elevation (DFE)
- Identifying appropriate materials and design considerations for higher foundations and extended stairs
- Identifying acceptable water-resistant materials for flood-prone areas

#### **F.1.4 Recommendation: Provide Protection for City's Historic Resources**

The City of St. Augustine owns many important historic buildings, sites and resources. Providing protection not only can not only mitigate the impact of a potential hazard, it can provide leadership by example, encouraging other property owners to follow suit. Specific protections measures should be undertaken for the archaeological laboratory which contains archival documentation and sensitive artifacts.

## **F.2 Strategy: Plan Historic Preservation Disaster Response**

### **F.2.1 Recommendation: Create an Expedited Review Process for Disaster Response**

In the aftermath of a disaster, decisions must be made quickly to protect people and property. Consequently, historic preservation concerns must follow life-safety priorities and are not at the forefront of the decision-making process. Although communities will often establish a process for expedited permit reviews, preferably in advance of a disaster, they will not necessarily have the capacity for historic preservation review in the wake of the emergency. To better protect historic resources, it is important that building code Staff be familiar with historic preservation requirements and can access preservation representatives in an emergency.

An expedited historic property review process can include the identification of stabilization measures and minor repairs that can be completed without formal HARB review. Similarly, Planning and Building Department Staff can be authorized to approve certain changes utilizing the previously approved AGHP. Since HARB members may be occupied addressing problems with their own properties or may have evacuated the area, Planning and Building Department Staff, with clear guidance, can expedite permits for proposed work without the need for a HARB review meeting. This could expedite stabilization and provision of a weather-tight building enclosure and reduce the administrative burden on property owners.

### **F.2.2 Recommendation: Identify Preservation Partners to Assist in Post-Flood Review Process**

Prior to a flood event, it is important to identify preservation partners from adjacent communities and the county or state representatives who will be able to assist in the review of preservation issues and provide information regarding preservation assistance programs. It is likely that local preservation professionals and HARB members will be affected by the flood event and either evacuated or struggling to address damage at their own properties in the immediate aftermath. Preservation partners who are not personally affected by the flood event can assist in providing a more immediate response to a large number of property owners.

### **F.2.3 Recommendation: Establish a Debris Management Plan**

One of the effects of flooding and high winds is the disbursement of building component debris and buildings contents. Some of the more vulnerable construction components include porches, railings, windows, shutters, fences, etc. If lost, historic materials and components can be costly and difficult to replace and, if replacement in kind is not the priority of the owner, the historic character of a building or structure can be compromised by an insensitive alteration or off-the-shelf alternative.

One of the best means of minimizing the loss of historic materials and components is to establish a salvage plan. This can also be promoted as a sustainable option to disposal. To be effective, a plan should

include training personnel to sort debris and salvage historic materials and components rather than discarding all debris in a landfill. In the aftermath of a disaster, the salvaged items can be identified by property and made available to owners seeking to complete repairs.

#### **F.2.4 Recommendation: Develop and Integrate a Plan for Historic Preservation into Local Response**

It is important to identify opportunities for historic preservation advocates and emergency management personnel who are responsible for recovery activities in the aftermath of a disaster to work together to protect historic resources. This includes during the disaster recovery phase and after, during ongoing rebuilding and infrastructure projects.

#### **F.2.5 Recommendation: Develop Information for Property Owners**

In the immediate aftermath of a disaster, property owners will seek guidance about recovery, including what they should and can do to protect their properties and return to “normal”. This includes everything from who should verify structural stability to how to document damage and prevent secondary damage, such as mold, in the aftermath of a flood. Much of the general information related to property owner response is available from the St. Johns County Division of Emergency Management. ([www.sjcemergencymanagement.org](http://www.sjcemergencymanagement.org))

Historic property owners might have added questions related to whether specific reviews are required, or if historic preservation assistance is available in the form of technical expertise or grant funding. Websites, brochures and/or pamphlets should be readily available for distribution in the immediate aftermath of an event.

## G. ARCHAEOLOGICAL PROGRAM

Since its inception, St. Augustine's archaeological programs have provided an authentic perspective on St. Augustine's history and early development. The archaeological process is initiated in response to a construction permit application. The City of St. Augustine Archaeological Preservation Ordinance, adopted on 20 December 1986, outlines the requirements for archaeological investigations based upon the location of a property in relation to defined zones and the proposed level of disturbance. Because of the invasive nature of many construction activities, the archaeological review often represents the last opportunity to document and collect resources before they are destroyed. Due to of funding limitations, the program heavily depends on volunteers from the St. Augustine Archaeological Association (SAAA).

A pressing concern is the effect of rising sea levels on archaeological resources. As the height of water levels increases, the opportunity to retrieve and document archaeological resources will decrease. In many cases, these resources represent the last tangible remains of everyday life from the City's earliest residents.

**G.1 Goal:** Provide sufficient support to the Archaeological program to allow the performance of duties in accordance with the requirements of the Archaeological Preservation Ordinance including providing additional Staff and increasing conservation efforts, including proper management and protection of artifact collection and archives.

**G.2 Goal:** Increase archaeological mitigation from development impacts.

### G.1 Strategy: Expand Archaeological Program

#### G.1.1 Recommendation: Add Additional Archaeological Staff

St. Augustine currently has one City Archaeologist, Carl D. Halbirt, who has held the position since 1990. Because of the length of his tenure, he holds the institutional memory of the City's archaeological resources. In addition to fieldwork, the responsibilities of the City's archaeology program include artifact curation and archival documentation. Since the first project in 1987, approximately 800 archaeological projects have been implemented, resulting in a growing backlog of artifact curation and archival documentation. It is recommended that a second City Archaeologist be hired to address this backlog as well as share the institutional archaeological memory of the City.

#### G.1.2 Recommendation: Establish a Process to Conduct Archaeological Assessment Early in Planning Process

Building application permits can require the review of HARB, the PZB, and the Planning and Building Department. If the property is located within the bounds of an identified archaeological zone, it could also be subject to review by the City's archaeological program.

To minimize the potential impact of proposed development on archaeological resources, it is recommended that the City

Archaeologists conduct an assessment early in the planning process of a project proposed in identified archaeological zones to identify potential mitigation measures.

**G.1.3 Recommendation: Encourage Support from the St. Augustine Archaeological Association**

The St. Augustine Archaeological Association (SAAA) is a volunteer organization, founded in 1985-1986, to support the City of St. Augustine's Archaeological Preservation Ordinance. The membership includes professional and avocational archaeologists who are often called upon to assist the City Archaeologist in the performance of his duties related to fieldwork and the processing of artifacts. It is recommended that SAAA's be encouraged to continue supporting the activities of the City archaeology program.

**G.1.4 Recommendation: Update Archaeological Zone Map**

Update archaeological zone map to reflect existing archaeological database and historical records. Records should be included in City's GIS mapping. (Refer to City Wide Planning Strategies.)

**G.1.5 Recommendation: Nominate Archaeological Sites to the National Register of Historic Places**

The nomination of significant archaeological sites to the National Register of Historic Places will serve to provide formal documentation of some of the City's oldest resources, enhancing their appreciation and understanding. Given the enormity of remaining archaeological resources in the City and particularly the colonial downtown, a prioritized list should be developed based upon clearly defined parameters.

**G.1.6 Recommendation: Expand Archaeological Artifact Curation**

Following the retrieval of artifacts, sufficient support should be provided to allow curation, data analysis and reporting to be performed in a manner consistent with the National Historic Preservation Act (NHPA). (Refer to Recommendation 1.1.)

**G.1.7 Recommendation: Prohibit Large-Scale Underground Construction in Archaeological Zone 1**

Archaeological Zone 1 delineates the City's oldest known area of below-ground resources, ranging from limited prehistoric and early European settlement remains through the 20th century. To minimize potential damage from new developments, it is recommended that below-grade construction be limited. This includes limiting underground garages, basements and overly destructive foundation systems.

**G.2 Strategy: Enhance Support of Archaeological Program**

**G.2.1 Recommendation: Develop an Information Pamphlet for Property Owners**

Create a user-friendly pamphlet describing the City's archaeological program. This can include a map of the City's Archaeological zones

and descriptions of the type of archaeological monitoring, testing or excavation that may be required under the Ordinance. It can also include the appropriate protocol for unexpected archaeological finds.

#### **G.2.2 Recommendation: Adequately Fund Archaeological Activities**

Because the archaeology program is driven by the building permit application process and construction is effectively discouraged in parts of the City by rising sea levels, the opportunities for documenting archaeological resources is dwindling. As a result, it is important to provide adequate funding for archaeological field and curation activities for projects that do occur, including proper storage, analysis, cataloging and conservation of artifacts. (Refer to Economic Strategies.)

#### **G.2.3 Recommendation: Earmark Archaeological Fees for Archaeological Programs**

Dedicate archaeological fees collected from permit applications to fund archaeological division activities including special projects, artifact analysis and interpretive programs.

## H. EDUCATION AND ADVOCACY

Critical to developing support for historic preservation and archaeological investigations in the City is offering ongoing educational opportunities to St. Augustine's residents and visitors. This cannot be the responsibility of any one organization or group. To be most effective, strong public-private relationships need to be developed between various entities to support and provide a sustained, well-rounded public education and advocacy program. In addition to the National Park Service's interpretive programs at the Castillo de San Marcos, there are currently a number of preservation education opportunities in the City of St. Augustine organized by the City, Flagler College, the St. Augustine Historical Society and the St. Augustine Archaeological Association. These include lectures and exhibits at the Visitor's Center, the St. Augustine Lighthouse and Museum, and the Government House Museum, lectures sponsored by each organization, and educational materials developed by City Staff.

One of the critical components that was once present in the City and is now lost is a strong advocacy voice for historic preservation and archaeology. The recently formed Citizen's for the Preservation of St. Augustine has the opportunity to fill the void. While City government is responsible for administering the rules and regulations of St. Augustine's Code of Ordinances, advocates can influence local policies, programs and funding mechanisms to support historic preservation. This might include advocating for an appropriate outcome-specific property or project, or raising money to support preservation education and awareness in the City. Additionally, the University of Florida is developing a preservation institute for its students through the UF Historic St. Augustine Direct Service Organization. The local partnership is proposed to be similar to their established Preservation Institute Nantucket program.

**H.1 Goal:** Encourage institutions, organizations and groups across the City to promote historic preservation and archaeology awareness, activities and support.

### **H.1 Strategy: Increase Awareness of the Value of St. Augustine's Architectural, Archaeological and Cultural Resources and Their Benefits**

#### **H.1.1 Recommendation – Regularly Update City Website with a Preservation and Archaeological Activity and a Calendar of Events**

Provide links on the City's website from the Historic Preservation homepage to various incentive programs available in the City, even if they are managed by other Departments, or State or Federal programs. Provide a link on the website to allow viewing of HARB application materials as well as access to HARB and preservation-related City meetings schedules. The website can also provide a forum to publicize recent ongoing publicly-accessible archaeological activities as well as to clarify the proper protocol to follow in the event of unexpected archaeological finds.

Links can also be provided to available helpful preservation resources such as the Florida Master Site File, National Park Service Preservation

Briefs, information on National Register listings, etc. Maintaining a clear calendar of Historic Preservation events, local lectures or education sessions, and State preservation programs, as well as HARB application meeting dates and submission deadlines should be a priority.

#### **H.1.2 Recommendation – Develop Historic District Education Materials**

The Zoning workbooks, developed by the City's Historic Preservation Staff, provide a good, concise history of the development of many of St. Augustine's neighborhoods. This information should be reformatted, and include photographs, as a stand-alone description of the City's historic neighborhoods and made available in print and on the City's website.

#### **H.1.3 Recommendation – Develop Archaeological Education Materials**

Create a user-friendly pamphlet with a map of Archaeological zones, clarifying the type of archaeological monitoring, testing or excavation that may be required. Include information on the proper protocol for an unexpected archaeological find.

#### **H.1.4 Recommendation – Post Historic Preservation and Archeological News on Facebook and Twitter**

Develop a Facebook page for historic preservation activities and provide Twitter posts of preservation accomplishments and archaeological findings and news.

#### **H.1.5 Recommendation – Develop Walking Tours and Podcasts of Historic Neighborhoods**

Walking tours and podcasts describing the Historic Districts and publicly-accessible archaeological sites should be developed in cooperation with neighborhood associations. Location-based mapping could provide searchable links to the City's GIS-based, Historic Resource Inventory and mapping. This same information should be included in tour brochures made available at the Visitor's Center and City Hall.

#### **H.1.6 Recommendation – Develop Tour Protocol for Archaeological Sites**

St. Augustine benefits from a robust archaeological program unlike anywhere else in the United States. Archaeological digs are fascinating for school children, residents and visitors. During active archaeological digs, at a designated times and days, a member of the team could informally brief the public about what is being learned or found. These briefings could be conducted by trained SAAA volunteers and can be filmed for web-streaming, with the schedule posted on the City's website.

#### **H.1.7 Recommendation – Develop a Lecture Series**

A lecture series should be developed to provide information on the City's history, historic preservation and archaeological efforts. Participating entities could include the St. Augustine Historical Society, Flagler College, the St. Augustine Archaeological Association, the Citizens for the Preservation of St. Augustine and the City of St. Augustine Staff. Topics might include neighborhood history and



revitalization, available historic preservation incentive programs, flood and hazard preparedness, and what to do in the event of an archaeological find.

#### **H.1.8 Recommendation – Provide Realtor Training**

Provide training to educate realtors on the City's Historic Districts and neighborhoods, preservation procedures, preservation incentives and financial benefits. This can be implemented by the Historic Preservation Staff as part of realtor-board mandated training.

#### **H.1.9 Recommendation – Develop a Property Owner's Pamphlet**

Prepare a pamphlet that includes information about HARB, historic designation, the Certificate of Appropriateness and Certificate of Demolition processes, as well as archaeological review requirements and protocol for finds for owners of property located in Historic Districts. A similar pamphlet can be developed for HP Conservation Districts. These pamphlets could be distributed by realtors and the City to new property owners as part of a welcome package.

#### **H.1.10 Recommendation – Conduct Hands-On Preservation Workshops**

Develop hands-on workshops focused on building preservation topics such as window restoration and masonry repointing. This can be completed in conjunction with local contractors and filmed or streamed for web viewing.

#### **H.1.11 Recommendation – Encourage Volunteer Design Assistance**

Many property owners conduct repairs on the basis of recommendations from contractors without the advice of design professionals. Volunteer architects, landscape architects and other professionals could provide design assistance, free of charge, to property owners pursuing rehabilitation projects, façade improvements, as well as other planning and design needs.

### **H.2 Strategy: Increase Awareness of How Historic Preservation Positively Affects the City**

#### **H.2.1 Recommendation – Hold a Preservation Awards Ceremony**

Recognize the achievements of successful projects, individuals and groups that have had a positive impact on preserving the City's architectural, archaeological and cultural heritage through an annual or biannual awards ceremony. The presentation of awards could occur at a regularly scheduled City Commission meeting, or be part of a larger, preservation-themed event, such as an advocacy fundraiser or lecture presentation.

#### **H.2.2 Recommendation – Recap Preservation Achievements**

Provide a recap of the City's historic preservation efforts. This can include a report on completed surveys, new Historic Districts, the number of applications processed, archaeological digs completed, artifacts conserved, and other City-sponsored initiatives. This recap should be posted on the HARB website and shared in the opening remarks at a preservation-themed event.