



Our Plan

“You’ve got to be very careful if you don’t know where you’re going, because you might not get there.”

- Yogi Berra

Introduction

Adopted in 2015, **planokc** instructs us to “develop and implement a citywide historic preservation plan.” This plan has been developed on the basis of that directive, building on the key issues identified in **planokc** of identification, protection, and incentivization.

Development of this plan incorporated many forms of public engagement and research. Decades of research into the historic resources of the city and region, available via the Oklahoma State Historic Preservation Office, provided a baseline for the understanding of Oklahoma City’s opportunities and challenges. Multiple surveys and studies prepared in the creation of **planokc** provided valuable information for this plan. A public kick-off meeting, multiple stakeholder meetings, meetings with small groups and individuals, and an online survey further informed the development of plan recommendations.

The following section of the plan seeks to encapsulate the concerns, challenges, opportunities, and aspirational goals identified through the development of this plan. Four **Big Ideas** target broad themes identified through the plan’s development, then refine those themes to specific, achievable initiatives. Initiatives include real-world, Oklahoma City-based examples of issues or opportunities, and inform further recommendations for specific actions to be implemented upon adoption of **preserveokc**.

Opposite page: Sanborn Fire Insurance Map of Oklahoma City at Main Street and Broadway, 1919.

Supporters gather to celebrate as the recreated belfry and steeple is installed at the historic 8th Street Church in Midtown.

big idea one

Big Idea One: Strengthen Public Support for Historic Preservation

“If you have a population which cannot see beauty, you will have a population which cannot produce beauty.”

- William Morris,
British artist and social activist, 1834-1896

BIG IDEA

We will build a culture of appreciation for Oklahoma City’s history and historic resources through accessible information, effective public outreach, and the formation of productive partnerships that recognize and celebrate the roots of Oklahoma City’s unique identity.

INITIATIVES

1. Increase community awareness of and appreciation for Oklahoma City’s history and historic resources.
2. Increase community awareness of and support for historic preservation activities.
3. Raise awareness among community leaders of historic preservation’s value to Oklahoma City.
4. Encourage public engagement in historic preservation.

Since the movement began, historic preservation has always been a grass-roots led activity. Beginning with the Mount Vernon Ladies’ Association who raised \$200,000 in 1858 to purchase and save George Washington’s home, to Oklahoma City residents’ tireless advocacy in 1969 for the creation of Heritage Hills, the state’s first locally-designated historic district, historic preservation is at its most effective when it serves a need that is locally recognized, locally understood, and locally supported.

In order for Oklahoma City to reap the full-spectrum benefits that historic preservation can offer, both the general public and community leaders must understand and support the mission and it’s related activities. First, the community must understand its own multi-layered history and must recognize existing historic resources and why they matter. The public must also have broad access to information and resources, and be encouraged to collect and share their own collective history so it can be appreciated and utilized by others.

Second, the community must understand what historic preservation is—and what it is *not*. This requires a clear articulation of the various levels of historic preservation, from a flexible adaptive reuse approach that maintains the character and identity of historic places while still allowing contemporary uses, to far less common museum-quality restorations that encapsulate a moment in time.



The public also requires a clear understanding of preservation “*whys*,” such as increases in individual property values, tangible quality-of-life improvements, and significant environmental benefits that can be gained when communities and individual property owners choose historic preservation approaches over new construction.

Beyond understanding the “*what*,” public support for historic preservation must be amplified through clear knowledge of the “*how*.” This means making widely available information on tools, programs, and incentives that make a historic preservation projects just as feasible as new construction.

Lastly, and perhaps most importantly, understanding how to engage in effective historic preservation is critical to building strong public support *for* historic preservation. Success here may be best evidenced by a mobilized community that knows how, when and where to use preservation tools, and understands how community history affects, and is affected by, future development.

Clockwise from far left: Wood window repair workshop, installation of district markers, Paseo Art Walk, and training for design review board members.

Opposite page, clockwise from upper left: An “urban camp-out” at the Overholser Mansion, a bicycle tour stops in front of the Municipal Auditorium, a car show on Automobile Alley, and families trick or treat at the Harn Homestead.

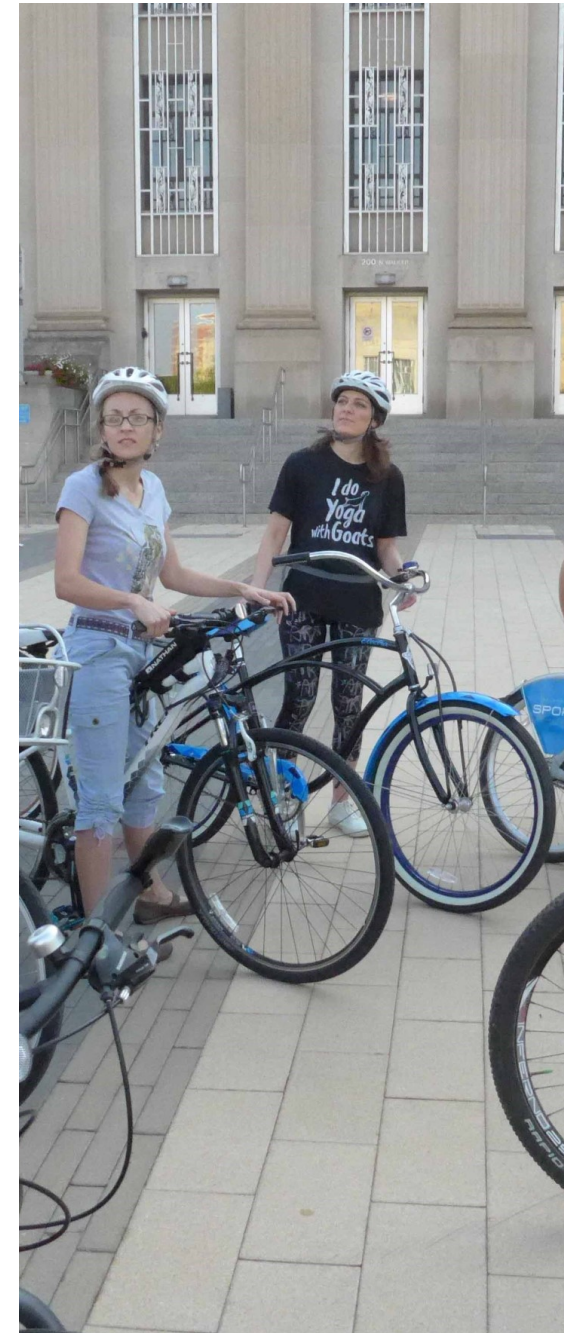
Initiative I:

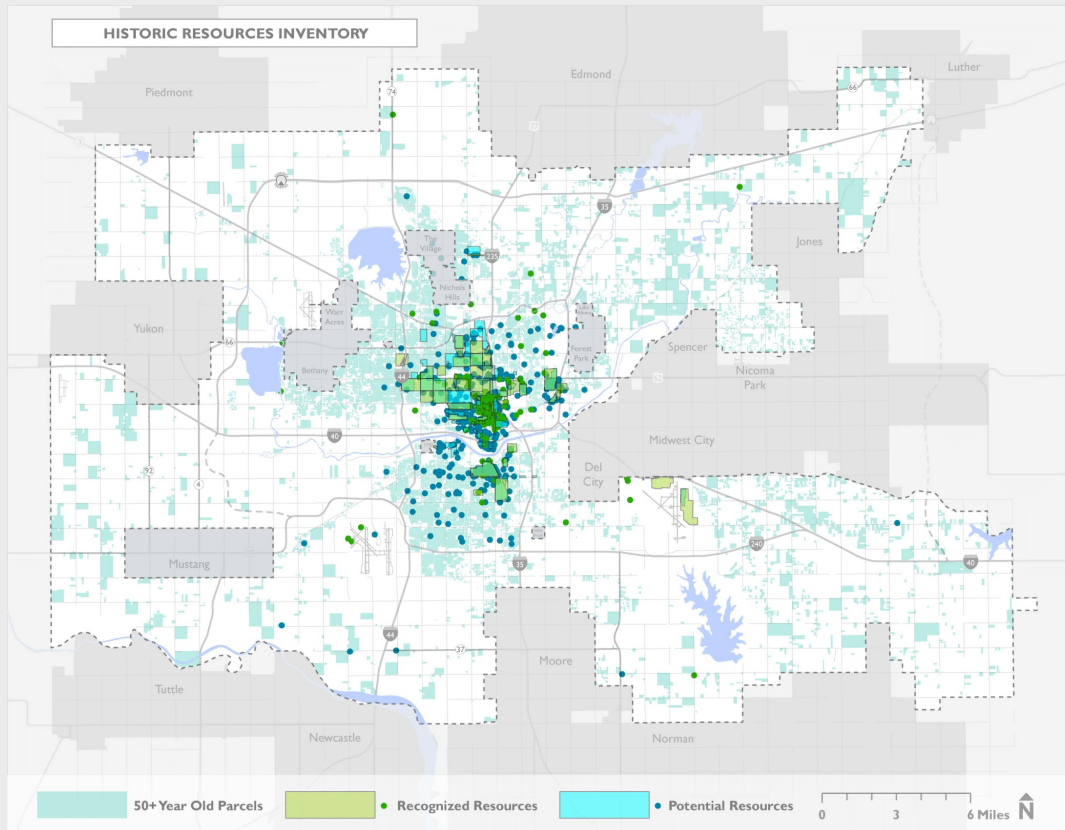
Increase community awareness of and appreciation for Oklahoma City's history and historic resources.

Oklahoma City's built environment exhibits waves of the city's history and development, built and rebuilt through oil booms and busts, construction and relocation of rail lines, neighborhoods developed and then replaced by new highways or urban renewal. Though many of Oklahoma City's earliest structures are gone, many historic resources remain, physically communicating the city's past, creating a palette of design elements and materials, and establishing a framework for future development.

Not all of these resources are initially impressive, and some may even go unnoticed. However even modest homes, utilitarian warehouses, neighborhood churches, shops, and schools tell the story of how Oklahoma City came to be. These historic resources from many different development eras create the rich fabric that is Oklahoma City today.

The public should be empowered to learn more about the history that has shaped Oklahoma City, and to share their own stories. This knowledge should inform public appreciation of the city's unique identity, and serve as a reference for decision makers about ongoing growth.





Inventory of Historic Resources

This map depicts individual properties and districts that have been formally recognized as historic at a local or federal level. This map also includes individual property and districts that have been identified through surveys and research efforts and significant and potentially historic. Finally, this map shows properties identified via county assessor records as at least 50 years old. These properties, based on age, are potentially historic and can be used to identify priority areas for future survey work.

Inventory of Historic Resources

For five decades, both professional and amateur historians have identified, documented, and evaluated historic structures, sites, and districts throughout Oklahoma. Within Oklahoma City, dozens of historic districts and hundreds of individual structures have been locally designated as historic, listed on the National Register of Historic Places, or determined to be eligible for the National Register. Thousands more structures throughout Oklahoma City have been surveyed and recorded, establishing baseline data for historic and architectural resources.

As a composite, this data is a valuable inventory that serves several key purposes:

- Provides information for the general public seeking to learn about Oklahoma City history;
- Informs property owners assessing their building's significance; and
- Informs policy-makers considering decisions affecting the growth of Oklahoma City.

The inventory of historic resources also has the potential to be interactive, allowing opportunities for the community to submit information about historic resources that are important to them.

Implementing proactive expansion and ongoing maintenance of this inventory, and making it available to City departments and the general public, is critical to increasing awareness of Oklahoma City's history and historic resources.

Promoting Historic Resources

An historic inventory is a valuable tool, but its mere existence does not generate awareness in the public at large. In addition to recording, updating, and making available information about our community's history and historic resources, the City can proactively use this data to promote these resources.

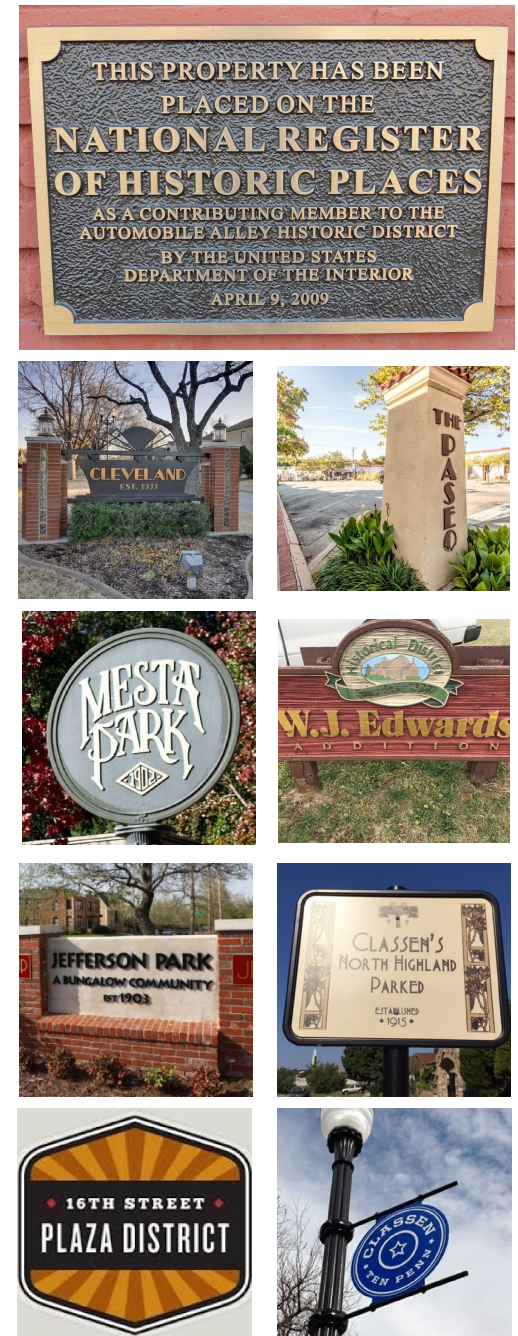
Across Oklahoma City, commercial and entertainment districts, residential neighborhoods, and other destinations take advantage of their historic identities to brand and market themselves, to establish community, and to create identity. From historic Uptown along NW 23rd Street and historic Capitol Hill along SW 25th Street, to the former showrooms of Automobile Alley and the former industrial warehouses of Bricktown, Oklahoma City's districts demonstrate the revitalization power of connecting historic character, distinct identity, and reuse of distinctive historic buildings.

Similarly, "historic" neighborhoods, whether formally designated or informally recognized for their character and architecture, have successfully used their history to promote their neighborhood identity. For example, since 2016, nine neighborhoods from all parts of the city have worked with the City to install sign toppers for neighborhood identification.

Increased awareness of Oklahoma City's history and historic resources can be achieved through less formal means as well. Providing information

for use by neighborhood or commercial associations and other groups, acknowledgement of historic places through awards and recognition, social media, or other City communications, are all ways to enrich public appreciation for Oklahoma City's unique character, and to build public support for the preservation of related historic resources.

Through the use of an accurate and accessible inventory of historic resources, opportunities for the public to provide information about places important to them, and outreach activities to publicize Oklahoma City's history, we will strengthen public support for the preservation of our most important historic places.





Uptown 23rd Street Urban Pioneer

Successful business people often find that good preservation practice also makes good economic sense. The lived-in character of historic commercial buildings can be a priceless asset for entrepreneurs seeking to establish a brand new sense of place.

In 1934, a Jefferson Park structure that began life as a 1919 Victorian home, was adapted for commercial use with the addition of a stylish Art Deco storefront. For the next six decades, three generations of family operated Cheever's Flowers at 2409 N. Hudson.

In 2000, the building was adapted again to become Cheever's Café. The flower shop's 20-foot display cooler remains the centerpiece of the storefront—now showing off a variety of dessert and wine bottles. The back portion of the former house has been adapted for a private dining area.

Cheever's Café has provided a solid foundation for the ongoing and expanding revitalization of the Uptown 23rd Street Commercial District—becoming an OKC “special place” nearly overnight.

Initiative 2: Increase community awareness of and support for historic preservation activities.

We must combat misconceptions of what historic preservation is—and is not—by providing resources, information, and evidence in the form of our own success stories to demonstrate that preservation is doable, and worth doing.

For the public to support historic preservation, people must understand what historic preservation is, how it works, and how they serve to benefit from it. Many assume that preservation standards are so rigid that an old building cannot be repurposed for a new use, or adapted for modern amenities or accessibility. People often assume that preservation is so expensive that it can only be undertaken at a financial loss. Alternatively, it is assumed that once a building is listed on the National Register of Historic Places, it is protected, and the battle is won.

With 50 years of preservation experience under our belt, Oklahoma City has more local historic districts and more completed historic tax credit projects* than any other city in Oklahoma. These projects have been accomplished by a local community of skilled, knowledgeable and devoted property owners and professionals. We can do a better job of

tapping into these resources and utilizing them to enhance public support for, and understanding of, historic preservation.

Targeted Outreach

Stakeholders working and living within Oklahoma City's numerous Design Review and Historic Districts, including residents, property owners, and professionals such as realtors, architects, or contractors, benefit from specific training and outreach. Participants in the Strong Neighborhoods Initiative and Commercial District Revitalization program work in largely historic areas, and would also benefit from increased awareness of preservation-related tools and incentives.

Numerous existing programs via the City of Oklahoma City and other organizations include:

- Hands-on Rehab Workshops;
- Partnerships offered to neighborhood and business district associations;
- Realtor Training +CEUs on Design Review District process, through the Oklahoma City Metropolitan Association of Realtors; and
- Training workshops on programs of the National Historic Preservation Act via the Oklahoma State Historic Preservation Office.

Each of these has been an effective way to reach different audiences and presents an opportunity for continued and increased outreach to support and engage those involved in historic preservation.

Training for Decision-Makers

In addition to those affected by historic preservation and design review, we also need to reach those responsible *for* historic preservation design review: elected officials and appointed review commission or committee members would benefit from training on the what, why, and how of historic preservation, directed specifically toward their roles.

Existing, targeted training efforts include an annual workshop for all design review commissions and committees, quarterly workshops for the Historic Preservation Commission, and training opportunities throughout the year provided by the State Historic Preservation Office.

Enhanced understanding of best preservation practices, principles guiding adaptive reuse and rehabilitation of historic structures, and available incentives to assist with historic preservation projects will improve comprehension of, and support for, a range of historic preservation activities.

Right: The 1907 Pioneer Building at 103 Dean A. McGee is listed in the National Register of Historic Places. This building is within the Downtown Business District, reviewed by the Downtown Design Review Committee.



Historic Tax Credits at Work

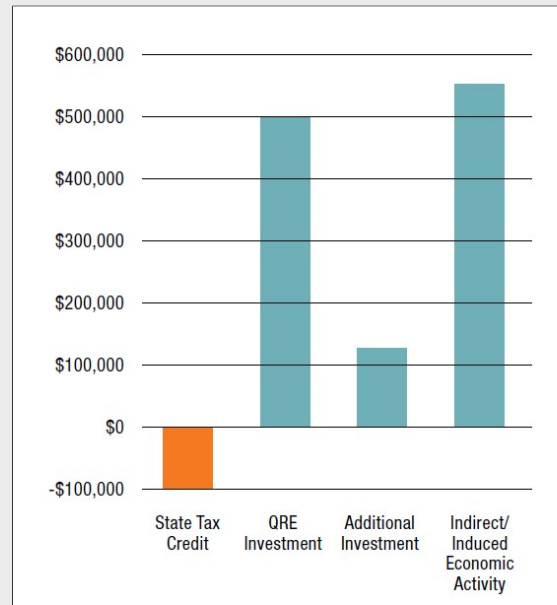
These graphics illustrate statistics about the use and effect of tax credits for the rehabilitation of historic structures. Research shows that, for every \$100,000 paid out in tax credits, over \$1 million in additional investment is generated.

Oklahoma City has benefited greatly from these credits, with nearly half the tax credit dollars in the state being used in Oklahoma City.

Contrary to popular belief, these tax credits are not limited to massive projects and large, iconic landmarks. Research shows that nearly half of the tax credit projects in Oklahoma are under \$1 million investments, and more than a quarter of the projects are under \$500,000 investments.

Graphics and data from The Impact of Historic Tax Credits by PlaceEconomics, Inc, courtesy of Tulsa Foundation for Architecture.

Economic Impact of \$100,000 tax credit project



Initiative 3:

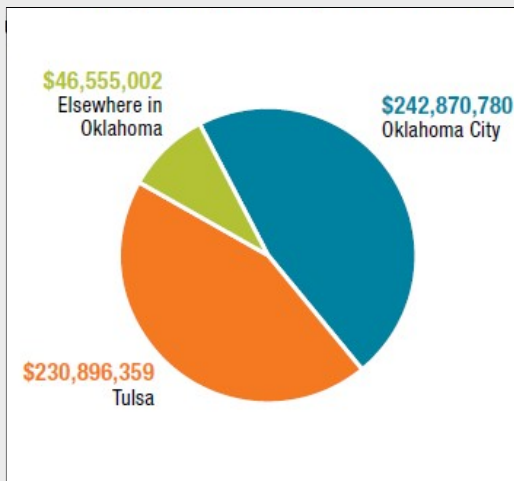
Raise awareness among community leaders of preservation's value to Oklahoma City.

It is critically important for community leaders to recognize the cumulative benefits of historic preservation for the City of Oklahoma City. Chapter X, *Why Preserve?* highlights the quality of life, environmental, and economic impacts of historic preservation. Just as we routinely collect and report information such as jobs created, sales tax generated, or number of code enforcement cases resolved to city leaders, we must track and share information on the impact that historic preservation is having on Oklahoma City.

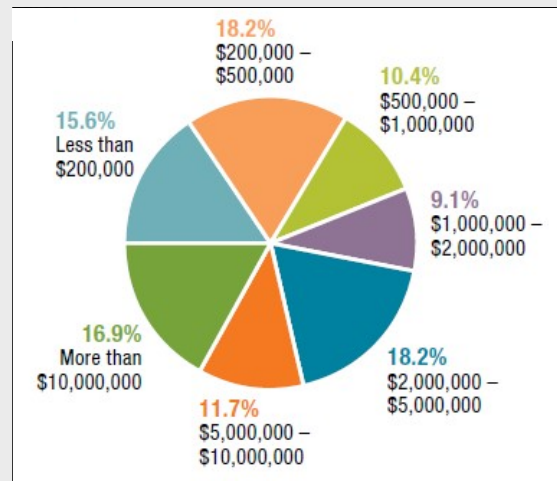
Readily available data that would help to quantify the benefits of historic preservation may include:

- Changes in property values
- Economic impact of historic tax credits
- Building Permit data
- Status of vacant, abandoned, or dilapidated historic buildings
- Commercial Revitalization District and Strong Neighborhood Initiative program data
- Historic resources in Tax Increment Finance Districts
- Heritage Tourism data from the Oklahoma City Convention and Visitors' Bureau

Location of Tax Credit Projects by Investment



Tax Credit Projects by Investment Size



Other agencies and organizations that may be potential resources include:

- Oklahoma State Historic Preservation Office
- Preservation Oklahoma, Inc.
- BlackSpace Oklahoma
- Neighborhood Alliance
- Greater Oklahoma City Chamber of Commerce
- Business Improvement Districts
- Oklahoma Department of Commerce

These resources can highlight the economic benefits of historic preservation-related activities to Oklahoma City, and emphasize the importance of historic preservation as an economic driver. Collecting and making available measurable information on the cumulative benefits of historic preservation will strengthen appreciation for the integral role that preservation plays in Oklahoma City's development and revitalization.

Initiative 4:

Encourage Public Engagement in Historic Preservation.

The success of historic preservation, and the many benefits that come with it, depends upon an engaged public that values its history and historic resources, and knows how to take an active role in what happens to those resources.

When the public can engage effectively and at the appropriate point in a decision-making process, projects can be directed toward the best possible outcome, avoiding the delays of last-minute objections and conflicts.

Public Notification

Public notification processes are well-established for existing design review and other regulatory or rezoning processes, often resulting in attendance at public meetings, letters of support of, or opposition to proposals, and media coverage.

While meeting the letter of the law, we should regularly evaluate the effectiveness of notification processes, ensure that the public not only receives proper notification but also understands their options for engagement, can find information online, and determine whether additional methods of outreach are needed.

Partner organizations such as Neighborhood Alliance and neighborhood and commercial district associations may be able to distribute information beyond the legally-required methods for notification and further enhance public engagement in review processes.

Additional Outreach

The City uses numerous forms of outreach, from press releases and social media posts to coverage on the City's government access cable channel, Channel 20, to distribute information to the public. By sharing information about opportunities to engage in historic preservation, we can strengthen the public's ability to take an active role in historic preservation.



The Tower Theater on NW 23rd Street used state and federal tax credits to rehabilitate a historic movie theater into a performing arts space, complete with a restored neon sign, contributing to the revitalization of a larger commercial area.

The City of Oklahoma City constructed the Lake Overholser Dam and Pump House in 1918; the structure was listed in the National Register of Historic Places in 2007.



Big Idea Two: Practice Good Stewardship of Our Historic Resources

“Rehabilitating historic properties conserves taxpayers’ dollars, conserves our heritage, and conserves the natural environment. Rehabilitating historic buildings and using the infrastructure that is already in place to serve them is the height of fiscal and environmental sustainability.”

- Donovan Rypkema,
PlaceEconomics

BIG IDEA

The City of Oklahoma City will continue to lead by example and act as a good steward of City-owned and –controlled historic resources through maintenance and preservation of City facilities and through decision making processes about City projects affecting historic resources.

A city is best known through its physical presence. Its government buildings, parks, and recreational facilities are the places where people interact with the “face” of a city, experiencing the pride with which a city maintains itself and the quality of life a city strives to establish. Oklahoma City’s grand civic buildings and neighborhood fire stations, local parks and public art are evidence of past generations’ efforts to establish a world-class city, and the present generation’s dedication to maintaining that legacy.

INITIATIVES

1. Preserve and maintain City-owned Historic Resources.
2. Consider historic preservation early in the decision-making process for City projects.
3. Ensure the preservation of City-owned historic resources in the event of a change of ownership.



ZooZeum: New Use for a Historic Bathhouse

Administrators at the Oklahoma City Zoo, a trust of the City of Oklahoma City, knew they had something special on their hands with the Works Progress Administration-built Bathhouse. Erected in 1935, nobody knew quite what to do with the rusticated red sandstone structure that had provided changing and shower facilities for generations of swimmers at Lincoln Park's Northeast Lake.

That is until 2011, when zoo staff conceived of a unique way to reuse the historic building and create a new attraction at the zoo: a ZooZeum. The only museum of its kind in the country, the ZooZeum is the place where visitors can experience galleries filled with artifacts and photographs of the Oklahoma City Zoo's 114-year zoological and botanical history.

The Lincoln Park Bathhouse structure, as it is formally identified on the National Register of Historic Places in 2016, is significant for its association with social history, specifically the work of the Civilian Conservation Corps in Oklahoma during the Great Depression. The ZooZeum is an outstanding example of good stewardship and adaptive reuse of publicly-owned historic resource.

For decades, the City of Oklahoma City has renovated, occupied, and maintained historic civic buildings, leading by example with adaptive reuse of historic structures. National Register-listed City properties include:

- Municipal Building
- Municipal Auditorium
- Harbor-Longmire Building
- Santa Fe Depot
- Union Depot
- Lake Overholser Bridge and Dam
- Will Rogers Park Gardens and Arboretum
- Lincoln Park Bathhouse

Despite these many successes, the City of Oklahoma City does not have a formal policy to evaluate the effect of City activities on City-owned or controlled historic resources.

It is important for the City to continue to protect long-term investments in its character-defining assets through the good stewardship of City-owned and controlled historic resources.

Initiative 1:

Preserve and maintain City-owned Historic Resources

From New-Deal era bath houses to ornate, Art Deco train stations, the City of Oklahoma City owns and maintains numerous historically significant structures and sites. Multiple departments are responsible for both ongoing maintenance and decisions about significant renovations. Some historic resources are within design review or historic districts, triggering a review process that considers historic preservation, and others have taken advantage of federal funding which triggers the National Historic Preservation Act's review process. However, many historic resources owned by the City or its Trusts are not subject to these processes and no special review is required.

Identification

An important part of maintaining historic resources is being able to identify the resources themselves. The list of properties owned by the City or its Trusts should be regularly evaluated for the identification of historic resources. This identification, in coordination with utilization of a Historic Resources Inventory, is essential to good planning and efficient use of City resources. In recent years, the City of Oklahoma City has taken identification to the next step by initiating the nomination of several City-owned properties to the National Register of Historic Places. This type of recognition honors those places that

matter to Oklahoma City, raising awareness of Oklahoma City's history and identity. As part of identification of City-owned historic resources, we should continue to lead by example through the identification and formal recognition of eligible City property, such as through listing on the National Register of Historic Places.

Best Practices for Maintenance

City facilities are managed by numerous departments, all with their own procedures or standards for maintenance and renovations. The General Services Department oversees building maintenance, repair, and enhancement for numerous City-owned properties, including the downtown campus. The Parks and Recreation Department manages and maintains over four thousand acres of park grounds, with park-related structures throughout. Numerous other departments, from Utilities to Police and Fire, oversee their own facilities, while the Public Works Department manages other projects citywide.

Individual City departments have procedures in place for maintenance, but there are no City-wide policies specifically addressing the treatment of city-owned historic resources.

Incorporating consistent standards for maintenance of identified historic resources into existing departments' procedures would guarantee that best practices are followed, ensure the resources' longevity, and protect generations of investment in Oklahoma City's built environment. Existing, established standards,

such as the Secretary of the Interior's Standards and Guidelines for Rehabilitation, and the Building Conservation and Rehabilitation Guidelines for Oklahoma City, provide a starting point for developing standards to be applied to city-owned historic resources.

Review of Major Renovations

Significant investments in properties of the City or its Trusts trigger review by City Council and the Mayor. However, this review does not specifically assess the effect of the proposed actions on a historic resource from a preservation perspective.

The City of Oklahoma City's Historic Preservation Commission is empowered to "comment upon and provide recommendations to the City Council, Planning Commission, other City Boards, Committees and Commissions on actions of other governmental units with respect to the effect of such actions upon historic, architectural and archeological resources," but it currently does not comment on projects outside of HP/HL-zoned districts.

An existing, similar process for advisory reviews and recommendations to City Council by the City of Oklahoma City's Arts Commission on activities related to public art presents a model for providing recommendations on City-owned historic resources. Consideration of the impact of City projects continues the City's stewardship of its own historic resources.



Initiative 2:

Consider Historic Preservation Early in the Decision-Making Process for City Projects

In addition to the historic resources that the City currently owns and maintains, the City of Oklahoma City sometimes acquires additional property, or partners with other entities, to invest in the renovation of public facilities. Whether planning for construction of a new facility or renovating an existing building, these activities have the potential to affect historic resources.

Consideration of a project's impact on historic resources should be formally incorporated into the existing public decision-making process. This process should:

- Evaluate whether historic resources will be affected through consultation of the Historic Resources Inventory;
- Encourage public input on the identification of historic resources ; and
- Consider whether an adverse effect on an identified historic resource can be avoided.

These considerations should be made early enough in the project development process to allow time for modifications. This will ensure that projects incorporate historic resources when feasible. They will also identify potential public concerns in a timely manner, keeping large projects on course.

Initiative 3:

Ensure the preservation of City-owned historic resources in the event of a change in ownership

It is a rare but real possibility that as City facilities fall out of use they may be de-accessioned and sold for redevelopment. Despite a change in ownership, these historic resources continue to be viewed as a part of Oklahoma City's legacy. Depending upon their significance and the prominence of their location, formerly City-owned historic resources have the potential to be anchors and architectural landmarks and serve as prime examples of creative, adaptive reuse.

To allow a historic resource built by the City and maintained for generations to be insensitively altered or even demolished squanders that public investment. This wastes an opportunity to extend the City's stewardship of its historic resources. When the City considers divesting itself of a historic resource, strong consideration should be given to encouraging or requiring the preservation of that resource as part of a sale or other redevelopment agreement.

Opposite Page: The Overholser Bridge, the Municipal Auditorium, Park Structure in Earlywine Park, Union Depot.

Right: Santa Fe Depot, Memorial Park, Harbour-Longmire Building, and the Water Filtration Plant.





big idea three

Big Idea Three: Protect Historic Resources

Citywide

“Is it not cruel to let our city die by degrees, stripped of all her proud moments, until there is nothing left of all her history and beauty to inspire our children? If they are not inspired by the past of our city, where will they find the strength to fight for her future?”

- Jacqueline Kennedy Onassis

BIG IDEA

We will utilize existing, regulatory tools, and develop and implement new tools, to proactively identify, evaluate, and protect historic resources throughout Oklahoma City.

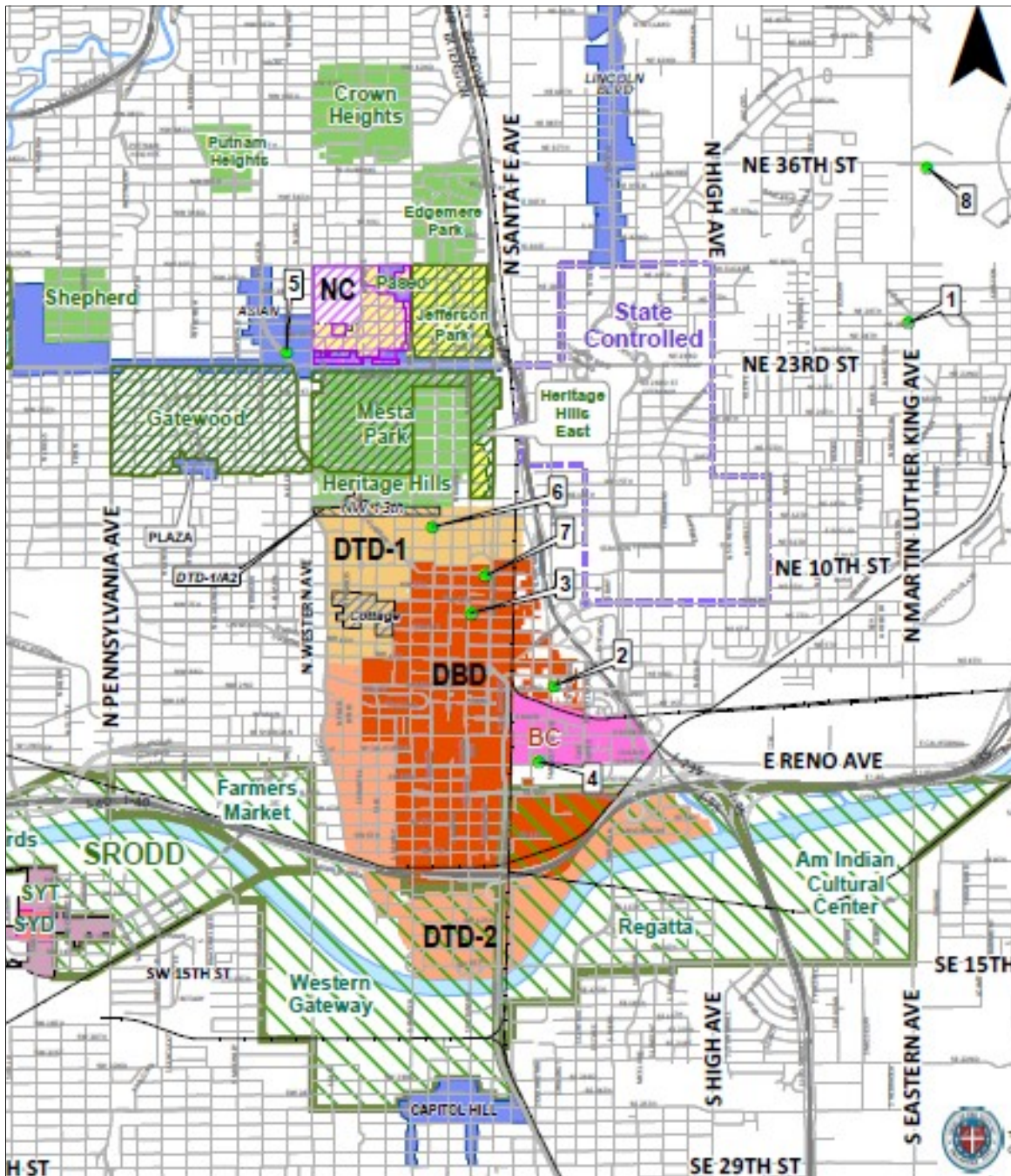
INITIATIVES

1. Identify and Document Historic Resources throughout Oklahoma City.
2. Use design review as a tool to manage change affecting historic resources.
3. Use existing, and develop new, zoning tools to protect Oklahoma City’s historic resources outside of established Historic and Design Review Districts.
4. Develop preservation tools to address vacant, abandoned, and dilapidated historic buildings.

Regulatory tools are integral to the management of a city’s ongoing growth and revitalization. In 1969, Oklahoma City became the first in the state to utilize zoning for the purpose of protecting historic resources with the creation of the Heritage Hills Historic and Architectural District. Since then, eight more historic districts, numerous individual landmarks, and other special zoning districts have been created throughout Oklahoma City’s residential and commercial areas.

Good growth and successful revitalization do not happen by chance. Every city uses zoning and other regulatory tools to manage the development of their downtowns, their commercial corridors, their neighborhoods, and their open space, ensuring the highest quality of life for residents and visitors. As areas from the Plaza District to Paseo and Automobile Alley to Capitol Hill have experienced reinvestment and growth, they’ve been guided by regulatory tools that protect and enhance existing character.

To ensure the ongoing success of these districts and other areas throughout Oklahoma City, additional protection of historic resources is necessary. A small fraction of Oklahoma City properties have the limited



protection of the National Register of Historic Places, while even fewer are protected by local regulations. Too often, historic resources are lost or dramatically altered with no oversight and no opportunity for public input.

Recent survey data shows strong public support for additional protection of historic and cultural resources. In plan**okc**'s Citizen Survey, 75% of respondents felt that it was "very" or "somewhat" important to enhance efforts to preserve historic structures. This was the highest-ranked action identified by the survey as a way to "improve the quality and appearance of the community."

When asked about specific areas of the city, plan**okc** Citizen Survey respondents identified the preservation of natural areas (for rural parts of the city) and historic buildings (for downtown) as high priorities. Each of these priorities ranked second only to the "repair and maintenance of city streets," and ranked higher than encouraging new development.

With the range of existing regulatory tools, and public support for the use of additional tools, the City has the opportunity to build on established practices and develop innovative approaches to preservation. We can ensure that ongoing development and revitalization incorporates Oklahoma City's many historic resources so that they may be enjoyed and valued for generations to come.

Initiative 1:

Identify and document Historic Resources throughout Oklahoma City

As addressed in Big Idea 1, *Strengthen Public Support for Historic Preservation*, we cannot preserve and protect what we do not know exists. Out of more than 400,000 structures in Oklahoma City, approximately 40% are more than 50 years old, yet fewer than 1% have been individually evaluated for, or listed on, the National Register of Historic Places.

Existing survey and National Register data is maintained by the City in a Historic Resources Inventory, but this inventory has not kept pace with Oklahoma City's growth and the related aging of historic structures. Each year, the number of potentially significant properties increases, as approximately 2,000 more structures reach 50 years of age (generally considered the cut-off for qualifying as potentially historic).

Further, while the current Inventory provides information about properties that have been evaluated for National Register eligibility, it does not adequately address which properties may qualify locally as Historic or Architectural Resources according to definitions within the Oklahoma City Municipal Code.

Ongoing maintenance and further expansion of the Historic Resources Inventory is not just a scholarly exercise. The Historic Resources Inventory is a valuable tool to inform residents

and property owners, City leaders and decision makers, about significant historic resources. The Inventory can be used to:

- Identify historic resources that may qualify for financial incentives, such as state and federal tax credits for historic preservation;
- Streamline the City's participation in federal review processes, such as FEMA-funded disaster response, EPA-funded environmental impact studies, or HUD-funded housing rehabilitation projects;
- Inform decision-makers and developers about priority areas for revitalization; and
- Highlight historic resources worthy of more formal recognition, including local historic district or landmark designation, or nomination to the National Register.

In the interest of providing accurate and useful information to the public at large, to property owners, and to decision makers, the ongoing maintenance and enhanced use of the City's Historic Resource Inventory is an important first step in identifying and protecting Historic Resources citywide.



Winchester Drive-In at 6930 S. Western is Oklahoma City's only remaining drive-in movie theater in operation, and was identified as historically significant by participants in the preserveokc survey. Neither the drive-in nor its spectacular neon sign has any local protection. It has not been identified as eligible for the National Register, in part due to its age.

Initiative 2:

Use Design Review as a Tool to manage change affecting Historic Resources

Oklahoma City has a multi-layered approach to historic preservation and design review within established Historic Preservation/Landmark and Design Review Districts. Each of these zoning tools effectively manages change within key, character-defining areas of the city. These existing tools present an opportunity for improvement in the treatment of historic resources.

Existing Design Review Process

Locally-regulated historic preservation and design review zoning is a powerful tool for guiding change, not just freezing a historic resource in time. Through the opportunity to guide redevelopment, the review process gives a community the ability to see the potential in key districts and buildings, to encourage property owners to rehabilitate historic properties, and to spur revitalization for entire districts. The individuals who serve on Historic Preservation and Design Review Commissions and Committees are ambassadors for the vision and significance of their districts.

Throughout Oklahoma City, nine Historic (HP/HL) districts and 10 Design Review districts oversee the maintenance, revitalization, and redevelopment of diverse residential and commercial areas. From July 2014 to July 2016,

these districts have approved over 1,300 projects, working with just as many property owners, developers and architects to achieve the best possible outcomes on a range of projects.

Projects bring ongoing investment and increase property values. Since 2009, property values within Historic and Design Review Districts have increased on average by 18.8% per year, compared to a 4.8% increase for the entire city.

The consideration of historic resources is an important yet sometimes controversial component of the design review process. Establishing policies for identification and review of historic resources will provide greater predictability for the public and for property owners. It will give design review body members the confidence that they are making decisions in an informed and consistent manner.

These policies should include:

- Consultation of the Historic Resources Inventory to identify historic resources;
- Evaluation process for properties not yet included in the Inventory;
- Improved Guidelines for review of Historic Resources; and
- Utilization of ability to refer cases affecting Historic Resources to the Historic Preservation Commission.

For Design Review Districts other than Historic Preservation/Landmark Districts, guidelines for changes to historic buildings are minimal. All

Design Review Districts should incorporate guidelines for historic resources. Documents like the *Building Conservation and Rehabilitation Guidelines for Oklahoma City*, as well as those previously developed for individual districts like Automobile Alley and Capitol Hill, serve as strong examples.

Policies for review of identified historic resources should also be developed to strengthen the recently revised criteria for review of proposed demolitions. Use of the Historic Resources Inventory can further clarify which properties are likely to be considered Historic and Architectural Resources under the review criteria. Additional policies may include a framework for determining when demolition of a historic resource should be referred to the Historic Preservation Commission for additional comments.

Engaging Design Review Members

Changes in policy make little difference if those implementing them are not fully engaged. New policies and guidelines should be combined with ongoing training opportunities to better inform and empower members of Design Review Commissions and Committees.

Interviews with members of design review bodies highlighted a need for ongoing training on the evaluation of historic resources.

Design review body members also expressed support for the increased utilization of their ability to seek additional information or expertise on historic resources, such as through the request for additional review and recommendation from the Historic Preservation Commission.

Expanding Historic Preservation and Design Review Districts

Nationally, cities use local zoning tools for landmark and historic district designation to proactively identify and protect important buildings, sites, and districts. In comparison to peer cities, Oklahoma City has a very small number of locally designated historic landmarks, mostly concentrated in and near downtown. Oklahoma City has not designated a local historic district since 1999. The most recent Design Review District to be created is the Scenic River Overlay Design District, established in 2007.

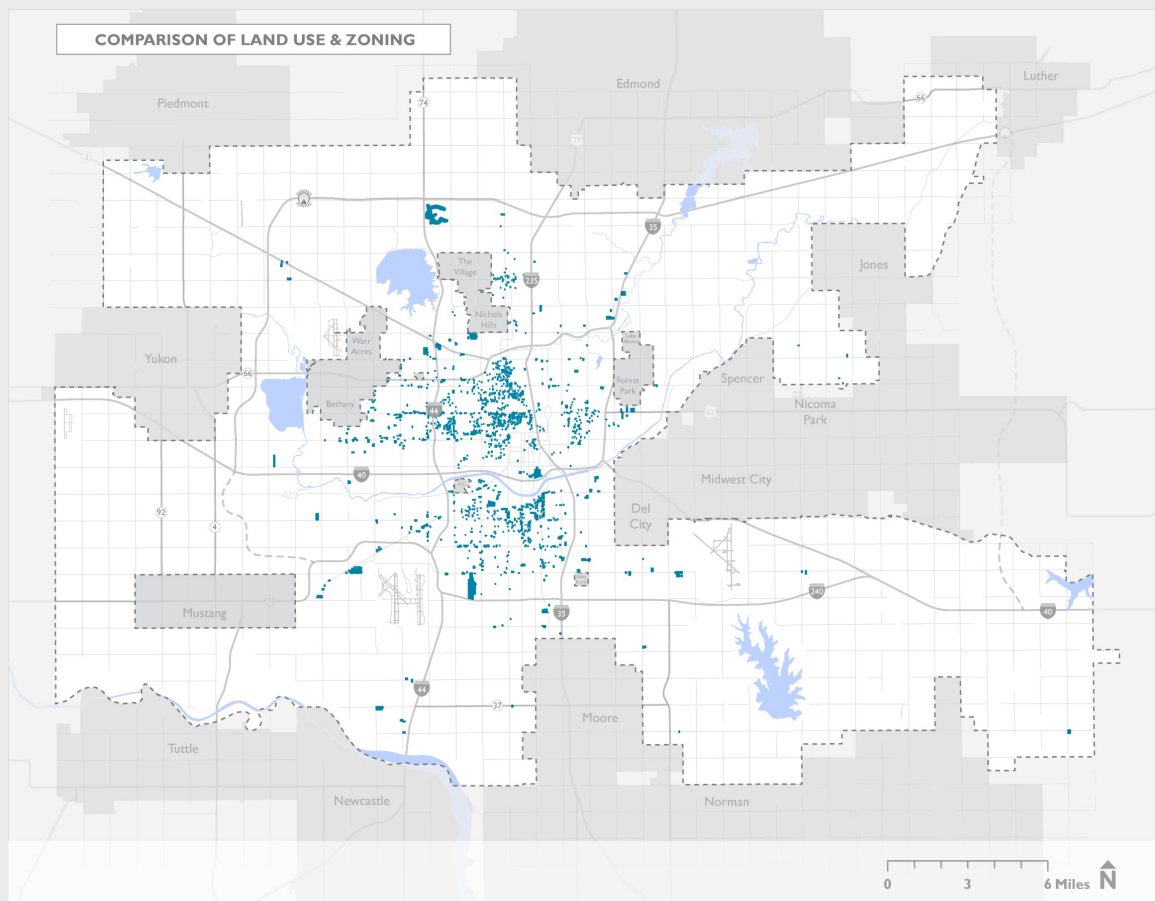
Creating and maintaining historic and design review districts requires time and effort, both in the rezoning process to create a new district and in management of the design review process once created. These processes also require a significant commitment from residents and property owners. However, there is public support for expanding historic and design review districts, with **planokc** Citizen Survey respondents ranking the enhancement of efforts to preserve historic structures the highest among actions to “improve the quality and appearance of the community.”

Working with neighborhoods, residents, and property owners to identify Oklahoma City’s significant historic resources improves community appearance and quality of life. In this way we can proactively identify the community’s priorities for preservation.



Creston Hills

Though not designated as a historic district, Creston Hills was identified as “historic” by residents in an online survey for **preserveokc**. First developed during the 1928 oil boom, northeast OKC’s South Creston Hills’ 30- square block area was restricted to white buyers, who purchased lots for \$50 down and \$15 a month. By January 1929, with 40 bungalows under construction, the Great Depression ground development to a halt nationwide. Little was built during the 1930s, but during the 1940s war years and beyond, new home construction in South Creston Hills—now for predominantly black homeowners—boomed due to proximity to good jobs at Tinker Air Force Base. Though not designated, residents prize the area for its historic character and comfortable, neighborly feel.



Non-Conforming Zoning & Use Parcels

This map depicts individual parcels indicated by the County Assessor to be at least 50 years old, for which the current zoning's allowed uses do not match the current use as identified by the County Assessor's records.

A zoning designation that does not match the actual use of the property may impede redevelopment of a historic resource. In addition, zoning at a much greater intensity than what exists may inadvertently encourage demolition and replacement of less intensively-developed historic resources.

Initiative 3:

Use existing and develop new zoning tools to protect Oklahoma City's historic resources outside of established Historic and Design Review Districts.

Out of more than 400,000 structures in Oklahoma City, less than 3% are regulated with Historic Preservation, Historic Landmark, or other Design Review District zoning. Nearly 100 neighborhoods and districts have been previously identified as potentially historic, but have no local protections in place.

For the majority of properties located outside of special design districts, zoning tools are in place to ensure compatibility of uses and the related built environment, regulating the “bulk standards” for proposed development, including building height, setbacks, density, and materials. While these regulations provide some oversight, they do not address historic resources. Entire neighborhoods can be rapidly transformed, rural landscapes destroyed, and iconic landmark structures lost, with no public notification or review process for “by-right” demolitions, alterations, or new construction. There is strong public support for increased oversight for changes to historic and cultural resources beyond the limited boundaries of historic and special design districts. 70% of planokc Citizen Survey

respondents supported preserving natural areas through regulation. 80% of **preserveokc** survey respondents who identified their neighborhoods as historic (but not zoned HP) supported review of changes to buildings in their neighborhood, while 83% supported review of demolitions.

This public support aligns with preservation goals identified in the City's comprehensive plan. **planokc** calls for revising existing or adopting new ordinances that ensure consistency in the review of projects that affect historic properties. By looking beyond Historic Preservation/Landmark and Design Review District zoning to other review processes, the City can establish a more comprehensive approach to preservation and revitalization.

Compatibility of Zoning with Historic Resources

As a city, we value quality development that creates distinctive places, utilizes established character and existing infrastructure, and preserves the historic, architectural, rural, and natural qualities important to our quality of life. We encourage reinvestment, revitalization, and infill development that enhances established character rather than detracts from it. We can further these goals by strengthening consideration of historic resources in our existing regulatory processes and implementing additional tools to specifically address historic preservation citywide.



The Capitol-Medical Center Improvement and Zoning District

The Capitol-Medical Center Improvement and Zoning (CMZ) District is a defined area within Oklahoma City that surrounds the Oklahoma State Capitol complex and the University of Oklahoma Medical Center. This area is not subject to City of Oklahoma City zoning regulations. Created by the State Legislature in 1953 to oversee development surrounding the State Capitol, the district has its own Zoning Commission and Historic Preservation Commission, and has designated historic districts and landmarks through its own zoning process.

This region of the city includes some of our most significant buildings and neighborhoods. While the City of Oklahoma City has no regulatory control over the district, we can share tools like the Historic Resources Inventory, programs like workshops, and provide support with many other non-zoning tools identified in this plan for the identification, protection, and revitalization of historic resources within the CMZ District.



Compatibility of Historic Resources and Zoning: Restoration of Historic Use

The apartment building at 436 NW 27th Street is located within the Jefferson Park Historic District, in an area now zoned “R-2” (which allows two-family residential development), but historically housed at least four apartments. The owner’s efforts to renovate the building required it to be brought into compliance with current zoning, limiting it to no more than two dwelling units. In order to return the building to its historic function, the owner pursued several forms of zoning relief. We can pursue programs, policies, or ordinance amendments to better facilitate the continued use of historic structures that are compatible with their surrounding neighborhoods but no longer in compliance with their zoning.

Consideration of Historic Resources in Development Review

The density and established development pattern of an existing, historic property or district should be a factor in evaluating the compatibility of a new development or change in zoning. Just as Environmentally Sensitive Areas are identified in **planokc**, historic resources should be identified, evaluated and when appropriate, protected, as part of evaluating the compatibility of a proposed development with the comprehensive plan.

planokc assigns Land Use Typology Areas (LUTAs) to land within Oklahoma City. Each LUTA focuses on the appropriate intensity of development for each part of the city and identifies areas designated for the provision of urban services, concentrations of commercial and employment uses, and preservation of rural and natural areas. These LUTAs range from undeveloped open space to the high intensity of Downtown.

While LUTAs are not preservation-specific tools, they illustrate the importance of considering the impact of growth and development upon existing resources. LUTAs, and the development review process in general, present an opportunity for increased consideration of historic resources.

Proactive Evaluation of Zoning Compatibility

Beyond review of individual development proposals, identification of historic resources presents an opportunity to evaluate the compatibility of the existing zoning with a historic

resources' density and intensity of use. Zoning that allows dense residential development within a rural area, for instance, may inadvertently encourage demolition of historic structures for higher-density redevelopment.

Conversely, single-family zoning applied broadly to neighborhoods that historically included a mix of single family homes, duplexes, small apartment buildings, and neighborhood businesses may create barriers to the ongoing use or adaptive reuse of historic properties and constrain compatible new development.

As historically-significant areas are identified, their compatibility with their existing zoning should be evaluated as well. When larger, comprehensive changes are made to the Planning and Zoning Code, the compatibility of the existing character of identified historic resources with their zoning should be assessed and revision encouraged in the case of a conflict.



Compatibility of Historic Resources and Zoning: Retention of Existing Development

This farmhouse on SW 29th Street was constructed prior to Oklahoma statehood, and county records indicate it has been in the same family since that time. This property has not been evaluated in a historic survey, and has no local or federal historic designations.

Currently, this and surrounding properties are zoned "R-1," which would allow single-family residential development, at a greater density than the current, rural character of this property. There would also be no review for the demolition of the historic house, and no consideration for the impact of development on the historic significance of this property.



New Zoning Tools

In addition to the development review process, the creation of new review procedures or zoning requirements would achieve additional protection for historic resources. Examples from across the country include enhanced review of demolition of identified categories of historic resources and zoning overlays that provide varying levels of review for new development within historic areas outside of established Historic Preservation, Historic Landmark, or Special Design Districts.

Demolition Delay

For example, cities across the country have implemented regulations, typically called “Demolition Delay” ordinances, to allow more thorough consideration of the demolition of historic resources. These tools identify specific properties, categories of properties (such as those already listed on the National Register of Historic Places, or those over a certain age), or geographic areas, for which the review is conducted.

Enhanced review typically incorporates a public notification process, additional review by staff or a designated review body, and a mandatory waiting period prior to issuance of a demolition permit. The process is intended to increase public awareness of

Left: In 2019, the Oklahoma City Council, the owners of the National Register-listed First Christian Church, and a prospective buyer executed a Memorandum of Understanding to ensure that the building would be preserved in the event of a change of ownership. Tools like Demolition Delay ordinances can provide a more predictable and proactive method for identifying alternatives to the loss of historic resources.

potentially significant demolitions, and to encourage property owners to consider alternatives to demolition.

Stepped Approach to Design Review

Many projects other than demolition may affect the character of a district or neighborhood, or dramatically alter a historic structure. Beyond review of demolitions, many communities have implemented tiered approaches to historic preservation and design review. These staggered levels of design review may limit their purview to certain categories of work, such as demolition and new construction, or be more flexible than a typical historic or design review district.

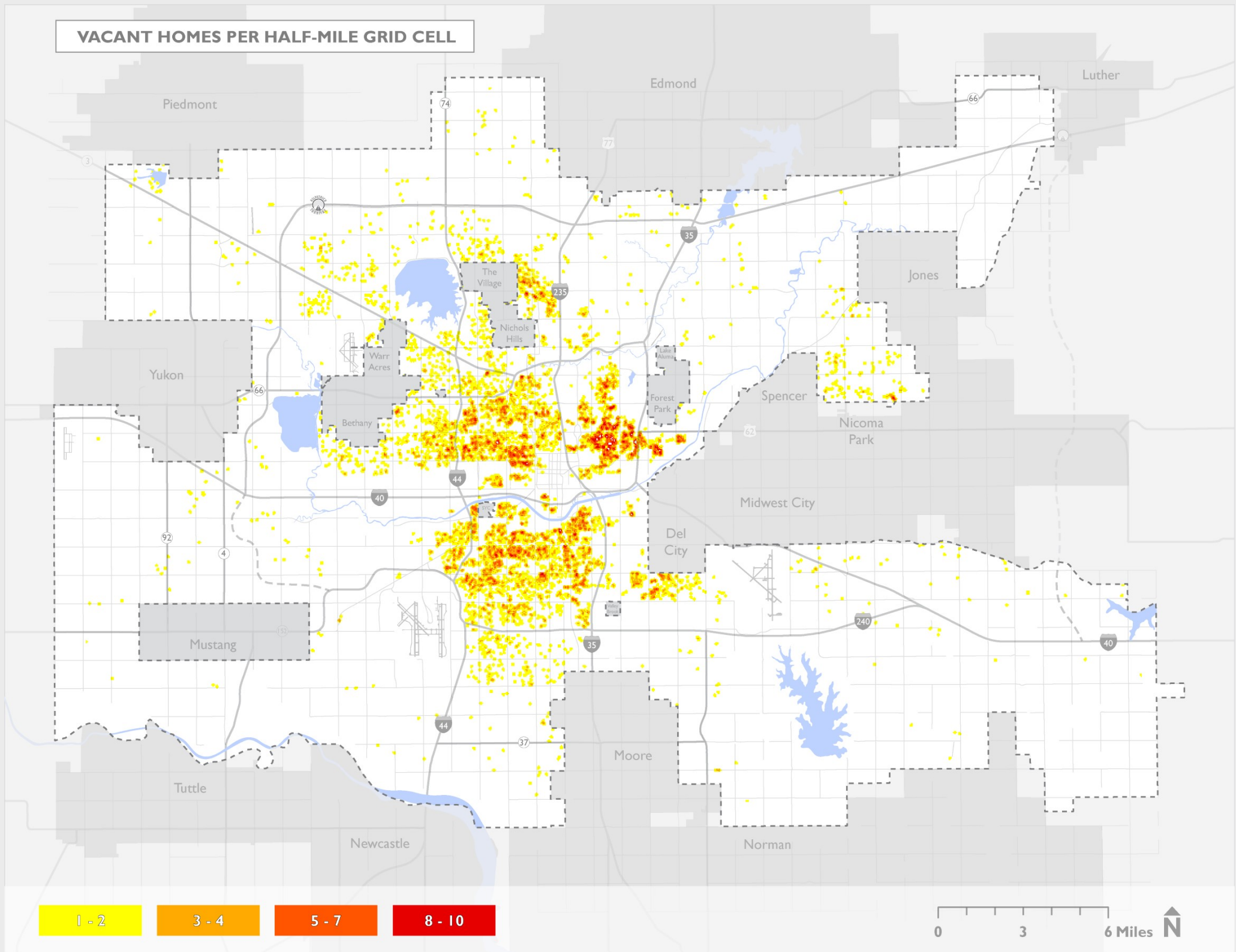
Implementing a tiered approach to design review gives residents greater opportunity to provide input into their neighborhood's development. This approach encourages investment and revitalization by setting clear expectations for an area's character, providing direction for compatible development, and stabilizing property values. This approach provides greater opportunity for the City to guide revitalization and redevelopment in key areas of the city.



The Evolution of a House: 1520 NW 6th Street

In 1907, a photographer captured this modest home in Oklahoma City. Over the years, the structure has evolved, as architectural features, windows, doors, siding, and roof forms have been replaced or changed. While most of these changes were seemingly minor, the cumulative effect is a transformation of this modest, historic home.

VACANT HOMES PER HALF-MILE GRID CELL



Fiscal Impacts of Vacant & Abandoned Buildings On OKC's Economy

\$2..7 billion in lost property value

29% loss within 150 feet

21% loss between 151-300 feet

12% loss between 301-600 feet

\$6.5 million annual cost of providing City services

Cost of police, fire and animal welfare calls attributable to vacant and abandoned structures.

\$17.8 million in lost annual revenues

\$12.4 million in lost sales/use taxes, franchise fees, licenses and permit and service charges

\$5.4 million in lost property tax revenue to debt service fund

\$15 million in lost revenue to OKC school districts from negative impact of vacant and abandoned buildings on surrounding properties

Initiative 4:

Develop preservation tools to address vacant, abandoned, and dilapidated Historic Resources.

In addition to zoning, code requirements for the basic maintenance of structures affect the potential revitalization of thousands of historic properties throughout Oklahoma City. New efforts to specifically address the serious problems caused by vacant and abandoned buildings increase property maintenance code enforcement efforts, with a disproportionate number of vacant and abandoned buildings located in potentially historic areas (map). These regulatory activities have the potential to have a significant impact upon Oklahoma City's historic resources citywide.

plan**okc** emphasizes the importance of addressing vacant and abandoned buildings, calling them out as a detractor from Neighborhood Health, one of eight issue focus points in plan**okc**. Multiple Elements in plan**okc**, including live**okc** (communities), enrich**okc** (preservation, appearance, and culture), and strengthen**okc** (economic development) identify addressing vacant and abandoned buildings as key to improving the quality of life, physical appearance, and potential for economic development in Oklahoma City.

In 2013, Oklahoma City completed the study *Addressing Vacant and Abandoned Buildings in*

Oklahoma City: Prevalence, Costs and Program Proposals. The study identified the real costs to the City from code enforcement, police, fire, other safety responses, and lost revenue in the form of decreased property taxes, all stemming from vacant and abandoned properties.

In 2014, Oklahoma City adopted a new abandoned building ordinance that defined abandoned buildings, implemented escalated fines for violations of the property maintenance code, identified abandoned buildings as a "public nuisance," and implemented fees for police and fire responses at abandoned buildings.

In 2016, a follow-up report from the City of Oklahoma City Abandoned Buildings Coalition was issued with recommendations for further action, including:

- increased administrative fees for code enforcement work related to abandoned buildings;
- developing a more strategic, proactive and preventative code enforcement approach;
- alternatives to traditional boarding and securing of properties to improve appearance and minimize the perception of blight;
- improvements in the area of public information and data collection and analysis; and
- increasing neighborhood engagement in the code enforcement process.



How Far Gone is Too Far Gone?

In 2015, this 1930s house at 917 NW 40th Street was nearly demolished. Neglected for years (top) with unresponsive owners, the house had become an object of extreme frustration for the Crown Heights neighborhood. With few options to provoke repair or maintenance, the house was added to the City's list of dilapidated structures slated for demolition. At the 11th hour, owners agreed to sell the blond brick Colonial Revival home to new owners who did not regard the condition as "too far gone." In 2016, following a full restoration and rehabilitation (bottom), the new owners moved into the house.

The report identifies efforts that may require more significant reform or funding, including:

- amending state and local laws to allow expanded recovery of associated public costs;
- establishing an abandoned property abatement fund or other investment mechanisms;
- targeted approaches to demolition of derelict structures;
- legislative efforts to addressing transfers of ownership, property taxation rates, and foreclosures;
- tax incentives to encourage revitalization or remediation of blight; and
- development of a land bank.

Each of these plans and studies echo the comments and concerns of preserveokc stakeholders and public process participants. They illustrate the impact of vacant and abandoned buildings themselves, and the methods selected to address them, upon Oklahoma City's historic resources. Current and ongoing efforts to alleviate Oklahoma City's vacant and abandoned building epidemic must specifically address the challenges and the opportunities facing historic resources citywide.

Code Enforcement

Enforcement penalties strong enough to motivate owners to either remediate or sell their property, paired with financial incentives or

assistance for qualified owners, would counter some of the economic imbalance in the current system. In the case of historic properties, rehabilitation and reuse of existing structures as the method of abatement must be emphasized over their removal. This is key not only to preserve individual historic resources, but to retain the cohesiveness, character and quality of surrounding neighborhoods and commercial districts. As recommended in the 2016 Vacant and Abandoned Buildings Coalition report, these enforcement efforts must be proactive and forceful, stimulating an owner response and the necessary repairs before it is too late to bring a structure back into use.

Demolition by Neglect

With recognized, protected historic properties, failure to maintain a structure violates not only property maintenance requirements, but circumvents the City's codes mandating the affirmative maintenance of designated historic resources. Enhanced code enforcement methods sometimes dubbed "Demolition by Neglect" can more directly target vacant, abandoned, and dilapidated structures.

Demolition by Neglect ordinances typically identify specific structural problems and maintenance deficiencies that demonstrate demolition by neglect of a historic resource, as well as appropriate methods of remediation. They give municipalities stronger enforcement tools such as increased fines or liens for repairs made by the City. These ordinances should include

provisions that prevent owners from claiming an economic hardship if they request approval of demolition; prohibit permitting for new work unrelated to abatement, or bar new development on the site for a specified length of time if the property is ultimately demolished due to neglect.

Incentives and Assistance

As recommended by the 2016 Vacant and Abandoned Buildings Coalition report, effective enforcement should be paired with financial assistance programs and incentives to encourage compliance. The City currently offers financial assistance for qualified owners to address property maintenance issues, such as those managed by the City's Housing and Community Development Division. These programs provide a basis for expansion and an opportunity to focus specifically on historic properties. Financial incentives specifically aimed at revitalization of vacant historic buildings, paired with requirements for appropriate rehabilitation, may also leverage state and federal tax incentives for historic rehabilitations, further extending the City's investment.

The negative effects of vacant, abandoned or dilapidated structures on Oklahoma City are well documented. The loss of historically and architecturally significant structures to neglect is irreversible. Using existing regulatory tools and creating new tools to address property maintenance and abandoned buildings is one of the most important steps the City can take to secure the high quality of life created through the active occupation of our historic resources.

Revitalization Power of Tacos

In 2009, three seasoned chefs took a chance on a vacant drive-in restaurant at 530 NW 23rd Street. Since then, Big Truck Tacos has helped catalyze the successful revitalization of one of OKC's hottest historic commercial districts, Uptown 23rd.

This segment of NW 23rd Street, once known as the heart of Route 66 through Oklahoma City, was the city's first shopping district outside of downtown. It is surrounded by historic neighborhoods and traveled daily by thousands of vehicles. However, by the early 2000s, this stretch of NW 23rd had many vacant and boarded buildings, struggling businesses, and little to draw interest and activity.

Big Truck Tacos was one of the first businesses to invest in what is now a thriving, urban commercial district, transforming a mid-century cinder-block building into a trendy, thriving destination restaurant.

Big Truck Tacos' success, including a modest exterior rehabilitation involving mostly paint and new signage, demonstrates how a great idea can activate even a humble historic structure. Just as one vacant building can bring down an entire block, one revitalized space can catalyze millions of dollars of reinvestment in surrounding properties. Now supported by the Uptown 23rd District Association and a participant in the City's Commercial District Revitalization Program, this historic corridor is lined with reactivated historic buildings and thriving businesses.



After decades of vacancy, developers of the historic Douglass High School (also known as Page-Woodson) used numerous local, state, and federal incentives to rehabilitate the building into housing.

big idea four

Big Idea Four: Develop Effective Tools to Promote Preservation

“An incentive is a bullet, a key: an often tiny object with astonishing power to change a situation.”

- Steven D. Levitt,
Freakonomics

BIG IDEA

We will use existing and develop new financial and procedural incentives to promote the preservation of Oklahoma City's historic resources.

INITIATIVES

1. Incorporate consideration of, and requirements for, historic resources into the use of existing incentives.
2. Create new financial incentives specifically for historic preservation.
3. Create procedural incentives to facilitate and encourage historic preservation.
4. Facilitate use of state and federal incentives for historic preservation.

By emphasizing the importance of historic preservation within existing incentive programs, and developing new tools and policies to encourage historic preservation specifically, we can more fully support and encourage the preservation of historic resources beyond the limits of regulatory controls.

Some of the greatest preservation success stories have been initiated through the use of incentives—programs that encourage a property owner to voluntarily preserve their building. At the national level, federal tax incentives have generated over 42,000 rehabilitation projects, generating \$84 billion in investment and an estimated 2.44 million jobs.

Oklahoma's equivalent state tax incentive has generated 77 rehabilitation projects, \$520 million in total project investment, and over 6,000 jobs. Nearly half of these projects, and over \$240 million in investment, have occurred in Oklahoma City alone.

The City of Oklahoma City has seen the impacts of successful



incentive programs. Prominent landmarks and entire commercial districts have been rehabilitated thanks to the state and federal tax credits for rehabilitation, in many cases boosted by the assistance of tax increment financing or other locally-run grant or loan programs. Neighborhoods, too, have seen the impact of financial and other programs to assist and incentivize revitalization.

Nationwide, cities are using similar incentive programs to specifically encourage historic preservation and to address the specific needs and challenges of their communities and historic building stock.

Oklahoma City has an opportunity to develop and expand incentives that recognize the value of historic resources to the community's larger redevelopment and revitalization efforts.

Left: The historic Ford Motor Company Assembly Plant, now the 21C Hotel (see opposite page).

Initiative 1:

Incorporate consideration of and priority for historic resources into the use of existing incentives.

The City of Oklahoma City utilizes incentive programs and other forms of assistance to encourage private investment and good development. Each of these programs affects individual historic structures, as well as entire historic neighborhoods and commercial districts. Each of these has successfully leveraged local, state, and federal funds for the revitalization of residential neighborhoods and commercial corridors key to Oklahoma City's quality of life. While these frequently impact historic resources, there is opportunity to more effectively utilize these incentives and programs to encourage historic preservation.

Tax Increment Finance Districts

Tax Increment Finance (TIF) Districts, used in cities across the country, reinvest property taxes into a designated area, encouraging increased private investment and ultimately generating increased property values and revenue. Oklahoma City has established 11 TIF districts, spurring millions of dollars in private investment in existing buildings and new developments. TIF projects include historic properties like the Skirvin Hilton and Ford Motor Company Assembly Plant (now the 21C Hotel) downtown, and Page Woodson High School in Northeast

Oklahoma City, as well as new developments in the Oklahoma Health Center, along the Oklahoma River, and elsewhere.

Enabling legislation for TIF Districts states that the *intent* is that "conservation, preservation, and rehabilitation be emphasized while demolition, clearance and relocation be minimized where possible." Many TIF projects involve the rehabilitation of historic structures, and pair this valuable local incentive with state and federal tax credits. However, the consideration of the impact of a potential TIF project upon historic resources, and utilization of TIF funds to specifically advance historic preservation has not been formalized within the TIF district process in the past.

Tax Increment Finance Districts are a powerful tool for revitalization. Rehabilitation of historic structures is key to that revitalization's success. There is local precedent for the incorporation of historic preservation into TIF districts, such as in the requirement of a preservation easement at the Skirvin Hilton, or the inclusion of consideration for historic resources in the recently-created Core to Shore Reinvestment Area Policy Guide. We should build on these successes to formalize policies that include consideration of, and priority for, the preservation of historic resources throughout new and existing TIF districts.

Artful Use of Tax Credits and TIF

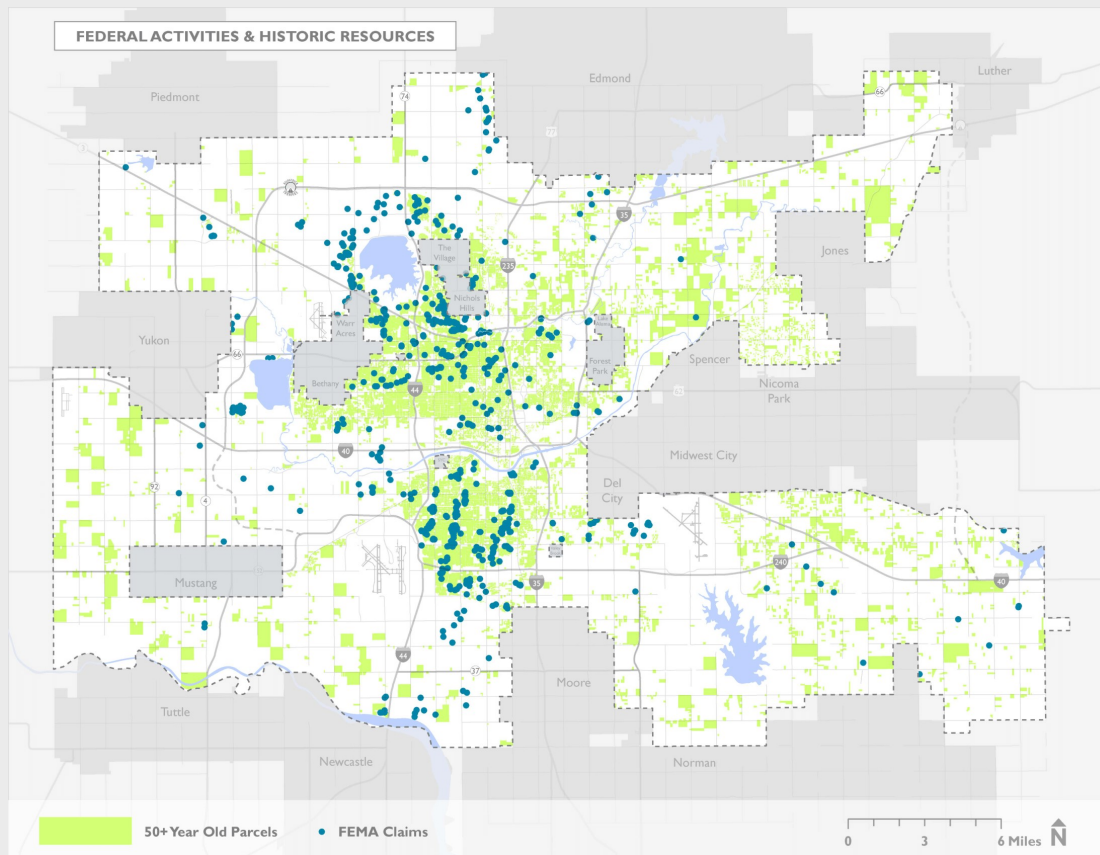
In 2016, Louisville, KY-based 21c Hotels opened their newest venture in Oklahoma City's 100-year-old Fred Jones Manufacturing building. Located at 900 W Main Street, the four-story red brick building was originally a Ford Model T assembly plant designed by famed industrial architect Albert Kahn. The building was listed on the National Register of Historic Places in 2014.

21c hoteliers, preservationists and contemporary art collectors Laura Lee Brown and Steve Wilson strongly believe in the power of historic preservation to leverage downtown revitalization. And Fred Jones property owners Hall Capital couldn't agree more. Managing partners were anxious to see their family's third generation investment put to a new use as a development catalyst on the western edge of downtown OKC.

The \$51.5 million project converted the former manufacturing plant to a 134-room hotel, restaurant and art museum using a combination of private and public financing. This included 20%, respectively, in state and federal Historic Preservation Rehabilitation Tax Credits, as well as \$5.3 million in Tax Increment Financing (TIF) and \$6.9 million in a Section 108 loan backed by the City's Community Development Block Grant allocation.

This project, with its enormous potential to create jobs and to anchor and spur revitalization of a difficult-to-develop, formerly industrial corner of downtown, would not have been possible without the combined use of tax credits, TIF and CDBG.





Federal Activities & Historic Resources

By coordinating the use of data on historic properties and federally-funded activities, such as the FEMA claims mapped here, the City can use federal dollars more efficiently. Many federal activities trigger review of historic resources, and we can streamline compliance with better coordination. We can proactively identify key areas of activity and prioritize survey efforts in advance of future needs.

Federal Programs

The City manages over \$30 million in grant funds for revitalization and redevelopment. These funds are available within a variety of programs through the U.S. Department of Housing and Urban Development, as well as programs through the Environmental Protection Agency and Federal Emergency Management Agency.

Each of these programs includes federal requirements for identification and consideration of historic resources. We can take steps to more efficiently manage compliance with preservation-related requirements, including:

- use of proactive survey work and the Historic Resources Inventory to streamline identification of historic resources;
- inclusion of historic resource identification and treatment methods in the City of Oklahoma City's Hazard Mitigation Plan; and
- development of programmatic agreements for specific federal programs.

We can also use these funds and the programs they support to encourage historic preservation, prioritizing projects that rehabilitate historic resources or make infrastructure improvements in qualifying historic areas.

Whether small grants or loans to assist with façade improvements along historic commercial corridors, or public investments in sidewalks or sewers within historic neighborhoods, these funds present an opportunity to respond to stakeholders' needs for redevelopment of historic areas, and to direct assistance toward important historic resources.

Initiative 2:

Create new financial incentives specifically for historic preservation.

Ensuring that existing incentives encourage, support, and do no harm to historic resources is an important first step in promoting historic preservation activities. Beyond this, many cities utilize financial or procedural incentives to specifically encourage historic preservation activities. Oklahoma City has had great success with the use of local incentives to encourage a range of development activities, but has not focused these on historic preservation. The City has the opportunity to create additional tools specifically to encourage historic preservation, and further catalyze rehabilitation of historic structures and districts.

TIF and Tax Abatement for Historic Preservation Areas

The state statute that gives Oklahoma municipalities the ability to create Tax Increment Finance districts allows the creation of a TIF district in a “historic preservation area,” but Oklahoma City has never created a TIF district on this basis. Historic preservation areas are defined as properties or districts in, or nominated to, the National Register of Historic Places, *or* areas or structures subject to historic preservation zoning. That statute further specifies that rehabilitation in a historic preservation area must



Case Study: A Hypothetical Tax Abatement

Some cities and counties have effectively used property tax abatement as a financial incentive for historic preservation. This tool “freezes” a property’s assessed value at the pre-rehabilitation amount for a specific number of years, lessening the impact of increased value (and therefore increased taxes) for an owner when they choose to undertake a significant rehabilitation project. When the property has been vacant or underutilized for many years, this savings can be significant.

One illustration of the type of property that would benefit from such a tool is Bricktown’s Rock Island Plow, vacant for decades before it was rehabilitated.

	2012 (Pre-Rehabilitation)	2019
Market Value	\$1,261,000	\$4,973,590
Assessed Value	\$138,710	\$547,095
Property Tax	\$15,911	\$62,062

The Oklahoma County Assessor indicates a tax increase of \$46,151, or 290% over the pre-rehabilitation taxes. If this increase was abated for 5 years, it would result in a savings of approximately \$230,000, or approximately 5.75% of the project’s estimated construction cost.



Tax Increment Financing for Historic Preservation Areas

Oklahoma's Local Development Act gives municipalities the ability to create Tax Increment Districts (TIFs). The legislation includes guidelines for working in conjunction with programs such as Oklahoma Main Streets and historic preservation, and ensuring that "conservation, preservation and rehabilitation be emphasized while demolition, clearance and relocation be minimized where possible" for *all* TIFs.

Beyond that, the legislation gives municipalities the ability to create TIFs for "historic preservation areas," or structures or areas listed in, or nominated to, the National Register of Historic Places AND subject to historic preservation zoning. In this way, the economic revitalization of an area can be prioritized equally with the retention of its historic character.

meet the Secretary of the Interior's Standards for Rehabilitation.

This category for TIF funding gives the City an opportunity to create an incentive for revitalization in historic areas that may not meet TIF criteria for an Enterprise or Reinvestment Zone, or where the additional requirement that rehabilitation meet preservation standards is warranted. Further, it provides a much-needed "carrot" for the regulatory "stick" of historic preservation zoning. By creating preservation-based TIF districts, we can further utilize this impressive tool for the revitalization of historic areas key to Oklahoma City's character and quality of life.

In addition to TIF, cities across the country have used property tax abatement to incentivize historic preservation activities. By capping a property's assessed value at the pre-rehabilitation value for a set number of years, the burden of increased property tax due to investment is alleviated. In return, the City is able to attach requirements for the preservation of the property to the abatement. While property taxes in Oklahoma are relatively low, an abatement for a property undergoing significant rehabilitation would be a worthwhile incentive for many property owners.

Preservation Easements

In addition to TIF for historic preservation areas, other opportunities exist to create incentives with preservation strings attached. One such tool is a preservation easement. Preservation easements

are a unique tool for the protection of historic resources that function separately from zoning. Easements can be put in place in perpetuity or for a defined number of years. With the donation of a preservation easement, property owners potentially qualify for a tax deduction.

The City previously has accepted the donation of a preservation easement on the Skirvin Hilton, pairing the public investment into the building's rehabilitation with the requirement that the historic building be preserved. More fully developing a preservation easement program would create an additional tool for protecting historic structures while offering some financial benefit to property owners.

Financial Assistance for Rehabilitation

Oklahoma City manages a number of successful programs to provide assistance for repair or redevelopment of properties. Across the country, cities pair similar programs with the encouragement (or requirement) that they be applied to historic buildings, and to appropriate rehabilitation work. Whether property tax abatement, a low-interest or forgivable loan, or a grant, Oklahoma City can use existing or new incentive programs to encourage and facilitate historic preservation.

Preservation challenges, such as dilapidated homes in historic districts, storefronts in commercial corridors, or prominent, vacant and abandoned landmarks, can be the road block to an area's redevelopment. Alternately, their rehabilitation can be the turning point for an

entire neighborhood or district's renaissance. Local incentives for historic preservation can be customized to address Oklahoma City's specific preservation challenges and to attach strings in order to ensure that those challenges are met appropriately.

Oklahoma City can use resources like Community Development Block Grant funds, General Obligation (G.O.) or General Obligation -Limited Tax (G.O.L.T.) Bond funds, other city projects, or develop tax incentive or abatement programs targeting identified preservation priorities. The City of Oklahoma City can learn from our own experience with successful incentive programs, and from other cities' successes in incentivizing preservation, to expand existing, and create new, tools to specifically encourage the revitalization of historic resources citywide.

Right: Built in 1911, the Skirvin Hotel was the centerpiece of the Oklahoma City social scene for decades, but sat vacant for twenty years before a bundle of financial tools brought about its rehabilitation. The hotel reopened in 2007 and donated a preservation easement to the City of Oklahoma City in 2014.



Initiative 3:

Create procedural incentives to facilitate and encourage historic preservation.

Property owners, developers, and others experienced with the redevelopment of historic properties note that *process* can be as much of a challenge as cost. Struggles with building code requirements, zoning limitations, and other procedural hoops leave valuable, viable historic buildings empty or underutilized. We can remove or reduce procedural roadblocks to facilitate and encourage the redevelopment and adaptive reuse of historic resources throughout Oklahoma City.

Building Code Compliance

Historic buildings often contain features that do not meet current building code standards, from means of egress to accessibility. These features can be identified as insurmountable obstacles to reuse, but options exist to address those issues without destroying a historic building's character. In addition to the 2015 International Building Code, Oklahoma City has adopted the 2009 International *Existing* Building Code.

According to the International Code Council, this set of requirements is intended to

“encourage the use and reuse of existing buildings. The scope covers repair, alteration, addition and change of occupancy for existing buildings and historic buildings, while achieving appropriate levels of safety

without requiring full compliance with the new construction requirements contained in the other I-Codes.”

This alternative to the International Building Code is an important tool for the rehabilitation and adaptive reuse of historic structures.

However, **preserveokc** stakeholders report that the available code provisions for existing and historic buildings are not widely known or well publicized. We must raise awareness of equally safe alternatives for code compliance in the redevelopment of our existing, historic buildings in order to ensure their ongoing use and viability.

Zoning Relief for Adaptive or Restored Use

Throughout Oklahoma City, there are historic buildings that are no longer zoned for their historic use, or that were constructed for a use that is no longer necessary or appropriate to their surroundings. We can encourage the redevelopment and adaptive reuse of these historic structures by removing unintended barriers to the reuse of a historic property as part of an appropriate rehabilitation project.

Many of Oklahoma City's neighborhoods historically contained a mix of uses and property types, including single and multi-family residences, accessory structures containing additional living quarters, and neighborhood-scale commercial properties. Where neighborhoods have been rezoned for single-family residential development only, or other

low-density categories of use, the reuse of these structures for their original intent is now non-conforming. The challenges and uncertainties of redeveloping these structures put them at significant risk, making demolition and new construction in conformance with the existing zoning the quicker, cheaper, easier option.

Conversely, throughout the city there are historic properties with original uses that are no longer viable, or are now incompatible with surrounding development. These properties are ideal candidates for adaptive reuse: converting a historic building to accommodate a new use while retaining its historic character and architectural features. Oklahoma City has numerous examples of successful and creative adaptive reuse of historic structures, with gas stations, churches, and industrial warehouses converted to trendy bars, law firm offices, and boutique hotels. However, rezoning requirements related to conversion can create uncertainty and impede success.

We can protect historic structures in both of these situations by improving the rezoning process for historic buildings. We should identify appropriate uses for existing, historic buildings that are compatible with their surrounding neighborhoods and develop policies that facilitate their rezoning. Further, we should identify specific roadblocks to reuse, such as parking requirements, and identify ways to alleviate these when compatible with the historic resource and surrounding development.

We will identify ways to appropriately accommodate the reuse of historic resources in order to give property owners and surrounding neighbors a greater degree of certainty, and facilitate the revitalization of more historic resources. By pairing incentives with requirements for appropriate rehabilitation, such as through the donation of a preservation easement or inclusion of an HL overlay, we can further protect historic resources citywide.

Case Study: Adaptive Reuse

Calvary Baptist Church, 300 N. Walnut Street in the Deep Deuce District, is a rehabilitated African American church which sat vacant for years after being damaged in the bombing of the Alfred P. Murrah Federal Building in 1995. The imposing, three-story red brick structure has a storied history in Oklahoma City. Designed by Russell Benton Bingham, architect and member of the congregation, construction began in 1921 with the dedication in 1923. For 70 years, this prestigious congregation served as a cornerstone of Oklahoma City's African American community.

Beginning in 1958, the church was the physical and spiritual base for a multi-year sit-in campaign that changed the face of segregation in Oklahoma City and arguably, the country as a whole. Rev. Martin Luther King spoke here in 1960. The church is recognized by the National Park Service as a historic site of the Civil Rights Movement.

Adapted for law offices in 2014, the project included restoration of historic features and spaces, re-creation of a historic neon sign, and rehabilitation of the sanctuary, with pews, pulpit, and stage left in tact; the sanctuary is now available for community events.





Facilitating the Use of State and Federal Incentives

As a Certified Local Government, the City regularly receives federal funding through the Oklahoma State Historic Preservation Office that can be used for, among other projects, historic surveys to identify property and districts that are eligible for the National Register of Historic Places. In recent years, the Historic Preservation Program has worked with the City's Commercial District Revitalization Program to identify historic commercial districts, coordinate with interested property owners, and carry out historic surveys. In this way, we can facilitate the use of financial incentives and further the rehabilitation of some of our city's most distinctive places.

Above is Owl Court, located within the Britton Road Commercial District where a historic survey was recently completed.

Initiative 4:

Facilitate the use of state and federal incentives for historic preservation.

The City of Oklahoma City has a long history of identifying and documenting historic resources, and of being proactive in initiating the nomination of properties and districts to the National Register of Historic Places. The City should build on these efforts. We should strategically prioritize the use of available resources for survey work and for National Register nominations in order to facilitate the use of state and federal tax credits for historic preservation throughout Oklahoma City's many historic neighborhoods and commercial districts.

Whether intentionally or incidentally, historic surveys conducted by the City have had the effect of spurring investment and utilization of state and federal tax credits. Survey efforts following the 1995 bombing of the Alfred P. Murrah Building in downtown Oklahoma City identified the Automobile Alley historic district. That district eventually became one of the largest collections of historic tax credit projects in the country.

Similarly, the multi-phase intensive level survey of downtown Oklahoma City, completed between 2009 and 2012, identified numerous structures as individually eligible for the National Register, some of which have since gone on to use historic tax credits.

Since the summer of 2016, the City has worked with the State Historic Preservation Office and with various universities and student volunteers to survey Heritage Hills East and Capitol Hill's commercial corridor along Southwest 25th Street, two districts that could potentially benefit from National Register listing and historic tax credits.

We should use available resources, including funding received through the Certified Local Government program, to identify and nominate eligible properties and districts to the National Register of Historic Places. This will facilitate the rehabilitation of historic structures citywide by providing easier access to state and federal tax credits for certified rehabilitation.



Facilitating the Use of State and Federal Incentives

Once a historic survey of an area has been completed, the City has the opportunity to use CLG funds to prepare National Register nominations for historic properties or districts. Recent efforts include Capitol Hill's Commercial District, Heritage Hills East, and the Britton Road Commercial District. Each of these districts include historic, income-producing properties that could potentially use state and federal tax credits for their rehabilitation.

Above is a portion of the Capitol Hill Commercial Historic District, recently nominated to the National Register of Historic Places.