

## MEMO

**TO:** City of Millwood Historic Preservation Commission  
**FROM:** Northwest Vernacular  
**DATE:** February 21, 2019  
**SUBJECT:** Preservation Ordinance Review Items

Northwest Vernacular has taken an initial look at the City of Millwood's historic preservation ordinance (Ordinance No. 464) and has noted a few items that the Commission may wish to review. We will continue to submit items to you as we notice them, but here is an initial slate for your review. We will submit a final list of any recommended changes as part of our close out reporting for the project.

### 1. OWNER CONSENT IN HISTORIC DISTRICTS

Currently the ordinance states [15.22.050(2)(c)]: "The nomination documentation shall also include the written consent of all owner(s) of the subject property located within the proposed district."

While requiring owner consent for individual properties can be common, typically 100% owner consent is not used with historic districts (the use of \*all\* in the ordinance). Rather a majority percentage may be used, say 51% for a simple majority or 60% for a super majority. This could be an interesting discussion to have amongst the commissioners, keeping in mind the culture of Millwood and City Council. Questions to consider/discuss:

- Do you remember the initial thoughts on why this provision was included in the ordinance?
- What are your thoughts on how potentially changing this portion of the ordinance will be perceived by Council and the community?

### 2. ADOPTING SECRETARY OF THE INTERIOR'S STANDARDS

Section 15.22.040(4) of the ordinance relates to the Historic Preservation Commission and its rules and procedures. We recommend the Commission adopt the Secretary of the Interior's Standards for the Treatment of Historic Properties so that they can be referenced in decision-making. These are foundational principles within historic preservation and using them will establish a standard language for design review applications.

### 3. EXCEPTIONAL SIGNIFICANCE

This is in the ordinance template provided by DAHP, but for a property to be eligible for listing in the Millwood Register of Historic Places, the ordinance states:

*Any building, structure, site, object, or district may be designated for inclusion in the Millwood Register of Historic Places if it is significantly associated with the history, architecture, archaeology, engineering, or cultural heritage of the community; if it has integrity; is at least 50 years old, **or is of lesser age and has exceptional importance**; and if it falls in at least one of the following categories. [Emphasis added]*

We recommend the Historic Preservation Commission review the National Park Service's language related to exceptional significance. The NPS states,

*A property that has achieved significance within the past fifty years can be evaluated only when sufficient historical perspective exists to determine that the property is exceptionally important. The necessary perspective can be provided by scholarly research and evaluation, and must consider both the historic context and the specific property's role in that context.*

We recommend the Commission consider adding this language or similar language into the ordinance to clarify exceptional importance.

For further information, read the National Register Bulletin "Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years" available as a PDF: <https://www.nps.gov/nr/publications/bulletins/pdfs/nrb22.pdf>.

#### **4. HONORARY DESIGNATION**

Under the "Effects of Listing on the Register," the ordinance currently states:

*(a) Listing on the Millwood Register of Historic Places is an **honorary** designation denoting significant association with the historic, archaeological, engineering, or cultural heritage of the community. Properties are listed individually or as located within an historic district. [Emphasis added]*

We recommend removing the word honorary, since unlike National Register of Historic Places designation, listing in the Millwood Register is not a strictly honorary designation because a certificate of alteration (COA) is required for alterations to properties listed in the Millwood Register. It is particularly confusing because immediately after saying the designation is honorary, the ordinance outlines how it is in fact, not honorary.