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Mr. David Brooks, Director
City of Lebanon – Planning & Development Dept.
51 North Park Street
Lebanon, NH 03766

September 10, 2021

Re: Colburn Park Historic District Update – Phase 1, Lebanon, New Hampshire
- Recommendations for Phase 2

Dear David:

Most of what is presented here is also contained in the Phase 1 Report for the Colburn Park Historic District Update Project (9/2/21) on pages 47 through 53. I am writing this letter to provide some estimated costs for the suggested next steps and to discuss in more details the potential uses for the Phase 1 products and suggested priorities for Phase 2 follow up.

The Phase 1 product of a new Area Form for the Colburn Park Historic District Expansion is not just a stepping stone to updating and expanding the 1986 federal National Register listing. It represents an important data set of current information, new research, and context for the historic resources within the purview of the Lebanon Heritage Commission (LHC). The LHC currently reviews Certificate of Approval applications in the Historic District Overlay Zone, using 35-year-old information. The new form includes updated statements of significance and integrity that help support and identify the most important characteristics to focus preservation efforts on. This will serve the City whether it is eventually submitted to the National Park Service for listing or not. The City's own historic preservation review and planning activities will benefit from the new information.

The Area Form provides context for decisions affecting City-owned historic resources as well – such as Colburn Park and the Lebanon Pedestrian Mall. For example, understanding the rarity and high degree of integrity of the 1855 stone and iron fence around Colburn Park may help guide planning for addressing its newly discovered poor condition and the presence of lead-based paint. Having the new Area Form which calls out the fence as a key historic feature of the park, may help in pursuing preservation-related sources of funding for its restoration and rehabilitation. At the same time, the area form also provides context for acknowledging that the many changes and additions to the park setting that are in keeping with its use and function, actually contribute to its historic significance. The same might be said of the Lebanon mall and parking lots with many changes of materials and landscaping features that nevertheless support their continued use as a vibrant pedestrian mall complex. What is most important about the

Lebanon Mall is the landscaped pedestrian space lined with – mainly red brick buildings providing commercial and other services to citizens and made workable by the proximity of accessible in-town parking.

As described under “Methodology” in the Phase 1 report, the original Phase 1 scope of work had included review of and recommendations for the City’s Historic District regulations and review process of the Heritage Commission (Section 408 of the Lebanon Zoning Ordinance). The scope was altered to remove this component when the boundary expansion documentation (that had originally) been part of the Phase 2, was added to Phase 1. Nevertheless, a brief look at the ordinance, regulations and process as presented on the City’s website and on the application for a Certificate of Approval from the Heritage Commission, indicates that these are only very briefly described and not so clearly defined. As a result, the interpretation of the ordinance and criteria for the Commission’s review of projects within the Lebanon Historic District may seem vague or even subjective to applicants and even possibly to Commissioners. The following criteria are listed for considering changes proposed to buildings in the Historic District Overlay Zone:

- A. *The historical or architectural value of a building and its setting;*
- B. *In connection with additions, repair or restoration of any existing building, the compatibility of the exterior design, arrangement, texture, and materials proposed to be used in relationship to this existing building, its setting, and the Historic District as a whole; and,*
- C. *The size, scale, and design of proposed construction in relationship to the existing surroundings, including consideration of such factors as a building's overall height, width, street frontage, number of stories, type of roofs, facade openings (windows and doors), and architectural details.*

The words “value” and “compatibility” without more detail, clarity or illustration could be difficult to define and administer. The criteria also include the following: *“Preservation and/or reproduction measures shall be completed pursuant to the "Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings." While the Secretary of the Interior’s Standards are a specific set of guidelines, they too include language that is open for interpretation. Many municipalities which have historic preservation review and/or regulations use design guidelines that can be fairly specific and which often provide examples to illustrate what “size,” “scale,” and “design” refer to or what specific character defining features might constitute “historical or architectural value.”*

One of the examples of design guidelines listed below in the general recommendations is in Rochester, NH. In that city, detailed and well-illustrated design guidelines were developed in 2019, and in 2020, the city undertook the updating of its decades-old local and national historic district documentation. These two projects – the development of clear and well-illustrated design guidelines and the update and evaluation of the documentation of the historic district – go hand in hand to ensure the best outcomes for a local review process from both a preservation/Commission and a user/property owner point of view.

Now that Lebanon has the updated and re-evaluated historic district documentation from the Phase 1 project, this would be the ideal time to follow up with developing effective, defensible, clear, and user-friendly design regulations for the administration of its local Historic District Overlay zoning process. I would recommend that the Phase 2 of this project focus on the

ordinance and design guidelines. I would suggest this be a priority before pursuing formal updating of the federal National Register listing, although these could be done simultaneously. Rough cost estimates for these potential next steps are:

- Formal NR listing of the Colburn Park HD Expansion: \$1800 to \$2000

- Full review of and recommendations for the Lebanon Heritage Commission– such as suggestions for revised ordinance language, or changes to the local historic district: \$1500 to \$1800. The development of new materials, such as illustrated design guidelines might cost \$20,000 to \$25,000.

- Intensive Survey of a new potential historic district: This estimated cost would depend upon the size of the area selected.
 - o For a very small district, such as Estabrook Circle (15 properties), the cost might be \$6,000 to \$8,000;
 - o \$13,000 to \$16,000 for a small/medium district of up to 50, such as the Riverdale Neighborhood or Mascoma Street area;
 - o \$17,000 to \$20,000 for a large district of about 80 – 100, such as Bank Street area or Hough Square area ; and
 - o \$20,000 to \$30,000 for a very large district of up to 200, such as The Plain area or Maple Street Neighborhood area.

- Educational projects:
The estimated costs would depend upon the types of projects undertaken.
 - o The project described below of public education around incentives and benefits of National Register listing might be focused on public events and presentation (Powerpoint) materials and a cost range could be \$6,000 to \$9,000.
 - o More generally, other educational projects might include creation of video and website materials about Lebanon historic districts or individual resources and a cost might be \$10,000 to \$20,000 depending upon the extent of products.
 - o Another project might be focused on public signage and interpretation and could range from \$5,000 (for 1-2 signs) to \$15,000 (for up to 6 signs) for the research, writing and design plus the cost of sign production and installation.

Recommendations for Next Steps and Areas for Future Work

Determination of Eligibility

The Colburn Park Historic District Expansion Area Form is being submitted to the New Hampshire Division of Historical Resources (DHR) for their review and Determination of Eligibility (DOE). If the district expansion is determined eligible, the City can pursue actual listing of the updated documentation with the National Park Service.

Formal National Register Listing

In order to move ahead with updating the federal National Register of Historic Places listing to formally add the Colburn Park Historic District Expansion, the Historic Area Form documentation created in Phase 1 would need to be converted to National Register of Historic Places forms.

Specifically, the data and narratives in the sections of the Area Form need to be re-organized and in part re-written to fit the National Register nomination forms. The National register form is now digital only and has eleven sections plus a photograph log, one or more maps, and a set of specially formatted photographs. The NH Area Form has twenty-eight sections plus a set of labeled photographs and a photo key. Many sections are easily transferable from the NH Area Form to the National Register Form, such as name, address, boundary geodata, areas and period of significance, maps, and the descriptive inventory of all resources. Others require combining and some re-writing and editing. An example would be the NH Form “Setting,” “Geography,” “Description,” and “Integrity” sections would be combined to fit the needs of the NR “Description” section. The digital images need to be properly formatted and the files named according to the NR standards.

This would ideally be done within two years of the Phase 1 to make sure the information and photographs from the Area Form are still reasonably current. Once completed, the National Register forms would be submitted to the DHR and National Park Service for formal listing on the federal National Register. Part of this submittal would be notification of property owners. At a minimum all owners of newly added properties would be included, but possibly all owners of properties within the entire district might be notified of the pending nomination. Owners may comment or even may object to the listing. However, a proposed historic district would be listed unless over fifty percent of the property owners within it object.

Once listed, the owners of properties within the historic district could be eligible for federal tax credits, grants or loans under state or federal programs, and could be protected from federal undertakings, such as transportation projects, that might harm a property’s historic character.

In the long-term, the historic district may warrant additional updates. The Colburn Park Historic District Expansion has a total of forty-nine resources of which five are considered non-contributing. Some of these are non-contributing due to age but characterize the architectural styles of a later period and should be reevaluated when they are fifty years old.

Documentation and Designation of Other Historic Properties and Districts in Lebanon

There are only three properties listed on the National Register of Historic Places in Lebanon currently: the Stone Arch Underpass (Glen Road, listed 1985); Colburn Park Historic District (listed 1986); and Spring Hill Farm (Meriden Road, listed 2002). There is additionally, one listing on the New Hampshire State Register of Historic Places: the Dana House (3 Elm Street West, listed 2004). Although Lebanon’s local Landmark Designation program was created in 1997 and has designated 83 buildings and structures, there have been no National Register listings since 2002.

Instead of or in addition to updating and expanding Colburn Park Historic District which is already listed on the National Register, the City might also pursue new National Register nominations for other historic districts. Potential historic districts that might include income-producing properties, such as commercial or residential rentals, could provide access to federal tax credits for property owners if listed on the National Register. The 2016 Reconnaissance Survey of Historic Resources in Lebanon identified twelve potentially eligible historic districts throughout the city as well as fifty-three potentially eligible individual resources. These represent a significant opportunity for the City and the Heritage Commission to further historic preservation goals in all areas of the town.

The first step to pursuing National or State Register listing for the districts would be conducting an intensive level historic resource survey. This survey would identify, define, and describe the possible eligible district on a survey form similar to the one in this Phase 1 for Colburn Park. That survey would then be submitted to the DHR for a determination of eligibility. If found eligible, a National Register nomination could then be prepared and submitted for listing.

The intensive level survey work would be important data, beneficial to the City's preservation goals, whether or not it is followed up by formal listing at the state or national level. More detail is provided in the Phase 1 report and in the 2016 Reconnaissance Survey. The potentially eligible historic districts – organized by the areas of town in which they are found - are:

Multiple Survey Areas:

- **Northern Railroad Historic District/Area Form**, a multi-municipality, linear corridor

In the Central Village Area

- **Bank Street Neighborhood Historic District** (including Bank, Parkhurst, part of Elm, and Allen Streets), with approximately 80 properties.

- **The Plain Neighborhood Historic District** (boundaries to be further defined but potentially including School, Messenger, Green, Union, Elm, Shaw, Prospect, and Kimball Streets and possibly parts of Abbott, Spring and South Streets) including 100-200 properties depending on boundaries.

- **Hough Square Area Historic District** (boundaries to be further defined but potentially including parts of High, Hanover, Hough, Light, West, and Granite Streets and Fairview Avenue) may contain as many as 100 properties.

- **Mascoma Street Historic District** (boundaries to be further defined but potentially including both sides of Mascoma Street from High to the campus of Alice Peck Day Hospital). There are potentially 50 properties in this district.

- **Mill Historic District** – (boundaries or parameters to be further defined but potentially either a discontinuous district based around the Mascoma River that could include industrial and residential and commercial properties on Mechanic, Foundry, Blacksmith, and Water Streets or thematic documentation focused just on the mills of the central village.

West Lebanon Area:

- **Crafts Avenue Historic District** (including Crafts Avenue, Beyerle Street, Chandler Street, and part of North Main Street) – An historic district of 81 properties was already determined eligible by NHDHR on 9/10/2014.

- **Estabrook Circle Historic District**, limited to Estabrook Circle, developed in mid-1940 through 1955 with possibly factory-built housing of 15 small ranch homes.

- **Maple Street Neighborhood Historic District** (boundaries to be further defined but potentially including Maple Street, parts of Central Street, Dana Street, Green Street West, Highland Avenue, Mack Avenue, Pearl Street, Pleasant Street, Prospect Street West, Timothy Avenue, White Avenue, and Winter Street West) may contain as many as 150 properties. Note:

More recently, in 2019, the Maple Street Historic District was further studied and reaffirmed as potentially eligible.

- **Seminary Hill Area Historic District** including the lower section of Seminary Hill Road and most of Elm Street West, containing potentially 28 properties .

Hardy Hill Area:

- **Riverdale Neighborhood Historic District** (Riverdale Parkway, part of Bank Street Extension, Cooper Street, Fortune Street & Excelsior Street) There are about 30 properties in this area but more research is needed to make a determination and define boundaries.

East Lebanon Area:

- **Rural/ Agricultural Historic District** (Dartmouth College Highway) A number of 19th century farms along Dartmouth College Highway have mixed integrity and include several barns and agricultural accessory buildings, As a group, in a still open agricultural landscape, they may have sufficient integrity to be eligible as a rural historic district.

Two of the potential districts listed above have already been determined eligible by the DHR. One is the Crafts Avenue Historic District that was identified in an intensive level survey conducted in a 2015 CLG project. It was then determined eligible by DHR. This historic district in West Lebanon could be listed on the National Register fairly easily by a simple update and transfer of the documentation. The other is the Northern Railroad Historic District, that is a linear district recognizing and documenting the railroad history of this region. It was last surveyed in 2013. Also, noted above, the large Maple Street Neighborhood Historic District in West Lebanon, was looked at again in 2019 and again found to be a highly likely candidate for eligibility.

Evaluation of Local District Guidelines

As noted above in the Introduction and Methodology sections, the City is interested in reviewing their local Historic District regulations, design review guidelines and its process. This was originally intended to be part of the Phase 1 of this project. However, since much of the Phase 1 and Phase 2 of the nomination update and expansion was done entirely in Phase 1, the local regulation review did not get done. This could be done as a new project and could be supported by Certified Local Government (CLG) funding as was this project.

A study of the City's design guidelines and regulatory process for the Lebanon Historic District would include an assessment of their clarity, ease of application by the Heritage Commission, and their effectiveness in supporting the preservation of the properties within the district. This might be done through interviews with current and past Commission members, City Planning and Development staff, and applicants that have been through the design review process. A review of the level of architectural and historic integrity of properties within the district over the periods before and during the Historic District Overlay zoning would also inform the assessment.

The written study would identify opportunities for improvement. The evaluation could focus on whether existing verbiage is effectively supporting the integrity of the District and provide a recommended list of tasks (i.e., workplan scope) and cost estimates for updating the guidance.

A study would include comparison between the Lebanon historic design guidelines and regulations and those in other New Hampshire communities. Other towns and cities in the state CLG program, which requires a municipality have a historic preservation review process, would be good candidates for comparison of ordinances and historic design guidelines, such as Amherst and Rochester. Portsmouth, although not a CLG, has a strong historic design review process. In Amherst, using a CLG grant in 2018, the town undertook a re-evaluation of its 1982 national and local historic districts and developed an illustrated style guide using Amherst properties as a resource for the local design review process and public education. Like Lebanon, Rochester recently used the CLG program to update its 1983 national register district nomination and also examine its local historic district. The local and national districts did not match – like the situation in Lebanon. Its design review guidelines were developed in the last few years and include a great amount of illustrated detail and examples of the types of alterations and rehabilitation likely to occur in its downtown. In 2015-16 the City of Portsmouth developed extensive materials to introduce the historic district including incentives and opportunities for owners of historic properties and detailed, illustrated design guidelines for its local historic district and ordinance.

A study would provide recommendations to increase the utility of district guidelines for Certificate of Appropriateness reviews, to better inform other land use board functions, and to improve the user-friendliness of the regulations for project applicants. Looking at recent historic design guidelines in other towns and how well they are working in practice might offer good examples of changes and refinements to Lebanon’s guidelines, ordinance and process.

Local District Boundaries

As noted above, the locally designated Lebanon Historic District does not exactly match the boundaries of the current national Colburn Park Historic District. The local district, for example includes the Lebanon Pedestrian Mall. Under the Historic District Expansion proposed in this Phase 1 project, while the Pedestrian Mall would be added to the national district, so would other properties that are not currently in the Lebanon Historic District. So, again the two districts would not match. The City and its Heritage Commission might choose to examine this discrepancy and either endorse it as appropriate to local goals and preservation objectives, or to suggest an adjustment to the local Lebanon Historic District that best matches those goals and objectives.

While the local district regulations and designation criteria are separate from the National Register district requirements and boundaries, due to the significant overlap of properties between the two districts, the City regards the former as an important resource to support the designation and continued preservation of properties in the latter.

A study of the use of historic preservation overlay zoning and regulations in Lebanon could also look at whether other historic areas within the City might benefit from the application of a Historic District Overlay Zone and/or extension of the regulatory role of the Heritage Commission.

Education

The City and its Heritage Commission might also choose to present the new documentation in this update to the public and more specifically to the property owners within the Colburn Park

Historic District. Materials that support the local historic preservation process as well as the facts and advantages of the National Register recognition can also be the subject of future CLG grant projects. The update and evaluation of older local historic districts in other towns, such as those mentioned above, is often accompanied by updated brochures, websites, and presentations to the public to help promote and explain the work of the Heritage Commission and what it means to be listed in the local or National Register.

Information about incentives available to owners of historic properties can be part of this outreach. Since the 1986 original listing of the district, even more properties within it and also within the current boundary expansion, are income-producing, as distinct from owner-occupied single-family homes. Owner-occupied historic properties can take advantage of the federal tax credit for rehabilitation of historic properties. There has been no use of the federal historic rehabilitation tax credit in Lebanon. Both the state (DHR) and the City could partner to provide education and examples of the use of this program to encourage more investment in historic properties. Additionally, information about other preservation related grants and incentive programs could be highlighted for property owners within the district and elsewhere in Lebanon.

The City has had great success in its preservation, education, and civic engagement projects around Lebanon's history and historic resources. I believe this Phase 1 project for Colburn Park Historic District Expansion will help in those endeavors.

Thank you for the opportunity to assist the City with this work.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lyssa', with a stylized flourish at the end.

Lyssa Papazian

cc: NHDHR