



Historic District Commission

Meeting Agenda

August 6, 2014 at 5:30pm
Council Chambers, 201 S Main St

1. Approve minutes of the April 9, 2014 meeting
2. Text Amendment for Historic Resources. Request by staff to amend the *Development Ordinance* related to historic resources.

A complete agenda packet is available at www.cityofgraham.com

HISTORIC DISTRICT COMMISSION
Wednesday, April 9, 2014

The Historic District Commission held a called meeting on Wednesday April 9, 2014 at 5:30 p.m. in the Council Chambers of the Graham Municipal Building. Commission Members present were Larry Brooks, Brenda Sykes, Denise Baker, Grace Baldwin, Lauren Nance and Cary Worthy. Steven West, Helen Sharpe and Jimmy Linens were absent. Staff members present were Melissa Guilbeau, City Planner, and Martha Johnson, Zoning/Inspections Technician.

Larry Brooks called the meeting to order and explained the function of the Commission.

1. A motion was made to approve the minutes from the February 26, 2014 meeting by Lauren Nance and seconded by Denise Baker. The motion carried unanimously.

2. Alamance Farmers Insurance Metal Cap (COA1402). Request by McDowell & Jordan, LLC for a Certificate of Appropriateness to add a metal cap over the existing concrete cap in a similar shape and color and to replace broken mortar above concrete accent strip with elastic caulking in similar color at 128 W Harden St. Josh McDowell was present representing McDowell & Jordan who is the contractor for Alamance Farmers Insurance. Mr. McDowell said that water was leaking into the building and they needed to add a colored metal cap to the existing cap using a similar color and shape. Cary Worthy asked how far over the cap would the new cap be and Mr. McDowell stated the entire length which is about seven inches. Mr. McDowell had a sample he showed which was the closest color to the existing cap and he stated the pictures presented were taken when the building was wet.

Denise Baker made a motion for approval, second by Brenda Sykes. All voted in favor.

Cary Worthy stated he was concerned about Alamance County building a residential bedding facility at 600 North Main Street, which is in the North Main Street Historic District. He feels it will bring down the value of the houses in that area and as a Commission he felt like a letter needed to be sent to the county expressing the Commission's feelings concerning this not being a good match. Melissa Guilbeau told the Commission this property was zoned O-I but a nursing home would need a special use permit and this would have to be approved by City Council.

It was the consensus of the Commission that a letter be sent to the Alamance County Commissioners concerning this issue. Ms. Guilbeau stated she would draft a letter and send an email to all members of the Commission to review and she would send it to the county.

With no further business the meeting was adjourned.

Respectfully Submitted,
Martha Johnson



STAFF REPORT

Prepared by Melissa Guilbeau, City Planner

Text Amendment for Historic Resources

Type of Request: Text Amendment

Contact Information

Not applicable

Meeting Dates

Historic District Commission on August 6, 2014

Planning Board on August 19, 2014 (tentative)

City Council on September 2, 2014 (tentative)

Summary

Staff proposes to adopt revised versions of Division 9 and Division 10 of Article IV of the *Development Ordinance*. These revisions are in response to the following:

- It was brought to staff's attention that there was confusion between the City and Alamance County regarding jurisdiction over the designation of local historic landmarks. The Historic District Commission voted for the City to have jurisdiction to designate local historic landmarks and requested that staff make the necessary ordinance revisions.
- In making revisions, staff took the opportunity to update the ordinance to reflect current state statute and reorganize it to be easier to understand and apply.
- Staff also researched the opportunity for the City to become a "Certified Local Government" (CLG) which would provide the City with access to resources for the work we are already doing. Staff consulted with the State Historic Preservation Officer to ensure that the proposed new ordinance meets their criteria for becoming a CLG should the City decide to pursue that opportunity.

Location

city-wide

Current Zoning

not applicable

Proposed Zoning

not applicable

Overlay District

not applicable

Staff Recommendation

Approval

The proposed revised Article IV, Division 10 is attached. Also attached is a table that shows each section in the current ordinance, what happened to it in the proposed new ordinance, and explanation for any changes.

The following major changes are proposed:

- Change the name of the commission to the Historic Resources Commission. This is recommended because the commission will have jurisdiction over both historic districts and historic landmarks. If the name remains as the Historic District Commission, it suggests that the commission has jurisdiction over only historic districts, not historic landmarks. Another naming option is the Historic Preservation Commission, but this is the name used by both Alamance County and Burlington for their historic commissions.
- Set a regular meeting date for the commission. This is a requirement for being a CLG. The regular meeting date can be voted upon by the commission when it adopts its rules of procedure.
- Establish procedures and criteria for designating historic districts and historic landmarks. These were developed in accordance with current state statute.

- Reorganization and updates. Many of the sections of the divisions were moved, combined or revised, and some were deleted. The state statute that the ordinance was drafted under in 1983 was repealed in 1989 and replaced by new state statute.

The following amendments to the Development Ordinance are proposed:

- Amend Section 10.142 Role of Historic District Commission as follows:

Showing changes

Role of Historic ~~District~~ Resources Commission. As provided for in Section 10-~~207.205~~, the Historic ~~District~~ Resources Commission is authorized to review and comment on special use applications for proposed uses within the Historic District Overlay Zone any historic district or historic landmark. Recommendations and comments from the commission shall be relayed directly to the City Council for consideration along with the Planning Board's recommendations.

Final result

Role of Historic Resources Commission. As provided for in Section 10.205, the Historic Resources Commission is authorized to review and comment on special use applications for proposed uses within any historic district or historic landmark. Recommendations and comments from the commission shall be relayed directly to the City Council for consideration along with the Planning Board's recommendations.

- Amend Section 10.186 Historic District Overlay Zone Established as follows:

Showing changes

The Courthouse Square Historic District is hereby established as a district which overlaps and overlays existing zoning districts, the extent and boundaries of which are as indicated on the official zoning map ~~for Graham. The boundaries of the Courthouse Square Historic District are as shown on the official zoning map.~~

Final result

The Courthouse Square Historic District is hereby established as a district which overlaps and overlays existing zoning districts, the extent and boundaries of which are as indicated on the official zoning map.

- Amend Section 10.187 Uses Conform to Underlying District as follows:

Showing changes

The Courthouse Square Historic District overlays several zoning districts. All uses permitted in any such zoning district, ~~whether by right or as a special use~~, shall be permitted in the historic district according to the procedures established ~~for such uses in the Graham zoning~~ this ordinance.

Final result

The Courthouse Square Historic District overlays several zoning districts. All uses permitted in any such zoning district shall be permitted in the historic district according to the procedures established in this ordinance.

- Amend Section 10.188 Dimensions Conform to Underlying District, Exceptions as follows:

Showing changes

Dimensional requirements shall be the same as those for the underlying zoning districts, except that:

- (1) No structure or part thereof shall extend nearer to or be required to be set back further from the front lot line than the average distance of the setbacks of the nearest principal buildings within 200 feet on each side of such building and fronting on the same side of the street.
- ~~(2) The side and rear lot areas shall be equal to the distances required in the Table of Area, Yard, Height Requirements of this ordinance~~

Final result

Dimensional requirements shall be the same as those for the underlying zoning districts, except that:

- (1) No structure or part thereof shall extend nearer to or be required to be set back further from the front lot line than the average distance of the setbacks of the nearest principal buildings within 200 feet on each side of such building and fronting on the same side of the street.

- Replace Section 10.189 Jurisdiction with Section 10.189 Criteria to Determine Appropriateness

Final result

The Historic Resources Commission shall develop and publish design guidelines that reflect and support the special character of the Courthouse Square Historic District. These guidelines shall be used by the Historic Resources Commission when deciding upon certificates of appropriateness for structures in the district.

- Replace “Article IV. Zoning, Division 10. Historic District Commission” with “Article IV. Zoning, Division 10. Historic Resources”

The proposed new Article IV, Division 10 is attached.

- Amend Appendix A. Historic District Design Guidelines for Signs as follows:

Showing changes

These guidelines are to be used by the City of Graham Staff to approve sign permits within the ~~Downtown Courthouse Square~~ Historic District. The items listed below are additional guidelines to “Article X, Signs” in the City of Graham Development Ordinance. Issuance of a sign permit cannot be denied without first being considered by the City of Graham

~~Historic District Resources Commission (City of Graham Development Ordinance, Section 10.202(15)).~~

Final result

These guidelines are to be used by the City of Graham Staff to approve sign permits within the Courthouse Square Historic District. The items listed below are additional guidelines to “Article X, Signs” in the City of Graham Development Ordinance. Issuance of a sign permit cannot be denied without first being considered by the City of Graham Historic Resources Commission.

Conformity to the *Growth Management Plan (GMP)* and Other Adopted Plans

Applicable Goals to Guide Us into the Future

- 6.1.2. Continue to support efforts that identify, restore and/or reuse cultural and historic structures, buildings, monuments, and neighborhoods. *The proposed revisions to the Development Ordinance will allow the City to designate local historic landmarks and historic districts. It will also allow the City to apply to become a CLG, which will give the City access to technical resources, grant opportunities, and jurisdiction to review and comment on nominations to the National Register of Historic Places.*
- 6.1.2. Discourage the destruction of cultural and historic resources within the Planning area. *The proposed revisions set out clear criteria and procedures for designating historic districts and historic landmarks. When an area or property is locally designated, its demolition can be delayed to give interested parties the opportunity to try to save it.*

Planning District

All

Development Type

All

Applicable Planning District Policies and Recommendations

- None

Staff Recommendation

Based on the *Growth Management Plan 2000-2020* and research of State regulations, other jurisdictions and best practices, staff **recommends approval** of the text amendments. The following supports this recommendation:

- The proposed text amendments will further goals of the *Growth Management Plan* and will accomplish the purposes of the revisions.

ARTICLE IV. ZONING

DIVISION 10. HISTORIC RESOURCES

Section 10.200 Purpose

The purpose of this division is to recognize and preserve Graham's historical heritage. It provides that Graham's heritage might be safeguarded by preserving any district or landmark that embodies important elements of Graham's culture, history, architectural history or prehistory and promotes the use and conservation of those districts and landmarks for the education, pleasure and enrichment of the residents of and visitors to Graham.

Section 10.201 Historic Resources Commission

- (a) Creation. The Graham Historic Resources Commission is hereby established, referred to in this division as the "commission."
- (b) Purpose, Authority and Powers. The commission shall seek to promote, enhance and preserve the character of historic districts and historic landmarks. The commission is authorized and empowered to undertake such actions reasonably necessary to the discharge and conduct of its duties and responsibilities as outlined in this division and Article 19, Part 3C of Chapter 160A of the General Statutes of North Carolina, including but not limited to the following:
 - (1) Undertake and maintain an inventory of properties of historical, prehistorical, architectural and/or cultural significance;
 - (2) Recommend to the Planning Board and City Council areas to be designated by ordinance as "historic districts" or that designation of any historic district or any part thereof be revoked or removed for cause;
 - (3) Recommend to the City Council individual structures, buildings, sites, areas, or objects to be designated by ordinance as "historic landmarks" or that designation of any historic landmark be revoked or removed for cause;
 - (4) Prepare and publish guidelines and criteria for the review of certificates of appropriateness for all designated historic districts and historic landmarks;
 - (5) Prepare and publish rules of procedure;
 - (6) Review and act upon applications for certificates of appropriateness;
 - (7) Establish criteria, procedures and guidelines by which designated city staff may review and approve certificates of appropriateness for minor works;
 - (8) Enter, solely in performance of its official duties and only at reasonable times, upon private lands for examination or survey thereof. However, no member or agent of the commission may enter any private building or structure without the express consent of the owner or occupant thereof;

- (9) Prepare and recommend the adoption of a preservation element as part of the City's comprehensive plan;
- (10) Propose to the city council changes to this division or any related ordinance and to propose new ordinances or laws relating to the total program for the development of the historic resources of the city and its environs;
- (11) Cooperate with other city boards or commissions or with agencies of the city or other governmental units, including federal and state governments, to offer or request assistance, aid, guidance, or advice concerning matters under its purview or of mutual interest;
- (12) Conduct an educational program with respect to historic districts and landmarks within its jurisdiction;
- (13) Undertake programs of information, research, or analysis relating to any matters under its purview;
- (14) Request the zoning enforcement officer to take such action as may be appropriate to prevent the construction, reconstruction, alteration, restoration, moving or demolition of buildings, structures, appurtenant fixtures, outdoor advertising signs or other significant features in any historic district or historic landmark in violation of the provisions of this division.
- (15) Negotiate at any time with the owner of a building, structure, site, area, or object for its acquisition or its preservation, when such action is reasonably necessary or appropriate; and,
- (16) To exercise such other powers and perform such other duties as are required elsewhere by this division, the General Statutes of North Carolina or by the city council.

(c) Members, Officers and Meetings

- (1) Members. The commission shall be composed of nine (9) members appointed by the Graham City Council. All members shall be residents of the territorial zoning jurisdiction of Graham and shall have demonstrated special interest, experience or knowledge in history, architecture, archaeology, or a related field. Members shall serve overlapping terms of four years. The City Council shall strive to fill any vacancy within 60 calendar days. Individuals appointed to fill vacancies on the commission shall serve out the term of the member whom they replace.
- (2) Attendance at meetings. Any member who misses more than two consecutive regular meetings or more than half the regular meetings in a calendar year shall lose his or her status as a member of the commission and shall be replaced or reappointed by the City Council. Absence due to sickness, death or other emergencies of like nature shall be recognized as approved absences and shall not affect the member's status on the commission except that in the event of a long illness or other such cause for prolonged absence, the member shall be replaced.
- (3) Chair and Vice-Chair. Members of the commission shall elect a chair at the last regular meeting of each calendar year. The chair shall decide all points of order and procedure, subject to the rules of procedure, and shall appoint any committees found necessary to investigate any matters before the commission. A vice-chair shall be elected in the same manner and for the same term as the chair and shall serve as acting chair in the absence of the chair.

Comment [MG1]: Consider reducing to 7?
Would make it easier to get a quorum.

- (4) Meetings. The commission shall establish a regular meeting time, and shall meet at least quarterly and more often as it shall determine and require. All meetings shall conform to the North Carolina open meetings law (G.S. Chapter 143, Article 33C). The commission shall adopt and publish rules of procedure for the conduct of its business.
- (5) Minutes of meetings. The commission shall keep permanent minutes of all its meetings. The minutes shall record attendance of its members, its resolutions, findings, recommendations, actions and the reasons for its actions. The minutes of the commission shall be a public record.
- (6) Quorum and Voting. A quorum shall consist of a majority of the members of the commission. The vote of a majority of those members present shall be sufficient to decide matters before the commission, provided a quorum is present. No commission member shall participate in the decision of any matter in which he has a personal financial interest.
- (7) Annual report. An annual report shall be prepared and submitted to the City Council at or before its regular March meeting. Such report shall include a comprehensive and detailed review of the activities, problems and actions of the commission, as well as any budget requests and/or recommendations.

Section 10.202 Designation of Historic Districts

- (a) Criteria for Designation. Historic districts shall be of special significance in terms of their history, prehistory, architecture and/or culture, and possess integrity of design, setting, materials, feeling and association.
- (b) Procedures
 - (1) Any person authorized to propose amendments to the text of this ordinance may propose that an area be designated as an historic district. Said proposal must include the following information related to the proposed district:
 - a. A description and map of the district boundaries;
 - b. An investigation and report describing the significance of the buildings, structures, features, sites or surroundings included in the district; and,
 - c. The proposed text amendment to this ordinance that will create and govern the district, which shall specify criteria to be used in reviewing certificates of appropriateness.
 - (2) Upon receiving a complete proposal, staff shall forward items (a) and (b) above to the State Historic Preservation Officer, North Carolina Department of Cultural Resources. If the Department does not submit written comments or recommendation in connection with the report within 30 days following receipt by the Department of the report, the commission, Planning Board and City Council shall be relieved of any responsibility to consider such comments.
 - (3) Consideration by the Historic Resources Commission. The commission shall consider the proposal and any timely comments received from the State Historic Preservation Officer or his or her designee at its first possible regular meeting. If necessary, the commission shall work with

the proposer to make any revisions to the proposed text amendment that it deems necessary. At or before the second regular meeting at which the proposal is considered, the commission shall forward the proposal to the Planning Board along with a recommendation to either approve or deny the proposed text amendment.

- (4) The proposal will then proceed in the same manner as amendments to the text of this ordinance.

Section 10.203 Designation of Historic Landmarks

- (a) Criteria for Designation. No property shall be recommended for designation as an historic landmark unless it is deemed and found by the commission to be of special significance in terms of its historical, prehistorical, architectural, or cultural importance, and to possess integrity of design, setting, workmanship, materials, feeling and/or association.
- (b) Procedures
 - (1) Pre-Application Conference. Before submitting an application, applicants are encouraged to schedule a pre-application conference with the City Planner to discuss the procedures, standards and regulations of designation of an historic landmark.
 - (2) Application. A complete application shall be filed with the City Planner at least 45 calendar days before the next meeting of the commission. A complete application shall include a report on the historic, architectural, prehistorical, educational or cultural significance of each building, structure, site, area or object proposed for designation, and a historic landmark designation fee fixed by the City Council. The report shall include the suggested minimum standards set forth by the State Historic Preservation Office and as otherwise required by the commission.
 - (3) Within 5 calendar days of receiving a complete application, staff shall forward said application to the State Historic Preservation Officer, North Carolina Department of Cultural Resources. If the Department does not submit written comments or recommendation in connection with the application within 30 days following receipt by the Department of the report, the commission and City Council shall be relieved of any responsibility to consider such comments.
 - (4) Consideration by the Historic Resources Commission. The commission shall consider the application and any timely comments received from the State Historic Preservation Officer or his or her designee at its first possible regular meeting, and shall hold a public hearing on the proposed designation ordinance. The public hearing shall be advertised in the same manner as zoning amendments, except that a notice posted on the site is not required. The commission shall have two consecutive regular meetings at which to consider the proposed designation. Only designations that are recommended for adoption shall be forwarded to the City Council.
 - (5) Consideration by City Council. The City Council shall hold a public hearing on the proposed designation ordinance. The public hearing shall be advertised in the same manner as zoning amendments, except that a notice posted on the site is not required. The City Council may adopt the designation ordinance as proposed, adopt with any amendments it deems necessary, or reject the proposed designation ordinance.

- (6) If the designation ordinance is adopted, the owners and occupants of each designated landmark shall be given written notification of such designation. A copy of the designation ordinance and all amendments thereto shall be filed with the City Clerk, Chief Building Inspector, Alamance County Register of Deeds, and Alamance County Tax Office.
- (c) Standards for Designation Ordinance. The designation ordinance shall include, at a minimum, the following information for each property to be designated:
 - (1) Identification of the property;
 - (2) Specification of the exact boundaries of the designation;
 - (3) Specification of the property's features that are included in the designation, such as exteriors of buildings and other structures, interior features (if any), and significant landscape, archaeological or natural features;
 - (4) Certification that the requirements of state law have been met;
 - (5) The main facts supporting the finding that the property has special historical, prehistorical, architectural or cultural significance; and,
 - (6) Designation of the property as a historic landmark pursuant to state law.

Section 10.204 Certificates of Appropriateness

- (a) Applicability. A certificate of appropriateness shall be required for (1) any changes in the external appearance of existing structures; (2) design of new structures; and (3) for demolition or relocation of existing structures within locally designated historic districts and/or locally designated historic landmarks within Graham's territorial jurisdiction. Specifically:
 - (1) No exterior portion of any building or other structure (including masonry walls, fences, light fixtures, steps and pavement, or other appurtenant features) nor above-ground utility structure nor any type of sign shall be erected, altered, restored, moved or demolished until after a certificate of appropriateness has been approved. Such certificate must be issued prior to the issuance of a building permit or other permit granted for the purposes of constructing, altering, moving or demolishing structures, which certificate may be issued subject to reasonable conditions necessary to carry out the purposes of this division. A certificate of appropriateness shall be required whether or not a building or other permit is required. Any building permit or such other permit not issued in conformity with this Section shall be invalid.
 - (2) The city and all public utility companies shall be required to obtain a certificate of appropriateness prior to initiating any changes in the character of street paving, sidewalks, trees, utility installations, lighting, walls, fences, structures and buildings on property, easements, or streets owned or franchised by the city or public utility companies.
- (b) Procedures
 - (1) Application. A complete application shall be filed with the City Planner at least 10 calendar days before the next meeting of the commission. The commission shall, by uniform rule in its rules of

procedure, require data and exhibits as are reasonably necessary to determine the nature of the application. Nothing shall prevent the applicant from filing with the application additional relevant information bearing on the application.

- (2) Public Notice. The staff shall notify by mail, not less than one week before the meeting at which the matter is to be heard, the affected property owners within 100 feet on all sides of the subject property for applications which involve a use by right or within 500 feet on all sides of the subject property for applications which involve a special use permit.
 - (3) Review and Approval. The commission shall take action on the application and in doing so shall apply any officially adopted review criteria or guidelines. The commission's action on the application shall be approval, approval with modifications, or denial. The applicant and affected property owners shall be given an opportunity to be heard at the meeting at which the application is presented. If the commission fails to take final action at or before the second regular meeting at which the application is considered and within no more than 180 days from the date the application is filed, the application shall be deemed to be approved.
 - (4) If the application is approved, the secretary for the commission shall transmit a certificate of appropriateness in letter form, clearly describing the nature of the work which has been approved. A copy of the letter shall be forwarded to the city department which is responsible for its enforcement.
 - (5) If the application is denied, a new application affecting the same property may be submitted only if substantial change is made in plans for the proposed construction, reconstruction, alteration, restoration or moving. The entire application process shall begin anew once an application is resubmitted.
- (c) Delay in Demolition or Relocation. An application for a certificate of appropriateness authorizing the relocation, demolition or destruction of a designated landmark or a building, structure or site within the district may not be denied except as provided in subsection (d) below. However, the effective date of such a certificate may be delayed for a period of up to 365 days from the date of approval. The maximum period of delay authorized by this section shall be reduced by the commission where it finds that the owner would suffer extreme hardship or be permanently deprived of all beneficial use of or return from such property by virtue of the delay. During such period, the commission shall negotiate with the owner and with any other parties in an effort to find a means of preserving the building or site. If the commission finds that a building or site within a district has no special significance or value toward maintaining the character of the district, it shall waive all or part of such period and authorize earlier demolition, or removal. If the commission has voted to recommend designation of a property as a landmark or designation of an area as a district, and final designation has not been made by the City Council, the demolition or destruction of any building, site, or structure located on the property of the proposed landmark or in the proposed district may be delayed by the commission for a period of up to 180 days or until the City Council takes final action on the designation, whichever occurs first.
- (d) An application for a certificate of appropriateness authorizing the demolition or destruction of a building, site, or structure determined by the State Historic Preservation Officer as having statewide significance as defined in the criteria of the National Register of Historic Places may be denied

except where the commission finds that the owner would suffer extreme hardship or be permanently deprived of all beneficial use or return by virtue of the denial.

(e) Appeal. An appeal from the commission's action in granting or denying a certificate of appropriateness may be taken to the board of adjustment.

(f) Compliance

- (1) The zoning enforcement officer shall enforce compliance with the terms of the certificate of appropriateness. Failure to comply with a certificate of appropriateness shall be a violation of this article. The discontinuance of work or the lack of progress toward achieving compliance with a certificate of appropriateness for a period of six months shall be considered as a failure to comply with a certificate of appropriateness.
- (2) Nothing contained in this division shall prohibit, impair, or limit in any way the power of the city to prevent the construction, reconstruction, alteration, restoration, or removal of buildings, structures, appurtenant fixtures, or outdoor signs in any historic district or historic landmark in violation of the provisions of this division. The enforcement of any remedy provided herein shall not prevent the enforcement of any other remedy or remedies provided herein or in other ordinances or laws.

Section 10.205 Commission Recommendation on Special Use and Conditional Rezoning

When an application for a special use permit or conditional district rezoning within an historic district or historic landmark has been submitted, the Historic Resources Commission shall review the application and forward its comments and recommendations to the City Council within 30 days of the filing of the application.

Section 10.206 – 10.239 Reserved

Comparison Table

Section #		Comments
Current	New	
DIVISION 9		
185	185	No changes
186	186	Minor changes
187	187	Minor changes
188	188	Removed 2 because it was redundant and not an exception
189	204	
190	190	No changes

Comparison Table

Section #		Comments
Current	New	
DIVISION 10		
200	201(a)	
201	201(b)	Updated to reflect current state statutes
202	201(b)	Updated to reflect current state statutes
203	201(c)	Updated and reorganized
204	201(b)	
205	del	From old state statute and covered by the variance process
206	del	Covered by the variance process
207	205	Broadened to include all historic districts and landmarks, not just Courthouse Square HD
208	204(a)	
209	204(a)	
210	del	Incorporated into 202 and 203
211	189	Specific criteria will be published in the Handbook that is being developed
212	204(b)(1)	
213	204(b)	
214	204(b)(1)	
215	del	Can be addressed in Rules of Procedure if necessary
216	204(b)(3)	
217	204(b)(3)	Specific criteria will be published in the Handbook that is being developed
218	del	A COA is required specifically for exterior work; this statement is not needed
219	del	Incorporated into 201(b)(8) and (11)
220	del	No advertising in local newspaper
221	del	To be addressed in the Rules of Procedure
222	204(b)	Also to be addressed in the Rules of Procedure
223	201(c)(6)	
224	201(c)(5)	
225	204(b)(3)	State statute time limit is 180 days
226	204(b)(5)	
227	del	From old state statute and covered by other sections
228	204(c)	
229	201(b)(14)	Minor changes
230	204(e)	Revised to simply direct to the BOA
231	204(f)	Minor changes
na	200	Added purpose by adapting language from state statute
na	202	Added criteria and procedures for designating historic districts
na	203	Added criteria and procedures for designating historic landmarks