



**PARK CITY HISTORIC PRESERVATION BOARD MEETING
SUMMIT COUNTY, UTAH
January 16, 2019**

PUBLIC NOTICE IS HEREBY GIVEN that the Historic Preservation Board of Park City, Utah will hold its regularly scheduled meeting at the City Council Chambers, 445 Marsac Avenue, Park City, Utah 84060 for the purposes and at the times as described below on Wednesday, January 16, 2019.

I. ROLL CALL

II. MINUTES APPROVAL

- II.A. Consideration to Approve Historic Preservation Board Meeting Minutes from December 5, 2018.
[December 5, 2018 Minutes](#)

III. STAFF AND BOARD COMMUNICATIONS AND DISCLOSURES

IV. PUBLIC COMMUNICATIONS

V. WORK SESSION

- V.A. Historic District Grant Program
[Staff Report and Exhibits pg. 21](#)

VI. REGULAR AGENDA

- VI.A. Main Street National Register Historic District - Historic Preservation Board will review the draft National Register nomination for the Main Street Historic District expansion and forward a recommendation to the State Historic Preservation Board for consideration on January 24, 2019.
[Staff Report and Exhibits pg. 71](#)

VII. ADJOURN

A majority of Historic Preservation Board members may meet socially after the meeting. If so, the location will be announced by the Chair. City business will not be conducted. Pursuant to the Americans with Disabilities Act, individuals needing special accommodations during the meeting should notify the City Recorder at 435-615-5007 at least 24 hours prior to the meeting. Wireless internet service is available in the Marsac Building on Wednesdays and Thursdays from 4:00 p.m. to 9:00 p.m. Posted: See: www.parkcity.org

***Parking validations will be provided for Historic Preservation Board meeting attendees that park in the China Bridge parking structure.**

PARK CITY MUNICIPAL CORPORATION
HISTORIC PRESERVATION BOARD
MINUTES OF DECEMBER 5, 2018

BOARD MEMBERS IN ATTENDANCE: Douglas Stephens, Lola Beatlebrox,
Puggy Holmgren, John Hutchings, Jack Hodgkins, Randy Scott

EX OFFICIO: Bruce Erickson, Anya Grahn, Mark Harrington, Liz Jackson

ROLL CALL

Chair Doug Stephens called the meeting to order at 5:00 p.m. and noted that all Board Members were present except Jordan Brody, who was excused.

ADOPTION OF MINUTES

November 7, 2018

MOTION: Board Member Holmgren moved to APPROVE the minutes of November 7, 2018 as written. Board Member Hodgkins seconded the motion.

VOTE: The motion passed. Chair Stephens abstained since she was absent from the November 7, 2018 meeting.

PUBLIC COMMUNICATIONS

There were no comments.

STAFF/BOARD COMMUNICATIONS AND DISCLOSURES

Planner Anya Grahn commented on the C-PACE program. They have been passing out flyers to the Building and Planning Department. She wanted the HPB to be aware that there was another financing option available to people in the Historic District.

Planner Grahn reported that the RFP for the art piece for the Historic Preservation Award was available on line. She asked the Board members to help promote it.

Planner Grahn noted that the Staff report included dates for the upcoming 2019 HPB meetings to help everyone plan ahead.

Planner Grahn reported that the Planning Department has been working with the Star Hotel to pull a demolition permit. There is a Notice and Order on the building and every winter they are concerned that the amount of snow on the roof will cause it to collapse. Even though the HDDR application has not yet been

approved, they will allow the owner to move forward with a demo. A financial guarantee is in place and demolition will resolve the Notice and Order.

WORK SESSION – Historic District Grant Program

Director Erickson commented on the need to get the Grant Program in place quickly because funds cannot be granted until the City Council accepts the document and allocates money in the budget specifically for this program.

Planner Grahn stated that the goal is to finalize the Grant Program at the January 16th meeting, and take it to the City Council before the end of January or early February at the latest.

Planner Grahn remarked that the first section was the Mission Statement. She had redlined the Statement to show the amendments that the Board previously recommended.

Board Member Hutchings recalled that they had talked about defining or clarifying socially equitable. Planner Grahn replied that the Board had talked about it, and the City was still working on defining it. Director Erickson was trying to look at it from a preservation perspective without creating a disadvantage for historic property owners due to the additional costs of restoration work.

Board Member Hutchings stated that he was against the preservation easement. However, if they intend to have a preservation easement as part of the program, it should be included in the Mission Statement. He understood that the purpose of the preservation easement is to insure that the property is preserved in perpetuity if the Guidelines go away. Mr. Hutchings thought they needed to make it clear that the program is about preserving historic structures, but it is also about preserving historic structures forever.

Planner Grahn thought it could be referenced. She encouraged the Board to make their comments for or against the preservation easement when they review the easement section. If they reach an agreement as a Board, the Staff will take their recommendation to the City Council.

Director Erickson explained that the intent is not based as much on whether the Guidelines go away or the Legislature makes changes. It is primarily based on the expenditure of public money and the need to show value for the money spent. He stated that they do not have an easement on the structures being done on the Park City Mountain Resort in conjunction with the Friends of the Ski Mining History. They have a license on those structure. Director Erickson

believed there was a mechanism to show public value if there were concerns about the rigor of the easement.

Chair Stephens thought the Mission Statement should be simplified. In reading the language, he deleted all the wording down to where it said “historic buildings” in red that was scratched out. Chair Stephens pointed to the language that he thought were Park City’s values and where they really talk about the Grant Program. He recommended deleting all the language prior to that statement to avoid being caught up in the question of whether it is a socially equitable grant. It simply gives the HPB the ability to use the money however they deem fit. It could still be part of the consideration, but it should not be part of the Mission Statement. Chair Stephens had also scratched out “emergency repair”. He believed it would be intuitive if an emergency repair was necessary to preserve a building.

Board Member Beatlebrox concurred. The rest of the Board concurred as well.

Planner Grahn moved to the next section, Eligible Improvements. She reviewed an exhibit listing eligible improvements for emergency repair work and for competitive grants. At the last meeting the Board talked about the actual meaning and whether they were useful terms. She believed that keeping the terms broad was helpful because each historic building will be unique in its own issues.

Chair Stephens asked Planner Grahn to address the Abatement of Hazardous Materials as being an eligible improvement. He wanted to know under what circumstances it would apply. If someone recently purchases a historic structure they would know that hazardous material abatement would be necessary. He questioned whether that would be an eligible improvement.

Planner Grahn explained that it was more for exterior building materials. There have been a few cases where the abatement was removal of asbestos siding and restoring the original wood siding. A cost was incurred because they had to abate the asbestos. Chair Stephens asked if that was the case of a recent purchase. Planner Grahn replied that it was an elderly homeowner who had lived in the house for a long time. Chair Stephens thought that scenario was appropriate and eligible. If he were purchasing a historic home, he would be aware that an abatement process needs to take place on the asbestos siding. The market price would already reflect that and receiving a grant would be double-dipping.

Planner Grahn suggested removing the abatement language and call it siding repair work. Chair Stephens favored that suggestion because it would allow the HPB to make adjustments based on the circumstances.

Board Member Hutchings thought the market price reflected all of those things when a structure is purchased. Board Member Scott pointed out that the Board would have a discussion to determine whether the item could be approved as eligible. Board Member Hutchings understood that the only abatement approved would relate to the exterior. Chair Stephens agreed that the Board would have some flexibility depending on the circumstances.

Chair Stephens referred to the ineligible improvements. He recalled that under the old Grant Program, updating mechanical and HVAC was an eligible improvement. Planner Grahn stated that since her time in the Planning Department it has been an ineligible improvement. She believed it was because the exterior of the building can be maintained without the HVAC. It could be mothballed to keep the exterior in good condition. Planner Grahn understood the argument that keeping the building up to Code helps to keep it livable and maintained. Chair Stephens was comfortable leaving it as ineligible. Board Member Hodgkins believed there were other options for funds to help the homeowner. Chair Stephens agreed that credits are available for efficiency upgrades.

Board Member Holmgren asked if they were keeping the emergency grant. Planner Grahn stated that they would like to. Ms. Holmgren asked about things such as roofs. Planner Grahn noted that roofing was not included and offered to add it as an eligible improvement. Ms. Holmgren thought it should be included. The Board concurred.

The Board had no additional comments or questions regarding the emergency repair list.

Planner Grahn reviewed the Competitive Grant and Improvement List. She would add roofing to the eligible improvements on this list.

Chair Stephens noted that his earlier comment regarding the Abatement of Hazardous Materials applied to this section as well.

Director Erickson was not sure he was in complete agreement with Planner Grahn regarding hazardous materials. He believed some of the houses needed interior remediation; particularly mice or rats or lead materials. Director Erickson thought the issue was broader than asbestos siding. He assumed they would see a lot of asbestos in the commercial structures that will need to be abated.

Chair Stephens explained that his point was to find a way to allow flexibility based on the circumstance of each property. He appreciated the suggestion to include it under siding rather than listing it specifically as hazardous material abatement. Planner Grahn stated that in the future as they talk about a score

card, many of the extenuating circumstances could be weighed differently through a score card.

Board Member Hodgkins was pleased that stabilization and preservation of the mine structures was included in the list; especially for emergencies.

Board Member Hutchings asked if they should make it clear that this was not an exhaustive list on either the emergency or the competitive grant list. Planner Grahn offered to make that clarification.

Board Member Holmgren stated that in the past they have not allowed grant money for exterior painting. Planner Grahn thought "interior paint" on the ineligible list should say "interior and exterior paint".

Board Member Scott noticed that roof structure was not listed under the Competitive Grants. Planner Grahn suggested that they could add roofing or roofs, and weigh whether it was replacing asphalt shingles or completely restructuring a roof.

Board Member Hodgkins understood that it did not matter if the material needing repair was historic or non-historic. If the building is historic, the grant is eligible regardless of whether an eligible material is historic. Planner Grahn replied that as long as it contributes to the integrity of the building or prolonging the life of the building, it could be covered by a grant.

Planner Grahn noted that at the last meeting they also talked about the need for a definition for emergency repair work and found that the LMC actually has a definition. She asked if the Board felt the definition met their goal, or whether they wanted to change the definition. The Board was comfortable with the LMC definition.

Planner Grahn stated that there were no definitions for Routine Maintenance and Deferred Maintenance. She would look at whether it was appropriate to add those definitions to the LMC or whether they could just be defined on a grant application. Planner Grahn had included definitions in the Staff report that were taken from Grant Programs in other states.

Under Routine Maintenance, Board Member Hutchings questioned whether it was necessary to have "simple and small scale" in the wording. Planner Grahn offered to cross it out. Chair Stephens agreed. He had also crossed out "simple and small scale activities made for the regular upkeep of properties" from the definition.

Chair Stephens stated that under Deferred Maintenance, he had crossed out "because of lack of funds or inaction". He did not think that wording was

necessary. Board Member Hutching stated that he had crossed out the same wording.

Planner Grahn stated that the Board had talked about the bi-annual application deadlines at the last meeting, at which time everyone agreed that the competitive grant cycle was fitting.

Planner Grahn noted that the Board still needed to talk about funding. She recalled a number of questions at the last meeting about where the money came from and how it all worked. She explained that there are two RDAs; the Lower Park Avenue Redevelopment Agency and the Main Street RDA. There is a small gap of a few blocks. If a structure that falls outside of the RDAs or outside of the Historic Zoning Districts, the owner can apply to the General Fund. She indicated the amount allocated to the Grant Program on an annual basis.

Chair Stephens clarified that the money available for an application is defined by the RDA where the site is located. He recalled mention of the 2015 budget. Planner Grahn stated that the numbers have been fairly consistent since her time with the Planning Department. The biggest change was a change to the government accounting laws in terms of how the funds were allocated and coordinated. Otherwise, the amounts have remained consistent. Chair Stephens pointed out that funds have not been awarded for the last few years. He asked if the money has been accumulating or whether it was a line item. Planner Grahn replied that it was a use it or lose it line item.

Chair Stephens asked if that would always be the case. Director Erickson stated that nothing is always. However, they would have to restructure the way the RDA works or if the City Council decides to do something different when the RDA is renewed. Chair Stephens clarified that it was part of the RDA regulations but not the General Fund regulation. Director Erickson answered yes.

Planner Grahn stated that the allowance to cover projects will be low and when they do the scorecards the Board will have to be selective in terms of awarding the grant funds.

Board Member Scott read from page 29 of the Staff report, "The Staff found the priority was to incentivize repairs for historic houses and commercial buildings first and mine structures second, as the majority of the Mine Sites are located outside of the Main Street and Lower Park Avenue RDAs". He asked how that would work if they receive applications for RDAs and an application for stabilization of a mine structure. Planner Grahn replied that they would not be comparing a Main Street project to the mine structure project. However, if there were several projects within the General Fund, under which the mine structures qualify, they would have to weigh it out. Planner Grahn clarified that the Staff opinion was that mine sites are important but they are not habitable buildings.

They need to incentivize the commercial and residential structures, but they also wanted to make sure there was an avenue to provide for the mine structures.

Board Member Scott noted that there was \$50,000 in the Lower Park RDA. If they award \$30,000 for projects and \$20,000 is left over, can the money be used for the mine sites if it is a use or lose it basis. He was told that the mine sites could only be funded from the General Fund. Planner Grahn remarked that there were two grant cycles per year. In the Lower Park Avenue RDA, if one project in the Spring that was awarded \$30,000; they would still have \$20,000 to use in the Fall. If the entire \$50,000 is used at the beginning of the year, there would be no funding left to offer in that zone for the remainder of the year.

Board Member Hodgkins clarified that if no applications were submitted in the Fall, any remaining money would be lost. Planner Grahn replied that he was correct. Board Member Scott asked if there were no applications submitted, whether the Board could call a special meeting and task someone to find historic projects to fund. Planner Grahn stated that they have discussed this in the past. For example, if they do not have Main Street applicants in the Spring, they could do a better job of promoting the Grant Program to the HPCA or other organizations in the Fall. Chair Stephens pointed out that the Grant document talks about outreach and the need to reintroduce this Program to the community.

Planner Grahn pointed out that if they have several applications in the same RDA, the HPB would not have to award the full amount for each project in order to spread the funds between projects. Board Member Scott asked if they pass on one project to fund another project in the Spring, whether that project would roll over to the Fall for consideration. Planner Grahn stated that it would depend on whether the grant applicant was willing to wait until the Fall review.

Board Member Beatlebrox stated that it was not a subjective method because it was based on criteria. If a project meets the criteria, she was unsure how it could be postponed until the Fall. Board Member Scott noted that each item would have a different score and the Board would have to decide which ones make sense to fund. Board Member Beatlebrox asked if there was a threshold of a certain number of points to meet. Planner Grahn stated that other communities use the competitive score card method, and it basically comes down to how much “bang for the buck”. She used examples to show how using the score card helps the Board make choices and determine how much to award for each item.

Board Member Holmgren asked if there was a sunset clause when someone is approved for a grant if the work is not done within a specific timeframe. Planner Grahn recalled that in the past the timeframe has been consistent with the Financial Guarantee, which is two years to complete the project. Communities who do not take on as many expansive projects as Park City have a timeframe is

six months to a year. Chair Stephens thought Board Member Holmgren raised a good point. He suggested that timing could be part of the scoring process.

Planner Grahn moved to the Easements. She believed the Staff report provided a good overview of the preservation easements, as well as examples. Planner Grahn stated that the Staff has always supported the Preservation Easement because they are concerned about the actions of the State Legislature and they want to make sure they can protect historic buildings. They also want to make sure they are protecting the public investment in private property.

Chair Stephens agreed with the earlier comment by Director Erickson that they need to show something of value for the public money being spent. He questioned whether there was a threshold for when a preservation easement makes more sense. Director Erickson replied that there were several ways to approach his question. If they give money to a Landmark structure they should do a preservation easement. For a Significant structure, which is related to the District and not the structure itself, they might find criteria to apply a lesser standard. Someone applying for a competitive grant may want to offer the protection of a preservation easements. Someone applying for an emergency grant might not need that much rigor in the application. Director Erickson stated that if there is agreement among the Board, the Staff will deliver that language to the City Council. Director Erickson used mine structures where the people who own the lease do not necessarily own the ground underneath or do not always take control of the structure as an example of when a license agreement is more appropriate than a preservation easement. On Significant structures, in a competitive situation they would review the request and the dollar volume and establish appropriate criteria. Regarding emergency repairs, unless something needs to be done immediately, the HPB could recommend to the City Council the need for a preservation license for public money without the rigor of an easement.

Planner Grahn agreed. She thought the dollar amount would also make a difference. Chair Stephens asked if there was concern about granting funds on properties that might be flipped. Planner Grahn understood from previous work sessions that the bigger concern was protecting the historic asset.

Board Member Hutchings had no doubt that a preservation easement is the instrument that puts the City in the best position. If the goal is to encourage people to use the Grant Program, he thought the preservation easement would act as a strong deterrent for people to use the program. Mr. Hutchings thought the commitment from the homeowner should be equal to what they are getting from the Program. He believed the 5-year Trust Deed was more reasonable for the amount of money the City offers. Mr. Hutchings stated that if they move forward with the preservation easement, he thought the current document was

too much of an encumbrance. He asked if there was a way to scale it down to essentially preserve the piece of the project that the City was paying for.

Chair Stephens understood the concern because it is important to make sure the program is used in the future. He agreed that there would be a perceived hindrance of having to place an easement on the property. Board Member Hutchings thought the negative aspect would only be if someone wanted to sell their property. Chair Stephens thought the question is how the public would perceive that to be a negative. Mr. Hutchings replied that it would be from the perspective of the buyer. If someone is looking at three different properties and one has a preservation easement, he believed the restrictions would be a deterrent for wanting to purchase that property. Mr. Hutchings thought an easement would decrease the value of the property, and it might also encourage a buyer to purchase the house without an easement. Mr. Hutchings believed that the City benefit for awarding money from the Grant Program is that the project gets done and the historic structure is preserved.

City Attorney Mark Harrington stated that the City used Preservation Easements prior to the 5-year Trust Deed. At its earliest point it was used for a different accounting purpose in exchange for public money. However, it was seen as a redundant protection to memorialize the expectation that the property could not be demolished; particularly if the owner received City funding. Mr. Harrington noted that at that time they had a more challengeable process because they did not have the Historic Sites Inventory and only had the process by which any property could go through a determination of significance. It was a more difficult regulatory process. The Staff had to track the preservation easements as they dealt with applications on properties that had easements and it became an administrative burden. Once the preservation community became aware that easements were no longer being required, they were reminded that the other option was to require preservation easements. That was the reason why it was back in the forefront.

City Attorney Harrington noted that it was a policy decision and he thought the Board was having the appropriate discussion. Mr. Harrington stated that most of the buyers in this market are fairly sophisticated and know they are purchasing a home that cannot be demolished. The City could simplify the form and make it mirror the CAD process more closely so it is clear that it is meant to be a redundancy and not additional restrictions. Mr. Harrington remarked that there was no right or wrong answer and it was simply a question of balancing incentivizing with protecting the public investment.

Chair Stephens asked if they chose to do the easement and found that it was keeping the program from being successful, whether it would be difficult to change the position. Director Erickson stated that the easement would be a legislative act. He suggested that the Staff could come back to the HPB in a year

see if there was an impediment in the system preventing people from using the Grant Program. Chair Stephens stated that after they get the program running and go through the first round of grants, they should look at it again so see if they need to tweak it for the next round; especially if they lose money because the program is not successful.

Board Member Hutchings asked if the City has to get something in return for giving people money, such as a trust deed or a lease. City Attorney Harrington asked if Planner Grahn had clarified whether it was applicable to both funds or just the CIP. Planner Grahn replied that in speaking with Finance it sounded like it was applicable to everything; however, she could delve into it in more detail. Mr. Hutchings clarified that he was only asking if there were options. Mr. Harrington thought they could get more creative in that interest. He did not believe it was the black or white answer that was initially communicated. Chair Stephens stated that whatever they decide, it should be consistent among all the grant applicants. General Fund applicants should not be treated differently than the RDA applicants. Mr. Harrington pointed out that unless the laws are different because of the money management, they may have the option to treat them differently. Chair Stephens personally preferred to keep it consistent. Planner Grahn offered to look into it further.

Board Member Hodgkins was in favor of the easement. He thought it was important to make sure that preservation is preserved. As Director Erickson alluded to earlier, nothing is permanent. A number of laws are in place that supposedly protect these Historic District zones, but in the future preservation may not be a top priority. Mr. Hodgkins stated that preserving this in perpetuity with the tax dollars being spent was an important protection. He felt that the easement, as currently written, was only an agreement between the City and the current owner. He was more comfortable involving a third party that would truly protect the interest of the easement and preservation in perpetuity. Mr. Hodgkins understood that the City wants to preserve preservation, but that is not their true mission. He has sat on other Boards that accept historic preservation easements, and there is a valuation that comes with them. Given the current zoning and laws around the historic homes in Park City, he did not believe the value of the easement was money. If the value is more than the grant, it provides the homeowner a tax incentive to use if they wanted to officially value the easement they were putting on their property.

Board Member Hodgkins noted that the easement as written only talks about the façade. He thought the historic building itself was important and per the LMC, they should be trying to preserve the historic building. He encouraged them to be more concerned with preservation of the building itself. Mr. Hodgkins commented on the number of homeowners who come before the HPB trying to fight their designation. Having easements on the properties would prevent that from occurring. As a member of the Historic Preservation Board, it was his duty

to protect those designations and he would feel more comfortable with an easement for that case to make it clear that it is a historic property and there is an easement that protects the historic building.

City Attorney Harrington stated that the easement as drafted both previously and now only addressed the façade so future additions and remodels could be done through the permit process without having to ask the City Council for permission as an owner of the easement. They could not modify the façade but there was flexibility to define the protected façade through exhibits. He emphasized that it was a policy decision and the HPB could make that recommendation.

Regarding a third party, Mr. Harrington stated that the City has a long history with that debate in the community. It is a policy decision; however, the question is whether the property owner will have the additional burden of asking two parties for permission before they can do anything. They already see that complication in open space negotiations. There is also a financial aspect because the third party wants endowment long term costs to be part of the third party monitoring. He asked the Board to be careful if they choose that direction because it can create its own problem.

Chair Stephens stated that when applicants come before the HPB, the application often deals with the historic building and how it is impacted with additions. He knows the Staff spends a lot of time reviewing the additions and their impacts. In terms of process, if a new property owner comes in and they do an easement on the entire historic building, he asked if the owner would need to go through the City Council. He favored an easement on the entire building, but at the same time he did not want to put an extra burden on the property owner. Mr. Harrington stated that they could put an easement on the building, but still have a permitted use defined as the process, which is any permitted approval through the Planning Department Design Guideline approval process. Chair Stephens clarified that there would be a way through the Planning review process that would not require approval by the City Council on the easement. Mr. Harrington replied that it would depend on how the easement language was drafted. As currently written he believed it contemplated City Council approval.

Director Erickson commented on the Competitive Grant Program. He believed part of the review criteria could 1) establish what the applicant is willing to do in exchange for the funding, and 2) and establish criteria with respect to what is funded and how much is funded as to what control mechanism is appropriate. Director Erickson stated that it would occur twice a year with the grant program and it would be discretionary by the HPB. In some cases, there may be a better tool for smaller preservation items. However, for a Landmark structure designated on the National Register and the owner requests \$30,000 for several items including a defining feature, they would want a more rigorous process.

Director Erickson was comfortable with that being part of the HPB's discretion when they review the grant process. He clarified that he was only talking about competitive grants; not emergency grants. Director Erickson thought he and Planner Grahn needed to give the emergency grants a little more thought to see if there was a mechanism that could respond to all their comments and still stabilize a historic structure. If the HPB wanted to send that recommendation to the City Council, the Staff could draft it and let the elected officials decide if it was right. The HPB could then address the specifics in the review process.

Board Member Beatlebrox was more comfortable with that approach. Board Member Hodgkins agreed. He has no experience in looking at these applications and he was trying to think of all the different possibilities that might come before them. He thought the Board needed some flexibility.

Director Erickson stated that they need to look at what they are trying to accomplish, what the owners are willing to do, and the best mechanism to make it happen given the funding constraints.

Board Member Hutchings understood that the idea would be to bring the proposal to the Board. If it was something as simple as a door a preservation easement would not be required. If it was a \$60,000 project, a preservation easement would be required. Director Erickson believed the Competitive Grant application will stipulate what the property owner is willing to do. The Staff will prepare a Staff report and make a recommendation. The HPB will make the final decision.

Planner Grahn thought it would be helpful for the Staff to meet internally and have a more in-depth discussion with the Budget and Finance Departments. Director Erickson noted that this item was scheduled to come back to the HPB. He actually liked the idea of the Board having the ability to make a case by case decision under established criteria. The Staff will work on the criteria before the next meeting.

Mr. Hutchings asked the Staff to look at the easement language to make sure it was all necessary. If it were streamlined the owners might be more willing to accept it. He understood why all the provisions were good for the City, but he did not think they needed all of them and some were one-sided. Mr. Hutchings suggested that they could make it simple and cite the Historic Guidelines. Planner Grahn offered to compare it to other organizations. She believed that part of the issue with the easement is that they compared it to so many organizations and it was piecemealed. City Attorney Harrington noted that it was written not just for the Grant Program but also for tax credits and/or working with State Agencies or Tax Agencies who need a National Standard Form with all those provisions.

Planner Grahn stated that for the next meeting the Staff will come back to talk about what the City gets in exchange for its money, the score card, and public engagement.

Chair Stephens opened the public hearing.

Sally Elliott stated that you never know when you start a project whether the public will appreciate it or buy in on it. They now have 305 registered donors to the project. Ms. Elliott stated that it has to be a public/private partnership. There is no way the public could fund an entire project and the private interests are happy with what the Friends of Ski Mountain Mining History are trying to do. She thought the discussion about easements was very appropriate and critical. When she and Doug Stephens worked at Utah Heritage Foundation, they owned an easement on Brigham Young Academy, the building that they ultimately saved for the Provo Library. Without that easement Provo City would have torn down that building. Ms. Elliott remarked that easements can bring great value and great benefit. Regarding the facades, she asked Bruce Erickson if he remembered when the Fields took the Dugler building façade off and poked it up with boards and laid it out against the highway. They built a new building underneath it and put the façade back on. Without the façade easement they would not have had the ability to at least preserve the streetscape. On the issue of demolition, the Friends of Ski Mountain Mining History came into being approximately 20 years ago when United Park City Mines and Park City Mountain conspired to tear down the Kearns Keith Mill at the bottom of Pioneer lift without talking with anyone or preserving any of the elements. The community, the entire Chamber Board, the City Council, and HPB and other groups got together and chastised United Park City Mines. United Park City Mines gave \$38,000, which the City matched with restaurant tax money, and she, Maryann Cone, and Sandra Morrison constructed the huge signs that are now historic markers on the mountain to make people aware of what was there. Ms. Elliott appreciated their concern and support and all the time the Board and Staff have spent working on this. She was certain it would bring great benefit.

Ruth Meintsma, a resident at 305 Woodside, intended to make general comments. On the Mission Statement, No. 1, the four bullet points, she thought the HPB was spot on with authentic sense of place in the first bullet because that relates exactly to where the General Plan talks about character. Regarding Sites and Structures, she thought it was good to include sites because projects coming forward have needed to be moved or shifted or turned. The approval or denial involves the site which makes sites very important. The second bullet point, committing to an affordable, complete community and social equity. She understood it was important, but she did not think it read well. However, after reading Director Erickson's explanation of social equity it was clear. Ms. Meintsma asked if the sentence could be re-written to include Director Erickson's explanation. She referred to the next bullet point about encouraging projects and

the outcomes that may not have happened but for the investment. She was pleased to see that in there because it has been on and off the table because it involves whether or not someone has financial means, even though that should not be part of it. Ms. Meintsma believed that criteria might be resolved with the score card. She was excited about the score card because it will be the exclamation point to the Program. When they start using a score card, she expected it would change with almost every consideration of every project. Ms. Meintsma read from No. 2 – Eligible Improvements. She stated that two tier, competitive, twice a year was perfect. Based on past grants, she believed this was the perfect solution. The HPB has the time and the score card to make the right decisions for the money. Ms. Meintsma also favored the emergency grant process.

Ms. Meintsma stated that in her opinion, the preservation easement did not look restrictive, and in fact, was more like a badge of honor. People could still have additions and the easement did not include the interior. The inspections would only be on the interior and only if something critical was observed for the City to analyze. A property having a historic easement would give it some glory because it makes the structure more important. Ms. Meintsma was excited about the score card because it will solve many problems.

Regarding the Improvements List on Page 75, Ms. Meintsma hypothetically applied it to her neighbor who has a historic structure that is stable but minimally livable. She applied the Improvement List to see if it would help her neighbor and it works.

Board Member Hodgkins disclosed that he was currently on the Board of Preservation Utah. He noted that Sally Elliott pointed to the example of the easement that Preservation Utah has that worked to save a building. Mr. Hodgkins questioned whether that building would have been saved without the third party involvement. He did not believe it would. He stated that being on Boards such as Preservation Utah and before that with Preservation Massachusetts, they were constantly considering easements and the cost, which he understood could be a burden. However, in this case, where the easement is on the exterior and the inspections are walk-by, he thought they could come up with some kind of a third party agreement in perpetuity, so they know someone else has an eye on the structure. The third party would not have to give permission for someone to do things, but they should be informed on what was being done.

Board Member Beatlebrox wanted to know who the third party was in the example Ms. Elliott had given. Board Member Hodgkins replied that Preservation Utah did not own the building but they owned the easement.

Director Erickson stated that Park City's program would be smaller and unrelated to what Provo intended to do with that building. He pointed out that the Landmark structures and other listed structures have a third party control either through SHPO or the National Parks Service. Using the Miners Hospital as an example, Director Erickson stated that if the Miners Hospital was owned by Cleveland Inc., and they wanted to restore the building and requested a certain amount of money for restoration or an elevator, the City would immediately require a vigorous preservation easement because that building is mission critical for the historic program, the landmarks program, SHPO, and the National Parks Service.

Board Member Beatlebrox asked if the Park City Museum could serve as a third party. Director Erickson remarked that the Museum might be more vested than a typical third party. For open space easements a third party could be Summit Land Conservancy, Utah Open Lands, Mountain Trails. There are certain conservation easements with the property owners themselves that are more rigorous than what the land uses allow. Director Erickson agreed that in some circumstances a third party is mission critical, but in other circumstances where a third party may not be the answer.

City Attorney Harrington suggested that the Staff could come back with some options for discussion. Board Member Hodgkins felt there needs to be some type of mechanism to force the City to uphold an easement that was signed. Mr. Harrington stated that people are passionate on both sides with good reason, and there are pros and cons both ways. They would provide the information and the HPB could make the decision.

Legal Training – Open Public Meetings Act

City Attorney Harrington stated that the respective Chairperson is charged by State Law for conducting this training annually. The City relieves the Chairperson of that responsibility by calendaring the training each year.

City Attorney Harrington stated that because he likes to incorporate film into his training sessions, he would be showing a short clip from the movie Bridge of Spies. He would explain its relevance after the viewing. Mr. Harrington remarked that the piece he was about to show was representative of a Board Member being stalked in a supermarket by a citizen.

City Attorney Harrington explained that he likes showing this particular clip because no one intentionally decides to break Open Meetings law or due process ex parte rules. Typically, it is more a scenario where someone runs into a Board Member and tries to guilt them into a compelling argument that they are responsible for insuring the protection of the structures and doing the right thing by the community. The rules are written to prevent conspiracy behind the scenes

for the benefit of a developer. Mr. Harrington stated that when people meet Board members in the supermarket they want them to listen to them because they are the constituent; not the evil developer. People get angry when they perceive someone from the Legal Department telling a public official that they cannot meet with a citizen informally, whether it be collectively or individually before a hearing. However, they are given this advice because it is outside the context of the due process and the rules by which they agree.

City Attorney Harrington explained that Open Meeting Regulations are meant to insure the baseline and goes one step further beyond the due process of the actual hearing to make sure the Board conducts their business openly and in public. No matter how well intentioned or how good the cause, the integrity of the entire system is predicated on the openness of their act and actions.

City Attorney Harrington presented slides regarding 1) What is a meeting as it relates to the HPB; 2) emails; 3) Electronic meetings.

An HPB meeting is four members or more and the purpose is to convene for the purpose to discuss. A meeting can take place any time four or more Board members are together and talk about City business. That type of scenario should be avoided. Mr. Harrington recognized that it was difficult in a small town because there are always social settings and it is easy for the issues they face to casually come up in a conversation. He stressed the importance of remembering the basic rule anytime they are outside of their regular meeting setting. If they find themselves in an awkward circumstance, they need to be responsible and change the conversation. If that happens, they should encourage that person to attend a meeting so everyone can hear what they have to say in the proper forum.

City Attorney Harrington stated that electronic communications are prohibited during a meeting. Per State law, the Board cannot email or text one another during a meeting to prevent the perception of secret communication that the public cannot see or hear during a public meeting. Emails between Board members outside the meeting are permissible; however, they should be treated like letters because they are subject to government records and management act of disclosure. They should never email something unless they intend for the public to read it in the Park Record at some point. Emails should be treated as letter correspondence knowing that the public could GRAMA them.

City Attorney Harrington stated that because of the real time nature of the exchange with texting, chatroom, or other social media services, it can resemble a conversation. If a number of Board members are emailing or texting back and forth, they run the risk of violating the Act. Mr. Harrington stated that Utah permits them to email one another if it is permissible, but it could be subject to disclosure. Mr. Harrington provided examples of prohibited conduct.

Board Member Hutchings asked about the GRAMA request process. Mr. Harrington stated that if it is an informal request from the Media or someone of interest, they would ask for the emails and anything on that topic to be forwarded. If it is challenged either through discovery or an appeal, the City can confiscate computers or devices. He noted that the County has done that a number of times in their water litigation.

City Attorney Harrington noted that the Handbook for Officials was posted on the website. If the HPB eventually gets City email, they should make sure to keep everything on their City email when corresponding with one another. Mr. Harrington encouraged the Board to avoid email correspondence as much as possible, and keep their dialogue for the public hearings.

City Attorney Harrington stated that the Board is not permitted to talk about a particular application outside the hearing process if it is subject to an Administrative hearing. For policy matters such as LMC changes, Guidelines, grants, etc., they are permitted to talk about it one on one; but it is discouraged if possible. The Board should try to follow the spirit of the law by publicly conducting their business.

City Attorney Harrington stated that the City does not encourage electronic meetings based on past experience. It does not lend itself to the best experience in terms of the deliberative process. The City Council does not use electronic meetings unless in the case of an emergency. The Planning Commission does not authorize electronic meetings. Mr. Harrington stated that the HPB has that ability and they can make the choice to adopt a rule that allows electronic participation. Currently, the City Council preferred not to expand that use until the technical ability can be improved. If the HPB is interested in allowing it, they could request that the Staff add it to the agenda as an item for discussion.

City Attorney Harrington stated that if a Board member has a specific question or needs advice on how something should be handled, they should contact the Legal Department prior to the meeting and he will be as proactive as possible to provide a quick response.

The Meeting adjourned at 6:40 p.m.

Approved by _____
Douglas Stephens, Chair

Historic Preservation Board

PENDING APPROVAL

Historic Preservation Board Staff Report

Subject: Historic District Grant Program
Author: Anya Grahn, Senior Historic District Planner
Date: January 16, 2019
Type of Item: Work Session
Project Number: GI-17-00353

Summary Recommendations

Staff recommends that the Historic Preservation Board (HPB) review this staff report and provide input on the purposes of the Historic District Grant program.

Background

In January 2017, the Planning Department contracted Kjersti Monson of Duval Companies to conduct a study of our Historic District Grant program and recommend changes for its administration. A joint City Council-HPB work session was held on November 16, 2017 [[See Staff Report](#) (starting page 16) + [Minutes](#) (starting page 2)]. Based on the feedback we received, the report was completed in May 2018.

The final Historic Grant Study has been attached as Exhibit A.

Staff met with the Historic Preservation Board on August 1, 2018 [See [Staff Report](#) (starting page 185) and [Minutes](#) (starting page 14)] and December 5, 2018 [See [Staff Report](#) (starting page 26)] during work session to start revising the Historic District Grant Program. During that meeting, the HPB requested addition information, which has been reflected in the Analysis section of this report.

Analysis:

Based on the consultant's report, staff finds that the HPB needs to forward positive recommendations to City Council for the following:

1. Establish target outcomes and develop a mission statement
2. Create a revised list of eligible improvements, including stabilization of mine structures
3. Set biannual application deadlines
4. Identify program funding sources and levels
5. Develop a score card to rank grant applications and determine funding for a two-tier funding approach (immediate and competitive grant programs)
6. Improve public engagement

During this work session, staff will be working with the HPB to accomplish tasks #4, 5, and 6.

4. Funding Sources.

During the December HPB meeting, staff provided an overview of the funding sources available to finance the Historic District Grant program. Staff has met with the Budget Manager and found that the Historic District Grant fund balances are as follows:

Main Street RDA	\$30,000
Lower Park Avenue RDA	\$50,000
General Fund	\$47,136

Staff also discussed preservation façade easements and liens in exchange for Historic District Grant fund. After hearing the HPB's concerns about preservation easements and liens, staff has determined that a two-prong approach is appropriate.

- For all Emergency Grant Funds, which are limited to no more than \$5,000 in awards, the City will require a 5-year lien. Should the property be sold within 5 years, the applicant will be responsible for paying the City a prorated portion of the lien amount.
- For the Competitive Historic District Grant Funds:
 - For all grant disbursements of \$10,000 or less, the City will require a 5-year lien. Should the property be sold within 5 years, the applicant will be responsible for a prorated portion of the lien amount.
 - For grant disbursements of \$10,000.01 or more, the City will require a preservation easement. Staff will continue to work with the Legal Department to amend the preservation easement agreement that will be recorded in perpetuity on the property.

HPB Discussion Requested.

5. Score Card

Staff has researched other cities' score cards. Based on their criteria and the intended outcomes identified by the General Plan and Design Guidelines, staff has created a 60-point checklist that evaluates the impact of the disbursement of the grant funds. Additional points may be earned should the project exceed the general expectations and further prioritizes the restoration of historic materials. See Exhibit B.

HPB Discussion Requested.

6. Improve Public Engagement

When the Historic District Grant Program began in 1987, it was a matching grant program focused on exterior restorations. Grant requests were reviewed on an annual basis, and within the first five years of the program,

over 100 projects had been completed and approximately half a million public dollars invested.

One of the benefits of this approach of reviewing applications on an annual basis was the high level of public engagement. Newspaper articles announced upcoming deadlines, informational meetings were organized in the weeks leading up to the application deadlines, and metrics of previous grant cycles. In addition to there being greater coverage of the projects being renovated through the use of grant funds, human interest stories emerged, and a friendly, competition emerged among different streets as they competed for the greatest number of façade restorations.

Over time, the Historic District Grant Program evolved to review applications on “first come, first serve” basis. This meant that the first grant requests in the year were often the largest, included whole-house renovations, and prevented us from awarding more than a few grants per year. Additionally, this review meant that there was less press coverage of the grant awards and the work being completed, which reduced the visibility of the grant program overall.

During the November 2017 work session, the HPB and City Council agreed that the following outcomes should be emphasized:

- Make the story of Park City visible and present
- Make a proactive and positive difference in the lives of our residents and businesses.
- Ideally, apply the grant to projects/outcomes that may not happen except for this investment.

Moving forward, staff proposes to improve public engagement of the Historic District Grant Program by:

- In addition to creating a webpage that focuses on the grant program, developing an application manual and brochure to promote the program.
- Identify themes or geographical areas that the HPB wants to target prior the grant cycle and promote these prior to the grant application deadline.
- Schedule public informational training sessions in February and August, prior to submittal deadlines of the grant applications in March and September. The informational sessions will be publicized and promoted in order to encourage those interested in applying for grant funds to attend and guide them through the application process.
- Promote upcoming grant cycles through press releases, the City’s social media, and press coverage.
- Following City Council’s awarding of grant funds, spotlight the grant recipients on the grant program website, City’s social media, etc.

- Create a sign identifying the project as a recipient of Historic District grant funds, and require the owner to display the sign on the property during the project and one month following completion of the project.
- Publish before-and-after photographs of the completed work on the grant program's webpage.

HPB Discussion Requested.

Next steps:

Staff hopes to draft a resolution for City Council review and proposal of the Historic District Grant program in early-February 2019. This will allow staff the opportunity to begin promoting the Historic District Grant program and allow for the HPB to begin their review of grant applications in March.

Going forward:

Staff will develop a resolution for review by City Council for approval.

Recommendation

Staff recommends that the Historic Preservation Board (HPB) review this staff report and provide input on the purposes of the Historic District Grant program.

Exhibits

Exhibit A — Historic Grant Study

Exhibit B — Scorecard

Historic Grant Study

Park City
Planning Department

2018



www.parkcity.org

Copyright

Copyright © 2018 Park City Planning Department

Set with Galaxie Polaris.

This report was prepared by Duval Development (www.duvalcompanies.com) under the direction of Kjersti Monson.

All photos are courtesy of Park City Planning Department unless otherwise noted. All reasonable efforts were made to secure permissions.



Table of Contents

Foreword from the Mayor	5
Preface	6
Acknowledgments	7

Introduction

8

History

9

About the Program	9
Changes & Adaptation	10
<i>Changing Authorities & Governance</i>	
<i>Adapting to New Rules</i>	
<i>Recommended Changes Approved</i>	

Analysis

13

Sources & Methods	13
Findings & Observations	13
<i>Wealthy Households a Large Share of Total</i>	
<i>Secondary Homeownership a Factor</i>	
<i>Historic Preservation has Economic Impact</i>	
<i>Metrics are a Valuable Tool</i>	
<i>Buying Power Outpaced Cost of Construction</i>	
<i>Average Grant Value Rose Slightly Over Time</i>	
<i>Number of Grants Dropped in 2003</i>	

Engagement

20

Stakeholder Engagement	20
<i>Stakeholder Interviews</i>	
<i>Interview Questions</i>	
<i>Summary of Stakeholder Observations</i>	
Staff Engagement	24
<i>Issue 1: Funding Sources & Dynamics</i>	
<i>Issue 2: Alignment with City Goals</i>	
<i>Issue 3: Competitive Grant Cycle</i>	
<i>Issue 4: Grant Administration</i>	
Leadership Engagement	26
<i>Engagement Themes</i>	
<i>High Level Takeaways from Leadership</i>	
<i>Detailed Comments: Mission</i>	
<i>Detailed Comments: Values</i>	
<i>Detailed Comments: Outcomes</i>	
<i>Detailed Comments: Principles & Criteria</i>	

Observations

32

Recommendations

35

Foreword from the Mayor

Park City's historic architecture contributes to our sense of place while paying tribute to our industrial mining history. We have the opportunity to embrace our past through our historic preservation efforts while encouraging new architecture that is both of its time and paying tribute to our historical roots. Since 1987, the Historic District Grant program has incentivized private investment in historic preservation through a matching grant program that invests public funds to offset the often restrictive costs of restoration projects. The success of the Historic District Grant program's early efforts contributed to Old Town's transformation from a dilapidated ghost town into the thriving downtown that exists today.

Historic preservation has not only revitalized our downtown but spurred the local economy. Property values within Park City's two (2) National Register Historic Districts—the 1979 Main Street National Register Historic District and the 1984 Mining Era Residences Thematic National Register District—are some of the highest statewide. Additionally, historic preservation efforts have led to Main Street emerging as the cultural heart of our community. Small-scale commercial buildings such as the Old County Sheriff's Office at 509 Main Street have served as incubator spaces for start-ups while rehabilitation projects such as that at High West Distillery, formerly the National Garage, at 703 Park Avenue are embraced by local businesses that provide vibrancy to our local entertainment district.

Historic preservation has also contributed to City Council's goals for sustainability. For decades, the historic preservation movement has recognized that existing buildings are inherently greener when compared to demolition and new construction, particularly when considering their embodied energy and the carbon impacts generated by new construction. The Historic District Grant program encourages property owners to maintain and restore existing historic materials, reducing the demand for new milled lumber and demolition waste.

The buildings and sites that contribute to our community's historic fabric promote economic vitality, socially equity, and a strong, resilient complete community. Much of the restoration work to bring back the vibrancy of these structures is credited to the Historic District Grant program. This study is key to helping us move forward with restructuring the grant program so that it may continue to incentivize and promote historic preservation efforts in our community.

Sincerely,



Jack Thomas
Mayor
January 2014 - January 2018



Andy Beerman
Mayor
January 2018 - Present

Preface

As early as the 1970s, Park City recognized the need to safeguard its industrial mining history through historic preservation. These early efforts were initiated by local residents utilizing private investment to rehabilitate their historic miner's shacks and commercial buildings; however, by 1987, the City had established the Historic District Grant program to further incentivize preserving historic buildings through a collaborative public-private partnership. The grant program played a significant role in promoting historic preservation while also spurring investment. Park City's commitment to historic preservation has continued to prosper, and today the City has some of the highest property values in the state.

Since its creation in 1987, Park City's Historic District Grant program has been modified to continue to serve the needs of the community. Initially developed as a matching grant program to offset the costs of exterior restorations, grant requests were reviewed on an annual basis and small expenditures provided seed money for small projects. As the grant program matured and costs of construction increased, the grant program was reviewed on a "first-come, first serve" basis with grant distributions increasing to cover the costs of whole-house renovations. As grant awards increased, staff and the Historic Preservation Board began to question the effectiveness of this public-private investment.

Changes to government accounting rules (GASB) in 2014 to the Historic District Grant program led to the Park City Planning Department engaging Kjersti Monson of Duval Development, LLC in 2017. Ms. Monson has provided a detailed history of the grant program in order to aid staff and decision makers in understanding the history of the program. On November 16, 2017, Ms. Monson engaged leadership in an in-depth, robust work session with City Council and the Historic Preservation Board (HPB) to identify current priorities, conditions, and trends. The outcome of that discussion, as well as her community engagement, has served as the basis for her recommendations in this report to restructure the program going forward.

This report is intended to aid staff in considering options and priorities as we continue to revise and adapt the grant program to changing demands. Originally, the Historic District Grant program served as a catalyst to incentivizing historic preservation by helping to offset the costs of expensive exterior restorations; however, as real estate prices have increased and the trend in renovations has shifted from small-scale to larger, more intensive projects, the goals and priorities of the grant program have changed. As we move forward with restructuring the Historic District Grant program, it will be imperative that we find a way to balance these changing demands while still encouraging and promoting historic preservation in throughout the community.

Sincerely,



Bruce Erickson, AICP
Planning Director



Doug Stephens
Historic Preservation Board Chair

Acknowledgments

City Council

Andy Beerman, Mayor (2018-present)

Jack Thomas, Mayor (2014-2017)

Becca Gerber

Tim Henney

Steve Joyce

Lynn Ware Peek

Nann Worel

Cindy Matsumoto, Councilperson (2010-2017); City Council liaison to HPB

Historic Preservation Board

Douglas Stephens, Chair

Jack Hodgkins

Randy Scott

Puggy Holmgren

Lola Beatlebrox

John Hutchings

Alex Weiner

David White, HPB Chair (2012- 2017)

Cheryl Hewett, HPB member (2014-2017)

City Staff

Planning Director Bruce Erickson

Historic Preservation Planner Anya Grahn

Planner II Hannah Tyler

Planning Technician Laura Newberry

Former-Planning Analyst Louis Rodriguez

GIS Administrator Spencer Lace

Assistant City Attorney Polly Samuels McLean

City Attorney Mark Harrington

Capital Budgets, Debt & Grants Manager Nate Rockwood

City Manager Diane Foster

County Staff

IT Director Ron Boyer

Public

David & Patricia Constable

Jonathan DeGray

Allison Kuhlow

Michael LeClerc

Russell Long

Ruth Meintsma

Sandra Morrison

Introduction

Park City has benefited culturally and economically from the community's longstanding dedication to historic preservation. The initial success in 1979 of achieving national designation for the historic Main Street district, followed by the creation of a dedicated commission in the early 1980s (the Historic District Commission, which in 2003 was restructured as the Historic Preservation Board) focused on preservation matters, led to purposeful and strategic public investments in restoration, enhancement, and interpretation.

It was the Historic District Commission (HDC) that designed and implemented the Historic District Grant (HDG) program.

the goal of incentivizing private investment through an injection of public dollars.

The overwhelming private response to the grant program over many years has resulted in hundreds of properties improved through not only investment of dollars, but through cultivation of knowledge and a culture of preservation.

Applicant property owners entered into purposeful dialogue with the City and the HDC as they explored their options and achieved compliance with guiding preservation policies. Newspaper articles highlighted and interpreted significant renovation stories, and in so doing served to celebrate the town's history.

Historic preservation has contributed to Park City's vibrant Main Street.



The character and charm of historic Main Street has contributed to Park City's appeal as a destination for both tourism and events. Economic activity has risen as a result of the community's policies and investments in preservation.

Because funds for the HDG program originated with the Redevelopment Agency (RDA) – which remained the funder for much of the life of the grant, there was an underlying framework of economic development thinking in the program's formation and administration. It was a dollar-for-dollar matching grant program designed as a public-private initiative, and was fully intentioned about

The Park City Historical Society and Museum recognized achievements in historic preservation with certificates and plaques. As more properties were renovated and became contributing properties, the downtown that was once considered “blighted” became one of the most desirable places to live in the country: a place of great character and a viable second home option for many.

The overwhelming success of Park City's historic-building investments, to which the Historic District Grant program has been a core contributor, has led to a different set of challenges and issues for the community. Policymakers are now wrestling with how to maintain affordability in housing, and how to retain local primary residents in light of the area's desirability as a second home and short term rental option.

The Historic District Grant program has been a major player in the growth and success of Park City as

a tourist destination and a valued community. The program has had a long and illustrious life, with great success over many decades, and it has evolved over time. The grant program of today is not the same as the program that was launched in 1987. Levels of funding, types of grants, and eligible expenditures have all evolved numerous times over the course of the grant program's life, and the City has sensed that the program must evolve again to adapt to new community realities and to reflect current City goals.

The purpose of this study, commissioned and overseen by the Planning Department, has been to document the grant's history, understand and contextualize the grant through the lens of current priorities and conditions as well trends through time, and to make recommendations for how to shape the grant going forward so that it can continue to contribute to both the character and the values of Park City.

History

ABOUT THE PROGRAM

In 1977, the Park City Redevelopment Agency was created with multiple goals in mind, most notably the improvement of Main Street. In 1979, as part of a burgeoning preservation movement, the City succeeded in having Main Street designated as a National Register Historic District, and city leaders envisioned enhancements to downtown that would contribute to Park City becoming a recreational and touristic destination.

Under the same leadership who sought the National Register designation, additional historic residential and historic commercial zoning was put in place by the City over the next couple of years, and historic properties were identified. In 1981, the Historic District Commission was created by ordinance and given broad powers within the historic districts, including authority over the review and approval of building permits, demolition permits, and shaping preservation policy.

Although there was significant interest in preservation and renovation in these early years, demonstrated through formal actions of government in ordinance and policy, there were very limited resources to undertake renovation of historic properties. A headline on December 18, 1986 in the Park Record declared "Renovation is expensive, but it may be the only hope." The article laments historic properties in limbo - homes that are too run down to be rented or inhabited, yet too expensive to fix.

In their first few years, the Historic District Commission explored several ways to incentivize restoration of historic properties by owners, including a revolving loan program, a matching grant program, and a no-strings-attached grant program. In March 1987, the HDC conducted surveys to identify homeowner needs pertinent to historic renovation activities, and a month later they presented their finalized proposal for the preferred incentive program: a matching grant program for historic renovations.

The Historic District Grant program, approved that spring, was part of a proposed 3-year, \$2.5 million initiative of the RDA to improve downtown Park City, including park, street, historic property, and parking enhancements. It was initially conceived as a three-year program, but was so successful and popular that it became institutionalized. In the first year, 33 projects were funded. In the second, 40, and in the third, 47. It was designed to be simple, with a one page application once a year, and the results were immediate and dramatic, leveraging an incredible private response of over 100 projects completed in the first 5 years (by 1991) with approximately half a million public dollars invested.

This pace heated up, with 224 projects reported complete just three years later, in 1994. Over the next two decades, hundreds of projects would be completed, and more than \$2 million would be invested, transforming Park City into a quaint destination with a strong sense of place and touristic appeal.

CHANGES & ADAPTATION

The goals and criteria for the program changed over time. From 1987 to 1991, the grant was for exteriors only – intended to fund “physical improvements to the outside of the building so all residents would benefit.” In 1992, foundation and stabilization work became eligible. Wiring heating and plumbing became eligible expenditure in 1995. By 1997, critical structural and foundation work became the major focus and priority of the grant.

Funding levels and the number of grants also changed over time. The initial \$5,000 residential maximum and \$10,000 commercial maximum became \$10,000/\$15,000 respectively in 1998, and during that same year a \$50,000 grant was offered for the first time. Grant maximums by type were eventually phased out and replaced by a common pool of allocated funds distributed to eligible and approved projects on a first come first served basis. This was one of the changes implemented under new grant governance put in place in 2003.

Changing Authorities & Governance

In July 2003, a sweeping set of actions disbanded the Historic District Commission and replaced it with the Historic Preservation Board, which was given more limited authority. During this time, the City also streamlined and restructured other parts of government leading to the departure or dismissal of three department directors: community development, administrative services, and leisure services.

The HDC had become the subject of ire by many who claimed that the

Commissioners held too much power to make subjective decisions, and that their authority was unchecked. Initial indications by elected officials that the Commission would be eliminated were not well received, however, and a restructuring by ordinance was pursued instead. In the restructuring, a new body was formed with diminished authority. City staff would now take on the authority to review and approve permit applications – a power previously held by the HDC. Demolition permit decisions in historic districts were shifted to an independent hearing board. The newly formed Historic Preservation Board would retain the authority to shape city policy on preservation, and would continue to oversee the grant program.

One of the first changes made to the Historic District Grant program was to end the annual application and award cycle and replace it with year-round applications and awards, a change which remains a popular characteristic of the program today. Although the change was a welcome one for homeowners, it had the potentially unintended consequence of reducing opportunities for annual press coverage of the program.

In past years, reporters covered announcements of the upcoming deadline, informational meetings were organized in the weeks leading up to the deadline, metrics from the previous grant cycle were published (including fun facts like which street had received the most investment that year), and human interest stories were featured about very significant properties or projects renovated that year. The annual cycle also inspired events and awards, for instance the Historical Society honoring the best projects with certificates and plaques at an annual event.

Adapting to New Rules

In 2014, changes to government accounting rules (GASB) resulted in a finding that the City could no longer fund capital improvement projects with Capital Improvement Project (CIP) funds for projects or assets the City does not own. Historic District Grants constituted capital improvement projects of this type.

The Historic District Grant program was originally housed in the CIP and funded with the Main Street and Lower Park Avenue (LoPA) RDA funds as directed by Council and included in the RDA resolutions. The funding questions raised in 2014 spurred broader questions about administering the program including a review of the application process and eligibility criteria, which reflected an interest in aligning the program more closely with other City priorities and objectives.

In 2012, City Council adopted the Park City 2030 Long Range Strategic Plan, and defined a set of priorities that reflected a significant policy focus on housing, transportation, and energy. The top priority identified was affordability. Staff and elected officials observed that Park City was becoming an expensive place to live, and, in particular, the historic districts were becoming popular second home communities where locals and primary residents were at risk of being priced out.

In a conversation with Planning Director Bruce Erickson, it was evident that this trend was perceived as not only a housing challenge, but a vibrancy challenge. In addition to promoting an equitable and complete community, Erickson is focused on keeping a local influence on and around Main Street and elsewhere,

noting that chains and franchises diminish the value of Park City as a place with a unique local flavor that tourists and residents both value.

To keep local influence vibrant, it's important to make it possible for primary residents, who comprise local business owners and the workforce that supports them, to remain in Park City, owning and operating authentic local establishments and not being driven out by rising costs of housing. For many reasons, affordable housing is a major initiative of the City and a value that policymakers and staff seek to embed in public dollars expended.

The HPB was asked to review recommended changes to the program, and to provide direction regarding the application process and policy for administration of the program.

At that time, the HPB approved the following changes, which began to reflect consideration of primary versus secondary homeowners and their eligibility to receive Historic District Grants:

- Houses lived in by primary residents (those houses in which the homeowner or a renter lives in full time) can be awarded up to 50% of

Locally owned and operated businesses contribute to the vibrancy and authenticity of Main Street. It's important to support primary residents in Park City.



Main Street is home to many unique local businesses and establishments. A sense of authenticity and local flavor is generated as a result of local influence and investment.

Recommended Changes Approved

Issues directly and tangentially pertinent to an update of the Historic District Grant program were fleshed out by staff with leadership at a Council working session on October 9, 2014. In a staff report to City Council, a recommendation was made for Council to review and adopt a new policy for the administration of the Historic District Grant program. Staff brought the matter to the Historic Preservation Board on November 5, 2014.

their eligible costs, while homes which are to be used as secondary homes or nightly rentals (i.e. not lived in by the primary residents) can be awarded up to 40% of eligible costs.

- Commercial properties continue to be eligible for up to 50% of construction costs regardless of ownership.
- An additional 10% may be awarded to those property owners committed to renovating a significant structure to elevate its status to *landmark*.

2.0 History

Staff sought and received a positive recommendation from the HPB to City Council on the proposed changes, and on December 4, 2014, staff recommended to City Council that they review recommended changes and adopt a policy for administration of the program.

In January 2015, staff submitted a report to City Council consistent with this recommendation, and Council supported staff recommendations. Throughout 2015-2016, staff considered ways to adjust the program in light of the funding question and adopted City priorities. On January 5, 2017, the following staff report was made to City Council:

"Since 1987, the Historic District Grant program has operated continuously with the support of City Council and the Historic Preservation Board (HPB). The Historic Preservation Grant program was originally housed in the Capital Improvement Project (CIP) and funded with the Main Street and Lower Park

Avenue (LoPA) RDA funds as directed by Council and included in the RDA resolutions.

With changes to the government accounting rules (GASB) in 2014, the City can no longer fund capital improvement projects with CIP funds for projects or assets the City does not own such as properties awarded grants through the Historic District Grant program. In 2015, staff revised the Historic District Grant program in order to reflect changes to the GASB.

Due to the concerns and feedback we received from the Historic Preservation Board (HPB) in early 2015-2016, staff has been analyzing ways in which to restructure the grant program."

The Planning Department engaged Duval to document the grant's history, understand and contextualize the grant through the lens of current priorities and conditions as well trends through time, and to make recommendations for how to shape

the grant going forward so that it can continue to contribute to both the character and the values of Park City. This report is the outcome of that engagement, and is intended to inform staff and policymakers as they consider options and make decisions about the grant program in its next iteration.

Analysis

An analysis of history and trends was necessary to inform the process of defining the next iteration of the Historic District Grant program. Considerations included Park City land value trends, a study of buying power of grant dollars over time based on costs of construction, ownership trends, economic impacts, and City values and priorities.

preservation, and the grant's performance over time. A summary of findings follows.

Based on sample data, Park City property values have risen more and at a faster rate in historic districts than in the city generally. 1990 data was too incomplete to analyze, but the trend of a widening gap is legible in an analysis of data from 2000-16..

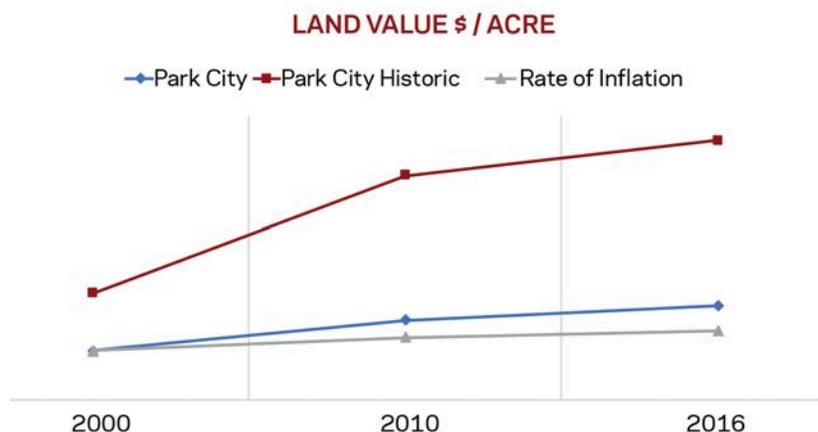
SOURCES & METHODS

For this study, decades of parcel data from multiple sources was utilized, including Summit County, the City of Park City, and the US Census. Additional non-parcel data sources include the ENR Construction Cost Index, City staff reports, adopted plans and policies, and news archives (Park City Record) spanning 1979-2004. Finally, direct engagement

The City completed a housing assessment and plan in 2012 aimed at addressing growing challenges of affordability, and these issues have been raised by both City staff and stakeholders as an important consideration in determining how to shape and administer the grant.

Park City's investments in historic preservation, as well as the success

Property values in Park City have risen faster than inflation, especially in historic districts.



A random sample of parcels was analyzed, showing the value of land per acre over a sixteen year period in Park City. Values in historic districts were greater and rose faster than the city-wide average.

was undertaken, including stakeholder interviews, a facilitated workshop with leadership and a technical advisory meeting with staff.

the city has seen as a ski and resort destination, have created lasting value and appeal, which brings both benefits and costs.

FINDINGS & OBSERVATIONS

Our analysis has considered property values, income, ownership trends, economic impact of historic

Because land value in Park City has outpaced the rate of inflation over decades, and land value in historic districts has risen at an even greater rate than Citywide, affordability and

3.0 Analysis

equity concerns have now become a focus of policymaker attention.

Wealthy Households a Large Share of Total

Park City's median household income in 2015 was \$105,102, which is almost twice the US median income of \$53,889. It also exceeds the median income in the state of Utah (\$60,727) and Summit County (\$91,773). The median household income in Park City grew from \$90,567 in 2000 to \$1,050,102 in 2015, outpacing inflation by over 15%, while the US median household income shrank over that same period from \$79,542 in 2000 to \$53,889 in 2015.

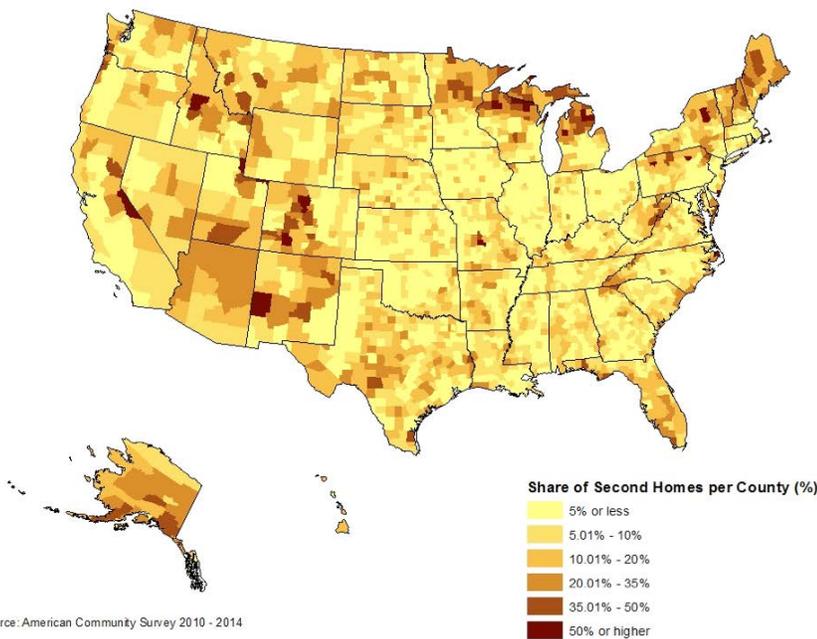
Households with income over \$200,000 per year comprise over 25% of households in Park City; by comparison, households earning over \$200,000 per year make up just over 5% of all households in the U.S.

Affordability of housing is a major concern of Park City leadership, who commissioned a housing study in 2010 and have since taken steps to make the issue a policy priority. Deeper consideration of this issue is beyond the purview of this report, but it is included as an observation due to the interest of some stakeholders in addressing affordability goals in the expenditure of public dollars, including grant dollars.

Secondary Homeownership is a Factor

The National Association of Home Builders (NAHB) estimated from American Community Survey data that in 2014, the share of second homes among the entire U.S. housing stock was 5.6%. For those areas with robust second home markets like Summit County, there are pros and cons to having a much higher rate of non-primary owners. In a 2011 analysis, the Summit County

Percent of Housing Stock Allocated to Second Homes



More than half of residences in Summit County are second homes.

With access to scenic beauty, skiing and recreation, Summit County has become a popular second home market.

Assessor found that more than half the homes in the County were in non-primary ownership. This places Summit County in company with other major second home markets, though still not breaking into the range of the top ten counties which range from 62% (Dukes County, Massachusetts) to nearly 80% (Hamilton County, NY) second homes.

According to the Assessor, the tax benefits garnered by the presence of second home owners are desirable, but are countered for some by a sense of diminishing community cohesion.

Two themes pertinent to second home ownership rates have been specifically identified through outreach and engagement. One is about maintaining housing affordability so that Park City remains a complete community with a strong sense of local identity. The other is about ensuring that the City retains its authenticity and unique character through the viability of locally owned and operated businesses. If the owners of these vibrant establishments can no longer afford to be a resident of Park City, they could be lost and replaced by establishments with less interest in reflecting local identity.

These issues are a consideration of the Historic District Grant program design inasmuch as the City and the Historic Preservation Board have directed that ownership type should inform levels of eligibility for grant support.

Historic Preservation has Economic Impact

PlaceEconomics, with the University of Pennsylvania, prepared a study for the Advisory Council on Historic



Authentic locally owned businesses are an important part of Park City's character and identity.

Preservation (AHCP) in 2011 (updated in 2013) called Measuring Economic Impacts of Historic Preservation. The study proposes a number of metrics for use in placing economic value on historic preservation, including:

- Jobs / Household Income
- Property Values
- History/Culture Tourism
- Environmental Measurements
- Downtown Revitalization

The study outlines the definition and purpose of such metrics, as well as potential methods of analysis. Detailed work on the subject of economic impact is beyond the scope of this study, and yet the economic impact of historic preservation has been a substantial part of Park City's story and is important to observe in this context.

Metrics are a Valuable Tool

Leadership may wish to pursue the development of metrics for Park City to guide future policy and to test several hypotheses that can be made based on a more casual analysis of the facts:

- Jobs have grown along with businesses, events, and resorts in Park City, and the City's investment in historic resources like Main Street has contributed to that.
- Property values have grown in part due to historic investments, with values in historic districts above the City average.
- Tourism has boomed in Park City; natural resources and character-building historic resources are both major contributors to Park City's appeal as a destination.
- Restoration of older properties contributes to sustainability with building efficiency and compact development benefits. Metrics for environmental/historic preservation outcomes could be developed.
- Downtown revitalization was the original purpose that drove the RDA and HDC to pursue public investments in both infrastructure and historic preservation in the 1980s. That trajectory has transformed historic Park City and created economic value.

Buying Power Outpaced the Cost of Construction

The average cost of construction nationally, according to the ENR Construction Cost Index (CCI), has risen by 2.37 times from the time of the grant’s launch in 1987 to the current day, meaning in short that it has become more expensive to build things. In 1987, the CCI was \$4,406 and by 2016 the CCI had risen to \$10,443.

Many stakeholders who were interviewed during the engagement process identified *rising construction costs* as a reason for the diminished perceived relevance of the grant program. However, the rise in construction costs over time was matched and exceeded by a more significant rise in the buying power made possible by the rising value of grant awards over time.

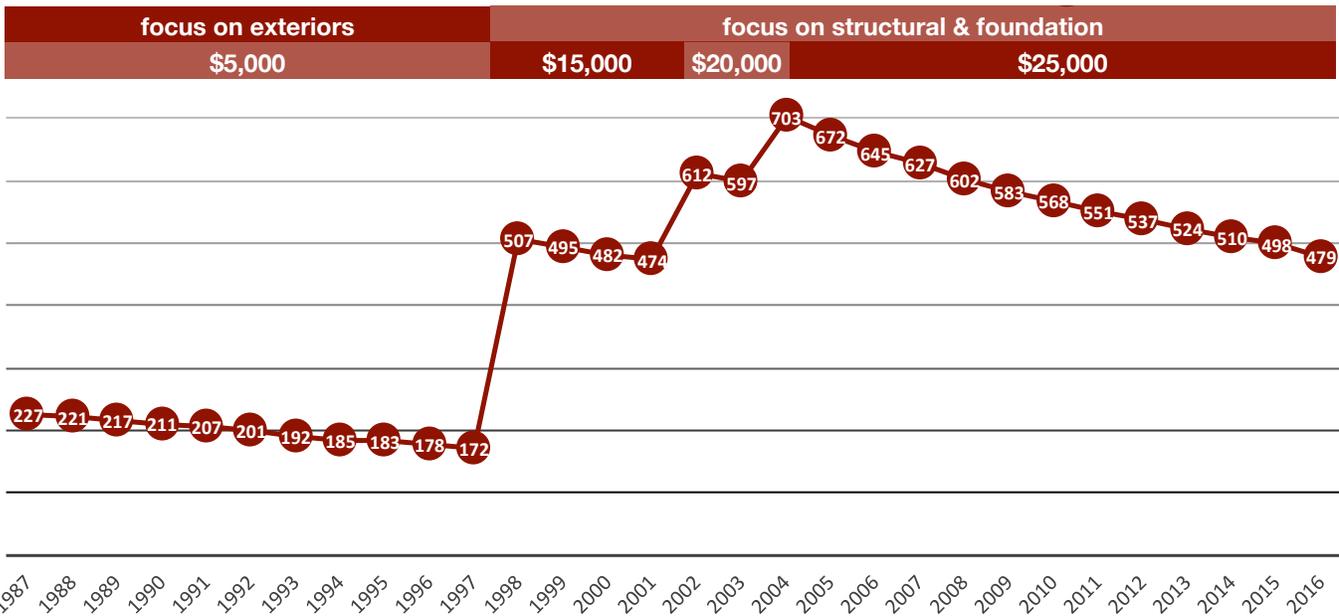
An analysis was conducted of historical data for the grant program and the “buying power” it has provided. Grant awards were logged over time based on City data and newspaper records. The maximum allowable grant value for each year was recorded, and that was converted to “buying power” for that year using the ENR Construction Cost Index data for the same year.

It’s clear that each grant dollar can buy a certain amount of materials and labor in a given year. What was less clear prior to the analysis was whether the grant’s buying power had diminished over time due to construction costs.

The data demonstrates that the buying power of the maximum grant declined over the first decade, but then rose at a higher rate than construction costs due to grant

Rising construction costs were matched and exceeded by the rising value of grant awards.

BUYING POWER OF THE RESIDENTIAL GRANT



“Buying power” is a unit of labor hours + materials that the maximum grant in a given year could buy based on the ENR Construction Cost Index for that year. The chart shows, for instance, that from 1987 to 1997, the buying power of a \$5,000 grant steadily decreased, but when the maximum award grew to \$15,000 in 1998, buying power was more than double what it was in the initial year of the grant.

Average grant size has risen slightly over time.

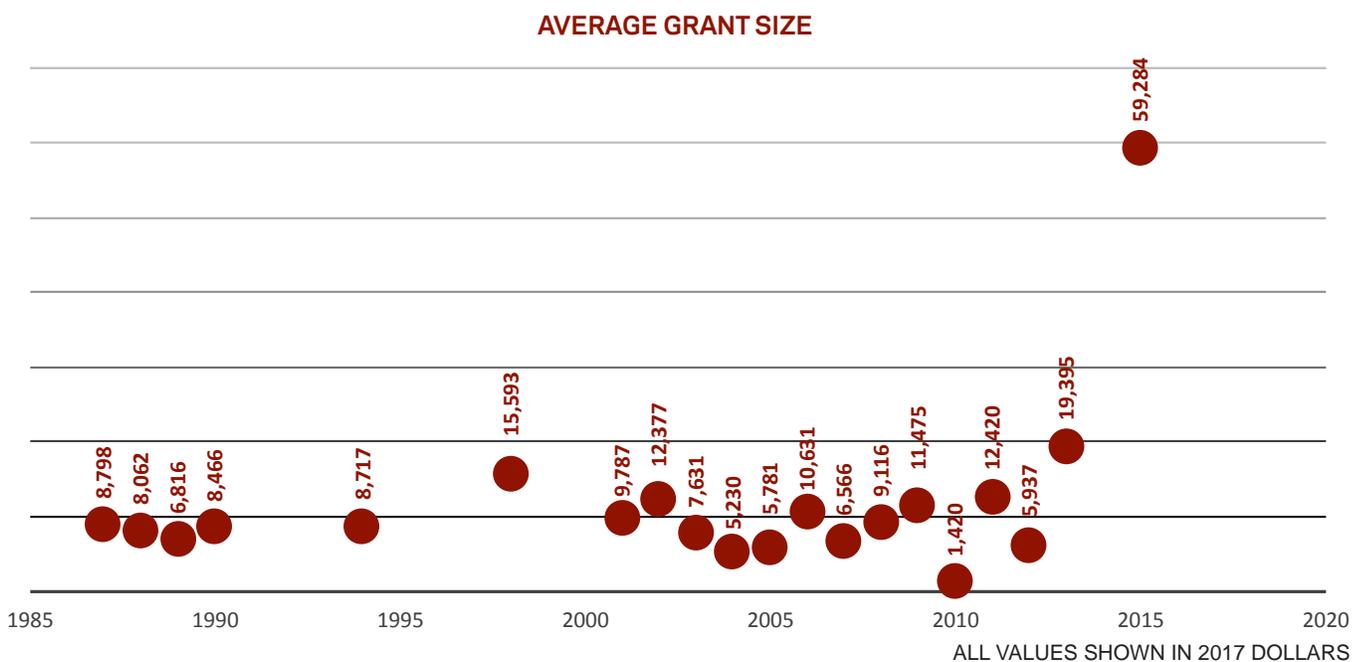
awards becoming larger over time. For approximately the first decade of the grant’s life, residential awards were capped at \$5,000 and commercial at \$10,000. Both residential and commercial caps were raised to \$15,000 in 1988, then raised again in the early 2000s to \$20,000. The current maximum award that the HPB can approve is \$25,000, though larger awards can be given with approval of Council. The buying power generated by these “raises” over time have enabled residents to buy more labor hours and materials in the latter life of the grant than they could in the early years - even accounting for the rising cost of construction. These findings are inconsistent with the prevailing assumption that the grant had more buying power in its early years. It would be more accurate to say that there were a larger number of grants

awarded in the early years, and that the impact of the grant to numerous properties was more widely known and publicized.

Average Grant Value Rose Slightly Over Time

The average grant size is the total dollars awarded for a given year divided by the number of grants awarded, adjusted to 2017 dollars. For those years between 1987 and 2016 where data was available about both the *total annual grant dollars awarded* and the *total number of grants awarded*, an average grant size was discernible.

Because early years are characterized by large numbers of grants whereas later years have few total grants, there is more deviation from year to year in later years.



Average grant size was analyzed for all years where the total value of grant money awarded and the total number of grants awarded were both known. It is shown here with all values adjusted to 2017 dollars. There is more deviation in recent years due to far fewer grants being awarded, and there is a significant outlier in 2015 when a single large grant was awarded.

Number of Grants Dropped in 2003

In 2003, significant structural program changes to governance and administration occurred which may have, with other factors such as the 2002 Winter Olympics, dampened the number of applicants to the grant.

First, the governing body was restructured: the Historic District Commission was dissolved due to perceptions of overreaching authority, and replaced by the Historic Preservation Board. Second, the grant ceased to be administered as an annual competitive process and became a year-round application.

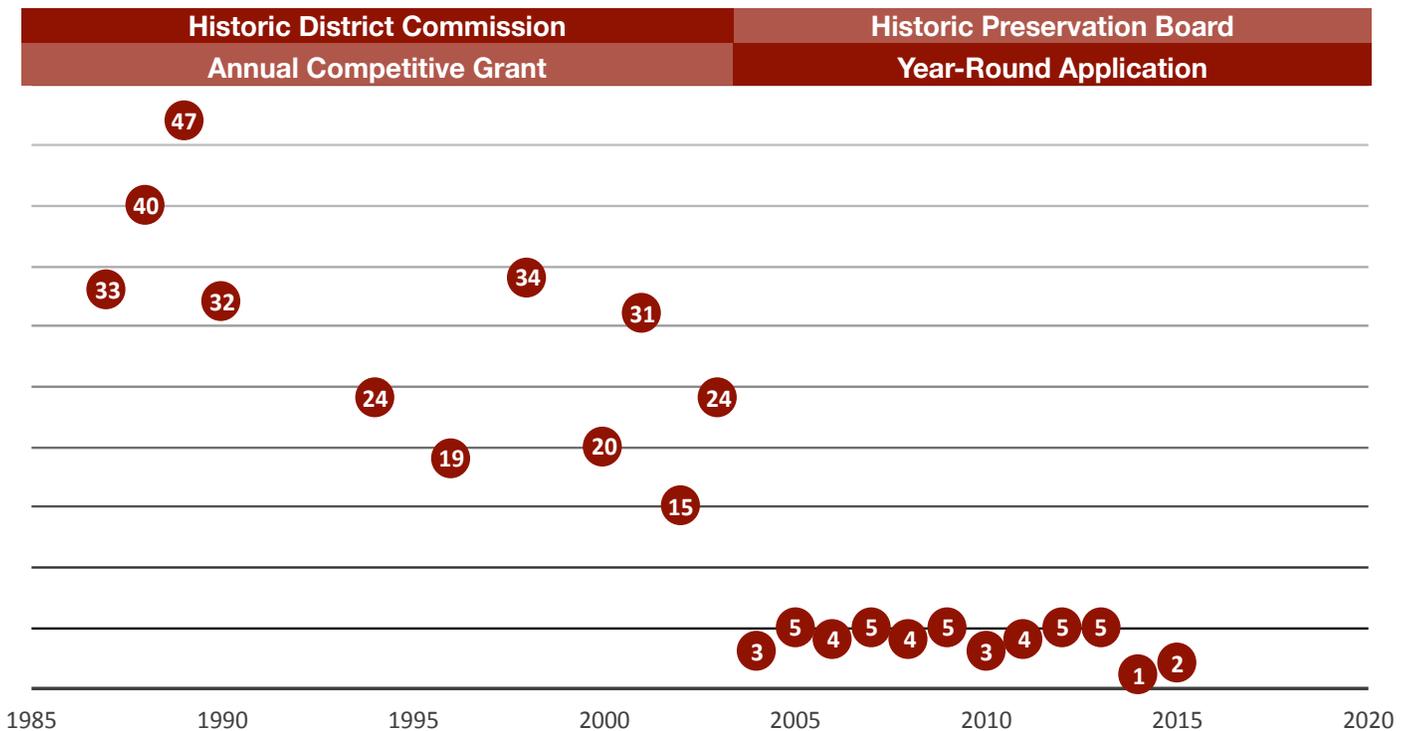
After 2003, it appears the grant became less visible to the community. The pre-2003 program had, by virtue of the nature of a competitive award, driven a community information and news cycle. Informational meetings would take place leading

up to the deadline; detailed human interest stories would take place about projects and results from the last year's awards; and the newspaper would publicize the list of winning properties along with some analysis such as which streets garnered the most investment. All of these touchpoints provided fertile ground for community dialogue and preservation awareness.

Historically, the grant has leveraged significant private investment in hundreds of properties within the historic districts, and through regular coverage in the newspaper, it has raised the public consciousness about the value of the community's history, resulting in a growing sense of common purpose and commitment to invest. The grant has raised the perceived appeal of historic districts and their desirability for additional private investments, including business, tourism, and programming investments.

The Historic District Commission administered an annual competitive grant program until 2003. Thereafter, the Historic Preservation Board and City of Park City have supported year-round applications.

TOTAL NUMBER OF GRANTS AWARDED ANNUALLY



The number of grants awarded annually dropped in 2003 and remained low. Also in 2003, which is also the year that two significant changes in grant administration occurred: the restructuring of the governing board and the shift from an annual competitive cycle to year-round applications.



Engagement

STAKEHOLDER ENGAGEMENT

Interviews with Program Users

Assessment of Grant Program Through User Experience Interviews

A selected group of users were contacted and interviewed about their direct experience with the program.

One of the most useful sources of information for any study is community engagement. For this study, valuable insights were drawn from stakeholder interview subjects, “goals workshop” participants, and technical advisors. A summary of engagement outcomes follows.

STAKEHOLDER INTERVIEWS

Eleven stakeholders were contacted for interviews about the Historic District Grant program, resulting in 7 interviews being conducted over two weeks in March 2017. Interview subjects represented differing expert or firsthand perspectives on the program, and included grant recipients, an architect, representatives of stakeholder organizations such as the Chamber of Commerce, the Park City Historical Society & Museum, and the oversight body, the Historic Preservation Board.

Interview Questions

Interviewees were asked the following seven questions:

1. What is your personal experience with the Historic District Grant program?
2. Do you and your peers have a generally held perspective on the Historic District Grant program? If you were to take the temperature of peers on preservation matters, and specifically grants to properties for restoration, what would the general feeling be? Is it your opinion that the general view of you and your peers is shared by most people?
3. Have you experienced a process with the Historic Preservation Board? What are your thoughts about the role of the HPB?
4. What do you think is necessary for the City to understand in crafting revisions to the Historic District Grant program? What's most important and successful about the program and its goals, and what may need another look?
5. What criteria do you think are most important to include in evaluating the eligibility of an applicant?
6. Are there any difficulties to be aware of? Are there any ways that you feel the program has been mis-used in the past?
7. Can you share a success story about the grant?

SUMMARY OF STAKEHOLDER OBSERVATIONS

In answering each of the questions posed, common themes were touched on among interviewees. Themes included an assessment of the program's value, comments on the process, and ways that the program could be improved. A summary of "interview takeaways" on these broad themes follows.

Perceived Value of the Historic District Grant Program

- The program is valued by those that have used it – however, most people don't really know very much about the program.
- On the commercial side, property owners are one step removed from the issue. Business owners have a stake in the character of Main Street, but they are renting – the property owners are one step removed.
- Preservation is a commonly held value, but issues like affordability and transportation are potentially more pressing topics today.

Success of the Historic District Grant Program

- It was very successful 20 years ago when it supported local people trying to invest in the community and build their own equity as residents. Created a sense of personal pride and investment.
- It is still useful, but due to rising construction costs, it's not as much of a carrot as it used to be.
- It is still useful, but due to rising home values and changing demographics (rising numbers of millionaire second home owners in Old Town), the grant is not serving the purpose it once did.
- It contributes to historic character, which is very important to people. Historic home tours and historic home dinners are very popular.
- Preservation contributes to sustained stable property values and economic value for tourism.
- One inadvertent negative outcome of the improved historic district is that locals get pushed out due to high property values and nightly rentals.

Ease and Value of Participating in the Program

- Homeowner interviewees who had participated directly in the program thought it was worth it, and stated that it was not an unreasonable process to go through for their project.
- It was observed that many property owners of historic properties would view the grant amount as inconsequential, and could take it or leave it.
- Many people either don't know about the program or don't bother to apply because of the sense that it will be a lot of work.
- Professionals who had some history with the program cautioned about avoiding leaving room for subjective decision-making by governing entities.
- It is perceived as a benefit to homeowners that grants are awarded as reimbursement at the end of the process, since there are often unanticipated costs along the way.

SUMMARY OF STAKEHOLDER RECOMMENDED IMPROVEMENTS

Interviewees provided detailed recommendations about program goals, grant award amount, criteria/eligibility, and administration. Their detailed comments follow.

Definition of Goals

- Restate the goals of the program in a way that's relevant to today. There is a perception that the people who own historic properties are well off and don't need grant assistance.
- The original goal was to support Park City residents and to restore homes in need of work that otherwise would not be restored. There is general agreement among interviewees that this dynamic has changed along with the demographics and property values in Old Town.
- Enhance and sustain Old Town in a way that contributes to the city's economy, increasing tourism and economic value.
- Ensure that Old Town retains its character by preserving historic structures, and offering interpretive opportunities.
- Focus the dollars on incentivizing higher levels of quality than are required by minimum compliance, for instance, incentivizing premium wood windows rather than standard, by making windows a grant eligible improvement.
- Using the defined goals, make a clear framework for decision-making by City staff, the HPB, and users.
- Clearly stated goals and criteria should be defined to manage homeowner expectations and avoid the perception of subjective decision-making.
- A point system should be developed.
- Staff and commissioners should be trained.

Size of Grant

- There is a common perception that the grants are small and inconsequential to historic property owners. There was consideration of making grant awards larger, reflecting today's real costs and home values.
- Typical grant amounts currently available will not get any project over the "but for" hurdle. Most people doing these projects today are not going to be swayed by a \$10,000 grant. One respondent suggested that \$40-\$50,000 would be a meaningful grant level.
- The grant is valued by homeowners doing smaller projects like roof work, or those doing the work themselves who are less impacted by rising costs of construction.
- It was suggested that a case could be made for increased public investment by measuring the amount of private investment that has been spurred by public dollars.
- There was consideration of making the grant "smarter" to be more of an incentive to achieving specific "above-minimum requirements outcomes."
- Doing things above minimum requirements costs more for homeowners, and having an incentive to do so would drive higher quality outcomes.

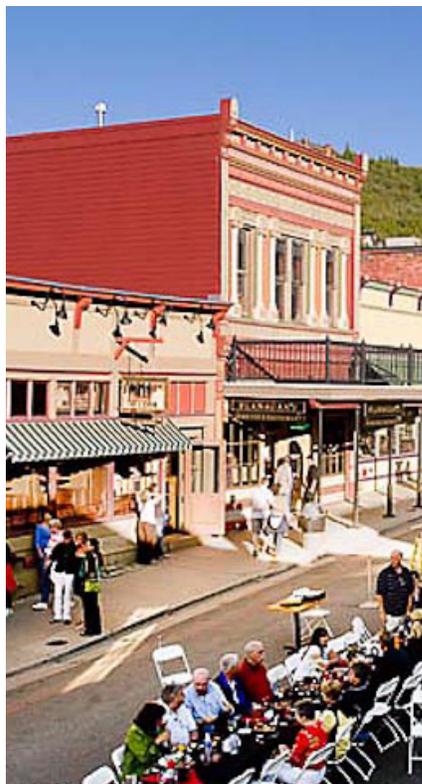
Criteria

- There is a general sense among interviewees that awarding grants to those who do not need public assistance to make their renovation feasible is not ideal, but there is little consensus about how to address the issue.
- Some interviewees felt that although there may be a perception issue, the grant is not a social program and the real goal is to save and improve historic stock – so who owns the property is a secondary issue that should not drive criteria.
- Other interviewees felt differently, and discussed the possibility of means testing as criteria for eligibility. Some observed that the grant is simply a non-issue in the calculus of a second home buyer who is planning a million-dollar renovation, so perhaps trying to “tune” the grant based on this factor isn’t going to be impactful.



Eligibility

- The City could identify homes that remain to be restored, assess the kind of work they need, and seek to understand why owners are choosing not to do the work. This may help to define criteria, and to design the grant to assist.
- Staff seek clear criteria for eligible types of work. Should the focus be on work that contributes to saving a building like foundation, structural, or roofing? Or the opposite: work that incentivizes above-minimum standard details, like windows and trim? Should tear-downs that are reconstructed be eligible?
- Should the grant privilege primary over secondary owners? Or focus on property restoration, with no preference for characteristics of ownership? It was observed that a lot of locals are moving out of Old Town, and that the community has changed in ways that the grant will not reverse.



Administration

- Interviewees encourage the City to make sure resources are available year-round.
- Include as much staff-level decision-making about eligibility and so on as possible to avoid uncertainty going in to the Historic Preservation Board process.
- Establish clear, specific language defining what decisions need to be made by the HPB (and conversely, what is not the purview of the HPB, including design), and establish an objective path to making decisions.
- Provide training to HPB members on their specific authorities, and on the Park City Historic District Guidelines that they are to apply to their decisions; also, ensure that there is common understanding by Board members of the fact that the National Park Service guidelines are different, more stringent, and not required.

Park City residents with direct experience of the grant program were interviewed and provided detailed feedback.

STAFF ENGAGEMENT

Technical Advisory Meetings

Issues Identification with Staff and Technical Experts

Two technical advisory meetings were held with staff, with one focused on funding and one focused on administration. Expert staff were engaged with detailed questions that emerged out of research and stakeholder engagement. Staff contributed their insights and observations about the grant program.

The following issues, which should inform the design of the next iteration of the Historic District Grant Program, were identified.

ISSUE 1: Funding Sources and Dynamics

The grant funding source has shifted from capital to operating dollars, so rollover is no longer an option. Budgets are on a one-year cycle, and unexpended funds cannot be retained for use in the next budget year. This presents a challenge because the time between the grant being awarded and the funds being dispersed is more than one year. The result is uncertainty and risk with regard to how many grants are outstanding at any given time, and when payments will come due.

Because the program allocation is a set amount, which does not change from year to year based on, for instance, projected distributions; and because no rollover is possible; and because funds are not pooled but split into three buckets tied to specific geographies; and because a single grant can be a fairly substantial chunk of allocated funds for an eligible area; it is hypothetically possible that all funds could be expended in one area very early in a given year, with other grants coming due and no resources to pay them. This uncertainty is currently being managed by staff, but additional steps could be considered to mitigate the risk. Factors to consider in administering the grant include:

- The grant funding source is operations, not capital
- There is no rollover
- The period between award and distribution is likely 2 years
- Grant sizes are growing
- The total program allocation is currently split between three buckets

It is additionally relevant to note that the Main Street RDA will expire in four years. Staff is aware of this and will work with policymakers on an extension. They are already anticipating what needs to be done to anticipate and manage grants that will be coming due during a period of potential uncertainty.

ISSUE 2: Alignment with City Goals

The mission and principles guiding the grant should be aligned with city goals and values. For instance: How could the grant encourage consideration of affordability? Could assistance with the cost of renovation help some owners to preserve naturally occurring affordable housing by mitigating the need for debt service on loans that could drive rents up?

Projects with the potential or intention to contribute to city goals through enhanced outcomes could be identified in the following ways:

- at Design Review;
- through a checklist on the application; and,
- with a scoring system that rewards required elements as well as including the opportunity to earn bonus points for “bid enhancement”

ISSUE 3: Competitive Grant Cycle

Staff and technical advisors endorsed the notion of a regular schedule of application deadlines throughout the year that would introduce merits and competition to the selection. Multiple deadlines per year would be necessary considering the fluidity of project starts.

A regular cycle of deadlines and decisions would have multiple benefits. (1) It would be easier for staff to administer; (2) it would lead to applications competing on the merits; (3) applicants in competition would be more incentivized to be responsive to City goals by identifying and delivering enhanced outcomes; (4) it would be newsworthy and therefore give the city an opportunity to communicate on a regular basis about program goals and successes. This kind of communication can build a sense of community through greater awareness of the town's historic places and assets.

ISSUE 4: Grant Administration

Staff expressed concern that current eligibility requirements may not provide sufficiently specific tools to ensure that grant dollars are not inadvertently subsidizing projects that don't need assistance or would happen anyway as a matter of course with existing regulations. Staff and policymakers want to ensure that funds are used wisely, in a targeted fashion, to implement City goals. This will require a more robust framework governing eligibility and requirements.

Options that were suggested to ensure successful administration of funds include the creation of specific criteria that lead to more targeted grants, potential means testing, scoring for enhancements, and even adopting the practice of promoting and implementing an "investment target" for each grant cycle.

Technical advisory meetings informed the study and recommendations. City staff identified issues and provided insight into grant funding and administration.



Park City staff provided technical, budgetary, and administrative insights.

LEADERSHIP ENGAGEMENT

Elected Officials & Historic Preservation Board

Mission, Values and Goals Workshop with Leadership

An engagement workshop was held with the Mayor, City Council, and Historic Preservation Board, which oversees the grant program. Leadership was engaged with questions intended to shape the mission and values for the future of the grant program.

On November 16, 2017, Park City planning staff and their consultant conducted an engagement workshop with the Historic Preservation Board and Mayor at the Council's regular meeting. After a presentation summarizing the grant's history, takeaways from stakeholder outreach, and draft recommendations for the next iteration of the grant program, the Board and Mayor participated in an interactive discussion focused on three topics: Mission and Values; Outcomes; and, Principles and Criteria for the grant. The meeting was noticed, and was open to the public, and the presentation and engagement exercise were recorded.

Participants' comments were noted by scribes on large notepads. Also, participants filled out and submitted worksheets, which were scanned and saved. The following fill-in-the-blank statements were the basis of discussion.

Engagement Statements

Participants discussed Mission, Values, Outcomes, and Principles/Criteria for the grant. They considered these fill-in-the-blank statements:

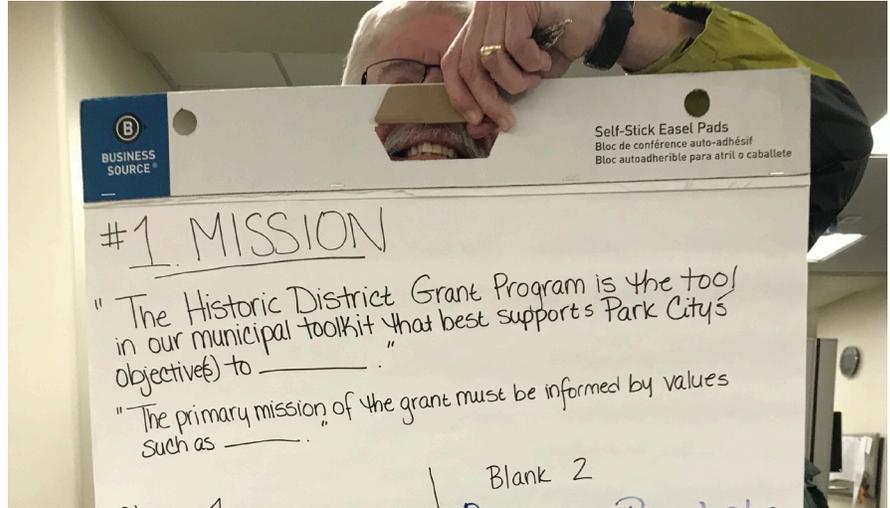
- "The Historic District Grant program is the tool in our municipal toolkit that best supports Park City's objective(s) to ____." (Mission & Values)
- "The primary mission of the grant must be informed by values such as ____." (Mission & Values)
- "The primary outcome of the grant should be ____." (Outcomes)
- "Pursuing enhanced outcomes for the Historic District Grant program does/does not make sense because ____." (Outcomes)
- "This grant could help Park City meet these additional goals: ____." (Outcomes)
- "Determinations for applicant eligibility should include consideration of ____." (Principles & Criteria)
- "The best way to make sure that we are targeting investment in areas consistent with our mission is to apply criteria such as ____." (Principles & Criteria)

Elected and Board leadership participated in an interactive working session focused on the mission, values, and desired outcomes for the grant program.



Engagement of leadership occurred in a regular Historic District Preservation meeting in Council Chambers. It was a noticed public meeting.

Workshop participants were given prompting statements to spur discussion about mission, values, and criteria for the next iteration of the grant program.



Park City Historic Preservation Board members and elected leadership participated in a facilitated discussion focused on mission, values, principles and criteria for the future of the grant program. Participants provided observations rooted in current policy focus areas and adopted City goals and objectives.

High Level Takeaways from Leadership Engagement

- The **mission** of the grant program should be to tell Park City's story, promote community knowledge and engagement, and make a meaningful difference.
- The **values** that should inform the next iteration of this grant program include our commitment to an affordable, complete community, responsible and impactful stewardship of public dollars, and an authentic sense of place.
- The most important **outcomes** of the grant are (1) to make the story of Park City visible and present, through all the town's periods of significance; and (2) to make a proactive and positive difference in the lives of our residents and businesses. Ideally, the grant should be applied to projects or outcomes that may not happen but for the investment.
- In addition to primary outcomes, the grant should seek to reward applications with the potential for achieving **enhanced outcomes**, including those that build community identity by contributing to a greater awareness of history; contribute to affordability and social equity; and support a quality Main Street.
- Applicant **criteria** should include a preference for full-time residents of Park City. The grant should also consider ways to target investment through project criteria supporting authentic mass, form and scale; and above minimum compliance in material selection and details.

Detailed Comments from Leadership Engagement: **MISSION >>****The grant should contribute to telling the story of Park City.**

- Preserve historic character, neighborhood character, and historic building stock.
- Save historic structures from neglect
- Tell the story of buildings, and the people who lived in them.
- Build knowledge in the community about the town and its history.

Promote community knowledge and engagement.

- Get the community involved and engaged through greater awareness.
- Don't just regulate. Encourage qualitative outcomes.
- Instead of focusing on regulation and minimum compliance, focus on encouraging better restoration.

Use public dollars responsibly. Make a difference.

- Define how and where the grant can make a difference.
- The City has changed since the grant was introduced in the 80s. This grant level is not a difference-maker to investor-owners. Residents for whom it is significant are fewer now.
- Where can this grant play a role in today's environment?
 - o Public buildings
 - o Distressed properties
 - o Roof repairs and smaller repairs
 - o Large remodels
 - o Historic Mine structures

Detailed Comments from Leadership Engagement: **VALUES >>****We want a complete community, with permanent residents, locally owned businesses, and affordability.**

- We want residents permanently living in these houses.
- Support local people; they are the ones who own and operate authentic local businesses.
- Support residents who want to preserve their family homes.
- Support residents who want to stay in town.

We want to target the grant dollars where they can make a difference.

- *Impact Investing:* The grant should make a difference in large project feasibility, even if it's just one project per year (impact investing rather than "spreading peanut butter"). Make sure we can respond to those big opportunities.
- *Incentivize Better Outcomes:* Inspire more authentic restoration by incentivizing recipients to exceed minimum standards for windows, corner boards, roof details, scale, and materials.

We want the physical environment of our community to tell our story, and to feel authentic.

- The grant should support telling our story, and should take an interest in mining structures, as well as family and community history.
- The grant should contribute to our community's authenticity.

In the discussion of outcomes, leadership focused on two key objectives:

(1) To make the story of Park City visible and present, through all the town's periods of significance.

(2) To make a proactive and positive difference in the lives of our residents and businesses.

Detailed Comments from Leadership Engagement: **OUTCOMES >>**

We want to make our community's story visible.

- Contribute to the story of Park City with restoration that reflects the town's unique story.
- Reveal the Mining legacy: We can tell a 150-year history, unlike many mountain resort towns. That's a differentiating feature.
- Tell the whole story; ensure we're revealing all of the periods of significance
- Enhance Main Street.

We want our investment to matter.

- Don't throw money at something that doesn't move the needle.
- We can make a difference on mining legacy.
- We can make a difference with targeted big investment.
- We can move the needle on details and quality exceeding minimum standards..

The grant should fully support our values.

- Outcomes should fully support the values identified through discussion and outlined above.

We want to take care of our community and be proactive.

- Owners of distressed homes should be made aware of the opportunity for assistance (homes needing new roofs, structural work, stairs, and so on). Social equity and residents in need should be a consideration.
- Commercial buildings and businesses that contribute to telling Park City's story should be proactively approached. Support businesses and properties (for instance on Main Street) through facade improvement grants to assist with visual narrative.

Build a sense of community by expanding historical awareness and recognizing good people doing good things.

- Create awareness of town, district, neighborhood, and street narrative and history.
- Recognize and acknowledge people doing great things. People take a lot of pride in their homes - make sure we're telling their stories (newspaper, awards and recognition) and celebrating the work they're doing to contribute to the town.

Contribute to affordability and equity, and be inclusive.

- Find ways for the grant to contribute to social equity.
- Ensure that the grant contributes to preservation being understood as an activity that is not just for the wealthy - it should be inclusive.

Leadership seeks to keep the grant true to its core mission of preservation, while making it responsive to new City goals and priorities.

"We need to tell Park City's story."

"We need to take care of our community."

"We shouldn't throw money at something that doesn't move the needle."



PHOTO COURTESY OF PARK CITY MUSEUM & HISTORICAL SOCIETY

Unlike many destination communities, Park City has an engaging history that stretches back hundreds of years. The community's history as a silver mining town is an important part of the town's, and its residents, identity.

Detailed Comments from Leadership Engagement: **PRINCIPLES & CRITERIA>>**

Applicant eligibility criteria should support our goals and values.

- Ownership type. Participants all agreed that preference should be given to full-time residents.
- There was discussion but not affirmation of applying means testing to ensure that grant dollars are awarded to applicants in need of assistance.

We should target our investment.

- Our public investment should contribute to the authenticity of mass, form, and scale.
- We should seek above minimum compliance in material selection, details and form.

We should use the grant for its core purpose.

- Consensus about supporting the core mission of restoration and preservation, and "telling Park City's story," was strong.
- There was not consensus about using the grant program to influence trends having little to do with preservation, such as nightly rentals.



Observations

Summary of Observations from Analysis and Engagement

A number of high level observations were derived from a review of the grant's history (as documented in news archives), trends discernible in an analysis of City and County data, and themes identified through outreach and engagement with staff and stakeholders.

1) The primary objective of the grant is the restoration of historic property.

The grant should focus first and foremost on what it was designed for: restoration of historic properties; but because there is a strong desire for all public dollars spent to contribute to adopted City Council Priorities and Goals, the application process could incorporate other values through the use of "bid enhancement goals.

- a) Preserve the stock
- b) Support permanent residents
- c) Support transient residents
- d) Consider other enhancement goals

2) The grant program is a public investment that should continue.

The grant is perceived as valuable by those who have participated in the program, and should continue to be made available. However:

3) Public awareness of the grant should be expanded.

There is very low awareness of the grant compared to what is evidenced in the early years; note that the grant became much less visible (both as a news item and in terms of the number of awards given) after the restructuring in 2003 when the HDC was disbanded. Strategies such as hosting public information sessions, soliciting news coverage to report on metrics or highlight subject properties and owners, and giving awards, could be re-introduced.

4) Year-round applications & awards are desirable.

The grant shifted from being a once-per-year application and award program to being open to applications year-round in 2003. Consensus is that it should continue to be available year-round.

5) The buying power of grant dollars has not diminished over time.

The buying power of the maximum residential award today exceeds the buying power of the maximum residential award in the first decade of the grant's life, calling into question the prevailing assumption that more funds are needed per grantee to make the grant relevant.

6) The grant can be designed to encourage better-than-minimum compliance outcomes.

The grant is not perceived to meet the "but for" test for most renovations today. It will not be a significant factor for homeowners in deciding whether a renovation happens or doesn't happen, but depending on the design of the program, it could influence the standards by which certain design and construction decisions in the renovation are made (such as choosing details and finishes that are higher quality than minimum standards require).



The community values its visual character, and seeks to tell a story about identity and history through preservation.

7) Applicants desire clarity on fundamentals.

There is a perceived need for more clarity during the process, especially on these matters:

- a)** Available Funding at Any Given Time
- b)** Detailed Criteria for Approval by the HPB

8) Training and education will enhance outcomes.

Education and training could enhance the success of the program and its outcomes; consider the following:

- a)** Train Historic Preservation Board members on the Board's authorities, and on the proper policy standards to apply in making decision to approve or not approve a project.

- b)** Train contractors and building professionals in policies and practices pertinent to historic preservation, and provide certification with regular renewals.
- c)** Educate the public about the value of historic properties, and contextualize historic properties in the story of the City.
- d)** Assuming the City introduces a preferred vendor or vendor training program, inform applicants about the City's trained vendor list.



Recommendations

The Historic District Grant program has contributed substantially to the character and vitality of Park City. With thoughtful refinement, it will continue to do so.

Much has changed since the origin of the grant program in the early 1980s, including residency and tourism dynamics, historic resource conditions, population growth, development, and economic conditions. These changes, along with resulting administrative and implementation challenges identified by staff and stakeholders, led to the review and reconsideration of the grant program. This study, and the recommendations herein, are the outcome of that review.

Policymakers, staff, stakeholders, and the Historic Preservation Board have contributed time, talent, and expertise to this assessment of the current program, and their input has shaped objectives for the future program. Qualitative research and quantitative data analysis laid a foundation of knowledge about existing conditions, and along with engagement outcomes, informed the resulting recommendations.

The recommendations that follow are presented as a roadmap for Park City staff and leadership to refine what has historically been a very successful grant program, and to bring it up to date in accordance with current conditions, values, and opportunities for impact.

1. Adopt a Historic District Grant program mission statement that reflects contemporary conditions, values, and opportunities for impact.

1.1. Adopt a mission statement and identify values to guide grant investments.

1.1.1. Draft a mission statement based on adopted City goals and objectives, and the values and engagement outcomes that emerged from this study.

1.2. Establish primary and enhanced target outcomes.

1.2.1. Define primary outcomes that the grant should measurably impact, including preservation of neighborhood character, preservation of historic stock, achieving higher than minimum standard outcomes, and telling Park City's story through the physical environment.

1.2.2. Define supplemental or enhanced outcomes that the grant could incentivize, such as affordability, public realm enhancement, resident retention, or assisting residents in need.

1.2.3. Review and revise the list of eligible improvements.

1.2.4. Ensure desired outcomes are consistent with eligible uses of funds.

1.3. Establish goals and topics for regular reporting.

1.3.1. Define reporting objectives based on the outcomes from Recommendations 1.1 and 1.2.

1.3.2. Establish metrics for tracking and reporting outcomes, and apply them to Recommendation 5.

1.3.3. Establish a regular annual cycle of reporting. Audiences for regular reporting include the Historic Preservation Board, Mayor and City Council, and the general public.

2. Create Historic District Grant program guidelines that enable grant administrators to responsibly steward impactful public investment.

2.1. Update grant eligibility requirements according to defined mission and target outcomes.

2.1.1. *Projects*. Review existing Project type eligibility, and refine according to the updated program mission and goals.

2.1.1.1. Ensure that grant dollars are not subsidizing outcomes that would happen anyway under existing regulations.

2.1.1.2. Define a target list of investment priorities where the grant can make a difference, and review it annually to keep it current. Consider public projects, historic mine structures, distressed properties, roof replacements, large remodels, and incentivizing above-minimum-standard outcomes (form, materials, details).

2.1.2. *Applicants*. Review existing Applicant eligibility requirements, and refine according to the updated program mission and goals.

2.1.2.1. Ensure that grant dollars are not subsidizing applicants who don't need public assistance.

2.1.2.2. Build in preferred status for permanent residents.

2.1.2.3. Build in preferred status for locally owned and operated commercial properties.

2.2. Make the grant competitive.

2.2.1. Create a cycle of multiple application deadlines per year.

2.2.2. Create a clear and transparent scoring system.

2.2.2.1. Define the program's "core requirements" and craft a scoring system based on it. Consider the program mission outlined in the

goals workshop with leadership, including the desire to preserve historic character, save historic structures from neglect, promote community knowledge and engagement, achieve better restoration outcomes, and invest public dollars in ways that make a difference (“move the needle”).

2.2.2.2. Define desired “enhanced outcomes” and craft a system of bonus points based on it. Consider the values that emerged out of the goals workshop with leadership, including the objectives for complete community, equity, and affordability.

2.3. Use administrative discretion to achieve the greatest program impact in each cycle.

2.3.1. Give grant administrators discretion to select a single large project or many smaller projects in a cycle, depending on their assessment of how the grant will be most impactful.

2.3.2. Give grant administrators discretion to accept applications of all types, or to define themes for each grant cycle according to perceived need or opportunity.

3. Create an application manual to make the process informative and easy for everyone.

3.1. The manual should include a program description and guidelines.

3.2. The manual should provide information about the application process, including an overview of grant awards available, application deadlines, a process map, criteria for decision-making, and required forms and submittals.

3.3. The manual should refer applicants to the City’s list of vendors who have completed the training program.

3.4. The manual should direct applicants to supplemental resources for those who wish to learn more about preservation, including links to guiding regulations, training and education opportunities, and Park City interpretive experiences.

3.5. The manual should provide information about program history and successes.

4. Define program funding sources and levels.

4.1. Work with City and Board leadership to right-size the grant commitment.

4.1.1. Review the current capacity of the grant in total and by source; and make a determination of whether to raise, reduce, or maintain the current level of funds in light of outcomes from Recommendation 1.1 and 1.2.

4.2. Mitigate constraints on funding sources.

4.2.1. Review the sustainability of funding sources (each RDA, General Fund) and take steps to ensure that needed capacity is maintained for out-year commitments.

4.2.2. Identify constraints resulting from the distribution of the total grant dollars by source, and consider how to mitigate for areas of need and opportunity that may be challenged as a result.

4.3. Ensure that there is clear and transparent definition of funding sources and constraints available to the public.

5. Build a database of grant supported projects for management and reporting purposes.

5.1. Create a database of projects to track them from the time a grant is awarded to the time the grant is paid out.

5.2. Apply metrics defined in Recommendation 1.3 into a program database, so that the performance and contribution of projects supported by the grant program can be measured.

5.3. Use the database to mitigate the management challenges inherent in the current disconnect between the fixed level of non-rollover funding sources (operations, not capital dollars) and the multi-year activities that the grant dollars fund, by incorporating projections over time.

5.3.1. Create a rolling 3- year schedule of projected grant payouts, including: project address, grant amount, estimated date of payout projected (year 0, 1, and 2), and project grant funding source (identify which pool dollars will come from).

5.3.2. Keep records of actuals for each project, including the amount and date of actual payout, and contribution to primary outcomes, consistent with Recommendation 1.2.1.

5.3.3. Record project contributions to enhanced outcomes, consistent with Recommendation 1.2.2.

5.4. Include data about the funding source for each project.

5.4.1. Identify the source and amount of funds committed to each project.

5.4.2. Use the database to project future years' available funds for each source based on grant commitments. For each application deadline, issue a report on the current (application) year plus the next two to three years. Because the grant is comprised of multiple pools of funding, each with unique constraints; and because grant commitments from a prior year

may come due and reduce available funds in a given area at a given time depending on how project timelines converge; there has been difficulty in defining “available funds” at any given time.

5.4.3. Ensure that staff consider projected available funds by pool when they define target outcomes for the upcoming grant cycle, in keeping with Recommendation 2.3.

6. Introduce and sustain training and education to enhance preservation outcomes.

6.1. Create and administer a training program on policies and practices in historic construction, through which contractors and building professionals can be granted “preferred vendor” status by the City; assume regular renewals.

6.2. Create a City “preferred vendor” list of historic contractors. Make this list available to applicants, and incentivize them to utilize the services of trained professionals.

6.3. Continue on-boarding training for Historic Preservation Board members on the Board’s authorities.

6.4. Create a publicly available brochure, the HPB Policy & Decision-Making Guide, outlining the Board’s authorities, criteria, and timeline for decision-making.

6.5. Provide, or coordinate, community education about the impacts of historic preservation (cultural, economic, & environmental), policies & standards, and criteria for decision-making. Topics could range from practical learning about regulatory frameworks to local history.

7. Establish a communications strategy to raise awareness, build community knowledge and engagement, and tell Park City’s story.

7.1. Establish a website with program information and resources.

7.1.1. Communicate program information (outcomes of Recommendation 1), and include downloadable program guidelines and application manual (outcomes of Recommendations 2 and 3)

7.1.2. Feature target themes and objectives for the upcoming funding round (as envisioned in Recommendation 2.3)

7.1.3. Feature program highlights: news coverage, photographs, resident or project spotlights (see Recommendation 7.3), goals and opportunities, and interest pieces about town history.

7.1.4. Provide links to supplemental resources including national standards, relevant Park City policies and zoning, community education

opportunities (Recommendation 6.5), preferred vendor information (Recommendation 6.1), and the HPB Policy & Decision-Making Guide (outcome of Recommendation 6.4).

7.1.5. If feasible, create a tool for people to simply type in their address and receive preliminary feedback about their property's eligibility and upcoming deadlines.

7.2. Create opportunities for news coverage.

7.2.1. Issue news releases about upcoming application deadlines and funding round themes, regular reporting, project successes, grant history, and so on.

7.2.2. Alert news and media about upcoming decisions that will be on the agenda for Board and Council meetings.

7.3. Recognize projects and people who have made significant contributions through use of the grant.

7.3.1. Coordinate with preservation organizations on awards or honors for outstanding contributions to historic preservation and interpretation.

7.3.2. Recognize projects that have achieved enhanced outcomes.



HISTORIC DISTRICT GRANT PROGRAM Scorecard

PREREQUISITES:			
<ol style="list-style-type: none"> 1. Project is located on a site that has been designated as Historic on the Historic Sites Inventory as either a Landmark or Significant site. 2. Project complies with the Land Management Code as well as the Design Guidelines for Historic Residential or Commercial Buildings. 3. All projects \$10,000 or less will require entering into a 5-year lien with the City; should the property be sold within that 5 year period, the applicant is responsible for repaying the City a prorated amount of the total grant disbursement. <p>For projects \$10,000.01 or more, the applicant will be required to donate a façade easement to the City that will be recorded on the property.</p>			
CRITERIA EVALUATION	POINTS	SCORING VALUES	FINAL SCORE
TARGET OUTCOMES:			
<ol style="list-style-type: none"> 1. Promotes Park City’s story and authentic sense of place through its historic sites and structures. 2. Commits to an affordable, complete community and to social equity. 3. Makes a positive and proactive difference in the lives of residents or businesses. 4. Generates enhanced outcomes that may not happen but for the investment. 	5	0: None are true 1: one is true 2: two are true 3: three are true 4: all are true 5: all are true and exceed minimum expectations	
IMPACT:			
<ol style="list-style-type: none"> 1. Key, highly visible character-defining historic elements of the structure and/or site will be preserved and/or restored. 	4	0: Non-visible historic elements will be preserved or restored 1: Few visible historic	

		<p>elements will be preserved or restored</p> <p>2: Several visible historic elements will be preserved or restored</p> <p>3: Majority of visible historic elements will be preserved or restored</p> <p>4: All visible historic elements will be preserved or restored</p>	
2. Historic structure, historic elements, and/or site has high visibility due to its location (prominent intersection, larger than surrounding properties, well-traveled trail, etc.)	2	<p>0: Minimal visibility</p> <p>1: Moderate visibility</p> <p>2: Prominent</p>	
3. Proposed improvements to the structure and/or site will positively impact the vitality of the historic context of the neighborhood.	2	<p>0: Minimal positive impact</p> <p>1: General positive impact</p> <p>2: Significant positive impact</p>	
4. Proposed improvements will redress or improve the structural stability of the historic structure.	2	<p>0: No structural stabilization</p> <p>1: Some structural stabilization</p> <p>2: Extensive structural stabilization</p>	
5. Project addresses a building and/or structure that has an active Notice and Order	5	<p>0: Does not have an active Notice and Order</p> <p>5: Project addresses an active Notice and Order</p>	
DESIGN:			
1. Proposed design and scope of work is consistent with the purpose of the Design Guidelines.	1	<p>0: Does not comply</p> <p>1: Complies</p>	
2. Proposed design and scope of work uses best practices for the treatment of historic materials.	4	<p>0: None</p> <p>1: Insufficient</p> <p>2: Average</p>	

		3: Above Average 4: Exceeds expectations	
3. The historic features and elements of the structure and/or site will be enhanced by the proposed work.	2	0: Minimally enhanced 1: Generally enhance 2: Exceeds expectations	
4. Proposed work facilitates reversal of non-historic elements or alterations.	2	0: None 1: Some 2: Exceeds expectations	
5. Proposed work promotes restoration of lost or re-exposure of hidden historic elements.	2	0: None 1: Some 2: Exceeds expectations	
6. Project encourages pedestrian-oriented development, minimizing the visual impacts of automobiles and parking on historic structures, sites and Streetscapes.	4	0: None 1: Insufficient 2: Somewhat 3: Above Average 4: Exceeds expectations	
7. New additions proposed as part of a renovation are compatible to the historic neighborhood context. (New additions and construction are not covered by the Historic District Grant Program.)	4	0: Addition is not compatible and subordinate 1: Addition is insufficiently compatible and subordinate 2: Addition is somewhat compatible and subordinate beyond expectation 3: Addition is compatible and subordinate 4: Addition exceeds expectations in its compatible and subordinate design	

<p>8. New additions proposed as part of a renovation are subordinate to the existing historic structure. (New additions and construction are not covered by the Historic District Grant Program.)</p>	<p>4</p>	<p>0: Addition is not compatible and subordinate 1: Addition is insufficiently compatible and subordinate 2: Addition is somewhat compatible and subordinate beyond expectation 3: Addition is compatible and subordinate 4: Addition exceeds expectations in its compatible and subordinate design</p>	
<p>9. Historic site features, such as retaining walls, will be stabilized and preserved or restored.</p>	<p>2</p>	<p>0: None 1: Somewhat 2: Exceeds expectations</p>	
<p>10. When panelization or reconstruction of a structure is considered, project utilizes best preservation techniques to avoid panelization and/or reconstruction.</p>	<p>5</p>	<p>0: Does not avoid panelization and/or reconstruction 1: Largely does not minimize panelization and/or reconstruction 2: Somewhat minimizes 3: Minimizes 4: Above Average 5: Exceeds expectations</p>	
<p>SUSTAINABILITY/PERMANENCE:</p>			
<p>1. Proposed improvements, more than cosmetic finishes, enhance the liveability, improve the physical integrity, and add to the longevity of the historic structure.</p>	<p>5</p>	<p>0: Does not enhance, improve, and add to the longevity</p>	

		1: Minimally enhances 2: Generally enhances 3: More than generally enhances 4: Enhances 5: Exceed expectations	
2. Priority is given to restoration and treatment of historic materials, rather than replacing historic materials and features in-kind.	4	0: No priority given 1: Minimum priority given 2: Some priority given 3: General priority given 4: Exceeds expectations	
3. Project has taken steps to increase the energy efficiency of the structure. Steps include, but are not limited to, weatherizing historic windows and doors; retaining the inherit energy-conserving features of the historic structure and/or site; improving the thermal efficiency of the historic building and/or structure; and incorporating sources of renewable energy.	2	0: None 1: Somewhat 2: Exceeds expectations	
COMMUNITY CONTRIBUTIONS:			
1. Applicant will be providing affordable and/or attainable housing as part of this rehabilitation project.	2	0: Not applicable 1: Somewhat applicable 2: Exceeds expectations	
2. Property will be used to house a primary resident either through primary homeownership or through long-term rentals.	2	0: No 2: Yes	
3. Project will be a rehabilitation and/or adaptive reuse of an existing Main Street commercial building.	2	0: Not applicable 1: Somewhat applicable 2: Exceeds expectations	
4. Applicant commits to enter into an agreement with the City restricting nightly rental of the property. (Applicable only to residential uses.)	2	0: No 2: Yes	
5. Project seeks to stabilize and preserve a	1	0: No	

historic mine structure.		1: Yes	
6. Project meets Historic Preservation Board's goals for a target area or targeted result. This grant cycle's targeted result is _____ . (To be updated each grant cycle.)	4	0: Does not meet goals 1: Minimally meets goals 2: Generally meets goals 3: More than generally meets goals 4: Exceeds expectations	

DRAFT

Historic Preservation Board Staff Report

Subject: National Register of Historic Places- Main Street District Expansion
Author: Laura Newberry, Planner I
Anya Grahn, Senior Historic District Planner
Date: January 16, 2019
Type of Item: Legislative
Project Number: GI-17-00347

Summary Recommendations

Staff recommends that the Historic Preservation Board (HPB) review the draft National Register of Historic Places (NRHP) Main Street District amended nomination and forward a recommendation to the Utah State Historic Preservation Board that the properties appear to meet the National Register criteria and should be listed in the National Register.

Staff will be giving a presentation about the proposed National Register of Historic Places (NRHP) Main Street District nomination expansion, along with staff from the state historic preservation office (SHPO) and SWCA Environmental Consulting, Inc.

A notary will be available should property owners of newly proposed listed properties wish to submit an official objection letter to the state opposing the district expansion. Only those property owners within the expansion area are permitted to object.

Note: NRHP listing is not a regulatory or zoning decision by the City. No changes to Historic District zoning is proposed as a part of this recommendation.

Background

In the 1970s, Park City was still a struggling ski town. Doomsayers believed the significant number of empty lots and dilapidated buildings was a sign of the eventual death of the town. In 1978, the NRHP designation of the Main Street District encouraged residents by providing federal funding through tax credits and State Preservation Grants to help spur revitalization and restoration of historic commercial buildings. As one of only two nationally-recognized Mining Districts in the state, many believed the NRHP would further help promote Park City's rich history and attract tourists.

At the time of the original 1978 NRHP nomination, the boundaries of the Main Street District extended from the [Union Pacific Depot \(660 Main Street\)](#) and the [Utah Coal & Lumber Building \(201 Heber Avenue\)](#) at the north to the [Young Apartment Building \(268 Main Street\)](#) and [Meyer Gallery Building \(305 Main](#)

[Street](#)) at the south. The south boundary lines of the nomination were set in part due to the vacant lots adjacent to Young Apartment Building and the newly constructed Treasure Mountain Inn.

Despite the growing interest in historic preservation and appreciation for the community's history, Main Street and the surrounding residential neighborhoods did not see immediate revitalization. At the time, recent changes to the Main Street District, in particular, brought concern that Park City's Main Street was endangered of losing its National Register designation. The City contracted Preservation Solutions to complete an initial review of the district in 2011, and then hired CRSA to complete an intensive level survey of both the Main Street and Mining Era Residences Thematic National Register Historic Districts in 2013.

As indicated in their report (Exhibit A), CRSA found that within the boundary of the 1978 NRHP District nomination, Main Street has seen significant changes. Increased real estate values and development along Main Street led to the construction of larger scaled development, including the Main Street mall in the 1980s. Four (4) other historic buildings that existed in 1978 have been demolished.

The previous analysis that led to concerns about the integrity of the district were largely based on an unwritten "50 percent rule" that required at least 50% of the sites within a district to be either individually significant or contributory sites; however, CRSA found that this is not a rule generally used by the NRHP or the Utah SHPO. The previous assessment also heavily weighted the architectural integrity of contributing buildings based on Criterion A, but even altered buildings could still contribute to broad pattern of industrial mining and recreational history. Finally, CRSA found that the boundary limits of the original 1978 nomination were based on the boundary of the Great Fire of 1898 or the concentration of commercial uses. In 2015, CRSA found that the Park City Main Street Historic District was in as good, if not better, condition than it had been at the time of the 1978 nomination. This new finding was presented to the Park City Council on March 19, 2015 (see [Staff Report](#), page 14).

CRSA's Intensive Level Survey (ILS) also led to the update of the Marsac Elementary School Building's NRHP nomination as well as the listing of the Carl Winters School (Park City Library) on the NRHP in 2015.

In 2017, the Planning Department contracted SWCA Environmental Consultants to update and amend the 1978 Main Street National Register Historic District nomination. The amended nomination has been attached as Exhibit D. The purpose was to fulfill earlier goals of expanding the district to ensure we retained the NRHP listing.

SWCA supported the expansion of the NRHP district boundary based on:

- Main Street NRHP district was established in 1979 (when it was approved by the National Park Service) and has not been re-evaluated for almost 40 years.
- In 1978, the period of significance was determined to be 1898-1929; it excluded properties that dated to the establishment of the recreation industry in the 1960s. With the boundary increase and amendments to the district, the change in the period of significance will be expanded to 1898-1968 to incorporate recreation era properties that have come to be of historic age (over 50 years old).
- The expansion to upper Main Street creates a more logical district boundary overall as the south end of Main Street contains a mix of commercial, multi-family and single-family residential buildings.
- The expansion will result in the inclusion of historic building types previously excluded from the district, including 2 historic boarding houses. The expansion area includes 24 properties and 21 primary buildings. Of these, 15 (63%) contribute to the historic character of the district while 9 are deemed non-contributing buildings (37%) that include 2 altered historic buildings and 7 that are not of historic age.

The final statistics for the Main Street NRHP District boundary including the expansion area includes 109 sites that include 104 buildings and 4 sites. A more specific breakdown has been provided in the NRHP draft nomination as well as below:

Year Built	Total Properties	Percentage of Total	Eligible Properties	Percentage of Eligible
Pre-Fire Mining Era (1868–1898)	11	10%	11	18%
Post-Fire Mining Era (1898–1929)	57	52%	47	77%
Great Depression, World War II, and Post-War Era (1930–1964)	2	2%	2	3%
Recreation and Tourism Era (1965–1980)	7	7%	1	2%
Modern Era (1981–present)	31	28%	0	0%
Vacant Lot	1	1%	0	0%

Note: For buildings with construction date ranges, the later date was used. For properties later altered or moved, the original construction date was used.

Analysis:

Process

Cory Jensen, National Register Coordinator for SHPO will be providing an overview of the NRHP process. Staff has included a summary of the NRHP process as Exhibit B. As part of the notification process, staff also sent out a “Rights of Owners to Comment and/or Object to Listing on the National Register of Historic Places” that has been included as Exhibit C.

Staff has reviewed the draft NRHP nomination form and has no further comments. Staff recommends that the HPB review the nomination and forward a positive recommendation to the Utah State Historic Preservation Board. The Chair of the HPB shall review and sign the Evaluation Form (Exhibit E). The public may provide comments or objections through a notarized letter. Staff has provided a sample letter template as Exhibit F; a notary will be available from 5pm to 6pm during the HPB meeting for any public wishing to submit a formal objection.

Reviewing the amended NRHP nomination form:

Much like the City's criteria for listing on the Historic Sites Inventory (HSI), the NRHP sets four criteria standards for evaluating and listing buildings:

- At least 50 years old
- Maintains its historic integrity
- Meets one of the following criteria:
 - Criterion A: Event
 - Criterion B: Person
 - Criterion C: Design/Construction
 - Criterion D: Information Potential (Archeology)

Park City's Main Street District is eligible and listed under Criteria A for its association with the historic Mining Era and Criteria C for its method of construction.

During this meeting, SWCA Environmental Consulting will be presenting an overview of the draft NRHP nomination (see Exhibit D).

Benefits of Listing on the NRHP

Inclusion on the NRHP is an honorary designation. One of the greatest benefits to historic property owners is the opportunity to apply for federal and state historic tax credits. Amber Anderson, Tax Credit Program Coordinator, will be explaining the state and federal tax credit programs.

Recommendation

Staff recommends that the Historic Preservation Board (HPB) review the draft National Register of Historic Places (NRHP) Main Street District amended nomination and forward a positive recommendation to the Utah State Historic Preservation Board.

Exhibits

Exhibit A — CRSA Report: "Park City Main Street Historic District Boundary Modification Recommendations."

Exhibit B — NRHP Process Flowchart

Exhibit C — Rights of Owners & National Register—Benefits and Restrictions

Exhibit D — Draft NRHP nomination form

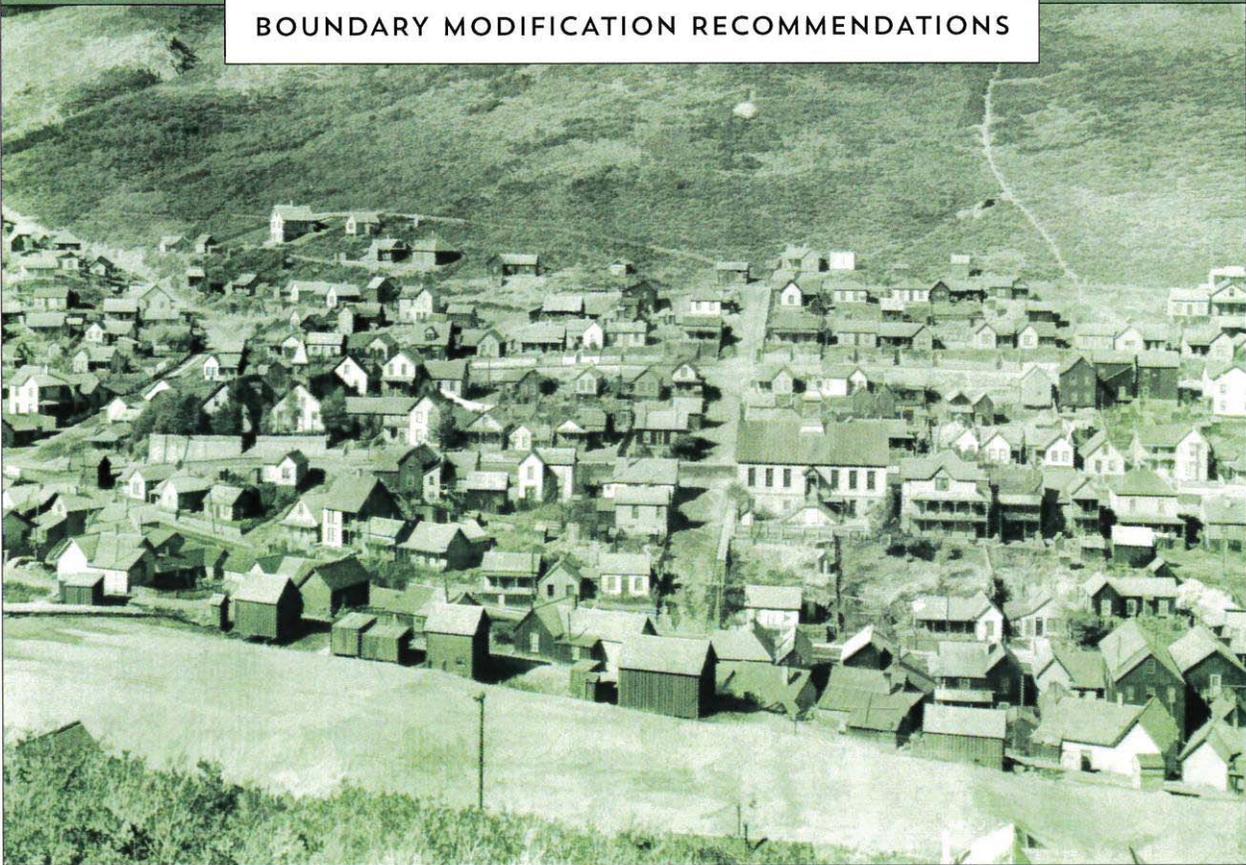
Exhibit E — Evaluation Form to be signed by HPB chair
Exhibit F — Sample Objection Letter template

PARK CITY PROJECT REPORT

TASK 01

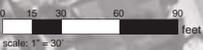
PARK CITY MAIN STREET HISTORIC DISTRICT
BOUNDARY MODIFICATION RECOMMENDATIONS

PHOTO SOURCE: PARK CITY HISTORICAL SOCIETY & MUSEUM





CONSTRUCTION DATES	
west side	east side
109: c. 1895	122: c. 1885
115: c. 1885, 1929-41 addition	140: c. 1892, moved c. 1990
125: c. 1914	148: 1888-1900, moved and addition 2008
133: c. 1882	150: c. 1885
151: c. 1926	158: c. 1885
221: 1904	166: c. 2005
227: c. 1885, 1920s addition	170: c. 1880
255: 1965	176: c. 1901
	186: c. 1905, rebuilt 2002
	250: c. 1988
	260: 2010



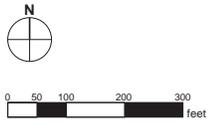
LEGEND	
	essential building
	significant building
	new-contributory/ minor building
	new-noncontributory building
	existing District boundary
	proposed District expansion
	parcel line (within District)



PARK CITY MOUNTAIN RESORT

MASONIC HILL

ROSSI HILL



LEGEND

	historically essential, contributing*
	historically significant, contributing*
	non-contributing, does not detract from feeling*
	non-contributing, detracts from feeling*
	contributing, demolished
	building outside of District boundaries
<small>*addresses are on Main Street unless noted otherwise</small>	
	existing District boundary
	proposed District expansion
	parcel line (within District)
	listed on National Register separately from District

SEE "PROPOSED ADDITION TO PARK CITY MAIN STREET HISTORIC DISTRICT" MAP

CONTENTS

Proposed Boundary Changes, Park City Main Street Historic District (map)

Proposed Addition to Park City Main Street Historic District (map)

Narrative Description:

I. Introduction_____	1
II. Park City Changes Since 1978_____	1
III. Implications of Growth on the Main Street Historic District_____	2
IV. Proposed District Expansion_____	3
V. Conclusion_____	5

Illustration: Break-down of Contents Within Existing and Proposed Districts

Appendix: Historic Site Forms of Proposed Contributing Buildings

109 Main Street_____	9
115 Main Street_____	13
122 Main Street_____	19
125 Main Street_____	25
133 Main Street_____	31
140 Main Street [†] _____	35
148 Main Street_____	39
150 Main Street [†] _____	43
151 Main Street_____	49
158 Main Street_____	53
170 Main Street_____	57
176 Main Street [†] _____	63
186 Main Street_____	69
221 Main Street [†] _____	73
227 Main Street_____	79
255 Main Street_____	83

[†]National Register listed as part of the Mining Boom Era Residence Thematic District

Introduction

Profound changes have occurred in the Park City Main Street Historic District since its initial nomination in 1978, both in the surrounding context of greater Park City and within the Historic District itself. The development of Park City, Utah from a slumping mining town to an outdoor sports destination was fully underway in 1978, although a groundswell for historic preservation in Old Town was just beginning. The opening of Treasure Mountain Resort (now Park City Mountain Resort) in 1963 and Park City West in 1968 (now Canyons Resort) ultimately led to the successful resort town of modern-day Park City. The early stages of this paradigm shift in the town were captured in the 1978 nomination, but ensuing events, including the opening of Deer Valley Resort in 1981 and extensive real estate development in Old Town, have dramatically changed the landscape of Park City. As land values increased on Main Street, so too did the scale of development, culminating in the Main Street Mall of the early 1980s, a building that was largely criticized as being overdeveloped in contrast to the surrounding historic storefronts. Even as most of the vacant lots on Main Street have been developed, National Register of Historic Places (NRHP) listing has protected the vast majority of contributing buildings in the 1978 nomination. The profitability of historic preservation projects has been recognized by developers, and adaptive reuse and renovation have become popular along Main Street and throughout Park City as a means of addressing spatial needs while respecting and capitalizing on the history of the town. Even the Main Street Mall is being renovated to mimic the scale of adjacent businesses and become a more fitting component of the Historic District. Municipal design standards and incentives for rehabilitation have created a Park City Main Street Historic District that is in as good of—if not better—condition today as it was upon initial nomination in 1978.

This report argues for the expansion of the Historic District to the south to include upper Main Street, a two block section of Old Town that is largely unprotected despite providing Park City with a handful of essential historic resources. Including these buildings would increase the percentage of historic resources within the Historic District. While four of these thirteen historic buildings are part of the Mining Boom Era Residences Thematic National Register Historic District, the remaining nine historic structures are National Register caliber. Furthermore, expanding the Historic District boundary would ensure responsible development on vacant lots and of the six non-historic structures in the future. The south boundary established in 1978 was arbitrarily based on the extent of the Great Fire of 1898, but many of these upper Main Street buildings predate the Fire, and there is no reason to exclude them from historic recognition. Therefore, the recommendation is to expand the Park City Main Street Historic District to the south to include all of upper Main Street to its intersection with Park Avenue, King Road, and Daly Avenue.

Park City Changes Since 1978

Park City has seen immense changes since the Park City Main Street Historic District was initially nominated for the National Register in 1978, the most profound of which are the result of the development of the town into a world-renowned resort destination. The earliest skiers in the area frequented trails that were built at present-day Deer Valley in the 1930s, which eventually became the site of Snow Park Ski Area after lifts were built in 1946. This small resort ran continuously past the closing of most of Park City's mines until 1968, when its land lease expired and it shut down. Meanwhile, Treasure Mountain Resort had opened in 1963 on the northeast-facing slopes above Old Town after a \$1.2 million federal loan was used for a gondola, chairlift, J-lift, and two day lodges. With mining activity in steep decline, real estate values had plummeted, but the resort offered hope of an economic turnaround for the town. The Park Record declared in an August 8, 1963 article, "Park City will soon be a name known all over the country as the

center of one of America's great year around resorts." This forecast came true, and it did not take long for Park City to become a destination resort town. Park City West capitalized on the recreational fervor in the area in 1968 by opening its three original lifts in Snyderville. The final resort of the three, Deer Valley, was opened in 1981 on the previous site of Snow Park. Although each was relatively small at first, these three resorts have become vast and collectively are a powerful economic driver for Park City, with almost 2 million skier days recorded annually.

As a result of its robust tourist economy, Park City has become a lucrative real estate market, with speculative development becoming commonplace in both residential and commercial ventures. This real estate boom, which gained significant momentum following the recession of the early 1980s, has changed the built landscape of the town significantly since the 1978 National Register nomination: density has increased tremendously with increased spatial demands, development has been decentralized, and building conditions have been greatly improved. This development boom has been furthered by the international spotlight following the growth of the Sundance Film Festival and Park City's role as a host of the 2002 Winter Olympics. The permanent population of Park City has increased almost threefold since 1980, from 2,823 to 7,558 as of the 2010 Census.

Implications of Growth on the Main Street Historic District

These developments in Park City over the past four decades have led to a Historic District that is markedly different from the one that was nominated for the National Register in 1978. Infill buildings have been constructed on previously vacant lots to capitalize on real estate demands, most of which are mixed-use projects with retail or commercial space at street level and residential units above. Although it is a rare occurrence, some buildings listed on the 1978 nomination have been razed and replaced with new construction (examples include 323, 453, 551, and 583 Main Street). Most of the new construction has followed scalar and stylistic cues of the historic buildings, although a few large structures dwarf their historic neighbors, especially in the Main Street Mall (333 Main) and the four-story Galleria Mall (580 Main).

A 2011 Preservation Solutions report to Park City Municipal Corporation titled "Park City Main Street National Register Historic District Study, 1979-2011" evaluated the Historic District in light of the changes it has undergone since initial nomination in the late 1970s. The report determined, "Today, the District no longer meets the criteria for listing in the National Register of Historic Places and is at risk of being delisted." While the report was very valuable for its comprehensive inventory of buildings within the District, including those that had been demolished, CRSA disagrees with the conclusion that the District is devoid of its historic integrity and is at risk of being delisted from the National Register. At the heart of the threat of delisting is the unwritten "50 percent rule," a notion in the historic preservation community some have held that for an historic District to be eligible for listing on the NRHP, at least 50% of its buildings need to be individually significant or contributory sites. However, this is not a requirement of the NRHP nor is it even a "rule of thumb" used by them or by the Utah State Historic Preservation Office (SHPO) in its administration of existing historic districts or nomination and listing of new ones.

We have talked with the staff of the National Register—a listing kept by the National Park Service—and they have verified that they use no 50% rule in evaluating the candidacy of new districts or the status of existing ones. In fact, many districts in Utah do not follow the alleged rule. Rather than a numerical assessment, they look holistically at the overall

visual character of the district. In discussing Park City's Main Street Historic District specifically, they said, "If you are standing on Main Street, looking up and down the street, and it looks and feels like a historic mining town Main Street, then this confirmation of its visual integrity is sufficient to justify its status as an historic district."

We asked about how compatible architecture (such as the Main Street Deli façade at 525 Main Street, constructed in 1976) built less than 50 years ago is regarded with respect to historic district integrity. The NRHP staff gave a similar answer, saying that if the newer buildings contribute compatibly to the architectural theme, then they are considered contributory in a visual sense and should not be viewed as intrusions which compromise the district's integrity. The NRHP does not intend to reconsider the status of existing districts, and they do not regularly audit districts to verify compliance.

Furthermore, the 2011 report put a heavy emphasis on the architectural integrity of contributory buildings, while many of these buildings are eligible for the NRHP through Criterion A, which defines eligible buildings as a "Property [which] is associated with events that have made a significant contribution to the broad patterns of our history." Even buildings that have been altered are eligible under this criteria, and all historic of the buildings on Main Street have contributed to the broad patterns of history in shaping Summit County and Utah at large through their support of the mining industry (and later outdoor recreation industry), which has brought fame and fortune to the area and supported the livelihood of countless residents since the 1870s.

In general, municipal design standards, zoning requirements, and federal and state tax incentives have effectively maintained the historic feel of the Historic District while providing hundreds of thousands of new square footage on Main Street. The District has been a success in facilitating economic development while prioritizing historic preservation, and businesses have benefitted from municipally funded improvement grants to restore and renovate building façades and interiors.

Proposed District Expansion

The success of the Park City Main Street Historic District and changing urban conditions have led to the recommended addition of upper Main Street to the Historic District. The exclusion of this area from the 1978 nomination was arbitrary, and it has left some of Park City's most valuable historic resources in a relatively unprotected position. Adding the entirety of the 100 and 200 blocks of Main Street to the Historic District would benefit Park City economically and protect some of its early residences.

Well over half of the buildings in the District are rated essential or significant historic sites. In addition, nearly all of the newer than 50 year old buildings are considered visually and thematically compatible and in that sense, also contributory. Moreover, the Treasure Mountain Inn (TMI, at 255 Main Street), which has heretofore been considered out of the historic period, out of scale and therefore intrusive to the district, is now over 50 years old and therefore a candidate for consideration to be included as a member of the District. The TMI is certainly historically significant as an important Main Street structure that helped catalyze the revitalization Park City in the 1960s, resulting in the later restoration movement and listing on the NRHP of the District.

Even without the TMI inclusion, the Main Street Historic District already meets the NRHP criteria for listing, despite changes to several sites and buildings within the District since its initial listing decades ago. Altogether, more than 90% of the buildings in the district are either essential, significant, eligible for listing (TMI), or newer but not detracting from the historical feeling (see pie chart break-downs on p. 7). Therefore, it is our conclusion that the District's status on the NRHP remains secure. Furthermore, this status is not in any danger of being lost, given that the integrity of the District is being protected by the City's Design Guidelines as administered by its Planning and Zoning staff.

The 1978 nomination gave precedence to buildings which were built immediately following the Great Fire of 1898, which was an important formative event in the history of Park City. In the narrative description of the Historic District, the southern boundary at the end of the 300 block was justified "both because this marked the fire's penetration [to the south], and the majority of structures to the south, on Main, were and are associated with housing (residential) and lodging." This justification is problematic in two ways, however.

Firstly, basing the boundary on the 1898 Fire may seem like a logical gesture, but this action precludes the buildings on upper Main Street—many of which were constructed before the Fire and are historically valuable because they were built in the 1880s and 1890s. According to *A Guide to Delineating Edges Historic Districts*, "The genius of many historic areas is the variety of visual experiences, provided in large part by the many styles that are present, graphically documenting an area's evolution, growth and continuous use." In other words, drawing a boundary that explicitly excludes older Park City buildings—those built before the 1898 Fire—limits the potential for protection of a record of the development of the town through the 1880s and 1890s. The collection of buildings on upper Main Street includes archetypical examples of changing housing styles in Park City over time, including rare early boarding houses and the rectangular cabin and T-cottage house types that were very popular in Park City in the 1880s and 1890s.

The second fallacy of the southern boundary for the Main Street Historic District is the false dichotomy between the "residential" upper Main Street and the "commercial" Main Street below 3rd Street. The mixed use nature of Old Town causes a blurring of these categories, as many of the Main Street businesses were either entirely or partially residential during the historic period. As an example, a quick survey of the 1920 United States Census documents about 175 people living on Main Street below 3rd Street at that time, not an insignificant amount of residents representing roughly five percent of the town's population that year.

The proposed expansion to the Historic District would include nineteen existing buildings. Four of these have already been listed on the National Register as a part of the Mining Boom Era Residences Thematic National Register Historic District: 140, 150, 176, and 221 Main Street. Eight are not National Register listed but are very historically integral and significant relics of early Park City domestic architecture: 109, 115, 122, 148 (historic section), 133, 151, 158, 170, and the historic front of 186 Main Street. Five of these were constructed outside of the historic period but do not detract from the historic feel of the Historic District: 148 (modern addition), 166, 186 (modern addition), 250, and 260 Main Street. Like many of the infill buildings within the current boundary, these buildings have been constructed following the municipal design guidelines and are respectful of the scale, materials, and style of similar historic examples. The Treasure Mountain Inn (255 Main) is at odds with the Victorian character and scale of the District, but its impact on the history of Park City is equally important as the older Main Street buildings. Thus, 255 Main should be added to the

District, and the period of significance of the district should be expanded to include 1963, the year TMI was constructed and Treasure Mountain Resort opened, dramatically altering the course of Park City history.

The expanded area boundary follows rear and side lot lines of the added properties. These are recommended by the National Register guidelines, which state, “The use of rear property lines as an edge has proven effective in many districts, and this device is recommended whenever lots are of a reasonable and fairly constant depth.” These lines have legal standing and are easily defined.

One other recommended change to the Historic District boundary is to clarify the boundary around 361 ½ Main Street, a small residence and former doctor’s office constructed in 1905 that fronts on 4th Street and does not have an association with Main Street. This is a clarification to the 1978 nomination, which does not include the address, yet it has been included in some Park City maps of the Historic District.

Conclusion

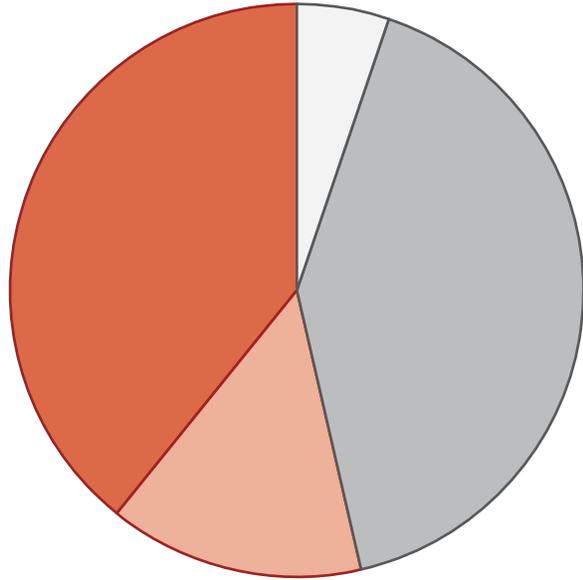
Expanding the boundary of the Park City Main Street Historic District would provide the district with two blocks of highly concentrated historic structures, nine of which are currently not protected by the National Register. The Historic District would benefit from added historical resources that were excluded by an arbitrary boundary under conditions in Park City that were much different in 1978 than they are today. Exclusion of upper Main Street on the basis of residential versus commercial buildings presents a false dichotomy, as there were a significant number of residents living above commercial buildings and in converted residences on the rest of Main Street. The added properties are mostly essential historic buildings on upper Main Street that would be an asset to their namesake Historic District and to Park City in general.

To further strengthen the Historic District’s integrity and to include a section of it that is thematically compatible and probably should have been included when first nominated, we recommend adding to the District the houses and other buildings on both sides of upper Main Street. These buildings are mostly essential, significant, or otherwise compatible historically, architecturally and thematically. This expansion would be a logical inclusion inasmuch as this area is part of historic Main Street and the building types, ages, and character are consistent with the Street’s historic development and nature. Adding these sites will increase both the number of total sites and the percentage of sites contributory to the overall Historic District.

BREAK-DOWN OF CONTENTS OF EXISTING AND PROPOSED HISTORIC DISTRICTS

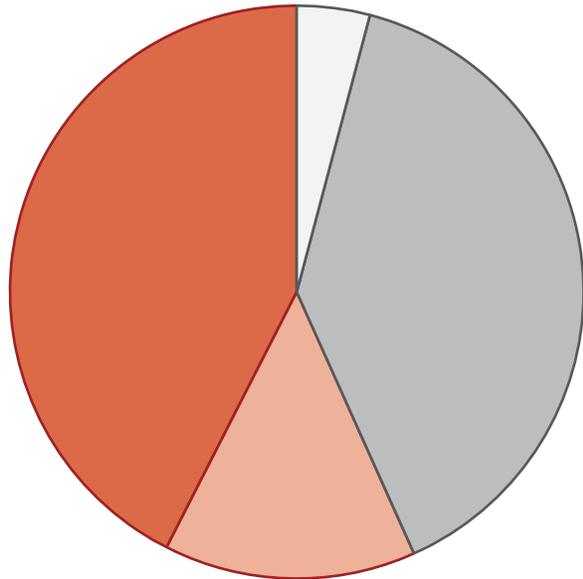
Existing District

- 38 essential buildings (39.2%)
- 14 significant buildings (14.4%)
- 40 non-contributing, not detracting from historic feel (41.2%)
- 5 non-contributing, detracting from historic feel (5.2%)



Proposed District

- 51 essential buildings (42.5%)
- 17 significant buildings (14.2%)
- 47 non-contributing, not detracting from historic feel (39.2%)
- 5 non-contributing, detracting from historic feel (4.1%)



National Register Nomination Process

Pursuant to Historic Preservation Act of 1966 & 36CFR60

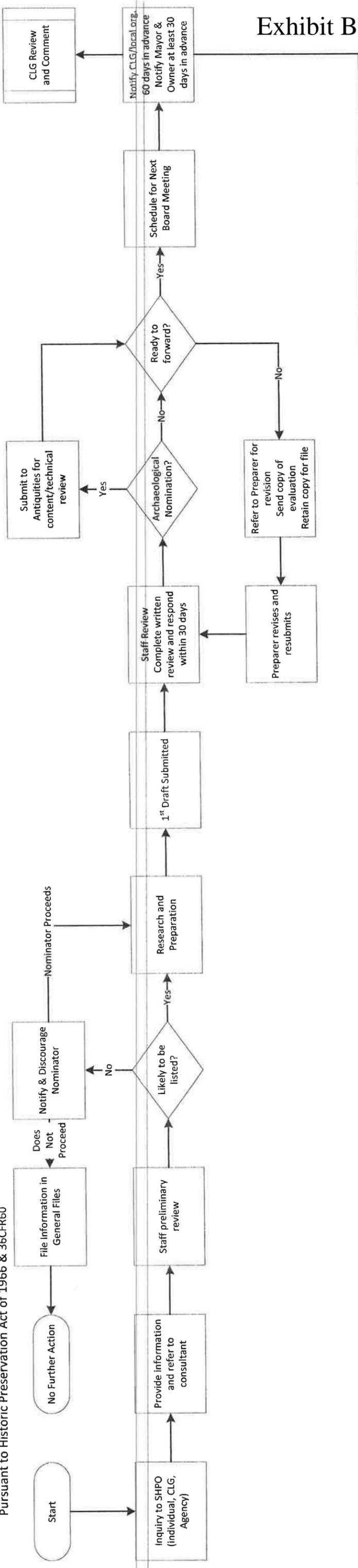
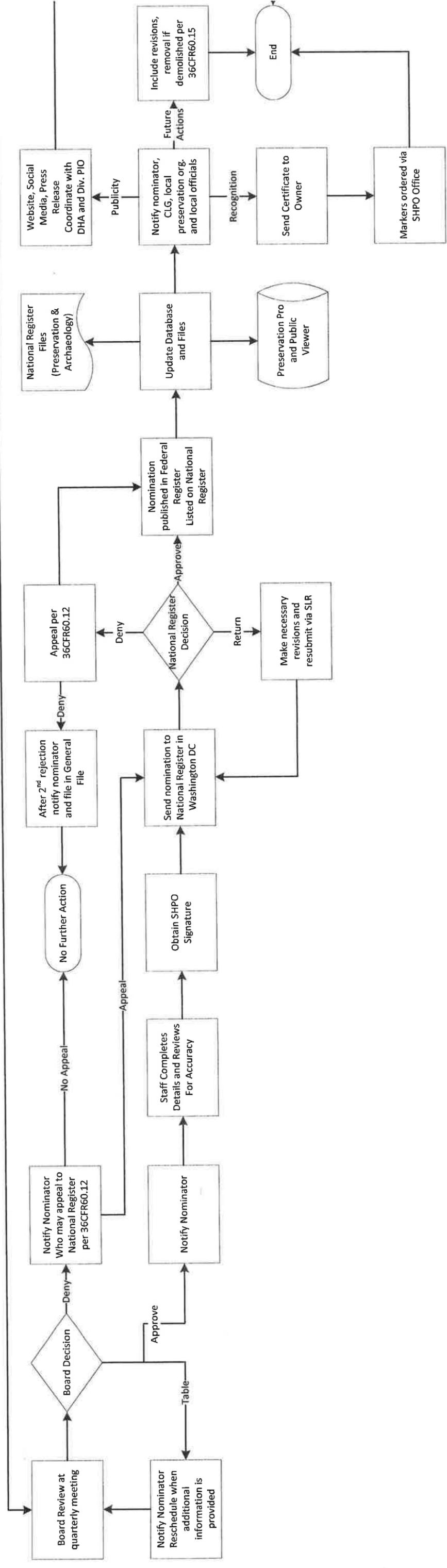


Exhibit B



RIGHTS OF OWNERS TO COMMENT AND/OR OBJECT TO LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES

Owners of private properties nominated to the National Register have an opportunity to concur with or object to listing in accord with the National Historic Preservation Act and 36 CFR 60. Any owner or partial owner of private property who chooses to object to listing may submit, to the State Historic Preservation Officer, a notarized statement certifying that the party is the sole or partial owner of the private property and objects to the listing. Each owner or partial owner of private property has one vote regardless of the portion of the property that the party owns. If a majority of private property owners object, a property will not be listed. However, the State Historic Preservation Office shall submit the nomination to the Keeper of the National Register of Historic Places for a determination of eligibility of the property for listing in the National Register. If the property is then determined eligible for listing, although not formally listed, Federal agencies will be required to allow for the Advisory Council on Historic Preservation to have an opportunity to comment before the agency may fund, license, or assist a project which will affect the property (see below).

If you choose to object to the listing of your property, the notarized objection must be submitted to Don Hartley, State Historic Preservation Officer, 300 S. Rio Grande Street, Salt Lake City, Utah 84101, before the Utah Board of State History meets to consider the nomination. Other comments regarding the nomination of this property should also be directed to Mr. Hartley prior to the meeting date. A copy of the nomination and information on the National Register and the Federal and State tax provisions are available from the above address on request.

RESULTS OF LISTING IN THE NATIONAL REGISTER

Eligibility for Federal tax provisions: If a property is listed in the National Register, certain Federal tax provisions may apply. The Tax Reform Act of 1986 revised the historic preservation tax incentives authorized by Congress in the Tax Reform Act of 1976, the Revenue Act of 1978, the Tax Treatment Extension Act of 1980, the Economic Recovery Act of 1981, and Tax Reform Act of 1984, and as of January 1, 1987, provides for a 20 percent investment tax credit with a full adjustment to basis for the “substantial rehabilitation” of historic commercial, industrial, and rental residential buildings. (The former 15 percent and 20 percent Investment Tax Credits (ITCs) for rehabilitations of older commercial buildings are combined into a single 10 percent ITC for commercial or industrial buildings built before 1936.) The Tax Treatment Extension Act of 1980 provides Federal tax deduction for charitable contributions for conservation purposes of partial interests in historically important land areas or structures. Whether these provisions are advantageous to a property owner is dependent upon the particular circumstances of the property and the owner. Because the tax aspects outlined above are complex, individuals should consult legal or professional counsel or the appropriate local Internal Revenue Service office for assistance in determining tax consequences. For further information on certification requirements, please refer to 36 CFR 67.

Eligibility for State tax provisions: S. B. No. 42 passed during the 1993 General Session of the Utah State Legislature created a state income tax credit for the rehabilitation of historic (i.e., National Register listed) residential buildings, either owner-occupied or rental. The credit is 20% of the cost of rehabilitation work totaling more than \$10,000. All of the proposed rehabilitation work must meet the Secretary of the Interior’s “Standards for Rehabilitation” and must be pre-approved by the State Historic Preservation Office. Rules implementing these tax provisions are still being developed. Contact the Historic Preservation Office for more information.

Consideration in planning for Federal, federally licensed and federally assisted projects: Section 106 of the National Historic Preservation Act of 1966 requires that Federal agencies allow for the Advisory Council on Historic Preservation to have an opportunity to comment on all projects affecting historic properties listed in the National Register. For further information, please refer to 36 CFR 800 or contact the Regulatory Assistance section of the Division of State History.

Consideration in issuing a surface coal-mining permit: In accordance with the Surface Mining and Control Act of 1977, there must be consideration of historic values in the decision to issue a surface coal-mining permit where coal is located. For further information, please refer to 30 CFR 700 et. seq.

Qualification for Federal or State grants for historic preservation when available: Presently, limited funding may be available through the Certified Local Government program. Direct grants to property owners are also occasionally available. For information about possible grants, contact the Office of Preservation Utah Division of State History.

National Register--Benefits and Restrictions

What is the National Register?

The National Register of Historic Places is the official federal list of properties that are significant in American history, architecture, archeology, and engineering.

What sites in Utah are on the National Register?

All types of sites and properties are represented -- from mansions to prehistoric pit houses, limekilns to LDS tithing offices, suspension bridges to rock art sites. In Utah there are over 1000 individual sites and over 50 historic and archeological districts containing several thousand additional sites. A complete listing of National Register sites in Utah can be obtained from the Office of Historic Preservation.

Why would someone list their property on the National Register?

While listing on the National Register is primarily an honorary recognition of the historic or architectural significance of a property, owners also list their buildings to qualify for federal and/or state rehabilitation tax credits or grants, when available. Listing on the National Register can also help educate the public and change a community's perception of its historic and cultural resources.

Does listing limit an owner's property rights?

Listing in the National Register does not interfere with a private property owner's right to alter, manage or dispose of the listed property. The owner is not required to restore or maintain the property or open it to the public. Local preservation ordinances, where present, may have some implication for a building owner.

What are the requirements for listing? OR Is my house eligible?

To be eligible for the National Register, a building must: (1) be at least 50 years old, (2) retain its architectural integrity [A rule of thumb: Would the original owner still recognize the building?], and (3) be significant. This significance can be national, state-wide, or even local, but must fall within at least one of the following categories: (A) association with important events, (B) association with significant persons, (C) architectural significance, or (D) archeological significance.

Who can nominate properties to the National Register?

Any interested person can research and nominate any property to the National Register. The legal owner has the right to object to, and prevent, the listing of their private property.

What is the process?

Research and document the property (call and ask for the Intensive Level Survey/Research guide) and submit current photos of the property with your early research results for a preliminary review. Next, prepare the National Register nomination form using the results of your research and documentation and the review suggestions. Coordinate with the local historic preservation commission, if one is present in your area. The completed nomination is then presented to the Board of State History for review. With their approval, it is then submitted to the National Park Service in Washington, DC for a final review. The staff of the Office of Historic Preservation is available to review and direct your research and nomination at any time -- consult with them early. The entire nomination process usually takes about six months.

Is there money available for restoration?

Limited matching grants are occasionally available for the preservation of properties listed on the National Register -- contact the Office of Preservation in April to see if grants will be available that year. We can also provide information about the federal and state rehabilitation investment tax credits and direct you to other possible funding sources, as well as providing technical **preservation or maintenance information**.

Where do I go for National Register forms, bulletins, answers, etc.?

Contact: Cory Jensen or Chris Hansen
Office of Historic Preservation
Utah Division of State History
300 S. Rio Grande Street
Salt Lake City, UT 84101-1182
Phone 801/245-7225

Our website: heritage.utah.gov National Register website: www.cr.nps.gov/nr/index.htm

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of Property

Historic name: Park City Main Street Historic District (Boundary Increase)

Other names/site number: NRIS Number 79002511

Name of related multiple property listing: N/A

(Enter "N/A" if property is not part of a multiple property listing)

2. Location

Street & number: Main Street

City or town: Park City State: Utah County: Summit

Not For Publication: Vicinity:

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this X nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property X meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___ national ___ statewide X local

Applicable National Register Criteria:

X A ___ B X C ___ D

<p>Signature of certifying official/Title:</p> <p><u>Utah Division of State History/Historic Preservation Office</u></p> <p>State or Federal agency/bureau or Tribal Government</p>	<p>Date</p>
---	--------------------

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

In my opinion, the property meets does not meet the National Register criteria.

Signature of commenting official:

Date

Title :
or Tribal Government

State or Federal agency/bureau

4. National Park Service Certification

I hereby certify that this property is:

_entered in the National Register

_determined eligible for the National Register

_determined not eligible for the National Register

_removed from the National Register

_other (explain:) _____

Signature of the Keeper

Date of Action

5. Classification

Ownership of Property

(Check as many boxes as apply.)

Private:

Public – Local

Public – State

Public – Federal

Category of Property

(Check only one box.)

Building(s)

District

Park City Main Street Historic District (Boundary Increase)
 Name of Property

Summit County, Utah
 County and State

Site

Structure

Object

Number of Resources within Property

(Do not include previously listed resources in the count)

Contributing	Noncontributing	
<u>62</u>	<u>46</u>	buildings
_____	_____	sites
_____	_____	structures
_____	_____	objects
<u>62</u>	<u>46</u>	Total

Number of contributing resources previously listed in the National Register 43

6. Function or Use

Historic Functions

(Enter categories from instructions.)

Domestic: Single Dwelling

Domestic: Multiple Dwelling

Domestic: Hotel

Commerce/Trade: Business

Commerce/Trade: Professional

Commerce/Trade: Department Store

Commerce/Trade: Restaurant

Social: Meeting Hall

Government: City Hall

Government: Fire Station

Government: Post Office

Recreation and Culture: Theater

Industry/Processing/Extraction: Communications Facility

Health Care: Medical Business/Office

Current Functions

(Enter categories from instructions.)

Domestic: Single Dwelling

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State

- Domestic: Multiple Dwelling
- Domestic: Hotel
- Commerce/Trade: Business
- Commerce/Trade: Professional
- Commerce/Trade: Department Store
- Commerce/Trade: Restaurant
- Government: Post Office
- Recreation and Culture: Theater
- Recreation and Culture: Museum
- Landscape: Parking Lot
- Landscape: Park
- Landscape: Plaza
- Work In Progress
- Vacant/Not In Use

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State

7. Description

Architectural Classification

(Enter categories from instructions.)

Late Victorian

Late 19th and 20th Century Revivals: Mission

Modern Movement: Modern

Other

Materials: (enter categories from instructions.)

Principal exterior materials of the property: BRICK; WOOD: weatherboard; STUCCO;
CONCRETE; ASPHALT

Narrative Description

(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)

Summary Paragraph

The *Park City Main Street Historic District (Boundary Increase)* updates the original nomination of the Park City Main Street Historic District and extends it two blocks to the south, for an additional area of approximately 3.44 acres. This amendment updates building counts as well as the period of significance and historic contexts. The increase area is part of Park City's Main Street. Main Street developed between 1898 and the present but assumed its current appearance for the most part by the 1980s. The added area includes 21 primary buildings, of which 15 (71 percent) contribute to the historic character of the district. Of the six (19 percent) non-contributing buildings, one is an altered historic building and five are not yet of historic age. The increase area also includes one non-contributing outbuilding.

Taken with the previous Park City Main Street Historic District, the revised district boundary encompasses 108 properties in total. The 108 properties consist of 104 buildings, three sites (three parks), and one structure (a parking lot). Of the buildings, 71 are of historic age. Of the 108 properties, 61 (56 percent) contribute to the historic character of the neighborhood. Of the 47 (44 percent) non-contributing properties, 13 are altered historic buildings and 34 are not yet of historic age (including three parks and a parking lot).

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

Narrative Description

The original Park City Main Street Historic District was listed on the National Register of Historic Places (NRHP) on March 7, 1979. The increase area lies directly south of the current district, abutting the southern boundary (see map). The Park City Main Street Historic District and the proposed addition encompass the core of Park City’s commercial district, as well as the historic center of its residential area.

There are several reasons for the proposed boundary increase. First, the original NRHP district was established in 1979 and the Main Street district has not been re-evaluated for almost 40 years. As a result, this expansion of the district will provide a valuable update to the original nomination. When the original NRHP district was listed in 1979, the period of significance was 1890–1929; properties on Park City Main Street dating to the establishment of the recreation industry starting in the 1960s were excluded. In addition to the boundary increase, this emendation also proposes a change in the period of significance to ca. 1880–1968 because many recreation era properties are now of historic age. Amending the historic district provides the opportunity to evaluate these previously out-of-period resources for inclusion in the Park City Main Street Historic District. Second, the extension of the historic district boundary brings the previously excluded south end of Main Street within the historic district, resulting in a more logical district boundary overall. The south end of Main Street contains a mix of commercial, multi-unit residential and single-family residential buildings. Historically, it functioned as an important transition zone between the commercial activity on Main Street and the adjacent residential neighborhoods, as well as the concentrated industrial activity of the mines and mills immediately to the south in and around Daly Avenue and Empire Canyon. Third, the expansion of the district two blocks to the south will result in the inclusion of key historic building types previously excluded from the district. Most significantly, the expansion includes two intact examples of historic boarding houses. Boarding houses historically represented a common building type in Park City. Miners, who were typically single men, often used boarding houses instead of buying or building individual residences (Oliver et al. 2017:28). The emended district includes two of only three extant examples of these boarding houses, along with a significant number of intact single-family residential building types, such as L- and T-cottages.

Construction Dates

Most buildings in the district date to early in Park City’s history: 11 to the Pre-Fire Mining Era (1868–1898) and 57 to the Post-Fire Mining Era (1898–1929) (Table 1). The next most common construction period is the Modern Era (1981–present), with 31 properties. Two properties date to the Great Depression, World War II, and Post-War Era (1930–1962), and seven properties date to the Recreation and Tourism Era (1963–1980). Most eligible properties date to the Pre-Fire Mining Era and the Post-Fire Mining Era.

Table 1. Summary of Construction Dates for Buildings and Structures in the Park City Main Street Historic District

Year Built	Total Properties	Percentage of Total	Eligible Properties	Percentage of Eligible
Pre-Fire Mining Era (1868–1898)	11	9%	11	18%
Post-Fire Mining Era (1898–1929)	58	54%	48	79%
Great Depression, World War II, and Post-War Era (1930–1962)	1	1%	1	1%
Recreation and Tourism Era (1963–1980)	7	7%	1	2%

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

Year Built	Total Properties	Percentage of Total	Eligible Properties	Percentage of Eligible
Modern Era (1981–present)	31	29%	0	0%

Note: For buildings with construction date ranges, the later date was used. For properties later altered or moved, the original construction date was used.

Building Uses

The historic district encompasses what was historically Park City’s commercial district and a small mixed-use section at the south end, and this is reflected in the building uses shown in Table 2. The historic commercial uses of properties include general commercial, businesses and offices, restaurants and bars/taverns, a theater, a railroad depot, and mixed commercial and residential. In all, commercial uses account for 73 percent of the total properties, and 67 percent of eligible properties. Dwellings (including multiple dwellings, single-family dwellings, and hotels/motels) make up 19 percent of the total properties, and 28 percent of eligible properties. Other uses make up the remaining 8 percent of the total properties and 5 percent of eligible properties.

Table 2. Summary of Historic Uses for Buildings and Structures in the Park City Main Street Historic District

Uses	Total Properties	Percentage of Total	Eligible Properties	Percentage of Eligible
Bar/tavern	6	6%	4	7%
Business/office	12	11%	10	16%
City hall	1	<1%	1	<2%
Commercial (general)	48	44%	20	33%
Hotel/motel	2	2%	2	3%
Meeting hall	2	2%	2	3%
Mixed commercial/residential	2	2%	1	<2%
Multiple dwelling	6	6%	5	8%
Museum	1	<1%	0	0%
Park/plaza	3	3%	0	0%
Parking Lot	1	<1%	0	0%
Post office	1	<1%	0	0%
Rail transportation related	1	<1%	1	<2%
Recreation/culture	1	<1%	1	<2%
Residential (general)	1	<1%	1	<2%
Restaurant	5	5%	0	0%
Single-family dwelling	11	10%	9	15%
Specialty store	2	2%	2	3%
Theater	1	<1%	1	<2%
Warehouse	1	<1%	1	<2%

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

Building Types and Styles

The type and style terminology used here was established by the Utah State Historic Preservation Office (SHPO). Commercial building types are listed in the top five rows of Table 3 and are predominantly one- and two-part commercial blocks (one- and two-story buildings, usually with large plate-glass display windows and transoms for added natural light on the street level) (Table 3). Commercial building types compose 78 percent of all buildings in the district, and 73.6 percent of all eligible properties in the district. The most common residential building types are twenty-first century other, hall-parlor, T- or L-cottages, rectangular block, double-loaded corridor, pyramid house, and foursquare. Together these types form 18 percent of all buildings in the district, and 26.4 percent of all eligible properties in the district (see Table 3).

Table 3. Summary of Original Plan/Type for Buildings and Structures in the Park City Main Street Historic District

Type	Total Properties	Percentage of Total	Eligible Properties	Percentage of Eligible
<i>Commercial</i>				
Two-part commercial block	46	42%	18	30%
One-part commercial block	30	28%	22	36%
Two-part vertical block	4	4%	2	3%
Central block with wings	2	2%	2	3%
Three-part vertical block	1	<1%	0	0%
Other commercial	1	<1%	1	1.6%
<i>Residential</i>				
Hall-parlor	7	6%	6	10%
Other residential	4	4%	3	5%
T- or L-cottage	3	3%	3	5%
Pyramid house	1	<1%	1	1.6%
Foursquare house	1	<1%	1	1.6%
Rectangular block	1	<1%	1	1.6%
Double-loaded corridor	1	<1%	1	1.6%
Twenty-first century other	1	<1%	0	0%
<i>Other</i>				
Park	3	3%	0	0%
Parking lot	1	<1%	0	0%
Indeterminate (due to construction)	1	<1%	0	0%

Building styles are closely related to building types, and these are summarized in Table 4. Victorian Eclectic, Victorian commercial, and Early Twentieth Century commercial buildings predominate. Later architecture is generally commercial and of the Late Twentieth Century Other or Early Twenty-first Century Other style.

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

Table 4. Summary of Original Styles for Buildings and Structures in the Park City Main Street Historic District

Style	Total Properties	Percentage of Total	Eligible Properties	Percentage of Eligible
Victorian Eclectic	48	44%	39	64%
Late Twentieth Century Other	24	22%	1	1.6%
Other	8	8%	3	5%
Victorian commercial	7	6%	7	11%
Early Twenty-first Century Other	7	6%	0	0%
Early Twentieth Century commercial	5	5%	4	7%
Mission	2	2%	2	3%
Vernacular	2	2%	1	1.6%
Railroad depot	1	1%	1	1.6%
PWA Moderne	1	1%	1	1.6%
Egyptian Revival	1	1%	1	1.6%
Victorian	1	1%	1	1.6%
Unknown*	1	1%	0	0%

* Building under construction at time of survey and style was unclear.

Boundary Description

The Park City Main Street Historic District (Boundary Increase) encompasses properties on upper Main Street in Park City, Utah. The properties are on the east and west sides of the street between the intersection of Main Street and Heber Avenue on the north end and, at the south end, the terminus of Main Street at its intersection with King Road, Hillside Avenue, and Park Avenue.

Original Park City Main Street Historic District

The original Park City Main Street Historic District is a primarily commercial district encompassing approximately 12 acres. The layout of the district, and Park City as a whole, is heavily influenced by the local topography. Steep hills border a narrow, relatively level area west of Silver Creek on which Park City's Main Street and several parallel streets are built. This narrow strip ascends moderately from north to south, with little space available to the east or west due to the presence of steeper slopes. As a result, Park City has a linear layout with Main Street at its core, flanked by narrow, irregular, often steep streets. This linear layout is characteristic of many mining towns in mountainous areas of the western United States and stands in contrast to the gridded layout and wide streets more common in agricultural and non-mining Utah communities.

The original Park City Main Street Historic District's period of significance was between 1890 and 1929 (Notarianni 1978:Item Number 7, Page 2). There were 64 buildings in the original district (some of which no longer remain), of which 55 were listed as contributing. Commercial buildings made up the majority, approximately 73 percent of the total number of buildings in the district. Additionally, three of the buildings were public (5 percent) and five of the buildings were residential (8 percent). In 1979, four

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

buildings were considered outside of the historic period (6 percent), and five were non-contributing (8 percent).

At the time of the initial nomination, the composition of the historic district was primarily Victorian- to 1920s-era buildings. Commercial buildings, which made up the majority of the district, were primarily one-part and two-part blocks, and were most commonly built in the Victorian Commercial or Victorian Eclectic styles. A limited number of other styles were also present, including a Mission Style commercial building. The buildings in the original historic district were generally uniform in terms of height and scale.

Changes to the District Since the Original Nomination

Because of several factors, it is difficult to assess how the Park City Main Street Historic District has changed since it was initially nominated in 1978. For one, the original nomination form includes no pictures of the district or of the buildings, or maps indicating the locations or eligibilities of buildings. In some cases no addresses are included for the buildings the original nomination describes, making it impossible to accurately assess which buildings were deemed contributing or non-contributing in 1978, and whether their statuses have changed since the initial nomination. Change of street address is another issue that has made it difficult to compare building data from 1978 with the present. Most buildings' street numbers changed between 1978 and 2018. Without a map showing the locations of buildings at the time of the initial survey, it was necessary to try to match up a large proportion of buildings in that survey with those standing today based on written building descriptions; the accuracy of the results is uncertain. Finally, county recorder data and building permit files are often incomplete. Because of this, it is often difficult to know with confidence whether a given building was demolished or not.

Nevertheless, it is possible to draw firm conclusions about the changes the historic district has undergone between 1978 and the present. In general, a majority of the buildings present in 1978 remain, but the district has changed significantly since it was first nominated. At least 16 buildings present in 1978 have been demolished (Table 5). In most cases, new buildings have supplanted these demolished buildings. In some cases, the new buildings are of considerably larger scale in terms of height and massing. The new buildings are also often built using different materials than their historic counterparts, such as concrete or metal. Additionally, open spaces have been improved for public use as parks, such as Bear Plaza and Olympic Plaza; these and many of the improvements and renovations to the district resulted from increasing tourism and the 2002 Winter Olympics, many events of which were hosted in and around Park City.

Table 5. Buildings in the Park City Main Street Historic District Demolished Between 1978 and 2018

Street Address*
314 Main Street
333 Main Street
364 Main Street
416 Main Street
424 Main Street
425 Main Street

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

Street Address*
446 Main Street
501 Main Street
?527 Main Street
551 Main Street
557-559 Main Street
562 Main Street**
586 Main Street
608 Main Street
?627 Main Street
632 Main Street

* All building addresses provided here represent property addresses from 2018 rather than the addresses used in 1978.

**While 562 Main Street has technically not been demolished, it was fully deconstructed and rebuilt; under National Register of Historic Places standards it has been reconstructed (personal communication with Anya Grahn 2018).

Development Patterns

Main Street is the principal thoroughfare in Park City’s Old Town. It is divided into two sections: upper Main Street (to the south of Heber Avenue), which is primarily commercial, and lower Main Street (to the north of Heber Avenue), which is primarily residential. The Park City Main Street Historic District (Boundary Increase) consists of upper Main Street.

Main Street has changed dramatically throughout its history. Mining camps typically developed organically, based on proximity to the mines and the convenience of miners, and Park City’s earliest layout followed that pattern. The town was not platted until 1880, when properties were re-ordered by blocks laid out in a regular linear plan. By 1889, Sanborn Fire Insurance (Sanborn) maps depicted the Main Street core with a dense collection of one- and two-story buildings: restaurants, saloons, social and fraternal halls, medical and mining company offices, hotels and boardinghouses, and a theater (Sanborn-Perris Map Co. Limited 1890). And by this time the division of Main Street into an upper commercial section and a lower residential section had begun: the maps also document a proliferation of single-family and multi-family dwellings north of Heber Avenue, with a very limited number of businesses (Sanborn-Perris Map Co. Limited 1890). The south end of Main Street and the mixed commercial and residential areas it encompassed were immediately adjacent to industrial activity on Daly Avenue and in Empire Canyon (Sanborn-Perris Map Co. Limited 1890, 1900).

The 1907 Sanborn maps indicate that almost all buildings fronting upper Main Street were wood-framed or brick commercial buildings and were built directly on the street without front or side yard setbacks. Dwellings (presumably for merchants) were often built at the rear of the narrow lots, facing Park Street (Sanborn Map Company 1907). And they also make clear that Park City was a pedestrian town, with a network of staircases and paths connecting the streets.

The development patterns that originally characterized the district persisted through the post–World War II period, although poverty and neglect resulted in the loss of some buildings and a rise in vacant lots.

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

With the rise of recreation and tourism in Park City in the early 1960s and the corresponding recovery of the economy, the appearance of the district began to change. Empty lots were re-developed and dilapidated buildings were rehabilitated or torn down and replaced with new construction. But today, as historically, the district can be distinguished from its surroundings due to the setback patterns (with limited or no front, side, or even rear yards), the consequent density and limited amount of open spaces (such as parks or yards), and the high concentration of commercial buildings. The overall density decreases somewhat at the south end of the district and the proportion of residential buildings increases. However, the housing there remains denser physically (with smaller-than-average lot sizes and more limited setbacks than in neighboring residential areas) and in the level of use (with several large boarding houses and an apartment building).

Streetscapes and Landscape

Main Street is a busy two-lane road with parallel parking on either side. Concrete sidewalks typically span the limited distance between the curb and the building façades and, because of the sloping street, stairs and ramps that provide building access often project into the sidewalks. A number of commercial buildings also have arcades and second-story porches that extend over the sidewalk. Narrow side streets and staircases open onto Main Street at regular intervals. Landscaping in the district is primarily left to the discretion of individual property owners; given the limited amount of front yard space, this is usually confined to planter boxes. Several publicly owned plazas and pocket parks feature flower beds, shade trees, and small lawns. The boundary extension to the district features a higher proportion of residential properties than in the original district. These residential properties are densely clustered but are set back slightly from the street; their small yards may feature shrubs, shade trees, and flowerbeds.

A limited amount of modern infill has been built throughout the district, particularly at the north end of Main Street. This development generally consists of three- to five-story commercial, residential, or mixed-use properties. The modern buildings are often somewhat larger in scale than surrounding historic buildings but in general they do not exceed the size of the largest historic multi-story commercial buildings in the district. Additionally, a limited number of non-historic buildings of smaller size are scattered throughout the district; these are generally of modest scale and blend in with surrounding historic buildings.

Architectural Types, Styles, and Materials by Period

This section is adapted in part from the original Park City Main Street Historic District NRHP nomination form. Information on historic building typologies dating to between 1930 and 1968, after the period of significance established in the original nomination (1890–1929), has been added, as well as information on buildings within the boundary expansion.

Commercial Buildings: Pre-Fire Mining Era (1868–1898)

Prior to the 1898 fire that destroyed much of the historic town core, Main Street was densely developed, and contained a wide variety of commercial enterprises ranging from restaurants and saloons to offices for the nearby mines. Most of these buildings were one- or two-stories tall and were commonly made of wood or (less often) brick or stone (Sanborn-Perris Map Co. Limited 1890). Today, only two commercial buildings in the historic district predate the 1898 fire, the Union Pacific Depot at 660 Main Street (built 1886) and a one-part commercial block at 268 Main Street (built ca. 1896). The railroad depot survived the fire despite being wood-framed. Both buildings are Victorian Eclectic in style.

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

Commercial Buildings: Post-Fire Mining Era (1898–1929)

The most common category of buildings in the Park City Main Street Historic District are commercial properties dating to the Post-Fire Mining Era. There are 47 such buildings in total, with historic uses that included a theater, bars and taverns and business offices. Of those, 16 were built in or shortly after 1898 or 1899 as part of the rapid rebuilding efforts after the fire. As Notarianni wrote of the buildings from this period,

Frame buildings sprang up quickly [after the 1898 fire]. These structures (some remaining) exhibited architectural styles of typical Victorian period mining town commercial buildings—one and two story structures, some with flat roofs, others with gable roof[s] and false fronts, and most often wood cornices (some bracketed). Facades generally had central indented entrances flanked by display windows and transoms over windows and doors. Two story blocks also contained an entrance, either next to the ground floor entry or to the side, for access to the upper floor. Some contained porches and second story balconies (elements that are reappearing in restoration projects). (Notarianni 1979:Item Number 8, Page 3)

In contrast to the district prior to the fire, a larger proportion of commercial buildings from this period were built using masonry instead of wood:

Stone and brick followed, however, with new commercial buildings using similar door and window placements as the frame, but adding decorative detailing, such as door and window arches, Queen Anne brick work, and piers (all elements remaining). (Notarianni 1979:Item Number 8, Page 3)

Most buildings from this period fall within one of three types: one-part block, two-part block, or a central block with wings. One-part block buildings are one story tall and generally have large plate-glass display windows. They also commonly have false façades. Two-part blocks are similar but are two or more stories tall and are divided into two distinct vertical zones. The first is at street level and generally contains businesses or offices, while the second zone encompasses the upper stories, which were commonly used for offices or apartments. Central blocks with wings are typically symmetrical and have a large central block with lower, recessed flanking wings (Utah Division of State History 2016).

Commercial Buildings: Great Depression, World War II, and Post-War Era (1930–1962)

No commercial buildings in the Park City Main Street Historic District date to this period.

Commercial Buildings: Recreation and Tourism Era (1963–1980)

A total of six commercial buildings in the Park City Main Street Historic District date to this period. These buildings are of larger scale and tend to be taller than earlier buildings. All are two-part block, two-part vertical block, or three-part vertical block type buildings. With the exception of the Park Hotel (605 Main Street; built ca. 1978), which was built to closely imitate the Victorian Eclectic style of earlier eras of construction, these buildings are not stylistically distinct and are classified as Late Twentieth Century Other. In general, the buildings from this era are built of wood and brick, but also incorporate new building materials, such as metal and concrete.

Treasure Mountain Inn (TMI), at 255 Main Street (built 1965), is particularly notable as one of the first tourism-related developments on Main Street:

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

The 50-unit lodge was modeled after similar resort developments built at the time in Aspen, Tahoe, and other ski resort communities, and was Utah's first condominium-style hotel. Built in a mid-century modern version of the Colonial Revival style, TMI consists of three sections: the four-story Main Street building and two buildings with one-story facades along Park Avenue... Storefronts on the main level provided additional retail on Main Street that catered to ski vacationers, while the basement level provided 36 owner and guest parking spaces. (Oliver et al. 2017:43)

As such, it represents a notable example of the changes in design and function that the commercial buildings during this period underwent to serve Park City's burgeoning tourism industry.

Commercial Buildings: Modern Era (1981–present)

A total of 24 commercial buildings in the Park City Main Street Historic District date to the Modern Era. None are contributing because they are not yet of historic age. All are built in the Late Twentieth Century Other or the Early Twenty-First Century Other style (generally plain brick buildings or wood buildings with a few Victorian Revival elements). Like buildings from the Recreation and Tourism Era, they tend to be of a larger scale than older buildings, but tend to feature a more eclectic mix of building materials. While buildings from prior to 1980 often used similar materials to those that had been in use for the entire history of the district (such as wood and brick), buildings from the Modern Era tend to incorporate other materials, such as synthetic stucco, concrete, and architectural metals.

Public Buildings (1898–1962)

A limited number of public buildings exist in the historic district. These are the original City Hall, the Post Office, and the W.P.A. War Memorial Building. As Notarianni observes in the original nomination:

City Hall, the Post Office, and a W.P.A. War Memorial Building helps [sic] to document public life. Labor strife and discontent in 1916 led to the jailing of members of the Industrial Workers of the World (I.W.W.), or Wobblies. Documenting this event is an insignia, dated August 8, 1916, burned on the wall of the communal cell in the basement of City Hall, which remains... In addition, City Hall functioned as a territorial jail for Utah Territory. The W.P.A. War Memorial Building, built in 1939, served the community as a recreational facility. (Notarianni 1979:Item Number 8, Page 4)

The styles, types, and materials of these buildings vary. The original City Hall is a brick, two-part block building in the Victorian Eclectic style, built in 1885. It also includes a historic fire station. The Post Office, built in 1921–1922, is a one-part block building that has Victorian Eclectic stylistic elements similar to the older commercial buildings around it. It is clad with wood clapboard siding. The W.P.A. War Memorial Building was built in 1940 and is a central block with wings type building in the PWA Moderne style. It is made of formed concrete.

Residential Buildings: Single-family Dwellings (1868–present)

All historic-age single-family dwellings in the district date to the Pre-Fire Mining Era (1868–1898). Most are hall-parlor houses or crosswing (L- or T-shaped) cottages, as well as one pyramid (109 Main Street; built ca. 1895) and one foursquare house (558 Main Street; built ca. 1898). In Park City, hall-parlor houses were the earliest building form and usually date to between 1870 and 1890. L- and T-cottages

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

were typically built later, between the mid-1880s and 1892. Pyramid houses became common from the late 1880s through 1910 (Randall 1985).

The construction methods used for Park City's residential buildings usually vary based on their period of construction. The earliest homes commonly used single-wall/plank house construction techniques.

Single-wall construction provided a quick solution to the need for housing during the mining boom. Using this simple method, builders made wall panels by nailing vertical wood planks to a roof plate and floor sill. Built like a box, the panels were assembled on the ground and then erected to form rooms, attached directly to one another without corner posts or other vertical structural members. Door and window openings were cut out after the wall was constructed, and battens or horizontal drop siding was often (but not always) used to finish the exterior. The roof and floor structures provided rigidity to the box, which typically had no foundation, although it might be raised off the ground on rubblestone or wood blocks. (Oliver et al. 2017:12–13)

Later residences, starting in the mid-1880s and particularly after the 1898 fire, were more commonly balloon framed, which offered better structural stability and enabled builders to insulate them against the harsh mountain winters. These later buildings (which were most commonly pyramid houses) were often embellished with Victorian details such as lathe-turned posts, decorative brackets, and spindles (Oliver et al. 2017:29–30).

Residential Buildings: Multiple-family Dwellings (Boarding Houses, Apartment Buildings, and Hotels/Motels) (1868-present)

Six multiple-family dwellings are present in the district, of which four are contributing. With the exception of the apartments at 205 Main Street (built ca. 2015), all date to the Pre-Fire Mining Era (1868–1898) or the Post-Fire Mining Era (1898–1929). Two of these (125 and 176 Main Street; built ca. 1914 and ca. 1901 respectively) are historic boarding houses that would have served miners working in the nearby mines and mills; they were a common building type within the city (Oliver et al. 2017:28). These boarding houses represent a building type previously omitted from the Park City Main Street Historic District. Additionally, one (115 Main Street; built ca. 1885) is a duplex, the only such building present in the historic district.¹ One other building, a contributing historic hotel is also part of the district.

Although of larger scale, both the boarding houses use the same materials as surrounding single-family dwellings (wood siding) and are built using similar styles. The boarding house at 125 Main Street is a modified version of the hipped-roof pyramid style common in Park City in the late 1880s until 1910; 176 Main Street is a scaled-up version of the T-cottages common between the mid-1880s and 1892. The hotel (227 Main Street; built ca. 1885) is actually a heavily modified and expanded single-family dwelling. The expansions (which occurred during the 1920s) were done using masonry and wood framing covered with stucco, in the Mission style.

Outbuildings (1898–present)

Only one outbuilding is present in the district, a modern gable-front, wood-framed, detached single-car garage associated with 140 Main Street. Although complimentary in style and materials to the residence on the property, the garage dates to ca. 1990 and is a non-contributing resource.

¹ 115 Main Street was original built as a single-family dwelling but was expanded several times between ca. 1920 and ca. 1941. By ca. 1941 it was in use as a duplex (Ewanowski 2015a).

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State

Summary

The historic resources of the Park City Main Street Historic District (Boundary Increase) illustrate architectural types and styles spanning much of the history of Park City, from its initial boom period prior to the 1898 fire, its reestablishment after the conflagration, to its establishment as a leader in the recreation industry. These resources document the transformation of the town from a mining community dependent on industry for its survival, to a largely defunct ghost town after the decline of mining, to a premier ski and recreation destination.

8. Statement of Significance

Applicable National Register Criteria

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Property is associated with the lives of persons significant in our past.
- C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D. Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations

(Mark "x" in all the boxes that apply.)

- A. Owned by a religious institution or used for religious purposes
- B. Removed from its original location
- C. A birthplace or grave
- D. A cemetery
- E. A reconstructed building, object, or structure
- F. A commemorative property
- G. Less than 50 years old or achieving significance within the past 50 years

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State

Areas of Significance

(Enter categories from instructions.)

Architecture

Commerce

Politics/Government

Social History

Transportation

Industry

Entertainment/Recreation

Period of Significance

ca. 1880–1968

Significant Dates

1898

1930

1965

Significant Person

(Complete only if Criterion B is marked above.)

N/A

Cultural Affiliation

N/A

Architect/Builder

N/A

Statement of Significance Summary Paragraph (Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations.)

The Park City Main Street Historic District (Boundary Increase) is significant at the state level under Criterion A for its association with events that have made a significant contribution to the broad patterns

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

of Utah's history, and under Criterion C as a significant and distinguishable entity whose components may lack individual distinction. Its period of significance is from ca. 1880 to 1968. The first construction in the area of the district began in 1868, but the oldest remaining buildings date to ca. 1880. The resources within the district span the time from the initial mining era prior to the fire that destroyed much of Park City in 1898 to the rise of the recreation and tourism industries after 1963. Throughout that timespan Main Street was the commercial heart of Park City and it remains so today. The broad temporal range of the period of significance reflects multiple cycles of decline and renewal that defined Main Street historically and into the modern era.

The Park City Main Street Historic District (Boundary Increase) is an approximately two-block boundary increase of the original Park City Main Street Historic District. The increase area consists of 24 properties. This emendation increases the size of the historic district to its historically logical boundary, which includes the important transitional zone of mixed residential and commercial use that links the head of Main Street to the industrial landscape of Empire Canyon and the residential neighborhoods that crowd the hills above it. The emendation of the district also offers the opportunity to incorporate historic resources from later periods of history that have gained significance since the original district nomination.

As stated in the original nomination form,

Park City's commercial historic district represents the best remaining metal mining town business district in the state of Utah, exhibiting unique historical and architectural qualities. The Park City mining district, opened in 1869, early was recognized as a top bonanza camp... Consumed by a conflagration in June 19, 1898, Park City's main business district lay in ruins; and its rebuilding, through public and private support, attested to the confidence and attachment demonstrated toward the city. The present commercial district is a product of that confidence of 1898, and also of a confidence born out of the area's rebirth as a recreational center, beginning in the 1960s. (Notarianni 1978:Item Number 8, Page 1)

As further explained in the original nomination, Main Street historically functioned as the commercial, social, and political center of Park City. It was closely associated with key historic events throughout Park City's history, from the Great Fire of 1898 to the booms and busts that characterized mining throughout the twentieth century. In the original form, the district was nominated as significant under Criterion A for its important role as a center of commerce during the mining era in Park City after the 1898 fire; it remains significant today. The emendation, however, adds a new area of significance under Criterion A: the district's importance in relation to the recreation and tourism industry. The district is also eligible under Criterion C as a significant and distinguishable entity whose components lack individual distinction. Although many of the properties in the historic district may not be individually significant for their architectural qualities, cumulatively they represent a distinctive collection of historic buildings spanning the history of development of Park City's Main Street, from its origins prior to the Great Fire of 1898 through the rise of recreation and tourism.

Starting with the opening of Treasure Mountain Resort in 1963, Park City's Main Street began to undergo changes to better serve the burgeoning recreation industry and the tourists attracted by the city's ski resorts. Increasing development and tourism brought two sharply contrasting trends: the construction of new buildings on Main Street on previously vacant lots or in place of deteriorated properties and, conversely, a new emphasis on the preservation of historic buildings because of their appeal to tourists. These trends shaped Main Street into what it is today. Furthermore, the growth of the recreation industry and the changes that it wrought on Main Street resulted in a new form of commercial development in Park

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

City that emphasized a combination of historic preservation and modern resort development, a pattern shared by many other alpine communities in the western United States.

Within this broader context, the history of the Main Street Historic District can be divided into five eras: the Pre-Fire Mining Era (1868–1897), the Post-Fire Mining Era (1898–1929), the Great Depression, World War II, and Post-War Era (1930–1962), the Recreation and Tourism Era (1963–1980), and the Modern Era (1981–present).

Narrative Statement of Significance (Provide at least **one** paragraph for each area of significance.)

SIGNIFICANCE

This section describes the areas of significance established in the original nomination form for the Park City Main Street Historic District and whether they still apply. These were commerce, politics/government, social history, transportation, and industry. Also, the boundary increase of the Park City Main Street Historic District allows for the introduction of two additional areas of significance: recreation and architecture. Between the mid-1960s and 1980, Main Street underwent development to meet the needs created by the burgeoning recreation industry, particularly skiing. As a result, the construction of new buildings on Main Street on previously vacant or deteriorated properties began to increase. Ultimately, this development shaped Main Street into what it is today: an eclectic mixture of historic, mining era commercial buildings beloved by locals and tourists, and modern buildings designed to address the commercial needs those same tourists create.

Criterion A: Patterns of History

Commerce

The Park City Historic District (Boundary Increase) is significant under Criterion A in the area of Commerce because of its role throughout the period of significance as the commercial heart of the community. From Park City's inception as a mining community through its evolution to a hub of recreation and tourism, upper Main Street has remained the most important commercial center in town. Originally, it catered to miners and other residents eager for food, drink, supplies, and social connections. Beginning in the 1960s, the construction of new commercial and residential buildings served the same needs of the increasing numbers of tourists. Upper Main Street's evolution mirrors that of the community as a whole and served as a model in Utah and the region of the revitalization the recreation and tourism industries could bring to economically depressed former mining communities.

Politics/Government

The Park City Historic District (Boundary Increase) is significant under Criterion A in the area of Politics/Government because of its history as the earliest center of politics in the community. The 1889 Sanborn maps show City Hall (including a fire station and a jail) on Main Street. After the 1898 fire City Hall was rebuilt; the building remains to the present (528 Main Street). The presence of local government offices only heightened the importance of Main Street within the community.

Social History

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

The Park City Historic District (Boundary Increase) is significant under Criterion A in the area of Social History because, as the center of commerce and politics in early Park City, it was also an important social hub. This is particularly evident in the presence of fraternal halls, which were present on Main Street as early as 1889. These organizations provided an important social counterweight to the relative anarchy of mining settlements and helped to create a sense of community among residents. One such building still stands on Main Street, the Benevolent and Protective Order of the Elks (B.P.O.E.) Lodge No. 734 (550 Main Street).

Transportation

The Park City Historic District (Boundary Increase) is significant under Criterion A in the area of Transportation because of its role in the development of Park City's transportation system. Pioneering improvements to Park City's transportation system often began with Main Street. It was one of the first places in Park City to receive active street maintenance and improvement, and it was also one of the first streets to have controlled use and access enforced, with the banning of heavy transportation and hauling in the early twentieth century and parking ordinances established in the 1920s. Additionally, the Union Pacific depot stands at the north end of the district; it historically served as a vital connection between Park City, outlying communities, and Salt Lake City to the west. In addition to passenger service, the railroad provided a low-cost means for transporting coal to the mines and mills in Park City and for moving the extracted ores to Salt Lake City for further processing and distribution (Oliver et al. 2017:13).

Industry

The Park City Historic District (Boundary Increase) is significant under Criterion A in the area of Industry because of the close relationship between the district and nearby industrial operations, and the impact those operations had on its development. While no industrial resources exist within the Main Street Historic District, Main Street's development was the direct result of the significant industry just blocks away, such as the Silver King Coalition Mines building to the north and the Ontario Mill just south of Main Street (Rick Pieros Photography 2011; Sanborn Map Company 1907). The boarding houses in the boundary extension housed industrial workers in the nearby mills and mines, and the many restaurants and businesses on Main Street served their needs. Indeed, the relationship of Main Street to nearby mining industry was one of the key selling points of the district for tourists. Many of the newer buildings reflect this relationship through names (such as Treasure Mountain Inn, whose name refers to one of the nearby silver mining areas), through industrial design elements reminiscent of hoist houses and mills, and through the use of historically industrial materials like corrugated metal and board and batten siding.

Entertainment/Recreation

The Park City Historic District (Boundary Increase) is significant under Criterion A in the area of Entertainment/Recreation because of its role as the entertainment and recreational center of Park City during much of the period of significance. Numerous entertainment and recreation establishments operated on Main Street from its earliest period, particularly theaters (Oliver et al. 2017:29). These offered the community, particularly miners and mill-workers with money to spend, a source of entertainment. One striking example that remains is the Egyptian Theater (328 Main Street), which was "built under the supervision of an Egyptologist in the au courant style" in 1926 (Oliver et al. 2017:29). The attention to the appearance and architectural character of the theater emphasizes the importance of entertainment within the community. Although outside of the historic period, it should be noted that the Egyptian Theater was also the principal venue of the Sundance Film Festival when it first moved to Park

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

City in 1981 (Friedman 2010). Another notable example of an important recreation-related resource is the Summit County War Veterans Memorial Building (427 Main Street), which served as a recreation center (with gym, bowling alley, and table games) from 1940 until the late 1960s (Ewanowski 2015b).

In addition to these two particularly notable examples of entertainment/recreation buildings, at least 10 of the buildings still standing on Main Street were historically used as saloons, bars, breweries, or billiard parlors (Ewanowski 2015c, 2015d, 2015e, 2015f, 2015g, 2015h, 2015i, 2015j, 2015k, 2015l). While these types of recreation were less formal than those at the Egyptian Theater or the War Veterans Memorial Building, drinking, gambling, and socializing at saloons and billiard halls were key pastimes for the town's predominantly male population with disposable income from mine work. A striking illustration of the importance these recreational outlets held in Park City's history was George Wanning's saloon, which was the first building rebuilt after the Great Fire of 1898, ahead of any other commercial or public buildings (Oliver et al. 2017:27). Just two years after the fire 14 saloons were again operating on Main Street; this number increased to 17 by 1907 (Sanborn Map Company 1907; Sanborn-Perris Map Co. Limited 1900). While the entertainment and recreation culture on Main Street has shifted more towards restaurants, bars, galleries, and shopping in the modern era, the large number of remaining buildings originally geared towards earlier forms of leisure activity illustrate the significance of the historic district as a center of recreation and entertainment in Park City historically.

Criterion C: Architecture

The Park City Historic District (Boundary Increase) is significant under Criterion C in the area of Architecture as a collection of buildings "that represent a significant and distinguishable entity whose components may lack individual distinction" (National Park Service 1997:2). While many of the district's buildings are relatively nondescript examples of commercial architecture from 1898 to 1968, they cumulatively represent a largely intact example of a late nineteenth to mid-twentieth century commercial district in a mining and tourist town.

From the Pre-Fire Mining Era (1868–1897), little remains within the original district boundaries. Almost all commercial buildings in Park City (which were concentrated on Main Street at the time) were destroyed in the 1898 fire and only two buildings remain, making them significant as rare examples of commercial architecture from the period. The boundary increase also includes dwellings, one of which was extensively altered in the 1920s for use as a hotel (227 Main Street; built ca. 1885). The dwellings are typical examples of Park City architectural types and styles from the era.

The majority of properties in the district (56 buildings in total) date to the Post-Fire Mining Era (1898–1929). These buildings vary in style and typify commercial architecture from the early twentieth century. The majority are one- or two-part block commercial buildings, and most retain enough aspects of integrity to contribute to the district. While some of these buildings may not be individually significant under Criterion C, cumulatively they reflect the historic architectural trends of the era.

Only two buildings date to the Great Depression, World War II, and Post-War Era (1930–1962). These buildings are therefore significant as the few examples of architecture linking the primarily Victorian commercial buildings of the Post-Fire Mining Era to the modern designs of the following Recreation and Tourism Era.

Seven buildings within the revised Park City Main Street Historic District boundaries date to the Recreation and Tourism Era (1963–1980). These buildings reflect changes in architectural character brought about by the burgeoning tourism industry (in terms of both style and scale, particularly when

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

juxtaposed with the traditionally designed, modestly sized buildings in the district from previous eras). As such, they represent an important new architectural trend in the historic development of Main Street.

The Modern Era (1981–present) falls outside of the historic period. Although buildings of exceptional importance may be significant even if less than 50 years old, no buildings in the Park City Main Street Historic District (boundary extension) appear to meet this standard (National Park Service 1997:2).

HISTORICAL CONTEXT

The period of significance for the district begins ca. 1880. However, in order to provide necessary background information, the context begins in 1868 when the first claim was staked in the area that would become Park City.

Pre-Fire Mining Era (1868–1897)

Park City is arguably the best-known mining settlement in Utah and one of the foremost silver mining communities in the western United States. Members of the Church of Jesus Christ of Latter-day Saints (LDS Church), or Mormons, had arrived in the region in 1847 and had explored the area in the mountains east of the Salt Lake Valley by the following year but did not initially settle there. Instead, the first European American settlers were non-Mormon prospectors, who arrived in the 1860s. Prospecting for mineral resources had begun early in Utah territory, long before statehood was granted in 1896. LDS Church leaders discouraged mining (and its associated lifestyle), perceiving it as a threat to the group's core agrarian values. But with the encouragement of Colonel Patrick Connor, commander of nearby Fort Douglas, soldiers in the U.S. Army began to actively prospect by 1862. The first claim in what would be Park City—the Young American lode—was staked in 1868; more claims soon followed (Thompson and Buck 1993).

Perhaps the most significant was the Ontario Mine, the claim for which was bought by George Hearst in 1872 for \$27,000.² The Ontario Mine is an excellent example of the rapid growth of these early holdings. By 1876, the Ontario Silver Mining Company had incorporated and preparations were begun to sink its No. 3 shaft. Just one year later, in 1877, the mine began running a 40-stamp mill at the mouth of Ontario Canyon, started a drain tunnel and another shaft (No. 4), and aggressively acquired adjacent claims. Mirroring the development process of the Ontario Mine, many of Park City's most significant mining operations were established over the subsequent 20 years, including the Daly, Comstock, and Silver King companies. The mines worked by these companies were owned and operated by some of Utah's best-known mining magnates, including John Daly, John Judge, and Thomas Kearns (Bowes 2000).

The formation of the Ontario mine in the early 1870s catalyzed the formation of Park City as a mining camp. Early residents quickly established additional claims and mines, and by the 1880s Park City was a bustling town with commercial establishments and residences. In contrast with most settlements in Utah at the time, the population was largely non-Mormon. However, the wealth generated by the mines attracted numerous Gentiles, as non-Mormons were known, and the town expanded and transitioned rapidly from a mining settlement to a permanent town (Oliver et al. 2017:12). It continued to grow despite early economic setbacks such as the financial Panic of 1893.

² George Hearst was the father of well-known newspaper baron William Randolph Hearst (Bowes 2000:17).

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

Historically, upper Main Street was primarily a commercial district. The south end of the district (the area of the boundary increase) also closely abutted industrial operations, particularly ore refining plants run by the local mines (Sanborn-Perris Map Co. Limited 1890, 1900; Sanborn Map Company 1907).

[Prior to 1898] Main street was built of log and frame homes and one-story business houses with two-story false fronts, with numerous shacks as of today. Rock and brick were freighted in by horse and ox drawn wagons, and, before the fire of June, 1898, our city's main thoroughfare was a real famed Main street, flanged [sic] on each side with brick and rock store buildings, boasting of a three-story bank building and a four-story opera house and lodge room. (*Park Record* 1942a)

A wide variety of businesses operated on Main Street, including everything from saloons to fraternal halls to professional offices. As temporary camps were replaced with more permanent dwellings, "families settled, and new businesses such as furniture stores, dress shops, jewelry stores, and mercantiles opened to serve the diversifying community" (Oliver et al. 2017:12). By the late 1890s the community had expanded to 7,500 residents, Main Street was flanked with established neighborhoods, and mining companies continued to modernize their workings, hoist houses, and mills (Oliver et al. 2017:27).

Post-Fire Mining Era (1898–1929)

The Great Fire of 1898 brought a halt to this progress. The fire destroyed 200 of Park City's 350 wood-framed and masonry buildings and caused nearly \$1 million in property damage; 500 residents were left homeless (Oliver et al. 2017:27; Notarianni 2018; Williams-Blaes and Jameson 2009:9). Despite the hardship, the town was rebuilt in just 18 months, initially with wood-framed buildings; these were sometimes later improved to brick and stone (Notarianni 2018). In rebuilding after the fire and in the following years Main Street assumed much of its present appearance.

By the early 1900s upper Main Street was again a bustling business district. "Main Street was busy back then with restaurants of all nationalities, department stores, grocery stores and last, but certainly not least...there were candy kitchens" (Polson 1980). Department stores, offices, and dance halls were also important fixtures on the street (Polson 1980). "If one would walk up one side of Main Street and down the other side in 1904 it would take quite awhile [sic] to count all the merchants in business. In one's total tabulation, 33 saloons could be counted with their doors swinging in and doors swinging out; twenty four hours per day" (Davich 1972).

The overall number of businesses is even more telling:

The Park City commercial district contained numerous businesses, as well as various social halls and meeting places, public buildings and at the base the Union Pacific Railroad Depot...A scrutiny of Utah business directories reveals that in 1892-1893, 112 businesses (including physicians and lawyers, but not mining companies) existed; while in 1903-1904, approximately 136 concerns operated in Park City. By 1918-1919, the number had declined to 87, and in 1920-1921, 75. (Notarianni 1979:Item Number 8, Page 4)

It was during this period of prosperity that Park City and its residents began to actively improve the streetscape of Main Street. In 1905, the streets themselves were rough at best. Main Street was unpaved and had no sidewalks; it was covered in dust in the summers and turned into mud when it rained (*Park Record* 1931). This was in part due to heavy teams doing mine-related transport up and down Main Street, which regularly damaged the roads and prevented long-term repairs (*Park Record* 1906a). Flumes serving the mines also ran down Main Street (*Park Record* 1905). Starting in 1906, however, the city

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

began to consider means for improving the situation, beginning in 1907 by directing heavy traffic up Marsac Avenue instead (*Park Record* 1906b). By 1907 three plank crossings were placed at key intersections on the road, and in 1911 the first concrete sidewalk was poured on upper Main Street (*Park Record* 1907, 1911a). As the *Park Record* optimistically reported at the news, “Truly Park City is on the upward trend. Good times ahead sure enough” (*Park Record* 1911a).

The *Park Record* was correct. Starting in 1911, many property owners on upper Main Street began to work to improve the streetscape through the construction of concrete sidewalks:

C.W. Hodgson and J.C. O’Hara are having cement sidewalks placed in front of their Main street property adding greatly to the attractiveness and value of the same. The Record understands that several other property owners have arranged to make similar improvements. It is not out of the way to predict that all of Main street will have cement walks before the close of the year. (*Park Record* 1911b)

Improvements to upper Main Street continued through the 1910s. These included the construction of additional concrete sidewalks and a public push to paint and maintain buildings (*Park Record* 1914, 1915). By 1915 much of Main Street had also been paved, and in 1916 residents petitioned the city to extend the paved section from the intersection of Main Street and Second Street down to the intersection of Main Street and Daly Avenue (*Park Record* 1915, 1916a). A strong impetus for these improvements was the introduction and growing popularity of automobiles in the early 1900s. The increase in automobiles also resulted in changes to how Main Street was used by residents. A 1916 article noted that it was common practice for residents to park on Main Street (*Park Record* 1916b).

The improvements to the streetscape during the 1900s and 1910s were accompanied by changes to the physical make-up of buildings on upper Main Street. By the 1910s, residents of the city were actively working to remove vacant and undesirable buildings:

There is a vacant building on Upper Main street that should receive the attention of the fire chief and the city officials. It is the old Berry barn, which has not been in use for years past. It is a tumble-down shack and a dangerous fire trap...it is only a matter of time before a fire will occur, and the whole upper part of town jeopardized by a big conflagration. (*Park Record* 1916c)

In cases such as the Berry Barn (which stood until 1924), removed buildings were replaced with new construction intended to meet the changing needs of the area’s residents. The Berry Barn was replaced with a commercial garage designed to hold ten cars in separate garages: “five with entrances on Main street and five in the basement, with entrance on Grant avenue” (*Park Record* 1924). During the 1920s efforts also continued to improve the appearance of the businesses, particularly through upkeep and remodeling (*Park Record* 1921).

Some issues continued to plague upper Main Street. In one case, heavy rains flooded mine flumes and (as a result) the Main Street gutters as well; the flood left rocks and ore all over the street (*Park Record* 1925). In another case, a car that one resident tried to park in his garage lost its brakes and rammed through the wall and into a neighboring residence on Main Street (*Park Record* 1927).

One issue that required management by the city was parking. Since the 1910s the numbers of cars in use had continued to increase, and ultimately the parking situation on narrow streets like Main Street required a city ordinance:

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

It shall be unlawful to allow any vehicle to stand on what is known as upper Main street, except to load or unload between the intersection of Second street and Main street and Daly avenue commonly known as Empire canyon and Hill streets... In the opinion of the City Council of Park City, Summit County, State of Utah, it is necessary to the health and safety of the inhabitants of Park City, Utah that this ordinance amending...shall take effect immediately. (*Park Record* 1928)

Despite this ordinance parking continued to be a problem on Main Street, something that might still sound familiar to residents today (*Park Record* 1942b).

Sanborn maps from 1929 depict a densely developed commercial district with a wide variety of businesses. These included boarding houses and hotels, entertainment venues such as a dance hall, pool halls, and theaters, professional offices and banks, specialty stores, such as those for jewelry or millinery, social spaces, such as meeting halls for fraternal organizations, public buildings such as city hall and a public library, and many additional general commercial enterprises, such as grocers, hardware shops, and a general store (Sanborn Map Company 1929). In general, the density and layout of the district in the 1929 Sanborn maps correspond closely to what exists today, although the overall size of the buildings was smaller (usually one or two stories).

The Great Depression, World War II, and the Post-War Era (1930–1962)

Throughout the period between the 1890s and 1930, Park City's mines experienced several economic setbacks tied to national ore markets but development in town continued during boom periods. A more steady decline began after World War I as a result of lessening ore quality and labor unrest. The start of the Great Depression brought an even stronger downturn in Park City's mining industry and (correspondingly) its economy. As a result, many families were forced to relocate to find work elsewhere, "the population of Park City declined sharply and many houses and commercial properties were abandoned" (Oliver et al. 2017:30). Despite this, Park City's residents made efforts to maintain upper Main Street. In 1937, the city conducted a "clean-up campaign" to "make the city the cleanest and neatest in its history. Accumulated dirt and rubbish, unpainted buildings, broken sidewalks—all are being attacked with a firm resolve to make a good job of the clean-up, paint-up, plant-up, fix-up campaign" (*Park Record* 1937a). These clean-up efforts included Main Street. That same year, a culvert and bridge over Silver Creek on upper Main Street were repaired under the supervision of the Works Progress Administration (*Park Record* 1937b).

By 1939, the industrial revitalization spurred by World War II brought a small amount of money back into Park City, and Main Street enjoyed the benefits:

Since the mines started and most of the boys are back on the job, new cars and new paint jobs are cluttering up the parking spaces on Main street so fast one would think this was a farming community. The color jobs on a few, are similar enough to make you wonder whether the owners had chipped in on some mail order paint. (*Park Record* 1939)

In general, though, mining was no longer economically viable—many mines were so deep that water had to be pumped out for them to operate, and the profits from mining remained too low to justify the costs of pumping the water (Price 1970).

The need for ore and mining that had fueled Park City's economy as part of the war effort soon ended, and in 1949 mine closures put 1,200 miners out of work (Oliver et al. 2017:30). By the 1950s most remaining mines had closed and, as a result, many businesses (particularly on Main Street) failed, creating

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

a ghost town atmosphere. Cumulatively, the events of this period meant that little development occurred on upper Main Street during the period between roughly 1930 and 1960 (Williams-Blaes and Jameson 2009:8). But in the 1960s Park City entered into a new boom period spurred by the burgeoning recreation industry, beginning with the opening of Treasure Mountain Resort (now Park City Mountain ski resort) near Main Street in 1963 (Ewanowski 2015m:1).

Recreation and Tourism Era (1963–1980)

Skiing had been an important part of Park City’s culture for almost as long as the city had existed. For example, in the 1880s a local undertaker and carpenter was known to manufacture skis, which were used for winter transport and sometimes for recreational purposes. The first rope-tow was installed at what would become Deer Valley Resort in 1929, and famous skier Alf Engen set world records for ski jumping at nearby Ecker Hill in 1931. (Ecker Hill Ski Jump [NRIS No. 86001251] is listed in the NRHP.)

Recreational skiing became even more popular as part of the increased leisure and tourism activity that occurred after World War II. The Squaw Valley Olympics, hosted in California in 1960, brought winter sports directly into the national spotlight and the number of ski resorts in the nation doubled in the next ten years (Oliver et al. 2017:36). In Park City,

The major push for skiing as a business and economic catalyst began in 1958 when United Park City Mines [UPCM], recognizing the potential value of its land above ground, conducted a feasibility study to create Treasure Mountain, named after the historic “Treasure Hill” of the Silver King Mine. In 1963, Park City received a federal loan from the Area Redevelopment Agency for 1.25 million to develop a ski area ... (Oliver et al. 2017:37).

That same year UPCM established the Treasure Mountain Resort, now Park City Mountain ski resort. (Oliver et al. 2017:36). Articles in the *Park Record* document the changes that occurred as skiing and tourism began to revive the town’s economy. In addition to the opening of a large new lodge at 255 Main Street (Treasure Mountain Inn) in 1965, new businesses centering around the needs of visitors started to supplant older ones, and other old businesses and buildings were renovated (*Park Record* 1965a, 1965b, 1974, 1979a). But change began slowly and even in the late 1960s upper Main Street retained much of its historic character.

A less-tangible but still important aspect of the changes on upper Main Street from the 1960s to the present is the acknowledgement and marketing of Park City as a historic mining town and a welcoming place for visitors. As early as the 1960s, businesses on Main Street had begun to emphasize a connection to the town’s mining history and the experience it offered to visitors:

You travel up Main Street through Park City to reach the southernmost guest accommodations in The Park. It is the same route the miners and ore wagons used in days past when the Judge and Daly West mines were working at full capacity. Hominess and friendliness make the tourist welcome to this famous mining community and resort area. (*Park Record* 1968)

By the early 1970s, Park City’s municipal government recognized the need to manage the rapid changes on Main Street. In 1973 a Main Street Improvement Plan was introduced, which was intended to guide improvement plans on the municipal level and which centered around the preservation of the area’s historic character. The goal was to balance the changing needs of the town with keeping the historic character of Main Street.

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

To accomplish these goals, the Main Street district must become unique and attractive in appearance, and capable of accommodating additional development, increasing traffic and demands for convenient parking... The proposed street and curb design would allow for more convenient street parking and easier snow removal and maintenance. Of great importance, too, are proposals for improvements that will enhance and preserve the old mining town character of Main Street. (*Park Record* 1973)

As in preceding decades, street parking was of particular concern and the plan included a discussion of ways to increase parking capacity in the area. It also touched on the question of how to keep Main Street's historic character, going so far as to dissuade property owners from installing historically inaccurate wood sidewalks and instead to use stone and asphalt for street and sidewalk materials (*Park Record* 1973).

Development continued at an increasing pace, and in 1976 the city adopted a Land Management Code that delineated historic districts and instituted historic preservation ordinances (Notarianni 2018). Merchants on Main Street agitated for "the lifting of building impact fees on Main Street to encourage owners of empty lots to build and to encourage restoration of our historical district" (*Park Record* 1976). And in 1977, developers presented the most ambitious plans for upper Main Street to date.

A three part development that could change the whole character of Park City's downtown area, featuring plans for a Main Street trolley line, a chair lift from the Park Avenue Coalition Building to the top of Park City Resort's Payday ski run, and a 49 lot subdivision on a proposed extension of Norfolk Avenue, were revealed to the planning commission last Wednesday night. (*Park Record* 1977)

The plan would have dramatically changed Main Street and much of Park City, and understandably it received considerable push-back from residents. Later that year, the developers back-pedaled and stated that the trolley and chairlift weren't necessary for their plans (*Park Record* 1977). (Ultimately, no trolley was ever built on Main Street, although the Town Lift, which connects Main Street with the ski slopes above, was built amid continuing controversy in 2001 [Oliver et al. 2017:48]). However, during the 1970s and 1980s numerous other building projects on Main Street were also reviewed and approved by the city (*Park Record* 1979c, 1980a). As a result, new buildings began to infill previously empty lots, increasing density and altering the appearance and character of the area.

In 1979, the importance of historic upper Main Street received formal recognition through the nomination of the Park City Main Street Historic District to the NRHP (*Park Record* 1979b). Also in that year, the municipal government of Park City was concentrating on how best to meet the needs of Main Street, and funded five project areas to help improve the area as well as to maintain its historic character. These areas were housing and commercial building rehabilitation, a demolition program to remove vacant and blighted structures, capital improvements (such as maintaining and building sidewalks and retaining walls), and acquisition and relocation (to acquire parcels that "pose hazards for motorists") (*Park Record* 1979d). In 1980 the city's redevelopment agency sought development proposals for city-owned lots (*Park Record* 1980b).

In response to this increasing development locals began to voice concerns about how it was affecting the character of Main Street. As one resident wrote in a letter to the editor regarding proposals for new developments, "Air Space indeed. Many of us call it living space, breathing space, seeing space, green space, or just not a space filled with a building 60 feet high... Another Monolithic [sic] planned building 300 feet maximum size, maximum height, maximum density and again almost minimum parking" (*Park Record* 1980c).

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State

Modern Era (1981–Present)

The recreation and tourism industry entered another phase with the opening of Deer Valley Resort in 1981. Prior to its opening, skiing had been a casual pastime. But Deer Valley Resort's emphasis on a luxury experience for its visitors, encompassing everything from accommodations at a deluxe hotel to valets who would carry ski gear for guests, deeply altered the tourism industry in Park City.

When Deer Valley Resort opened in 1981, it marked the beginning of the luxury ski era and the transfiguration of Park City from a casual winter vacation spot to a recreation mecca and second home community, from a revitalized mining town with a few ski runs to a glittering tourist destination set against the backdrop of mining-era buildings (Oliver et al. 2017:44).

Main Street was no exception. The opening of Deer Valley Resort and the expansion of surrounding ski resorts resulted in development pressure in Park City's Old Town, particularly Main Street. Old Town functioned as the commercial and social hub, and the increasing numbers of visitors and the need to accommodate them created pressure on existing buildings and infrastructure. At the same time, however, Park City's residents and developers recognized the value of the mining-era buildings as "a coherent and ready-made theme for tourists seeking an escape" and continued to make extensive efforts to preserve them for both their historic and commercial value (Oliver et al. 2017:45).

As Notarianni concluded in the original nomination,

...the significance of the Park City commecial [sic] district lies in the areas of commerce, politics, government, social, transportation, labor and mining; as well as signifying the contributions made by prominent and well-known members of the community... As mentioned, the area functioned and continues to function as an important element in daily life in Park City. A low ebb was reached in the city in the 1950s, but the area's rejuvenation as a recreational community in the 1960s has prompted a surge; thus an increase in commercial activity. (Notarianni 1979:Item Number 8, Page 4)

Presently Park City's permanent population is only 7,500, but the town accommodates over 3 million visitors each year (Park City Municipal Corporation 2014). Intense development continues apace to meet the seasonal housing demand, continuing to place great strain on the city's historic architecture while at the same time relying on it to convey the "real" Western mining town that people come to experience. On today's thriving Main Street, a few large-scale modern commercial buildings stand among clusters of smaller, historic one- and two-part blocks dating to the late nineteenth and early twentieth century, giving the district a unique character that conveys the diverse aspects of its historic significance.

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State

9. Major Bibliographical References

Bibliography (Cite the books, articles, and other sources used in preparing this form.)

Bowes, Alan R.

2000 *Historic Preservation Plan for Flagstaff Mountain Resort*. Prepared for UPK/DMB Associates, LLC. SWCA Environmental Consultants, Salt Lake City.

Davich, Joe J.

1972 First Telephone Pay Booth Here Installed in Building in 1908. *Park Record*. 12 October.

Ewanowski, John

2015a Historic Site Form: John T. Harrington House II. CRSA Architecture, Salt Lake City.

2015b Historic Site Form: Summit County War Veterans Memorial Building. CRSA Architecture, Salt Lake City.

2015c Historic Site Form: Dudler Building. CRSA Architecture, Salt Lake City.

2015d Historic Site Form: Coffey & Farrell Saloon Building. CRSA Architecture, Salt Lake City.

2015e Historic Site Form: Mary McLeod Building. CRSA Architecture, Salt Lake City.

2015f Historic Site Form: M. D. Hurlbut Building. CRSA Architecture, Salt Lake City.

2015g Historic Site Form: Riley & Towey Saloon Building. CRSA Architecture, Salt Lake City.

2015h Historic Site Form: Henry Wagener Brewing Company Building. CRSA Architecture, Salt Lake City.

2015i Historic Site Form: Utah Independent Telephone Company Building. CRSA Architecture, Salt Lake City.

2015j Historic Site Form: The Club Saloon Building. CRSA Architecture, Salt Lake City.

2015k Historic Site Form: John Diem Building. CRSA Architecture, Salt Lake City.

2015l Historic Site Form: George Wanning Saloon Building. CRSA Architecture, Salt Lake City.

2015m *Main Street Historic District Boundary Modification*. CRSA Architecture, Salt Lake City.

Friedman, Megan

2010 Sundance Film Festival. *Time*. 27 January. Available at: <http://content.time.com/time/arts/article/0,8599,1956952,00.html>. Accessed September 27, 2018.

National Park Service

1997 National Register Bulletin: How to Apply the National Register Criteria for Evaluation. Department of the Interior, National Park Service, Washington D.C.

Notarianni, Philip F.

1978 Park City Main Street Historic District National Register of Historic Places Nomination Form. Produced by the Utah State Historical Society. Department of the Interior, National Park Service, Washington, D.C.

2018 Park City. Utah History to Go. Available at:

https://historytogo.utah.gov/places/historical_places/parkcity.html. Accessed September 27, 2018.

Oliver, Anne, Anya Grahn, and Hannah Tyler

2017 *Boomtown: From Mining to Skiing in Park City*. Vernacular Architecture Forum, Salt Lake City.

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State

Park City Municipal Corporation

2014 Park City General Plan. Available at: <https://www.parkcity.org/departments/community-development-affordable-housing-building-engineering-planning/planning/general-plan>. Accessed September 27, 2018.

Park Record

- 1905 A Short Session. 7 October. Park City, Utah.
1906a City Hall to be Repaired. 22 September. Park City, Utah.
1906b Heavy Haulers Keep Off Main. 24 November. Park City, Utah.
1907 Lax in License Duty. 5 October. Park City, Utah.
1911a Park Float. 27 May. Park City, Utah.
1911b Park Float. 15 July. Park City, Utah.
1914 Park Float. 13 June. Park City, Utah.
1915 Park Float. 28 August. Park City, Utah.
1916a City Council. 7 April. Park City, Utah.
1916b Over the Town. 28 April. Park City, Utah.
1916c News About Town. 22 September. Park City, Utah.
1921 Rejuvenation [*sic*] of Upper Main Street. 15 April. Park City, Utah.
1924 Park Float. 19 September. Park City, Utah.
1925 Park Float. 14 August. Park City, Utah.
1927 Park Float. 18 November. Park City, Utah.
1928 An Ordinance. 3 February. Park City, Utah.
1931 Dad's Column. 23 January. Park City, Utah.
1937a Activity on the Clean-up Campaign. 29 April. Park City, Utah.
1937b New Beer Ordinance Passed by City Council. 27 May. Park City, Utah.
1939 Telling Tales. 22 June. Park City, Utah.
1942a Why Park City Was Built So Close to the Mountains. 5 March. Park City, Utah.
1942b Sorting the Muck Pile. 3 September. Park City, Utah.
1965a Old Drug Store Will be Ice Cream Parlor. 4 November. Park City, Utah.
1965b Thousands Visit Park City and Lovely Apartment Inn. 25 February. Park City, Utah.
1968 Park City Lodging Offers Full Complement of Fine Facilities. 8 February. Park City, Utah.
1973 Main Street Improvement Plan Explained. 11 January. Park City, Utah.
1974 Renovation Plan Approved. 31 October. Park City, Utah.
1976 Main Street Merchants Seek Improvements. 5 August. Park City, Utah.
1977 Depot Developers Meet the People. 31 March. Park City, Utah.
1979a Cozy Farewell. 31 May. Park City, Utah.
1979b Main Street Picked as Historic Site. 29 March. Park City, Utah.
1979c New Building Proposed for Main. 1 March. Park City, Utah.
1979d City Approves Old Town Funding. 24 May. Park City, Utah.
1980a Main Street Hotel Plans Appear Before Commission. 21 February. Park City, Utah.
1980b Redevelopment Agency Seeking Proposals for City Owned Lots. 8 May. Park City, Utah.
1980c Scale Down Main St. Projects. 15 May. Park City, Utah.

Polson, Teri

1980 Nan McPolin's Park City. *Park Record*. 7 February.

Price, Raye Carleson

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State

1970 *Diggings and Doings in Park City*. University of Utah Press, Salt Lake City.

Randall, Deborah Lyn

1985 "Park City, Utah: An Architectural History of Mining Town Housing, 1869 to 1907." Department of Art, University of Utah, Salt Lake City, Utah.

Rick Pieros Photography

2011 *Park City Past & Present*. Rick Pieros Photography, Park City, Utah.

Sanborn Map Company

1907 Park City, Utah, August 1907. Sanborn Map Company, New York.

1929 Park City, Utah, November 1929. Sanborn Map Company, New York.

Sanborn-Perris Map Co. Limited

1890 Park City, Utah, December 1889. Sanborn-Perris Map Co. Limited, New York.

1900 Park City, Utah, April 1900. Sanborn-Perris Map Co. Limited, New York.

Thompson, George A., and Fraser Buck

1993 *Treasure Mountain Home: Park City Revisited*. Dream Garden Press, Salt Lake City.

Utah Division of State History

2016 Commercial, Public & Industrial Building Types. Available at:
<https://heritage.utah.gov/history/commercial-public-industrial-building-types>. Accessed August 8, 2018.

Williams-Blaes, Dina, and Trent Jameson

2009 *Design Guidelines for Historic Districts and Historic Sites*. Park City Municipal Corporation, Park City, Utah.

Previous documentation on file (NPS):

preliminary determination of individual listing (36 CFR 67) has been requested

previously listed in the National Register

previously determined eligible by the National Register

designated a National Historic Landmark

recorded by Historic American Buildings Survey # _____

recorded by Historic American Engineering Record # _____

recorded by Historic American Landscape Survey # _____

Primary location of additional data:

State Historic Preservation Office

Other State agency

Federal agency

Local government

University

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State

Other
Name of repository: _____

Historic Resources Survey Number (if assigned): NRIS Number 79002511

10. Geographical Data

Acreage of Property 11.9 acres

Use either the UTM system or latitude/longitude coordinates

Latitude/Longitude Coordinates (decimal degrees)

Datum if other than WGS84: _____

(enter coordinates to 6 decimal places)

- | | |
|------------------------|------------------------|
| 1. Latitude: 40.646656 | Longitude: -111.498005 |
| 2. Latitude: 40.646894 | Longitude: -111.497251 |
| 3. Latitude: 40.63961 | Longitude: -111.494086 |
| 4. Latitude: 40.639645 | Longitude: -111.49437 |

Or

UTM References

Datum (indicated on USGS map):

NAD 1927 or NAD 1983

- | | | |
|----------|----------|-----------|
| 1. Zone: | Easting: | Northing: |
| 2. Zone: | Easting: | Northing: |
| 3. Zone: | Easting: | Northing: |
| 4. Zone: | Easting: | Northing: |

Verbal Boundary Description (Describe the boundaries of the property.)

The boundary of the Park City Main Street Historic District (Boundary Increase) is shown as the yellow line on the accompanying map entitled "Park City Main Street Historic District (Boundary Increase) Sketch Map."

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State

Boundary Justification (Explain why the boundaries were selected.)

The boundary (with the extension added in 2018) encompasses all of upper Main Street.

This area historically formed the commercial core of Park City. Although the farthest south section includes residences as well as commercial properties, this area was closely tied with the business area to the south geographically and economically, and represents a transitional zone between the dense commercial district to the south and the residential neighborhoods surrounding it.

11. Form Prepared By

name/title: Kate Hovanes and Anne Oliver
organization: SWCA Environmental Consultants
street & number: 257 East 200 South, Suite 200
city or town: Salt Lake City state: Utah zip code: 84111
e-mail khovanes@swca.com
telephone: (801) 322-4307
date: September 28, 2018

Additional Documentation

Submit the following items with the completed form:

- **Maps:** A **USGS map** or equivalent (7.5 or 15 minute series) indicating the property's location.
- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Additional items:** (Check with the SHPO, TPO, or FPO for any additional items.)

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State

Photographs

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.

Photograph Log

Name of Property: Park City Main Street Historic District

City or Vicinity: Park City

County: Summit

State: Utah

Photographer: Kate Hovanes

Date Photographed: July 11, 2018



Main Street from north boundary of historic district. Camera facing southeast. 1 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



Main Street Historic District, from south of 4th Street. Camera facing northwest. 2 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



Main Street Historic District, from south of 4th Street. Camera facing southeast. 3 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



Main Street Historic District, from north of intersection of Main Street and Swede Alley. Camera facing northwest. 4 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



Main Street Historic District, from north of intersection of Main Street and Swede Alley. Camera facing southeast. 5 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



Main Street Historic District, from south district boundary. Camera facing north. 6 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



109 Main Street. Camera facing north. An example of a modified pyramid house in the expanded historic district boundary. 7 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



115 Main Street. Camera facing west. Modified hall-parlor duplex in boundary extension. 8 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



125 Main Street. Camera facing west. An example of an intact boarding house in the boundary extension. 9 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



140 Main Street. Camera facing east. An example of an L-cottage in the boundary extension. Note modern detached garage south of house. 10 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



151 Main Street. Camera facing west. An example of a building historically used as a multiple dwelling in the boundary extension. 11 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



176 Main Street. Camera facing southeast. A larger-than-average example of the T- and L-Cottage form. 176 Main Street was historically used as a boarding house. 12 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



205 Main Street. Camera facing west-northwest. Modern Era residential development in boundary extension. 13 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



227 Main Street. Camera facing southwest. An example of a hotel in the boundary extension (the former Star Hotel, which was built around an older single-family dwelling). 14 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



255 Main Street, Treasure Mountain Inn (1965). Camera facing south. 15 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



580 Main Street. Camera facing north. Brick building dating to the Recreation and Tourism Era. 16 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



605 and 613 Main Street. Camera facing south. Buildings dating to the Recreation and Tourism Era. 17 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



221 Main Street. Camera facing west. An example of a rectangular block type building in the expanded historic district boundary. 18 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



328 Main Street. Camera facing northeast. Egyptian Theatre, in original district boundaries. 19 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



427 Main Street. Camera facing southwest. An example of a central block with wings in the PWA Moderne style in the original historic district boundaries. 20 of 35.

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State



528 and 530 Main Street. Camera facing northeast. One-part block and two-part block. The Park City Museum at 528 Main Street (composed of the old City Hall, a two-part block, and a commercial building to the south, a one-part block), is historic. 530 Main Street (on the far left) is modern construction. 21 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



660 Main Street. Camera facing northwest. 660 Main Street was historically the Park City Union Pacific Depot and was one of two buildings in the original historic district boundaries that survived the Great Fire of 1898. 22 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



301-305 Main Street. Camera facing west. An example of a one-part block commercial building in the original historic district boundaries. 23 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



447 Main Street. Camera facing southwest. An example of a one-part block commercial building in Mission Revival style in the original historic district boundaries. 24 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



509 Main Street. Camera facing west. An example of one-part block commercial building in the Victorian Eclectic style in the original historic district boundaries. 25 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



525 Main Street. Camera facing west. An example of one-part block commercial building and an adjacent two-part commercial block in the Victorian Eclectic style in the original historic district boundaries. 26 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



558 Main Street. Camera facing east. An example of a foursquare residence put into use as a commercial building in the original historic district boundaries. 27 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



309 Main Street. Camera facing west. An example of a two-part block commercial building in the original historic district boundaries. 28 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



361 Main Street. Camera facing southwest. An example of a two-part block commercial building in the original historic district boundaries. 29 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



438 Main Street. Camera facing east. An example of a two-part block commercial building in the original historic district boundary. 30 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



544 Main Street. Camera facing east. A particularly small example of the two-part block commercial building type in the original historic district boundary. It provides an example of compatible modern infill between historic buildings that has occurred. 31 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



550 Main Street. Camera facing east-northeast. An example of a two-part block building within the original historic district boundary. 550 Main Street was originally used as meeting hall by the local Benevolent and Protective Order of the Elks. The historic Masonic Hall is at right. 32 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



586 Main Street. Camera facing east. An example of a two-part block commercial building within the original historic district. 33 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



Olympic Plaza, between 405 and 419 Main Street. Camera facing west. An example of open public space in the original historic district boundaries. 34 of 35.

Park City Main Street Historic District (Boundary Increase)
Name of Property

Summit County, Utah
County and State



?200 Main Street. Camera facing northeast. A surface parking lot at the south end of Main Street. 35 of 35.

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State



Park City Main Street Historic District (Boundary Increase)
Park City, Summit County
40.646659 Latitude -111.498277 Longitude
40.647079 Latitude -111.496862 Longitude
40.639829 Latitude -111.493158 Longitude
40.639409 Latitude -111.494573 Longitude

 Historic District Boundary

1:2,697
Contains Privileged Information: Do Not Release
Base map from ESRI World Imagery
Date Accessed: 9/20/2019
*From the BLM's LRS database.



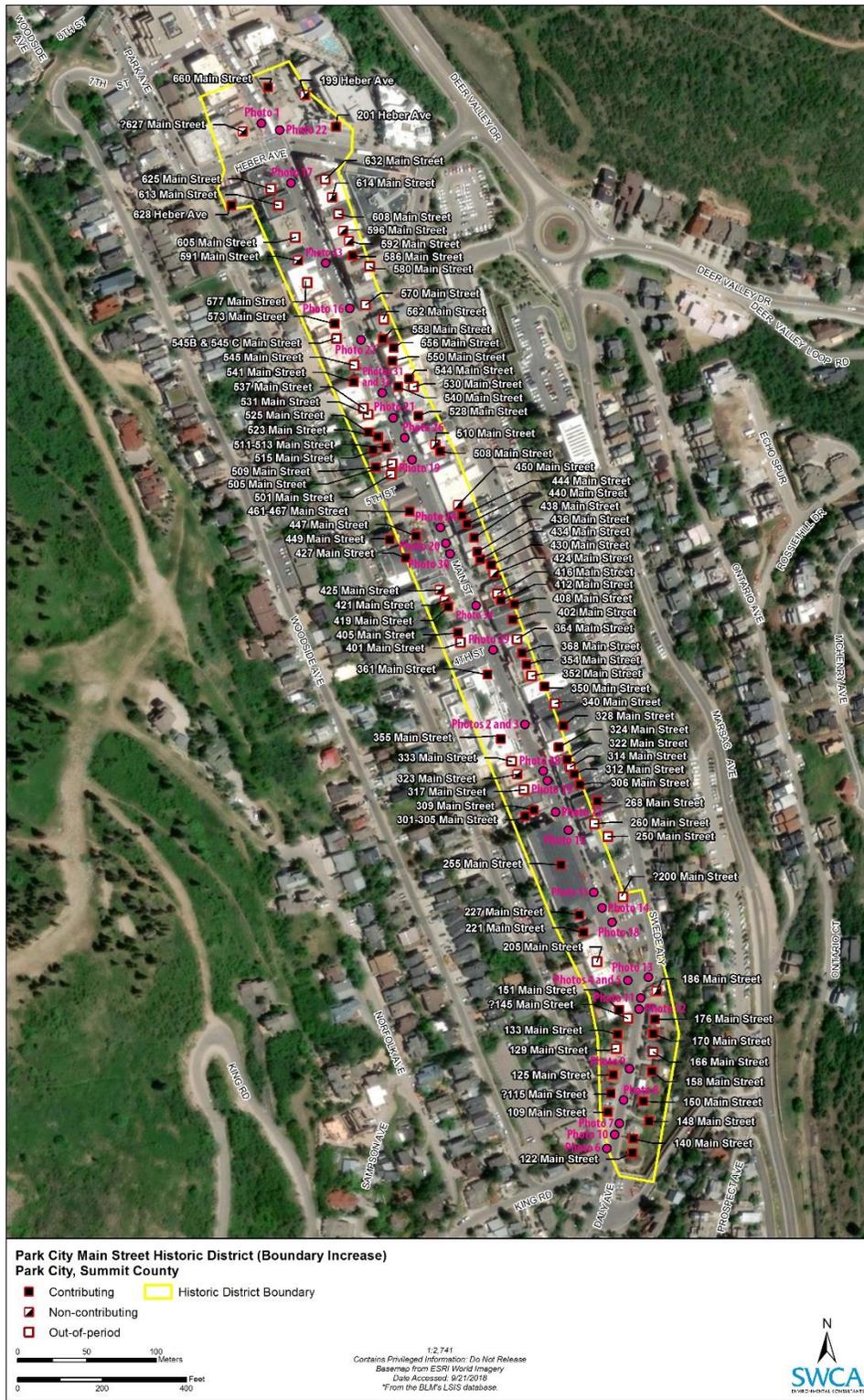
Location map.

Park City Main Street Historic District (Boundary Increase)

Summit County, Utah

Name of Property

County and State



Sketch map.

Park City Main Street Historic District (Boundary Increase)

Name of Property

Summit County, Utah

County and State

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 100 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management, U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.

NATIONAL REGISTER NOMINATION EVALUATION SHEET Certified Local Governments / Historic Landmark Commissions

The following property is being nominated to the National Register of Historic Places and will be reviewed by the Utah State Historic Preservation Review Board at its next meeting

PROPERTY NAME:

ADDRESS:

OK Concerns **INTEGRITY:** Major alterations or additions? New materials? Altered setting? Moved? etc.

OK Concerns **DESCRIPTION:** Is the property adequately described? Have contributing and non-contributing features been clearly identified?

OK Concerns **SIGNIFICANCE and CONTEXT:** Has the appropriate criterion been used? Has it been justified? Is the context sufficient in breadth and depth to support the claims of significance?

OK Concerns **FACTS AND SOURCES:** Are the appropriate and best sources used? Are key dates and facts accurate?

OK Concerns **SUPPORTING MATERIALS:** Adequate photos, maps, drawings, etc.?

The Commission recommends that the property or properties appear to meet the National Register criteria and should be listed in the National Register.

The Commission recommends that the property or properties do not appear to meet the National Register criteria and should not be listed in the National Register.

Signature of Commission Chair (or Designee)

Date

Return to: Utah Historic Preservation Office
ATTN: National Register Coordinator
300 S. Rio Grande Street
Salt Lake City, UT 84101

Name of Local Historic Preservation Commission

Exhibit F

Owner Objection

Park City Main Street Historic District Boundary Increase

I certify that I am the legal owner of the property at:

_____, located within the boundaries of the proposed boundary increase area of the Park City Main Street Historic District, Park City, Utah.

I wish to formally object to the nomination of the Park City Main Street Historic District Boundary Increase.

Name: _____ Date: _____

Notary Public: _____ Date: _____