



**Greater Houston
Builders Association**

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14 September 2000

Mr. Marvin Katz, Chairman
And Members
Houston Planning Commission
PO Box 1562
Houston, Texas 77251

RE: Proposed Revisions to the Historic Preservation Ordinance

Dear Mr. Katz and Members of the Commission:

The Greater Houston Builders Association appreciates the opportunity to comment on the proposed revisions to the Historic Preservation Ordinance. The members of the Association value truly historically significant structures and areas of Houston. We want to see those buildings and districts preserved. However, progress, revitalization, and increased home ownership are also important to the future of this city. The ordinance must be strong enough to preserve truly historic buildings and districts, and reasonable and flexible enough to allow for the continued redevelopment of the city. It must also recognize and protect private property rights.

While we support some of the new provisions, we cannot support provisions that trample private property rights or unnecessarily delay or halt development at a time when the city is striving to add 5000 new homes each year for at least the next ten years. We hope that the Planning Commission and City Council will find the balance needed to protect the truly historic without slowing or stopping revitalization.

First we would like to voice our support for several new provisions:

1. Increasing the tax exemption from five to fifteen years.
2. Façade easement program.
3. Provision for removal of designation.
4. Designation standards that include important criteria in addition to age.
5. Counting only primary structures.
6. The concept of an annual plan.
7. Opt-out provision for existing districts or landmarks.

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These provisions add strength and flexibility to the ordinance.

We would suggest four additional provisions to the ordinance:

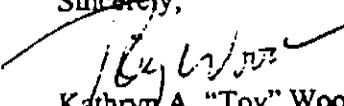
1. The City should establish a funded loan and grant program for truly historic buildings.
2. HAHC should have three new seats for a builder, developer, and Realtor.
3. To provide adequate notice when a district or landmark is to be designated, 4x8 signs should be posted at the entrances to the district or on the site of the landmark.
4. The Certificate of Non-Designation period should be increased to one year. Especially in cases where a large commercial building is involved, six months is not adequate time to go through the planning process.

Following are our comments on specific proposed revisions:

1. GHBA opposes the creation of a three-person Appeals Board and the removal of the Planning Commission from the process. The Planning Commission is a much more diverse and balanced group than the proposed Appeals Board. (Section 33-218)
2. GHBA opposes removing the Planning Commission from the historic designation process. (Section 33-221)
3. GHBA opposes increasing the waiting period for demolition. (Section 33-250) It is our understanding that the 90-day period is ample time to determine if there is another alternative.
4. GHBA opposes the elimination of the Waiver Certificate for remodels, restorations, alternations, and new construction. (Section 33-250) This is a serious private property rights issue. The 90-day wait should be continued.
5. GHBA opposes the inclusion of Section 33-228 (6) as a restriction on a Certificate of Non-Designation. The paragraph is far too broad and will hold up development, for example, on property where one of the mentioned designations is no longer relevant.
6. To allow for citizen input, Design Standards (Section 33-201) should be developed with the aid of a qualified committee of private sector registered architects and should be approved by the Planning Commission and City Council.
7. The Annual Plan should also be approved by the Planning Commission and City Council and should be directly related to the available funded staff resources. (Section 33-215)

Again, thank you for the opportunity to comment.

Sincerely,


Kathryn A. "Toy" Wood
Vice President and
Director of Government Affairs