

Essay answers to OHP Survey

5. What would you like to see included on the Architectural Review Unit web page?

Relevant information regarding format for submittals (loose unbounded sheets) and level of detail desired (with description of work, graphics, supporting information). How a phased Tax Credit project works in detail.

We work through our Historic Architects, Page and Turnbull and our lawyers and HTC auditors so we do not use it

8. What do you find most beneficial on the Architectural Review Unit web site?

Listing of CA Certified Projects (and slideshow). And the checklist - have not seen or found this on the NPS web site.

Frequently asked questions/answers links to Interpreting the Standards

example decisions

N/A - see answer 2

Links to NPS, etc.; and to documents, reports, etc.

Technical information

9. What do you find least beneficial about the Architectural Review Unit web site?

Cyclical Maintenance Bulletin - some context as to reasons for its posting would be helpful.

N/A - see answer 2

It's not easily navigable.

Certain links should be updated to make sure that they still work...

14. Can you recommend improvements to the NPS application form?

In this day/age, email address should be included/asked for as part of contact info on the form.

Include reference line or page for attachments

clarification of owner definition when long-term lessee is the applicant

We need to be consistent about requirements. For example, should we still be submitting photos as prints or is it acceptable to submit digital images on a sheet, printed with good quality paper?

An electronic filing process would be helpful

18. Why not? (find the NPS or OHP Checklist useful when compiling applications for submissions?)

I didn't know it existed...

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I haven't seen the checklist.

Our consultants do it for us

Page & Turnbull fills out all applications for us.

I do find them useful

21. Please elaborate on (rating of NPS and OHP review process) above.

It is understood reviewing takes time, however at times when closings are near and responses are of the essence, the combined review period combined (av. 60 days) is too long.

I think the comments are generally reasonable, but the process is quite formal and cumbersome.

Sometimes conflicting and can vary depending on who is reviewing

I have found that the lack of consistency of review between OHP and NPS can lead to serious approvals issues. My sense is that there is a lack of clear communication between the two.

More recently there seems to be improved coordination on an application's critical issues between OHP and NPS - OHP is assisting the applicant with the review process and trying to avoid surprises with NPS review.

Seems to be a disconnect in dialogue between OHP and NPS

1. Lack of time to really become familiar with all aspects of a project. 2. Inconsistency of opinions by individuals within State and federal reviewing offices. Reviewers should avoid participation in detailed level review and stay with interpretation of the guidelines and standards. Especially when qualified practitioners are more familiar with the project.

We have found that the staff are very helpful, they become engaged in the project and, while we have not always gotten what we want they have always worked with us to help solve the functional challenges of adaptive re-use while adhering to the standards

NPS seems to not provide information beyond what the OHP provides. Often seems like they "cut and paste" the response from the OHP.

Not timely. Narrowly focused on historic issues and not the benefit of the overall project. It has an all or nothing approach, which is not helpful when one is almost there, but not quiet.

The process has been quicker than I expected and we've had meaningful meetings with Tim Brandt.

I find the review process efficient, timely and the information received back informative and helpful

23. Do you feel the OHP reviewers provide clear and concise advice and direction?

Yes.

Typically clear not always concise

Written direction is clear; verbal direction is not clear (or not reliable). I have found that reviewers want to be brought into the design process, but when they are brought into the process, they might write a determination that conflicts

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with the verbal design direction they provided to the design team. If the direction that is provided by OHP during interim reviews can't be used to help determine design direction, then I'm not clear why we go through the hoops.

Yes, OHP reviewers are very well experienced, helpful and available. They make themselves available for consultation meetings. They seem to have a good read on the NPS review/interpretation that an application will receive.

No

Varies significantly between reviewers. recent reviews have been frustratingly detailed and provided excessive design direction that clearly reflects personal opinions rather than simple interpretation of the standards. this seems to be different from reviewers approach in past years.

Yes

The advice and direction is most clear when preceded by a phone call.

Concise, yes, but that can be at the expense of clarity.

Yes

Most of the time

24. How would you improve or streamline the OHP overall review process?

Electronic submissions should be the wave of the future, at minimum for text and photos - pdfs of drawings would work as well. Electronic submission is done now in college applications, taxes etc. No reason it can't be the ultimate goal for tax credit applications. This would be both cost effective (in terms of photo printing, plan printings, mail delivery) and paper files.

Guidelines for the number of photos required and methodology for photographing and numbering could be provided. That way submittals are not rejected for inadequate quantity of photos, and questions aren't raised about how photos are numbered.

I would ask OHP and NPS to put their heads together to come up with a system that would generate constructive and consistent feedback. I would ask the OHP to define how they would like to be brought into the design process.

Have overlapping SHPO/NPS review.

Include NPS in group dialogue with OHP and owner so there is no miscommunication

see note 3 above

The process is very good, but the only problem comes when the developer needs a quick response. It is always a question of staff availability - work load. Sometimes your staff is swamped and we need a particular matter dealt with quickly because of (for example) a construction sequence or potential tenant inquiry. I would be in favor of giving the applicant (developer) an option of paying an expediting fee to get urgent matters dealt with on a priority basis. The fees could be used to increase your staff's resources.

It should be a design review in front of a panel that can ask questions before completing the written review.

I would like to have open communication with OHP and have my SHPO representative be able to discuss my projects without formal applications with 30 response times. A phone call to discuss an individual item or issue would be extremely beneficial to speed project timelines and Owner costs. This seems to be starting to happen -- I would like

to continue in this positive direction.

26. Why or why not? (do you find preliminary reviews useful?)

NPS will only provide verbal comments on preliminary reviews. There is no guarantee the same response will hold upon submittal of formal application.

Even though there is generally good dialogue in preliminary reviews, there always seems to be some fairly significant issue raised during the review process that was not raised in the preliminary.

Allows for early decisions during the planning of a project

It's extremely helpful for a client to get an early read from the OHP, but without a similar early read from the NPS, we are working on assumptions that might end up leading us down the wrong path for overall approvals.

Process is disconnected from local approvals which many times are contradictory

Imperative to get consultation early even if non-binding, since it often becomes the basis of important decision making before large design fees have been incurred.

It saves us from incurring consulting costs to develop a design that may end up not conforming

It gives the OHP a chance to ask about certain aspects of the project and therefore shortens the RFI process.

Final review comments can be at odds with preliminary comments

It gives the owner a chance to evaluate the project before going too far down one path.

Again, it would be helpful to have an open discussion process in addition to formal submittals

28. Why or why not? (would you find site visits useful?)

Again, typically only verbal comments are provided. Thus, like preliminary reviews, such is not a guarantee on the offices' response to the actual subsequent formal application.

I can't imagine doing reviews without having seen a building. And it's great to have a face-to-face meeting to get dialogue moving.

Photos are only so good, visually can say a lot more.

Site visits are very helpful, but due to budgets cuts (I assume) they rarely happen. In my opinion, there is enough money and time at stake that every major rehabilitation project should be visited by both OHP and NPS. NPS should de-centralize their review so that local and regional offices can once again be involved in the process. I know this isn't likely to ever happen, but the current process of review in Washington doesn't seem to be working.

The reviewer can immediately gain a level of understanding for the resource and the issues that is very helpful in consultation discussions.

Understanding what the site would be WITHOUT the project will help OHP/NPS in making real world rather than text book judgments

Imperative, particularly if reviewers really expect to understand the project and its context.

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No matter how much one spends on design and presentation documents, it is not always possible to communicate the context in which a particular design is being proposed. There are always extenuating environmental circumstances that should be taken in to consideration

A personal site visits helps to clarify many issues. It may allow the project to move forward with tax credit or abandon them. Helps to shorten the RFI process.

It's sometimes difficult to explain a project when the reviewer is not familiar with a particular building.

SHPO officials at the project site have been a tremendous benefit to my projects in the past.

33. Why were (tax credits for projects) not pursued?

perceived impact on schedule; concern that Standards compliance will result in a too-conservative project.

Because a middle ground on needs of project and NPS interpretation of Standards could not found.

Project was considered too intrusive to meet the high level of Standards applied to tax credit projects.

the adaptive reuse could not be completed without interior modifications that were not acceptable to NPS

Usually tax credits are not pursued because of the time they add onto an already lengthy and complicated entitlements process.

Construction schedule or funding would not permit the project to be modified to meet the stipulated conditions for approval.

OHP/NPS requirements are at times not achievable on their own merits. They need to be grounded in economic realities that will sustain the resource not just rehabilitate it

perception of uncertainty or onerous process misconceptions. Ignorance of applicant, unwillingness to participate in process. ineligibility to receive credits, and no interest in creating tax eligible partnerships.

In some cases, the negative economic impact of compliance defeats the economic benefit of adaptive re-use

If the requirements end up being a financial burden that exceeds the benefits that the client will get from tax credits, the client will abandon their pursuit of tax credits.

Clients that are non-profits have to do too much to get value from the credits.

We were unaware of the benefits and the projects were too small to warrant the renovation work that would have been required at the time.

Generally window replacement becomes an issue. Many Owners conceive replacement as the ONLY efficient and sustainable option -- I would like to see more education for the general public on embodied energy and the pros of rehabilitating historic windows and other materials that the "Green" community view as inefficient.

35. Include other topics for workshops here.

Adaptive Reuse for Tax Credits

How to mediate between OHP and NPS.

Detailed information regarding phased projects, what costs are covered, examples showing how the numbers are

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penciled out.

How OHP/NPS should be considered in working with local regulatory agencies; timing of approvals.

improving the consultation process during design and after submitting Part 2

A better understanding of the Mills Act and the Federal Tax Credits

37. Please add any additional comments.

I think the SHPO put it best when he said that rehabilitation is not about prescriptively meeting each of the Standards; instead, it's about good stewardship of our historic resources.

There should be clarity from the very beginning about the level of finish required for the project prior to filing the Part 3.

Since we work with Page & Turnbull, they have prepared and submitted our applications after I review them, so I was unable to adequately answer some of your questions. This process was new to me and some of the workshops listed above would have been very helpful.