



October 24, 2014

Sarah Hanzel
City of Rapid City
Community Planning and Development Services
300 6th Street
Rapid City SD 57701-2724

Dear Ms. Hanzel:

Thank you for the opportunity to review the final report prepared by Lehe Planning regarding Rapid City's Historic Preservation Program. Upon review of the final report and the staff memorandum to our office, we would like to offer the following comments.

1. The State Historic Preservation Office (SHPO) agrees that we should let the Memorandum of Joint Agreement between the SHPO and the City of Rapid City expire at the end of this year and handle SDCL 1-19A-11.1 reviews as outlined in state law. This will expedite the review process for projects impacting historic properties and will allow city staff to determine whether projects are subject to review under SDCL 1-19A-11.1. The Rapid City Historic Preservation Commission (HPC) may be asked to comment on projects if SHPO requests a case report as outlined in ARSD 24:52:07:03. In addition to expediting the review process, this action will allow the HPC to refocus its efforts away from often unnecessary project reviews and towards more productive programs, such as education, outreach, training workshops, and surveys of historic properties, which are typical of the Certified Local Governments within the state.
2. The report from Lehe Planning suggested reorganizing the HPC into two boards: one to serve residential properties and one to serve commercial properties. The SHPO would recommend that this action NOT be adopted for the following reasons:
 - a. In order to create two separate boards, it will be necessary to find qualified and interested parties to serve on both boards. Given Rapid City's population, it may be difficult to find enough qualified and interested parties to serve on each board.
 - b. If there are two boards, it is possible that each board could review projects differently, leading to inconsistent local decision-making, which could create problems of credibility
3. The SHPO agrees that city staff should have the authority to administratively approve projects that meet the Secretary of the Interior's Standards for Rehabilitation. City staff responsible for these decisions should have training in historic preservation and the Secretary's Standards.
4. The SHPO encourages the city to work towards the creation of a Main Street program. The SHPO further encourages the city to explore opportunities to create façade easement and façade grant programs to aid in the rehabilitation of historic properties.

If you have any questions or concerns, please contact myself or Kate Nelson at (605) 773-3458. Thank you for the opportunity to review this information. We appreciate your dedication to Rapid City's historic places.

Sincerely,

TED M. SPENCER
Director - Historic Preservation Office