



Department of City Development

Housing Authority  
Redevelopment Authority  
City Plan Commission  
Historic Preservation Commission

**Julie A. Penman**  
Commissioner  
**Michal A. Dawson**  
Deputy Commissioner

September 17, 2002

To the Honorable Members of the  
Community Development Committee  
City of Milwaukee  
City Hall, Room 205

Dear Committee Members:

On July 30, 2002, the Community Development Committee acted on an Omnibus Amendment to the 2003 Funding Allocation Guide, which deleted \$97,800 from the Department of City Development Historic Preservation Section. I urge the members of the CD Committee to reconsider this action and to fund the Historic Preservation program for \$97,800.

The deletion of this funding effectively eliminates two positions from a section consisting of four staff members. This reduction in staff will severely impact our ability to review federally funded projects and could jeopardize federal funding of future redevelopment projects in Milwaukee.

As you may know, Section 106 of the National Historic Preservation Act (NHPA) requires that **all** federally funded projects (including CDBG) be reviewed to determine the impact these projects may have on historic structures, sites or districts. The requirement includes building rehabilitations, lead abatement projects and new construction.

Since the review process is mandated by federal statute, it is reasonable to expect that federal funds would be used to meet these requirements.

Currently, preservation staff performs more than 1,200 Section 106 reviews annually. Staff is required to determine the historic status of projects (either local designation or National Register of Historic Places) or eligibility for historic designation. Section 106 reviews include research of in-house site inventory forms and permitting records, as well as on-site field inspections.

Projects that are, or eligible for, historic designation must receive a Certificate of Appropriateness or work with staff to ensure the renovations/construction meet minimal historic preservation standards. Unless the Section review process is performed, federal funds may not be allocated.

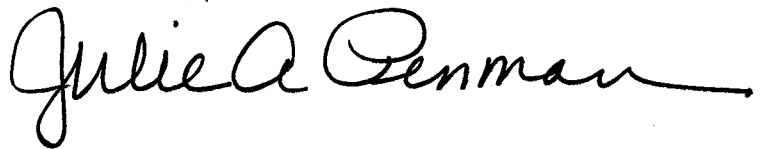
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The NHPA also requires that those qualified to perform Section 106 reviews meet minimum professional standards, including a graduate degree in architectural history and at least two full years of full-time experience in research or teaching in American architectural history. Historic Preservation staff are the only personnel within the department qualified to perform these reviews.

Without CDBG monies to fund these positions, DCD will be unable to carry Section 106 reviews as mandated by federal statute. And without these reviews, we will be unable to allocate federal funding for economic and community development projects within the city of Milwaukee.

Again, I strongly urge you to reconsider your July 30, 2002 action and reinstate CDBG funding for the Department of City Development Historic Preservation Section.

Sincerely,

A handwritten signature in black ink that reads "Julie A. Penman". The signature is written in a cursive style with a long horizontal flourish at the end.

Julie A. Penman  
Commissioner