



MEMO

TO: San Marcos City Council
FROM: Planning & Development Services
DATE: January 29, 2026
RE: Historic Preservation Plan – Staff Analysis of Citizen Comments

BACKGROUND

Staff has received the following public and stakeholder comments on the Final Historic Preservation Plan. Per City Council direction on January 20, 2026, each comment has been reviewed, and staff has prepared detailed responses on the following pages. The page numbers referenced in the staff responses correspond to the page numbers *in the bottom corners of the document* titled “San Marcos Historic Preservation Plan” dated December 19, 2025:

<https://sanmarcostx.gov/DocumentCenter/View/45235/Final-Historic-Preservation-Plan->

To assist City Council in making an informed decision, staff has categorized these comments in the following ways:

1. **Stylistic:** Typos, preferences in grammar, corrections, and non-substantive alternative language. Staff will incorporate into the Final Plan.
2. **Implementation:** Refers to comments that are methods of implementing the Plan and will be incorporated into the Implementation Report following Plan adoption. Staff recommends these are not added to the Final Plan as they will be addressed during the Implementation process.
3. **Currently Addressed:** Refers to comments that are currently addressed by the Plan. No staff edits are proposed.
4. **Recommended Revision:** Comments that recommend an edit to the Plan. Staff recommends these be incorporated into the Final Plan.
5. **Future Revision/Initiative:** Comments that recommend an edit to the Plan but are not recommended by staff for incorporation at this time due to the need for additional analysis, study, discussion, or direction. Staff recommends these revisions be incorporated as part of a future Plan update.

SUMMARY OF STAFF ANALYSIS:

The table below summarizes staff’s analysis of each citizen comment. A majority of comments (36) were categorized as “**Currently Addressed**”, indicating that these comments raise important issues already reflected in the Plan. As such, no additional edits are proposed by staff at this time. “**Stylistic**” comments (17) include corrections and rewording that staff recommends adding to the Final Plan.

“**Implementation**” comments (17) provide important ideas and suggestions related to actions following Plan adoption. While these comments fall outside the scope of the Plan document itself, they offer a valuable head start for identifying priorities and approaches for the next phase of work. Implementation is a critical step in realizing the Plan’s vision and will inform City staff workplans. Although the Planning and Development Services Department will likely lead implementation of many Solutions, other City departments, partner organizations, boards and commissions, and City Council will have important roles to either lead or provide direction. Separating implementation from the Plan document allows appointed and elected officials the flexibility to refine priorities, responsibilities, timelines, and resources as conditions evolve and allows ample time for meaningful consideration.

“**Recommended Revisions**” (13) include new or revised text proposed by staff, shown in underlined red text, to directly address specific citizen comments. Lastly, five comments are categorized as a “**Future Revision or Initiative**” and include proposed edits that staff does not recommend incorporating into the Final Plan at this time. These comments would require additional analysis, study, stakeholder discussion, or direction from City Council and may be considered as a future Plan amendment or addressed through separate initiatives or policies.

Type of Comment	Color ID	Total
Stylistic		17
Implementation		17
Currently Addressed		36
Recommended Revision		13
Future Revision or Initiative		5

STAFF RECOMMENDATION

Staff appreciates the extensive community and stakeholder input received throughout the development of this Plan, which has helped strengthen it as a comprehensive policy document and guiding framework for San Marcos’s preservation efforts. Staff is committed to implementing City Council’s adopted plans and policies and remains committed to continued collaboration with the community as implementation occurs. Staff recommends approval of the Plan with incorporation of all “stylistic” and “recommended revisions” into the Final Plan in accordance with this memo.

APPENDICES

- **Appendix A:** Letter received from Preservation Texas, January 20, 2026
- **Appendix B:** Comment received from Mayor Jane Hughson on the City Council Message Board, Monday, January 19, 2026
- **Appendix C:** Email received from Ryan Patrick Perkins, January 12, 2026
- **Appendix D:** Document titled “Analysis - San Marcos Draft Historic Preservation Plan 2025”: Received in-person from Ryan Patrick Perkins, Monday, January 12, 2026
- **Appendix E:** Document titled “Addendum - Lamar Campus & Centro Plaza Preservation”: Received via email from Ryan Patrick Perkins, Monday, January 19, 2026

Comments received from Preservation Texas via email – Received Tuesday, January 20, 2026

We feel that the draft Preservation Plan fails to provide an actionable plan that can guide the work of organizations like ours to assist the city in achieving its preservation objectives. We are willing to assist the city in amending and enhancing the plan, particularly as it relates to identifying critical current preservation challenges that are not meaningfully addressed, including:

- identifying neighborhood-specific character-defining elements and features of the city to guide new development in different areas;
 - **Currently Addressed: Solutions under Alternative Local Zoning (pp. 130-131)** incorporate My Historic SMTX 2019 findings and anticipates developing more detailed neighborhood guidance during implementation.
- demolition of historic resources to facilitate construction of new development out of scale with historic areas of immense cultural value;
 - **Currently Addressed: Solutions under Demolition Delay and Demolition by Neglect (pp. 124-126)** were drafted to better inform demolition review and compatibility decisions. Solutions under the Survey & Recognition Goal were drafted to provide additional neighborhood-level guidance, including updated surveys, context statements, and evaluation of district expansions (p. 128-133).
- identifying underutilized properties within historic neighborhoods of strategic importance for appropriate redevelopment to enhance the economy and quality of life in San Marcos;
 - **Currently Addressed: Several actionable solutions directly address adaptive reuse (pp. 140-141).**
- the unpredictable encroachment of the university downtown (the university is exempt from all local preservation regulations and the Plan);
 - **Currently Addressed: The City cannot impose zoning, demolition review, or design-review authority on a state entity. Instead, the Plan proposes strengthening the City's tools in adjacent areas to manage impacts around campus within the City's jurisdiction (Administration Goals [pp. 119-127] and Survey & Recognition Goals [pp. 128-133, and Economic Development [pp. 134-141]).**
- demolition by neglect and the need to rehabilitate vacant buildings such as the former Hays County annex, First Baptist Church, old Hays County Jail, historic industrial buildings along the railroad, and the former San Marcos railroad depot itself; and

- **Currently Addressed:** Several actionable solutions directly address demolition of historic resources and out-of-scale new development (pp. 124-125, 130).
- the lack of a local history museum to better facilitate heritage tourism and increase appreciation for local history and preservation.
 - **Future Revision/Initiative:** Public input on the Plan did not indicate strong interest in creating a heritage tourism museum. There are several museums in San Marcos that could benefit from greater support, such as the Calaboose African American History Museum, the LBJ Museum, Centro Cultural Hispano de San Marcos.

Comments received from Mayor Jane Hugson on the City Council Message Board – *Received Monday, January 19, 2026*

 Page 3, Lauren's name is misspelled.

- [Stylistic: Change to be included in Final Plan.](#)

 I had noted earlier that the document is nice and not cluttered, but the EXECUTIVE SUMMARY HONOR OUR PAST text sure looks crammed onto the page along with the following page. The print is small, gray and not black, and there isn't enough leading (Leading (pronounced "ledding") refers to the [vertical space between lines of text](#), measured from the baseline of one line to the baseline of the next).

Same for Page 3, actual page 13 ABOUT HISTORIC PRESERVATION and the next few pages. The rest is a little better.

- [Stylistic: Change to be included in Final Plan.](#)

 I suggest that the footer should include either "2026" or other identifier as the timeframe.

- [Stylistic: Change to be included in Final Plan.](#)

 Context statement on actual page 26 - PLEASE make this text black, not a thin gray (green?), so it is legible. Same for page 52, 90, 114. These pages are not readable. Most of the rest is OK except a bit crammed on the page. See above.

- [Stylistic: Change to be included in Final Plan.](#)

 Page 34, while the university "opened" in 1903, the university was founded in 1899 by the Texas Legislature. That's the year on all the big stone signs on the perimeter of campus. Perhaps we should use the same "starting" year they do. The text can be changed to "1899 Southwest Texas State Normal School was founded" (This is the SAME notation I made on the Comprehensive Plan)

- [Stylistic: Change to be included in Final Plan.](#)

 Page 35 1915 "San Marcos City Hall and Fire Station completed. This is the present-day NRHP listed Fire Station Studios" What is NRHP? Note that it's part of Texas State University.

- [Stylistic: Change to be included in Final Plan. NRHP is an acronym for the National Register of Historic Places. The Appendix includes a section for abbreviations, acronyms, and initialisms on Page A-3, and the full form of the acronym will be provided earlier in the document.](#)

 Page 36, 1923 "The Texas State Normal College is renamed the Southwest Texas State Teachers College" Nope. "Southwest Texas State Normal College" is renamed "Southwest Texas State Teachers College." "Southwest" is there until 2003.

- [Stylistic: Change to be included in Final Plan.](#)

Page 40 1955, we often call it the "school board" but it's really the "Board of Trustees"

- **Stylistic: Change to be included in Final Plan.**

Page 42 1963 "Five Black women desegregated Texas State." Their names are "**Dana Jean Smith, Georgia Faye Hoodye, Gloria Odoms, Mabeleen Washington, and Helen Jackson**" - perhaps use this for the caption; there is plenty of room on the page.

- **Stylistic: The names of the "First Five" are currently included under the photo of them on page 42 of the Plan Document. Staff will update to add middle names for Ms. Smith and Ms. Hoodye.**

Page 43. "Heritage Association of San Marcos formed to coordinate U.S. bicentennial celebration."

Nope. (I'm a past president of this organization.)

From the heritagesanmarcos.org website.

"The Heritage Association of San Marcos is a non-profit organization chartered in 1975 to support the preservation of buildings, historical sites and archives as well as to perpetuate traditions that beautify and enrich the community life of this city. The Association grew out of the San Marcos Bicentennial Commission, which was formed in 1972 to plan and coordinate the city's celebration of the nation's Bicentennial in 1976."

- **Stylistic: Language will be revised to match text from heritage association website. Change to be included in Final Plan.**

page 44 "Dunbar Park became first San Marcos municipal park." The City's "Rec Hall" was in place years before 1973 along with the parking lot and access to the river. Was it not considered a "municipal park?" It was called "City Park" when we only had one.

- **Stylistic: Staff is coordinating with Parks and Recreation to clarify details regarding the City's Rec Hall. The timeline in Chapter 2 will be adjusted. Change to be included in Final Plan**

page 45 "1975 George Strait performed his first gig ever at the Cheatham Street Warehouse with His Ace In The Hole Band (Restored and colorized photograph by Chad Cochran posted on COSM Instagram)" I don't think "His" should be capitalized here.

- **Stylistic: Change to be included in Final Plan.**

Pages 45-46. You have 1981 as " Texas Main Street Program organized under Texas Historical Commission." and 1983 as "Texas Main Street Program organized under Texas Historical Commission." Which is it? 1981 or 1983?

- **Stylistic: The Texas Main Street Program was established in 1981. The duplicate "1983" will be deleted and included in the Final Plan.**

Page 47. 1994 "Southwest Texas State University, now Texas State University, acquired Aquarena Springs and removed amusement park infrastructure." Nope. Name change to Texas State University

was in 2003. <https://www.txst.edu/about/history-traditions/names.html>

Change to "Southwest Texas State University acquired Aquarena Springs and removed amusement park infrastructure."

- **Stylistic: Change to be included in Final Plan.**

 The insert maps on these page are very blurry. What is the purpose of them?

- **Stylistic: The insert maps within the timeline are included to illustrate the past historic resources surveys conducted by the City over the years. Photos will be enhanced in the Final Plan.**

 Page 48, 2003 "Texas State University—San Marcos renamed Texas State University." Nope. What happened in 2003 is the big change of removing "Southwest" so it was "Southwest Texas State University was renamed Texas State University—San Marcos." The university quietly removed the "--San Marcos" in 2013. Never made a big deal about that one. (I worked at the university 1976-1981 and 1988-2016.)

<https://www.txst.edu/about/history-traditions/names.html>

- **Stylistic: Change to be included in Final Plan.**

 Page 49 "Centro Cultural Hispano de San Marcos established headquarters in former Bonham School. " They don't have "headquarters" - just drop that word.

- **Stylistic: Change to be included in Final Plan.**

I wish I had taken the time to read every page of this prior to this weekend. I only know a few of the items presented as facts in this document to be incorrect, but I don't have knowledge of everything. I am very surprised to see such errors and to not list the names of the "First Five" (as the university calls them, even named a dorm as such) is disrespectful.

I don't have time now to fact check the entire document, and I'm stopping on page 49 (59 of the document) and I'll have to read the rest later for the items I personally know. I'll try to have the rest of the list in a week or so.

Comments received from Ryan Patrick Perkins via in-person meeting – *Received Monday, January 12, 2026*

Email Body: Received Monday, January 12, 2026

I'm writing with a constructive concern: in its current form, the draft reads more like a compendium of context and ideas than a practical plan the City can adopt and implement. Much of the document appears to restate information already contained in the My Historic SMTX Historic Resources Survey (2018–2019), but it does not translate that existing data into clear priorities, a focused roadmap, and a resourced implementation strategy.

First, the plan needs prioritization. San Marcos already has known high-priority resources and areas, and the community is actively asking for direction on what the City will protect first and why. The plan should clearly identify which districts, corridors, and individual properties are the City's top preservation priorities for the next one to three years, and what actions will be taken for each. This is especially important given immediate and foreseeable development pressures and public policy decisions underway. As drafted, the plan doesn't provide a clear, ranked list or a phased sequence that helps staff and Council understand what comes first, what comes next, and what can wait.

- **Currently Addressed:** The Implementation Matrix details the steps the City can take to implement the Solutions identified in Chapter 5 (Goals); see pp. 157-178. Requests for a detailed, prioritized annual or multi-year work program exceed the executed scope and will be developed post-adoption through staff and Historic Preservation Commission work planning, and the Historic Preservation Plan Oversight Committee.

Second, the plan needs an implementation roadmap that matches City capacity. An action matrix is helpful, but a plan should also present a short, understandable set of priority actions, a “first year” work program, and a way to track progress. If City Council is adopting a plan, it should be obvious what staff will do in Year 1, what will be done in Years 2–4, and what specific deliverables will come back to Council for action. This also requires a clear discussion of staffing, consultant support, and partnerships, including how the City will actually carry out the long list of solutions in the draft.

- **Currently Addressed:** The Implementation Matrix breaks down when the Solution could be acted upon during the 10-year lifespan of the Plan (p. 157). Near-term are those anticipated to begin within 1-2 years of adoption, mid-term within 3-5 years, and long-term within 6-10 years. The forthcoming Historic Preservation Plan Oversight Committee will use this matrix to guide implementation of the Plan.

Third, the plan should include or attach the practical tools needed for implementation. If the plan recommends “provide an application form” for local designation or improved processes for COAs and nominations, the plan should include an example form or template, a checklist of required

documentation, and a step-by-step workflow. Those are the “how” details that turn a plan into something usable for residents, property owners, and staff.

- **Implementation: Development of forms, checklists, and templates typically occurs in implementation. For example, Solution 1, Certificates of Appropriateness, pg. 123 is to consider adapting an existing document, “Guide to Preservation”, into a brochure to facilitate easier distribution in public spaces and at events.**

Fourth, several proposed “solutions” appear incomplete or misaligned with best practice and need clarification. If the plan calls for evaluating trends in COAs and permits for historic-age buildings, that analysis should be part of the plan baseline, not an afterthought. If the plan proposes a “city archaeologist,” it should clearly explain the problem being solved, define the City’s archaeological strategy, and identify where archaeological sensitivity exists and how projects will be reviewed and managed. If the plan proposes changes to demolition delay and treatment of National Register contributing resources, the plan should be careful to align with National Park Service policy and standard preservation practice, and it should set out a clear process that is predictable, fair, and legally defensible.

- **Currently Addressed: The Plan notes gaps in current capacity and acknowledges that archaeological sites are under-documented compared to architectural resources (pg. 120). Several Solutions identify the need for archaeological expertise (e.g., recommending a City Archaeologist or on-call specialists) and proposes adding archaeological review to the pre-development process.**

Fifth, the plan needs a stronger strategy for interagency coordination and stewardship of publicly owned historic resources. A straightforward first step is to create and maintain a current inventory of City-owned historic properties (and other public properties with historic value), and to establish a proactive communications process so that the Historic Preservation Officer, HPC, and Council are alerted before any disposal, redevelopment, or demolition decisions are made. The plan should also address coordination with key partners who control historic resources in San Marcos, including the school district, Hays County, and Texas State University, because many of the community’s most sensitive historic places are affected by those entities’ decisions.

- **Currently Addressed: Solution 6 under City Staff & Resources calls for establishment of proactive communication between the City and other governmental entities when they are considering disposal of surplus property that may have historic value (p. 120). This is a recommendation carried over from the My Historic Resources Survey (2019).**

Sixth, the plan should more directly address today’s major preservation concerns and place-based priorities, not just historic context. The community is asking for clear direction on preservation policy in the face of downtown redevelopment and potential City facilities planning; the future of major historic civic resources like Lamar School; the need for a preservation and cultural strategy for Mexican American heritage assets and a cultural plaza concept; stewardship of sensitive lands and historic resources tied to Spring Lake; and the preservation needs of working-class and historically underrepresented neighborhoods such as Victory Gardens, and Dunbar. A plan should help Council and

staff make better decisions on these real, current issues. Right now, the draft does not clearly connect the City's preservation tools to these present-day decision points.

- **Currently Addressed: The Plan meets the contract requirement by providing goals, action items, and an implementation framework. Requests for a detailed annual or multi-year work program exceed the executed scope and are typically developed post-adoption through staff or commission work planning.**

Finally, the plan needs a stronger funding and incentives strategy. If we want preservation to be implemented rather than discussed, the plan should identify realistic mechanisms: dedicated annual funding for surveys and program work; on-call preservation expertise for defined projects; local incentives that encourage rehabilitation; and partnerships and grant strategies that can be executed year to year. Without a resource strategy, the plan risks becoming aspirational rather than actionable.

- **Currently Addressed: Solutions under the Economic Development Focus Area (pp. 134-141) include recommendations for a broad range of properties. For example, Solution 1 on pg. 134 speaks to those located within designated historic districts, and Solution 3 on pg. 136 speaks to those that are historic-age properties in need of maintenance.**

My request is not to discard the work already done, but to refine it so the City ends up with a document that functions as an implementable plan. I respectfully recommend that staff revise the draft to: (1) identify and rank the City's preservation priorities using the existing My Historic SMTX survey data, (2) produce a concise Year 1 work program with clear deliverables and accountability, (3) attach the practical tools and templates required for implementation, (4) clarify or correct demolition and designation policy language so it aligns with best practices, (5) include an archaeology plan if archaeology is identified as a priority, and (6) outline a clear funding and staffing strategy.

- **Implementation: The suggested elements align with the Plan's intent but belong in the implementation phase rather than the strategic framework. Adoption now fulfills contractual obligations by establishing policy and strategy, while enabling the City to develop detailed tools, such as project directives, regulatory changes, and funding programs, through staff efforts, the upcoming HPP Oversight Committee, and future policy and budget processes.**

San Marcos has the information and community energy to succeed in historic preservation. What we need now is a plan that provides clear priorities, a roadmap, and the tools to implement it. I appreciate your consideration, and I am happy to be helpful as the City refines this document into something the Council can adopt with confidence, and the community can rally behind.

Comments received from Ryan Patrick Perkins via in-person meeting – *Received Monday, January 12, 2026*

Document titled “Analysis - San Marcos Draft Historic Preservation Plan 2025”: Received in-person, Monday, January 12, 2026

Evaluation of the San Marcos Draft Historic Preservation Plan (2025)

Introduction

The City of San Marcos Draft Historic Preservation Plan (June 27, 2025) is a comprehensive 240-page document intended to guide the city's preservation program. It covers San Marcos's rich history and current preservation tools, and includes an Implementation Matrix (Appendix A) detailing numerous recommended actions. Overall, the draft provides a broad vision, but in its current form it has gaps in completeness, clarity, and practical utility. In comparison to exemplary preservation plans from other communities (Tyler, Plano, Corpus Christi, Tarrant County, Charleston, San Antonio) and best-practice guidance (e.g. PlaceEconomics), the San Marcos plan would benefit from sharper prioritization, a clearer implementation roadmap with funding strategies, more detailed guidance on processes (like nominations and documentation), a refined demolition policy, and stronger emphasis on inclusivity and partnerships. The critique below identifies specific deficiencies and recommends improvements, with references to the draft plan (by page number) and examples of language or policies that San Marcos can emulate.

Lack of Prioritization of Key Historic Resources

Observation: The draft plan does not clearly prioritize which historic districts, landmarks, or cultural sites should be addressed first. Important sites are mentioned in passing, but without an action plan or ranking. For example, Centro Cultural Hispano de San Marcos, the Dunbar neighborhood, and other cultural institutions are acknowledged as community assets, and public feedback highlighted places like the vacant Lamar High School (a historically Black school) and the Victory Gardens (Barrio Victoria) neighborhood as critical concerns. Yet the plan stops short of saying which of these will be prioritized for designation, preservation incentives, or protective measures. The former MKT ("Katy") train station and the Old Gin site - sites often noted by the community - appear to be omitted entirely, suggesting a gap in identifying all priority resources.

- **Currently Addressed:** Solutions within the Survey & Study goal provide the framework for expanded surveys, creation of thematic context statements, and partnerships, needed to identify and address underrepresented and at-risk resources through future actions (p. 128).

Why It Matters: Without a prioritization framework, the City lacks focus. A preservation plan should tell stakeholders which historic resources merit immediate attention – whether due to historical importance or development pressures. Other cities' plans make this a centerpiece. For instance, Tyler's Historic Preservation Strategic Plan (2017) explicitly identified specific survey areas and potential historic districts to pursue. As a result, Tyler promptly undertook five new architectural surveys and even kick-started a new National Register Historic District nomination for a mid-century neighborhood. Similarly, Plano's Preservation Plano 150 plan (2018) included a clear list of properties and districts that "may be eligible for designation at the local level", giving city officials a checklist of sites to protect in the next 5 years. In fact, the San Marcos draft does have valuable data from a 2019 survey - 204 individual properties were classified as high-priority and 6 potential new districts or expansions were identified - but those findings are buried in the text and not translated into a clear action sequence. By contrast, best-practice plans use such data to set forth priority designations.

- **The plans referenced may have been scoped to also include a historic resources survey or been scoped to include specific results from recent historic resources surveys.**

Recommendations: To strengthen the plan, San Marcos should incorporate a prioritization schema for historic resources, so that everyone knows what comes first. For example:

- Rank and List Key Sites/Districts: Develop a ranked list or map of the top-priority historic places (e.g. Lamar School, Dunbar-area sites, Victory Gardens/Barrio Victoria, the old train depot, etc.), based on criteria like significance and urgency (development threat). The plan should state, for instance, "Pursue local landmark designation for Lamar School as a Year 1 priority". This would build on the 2019 survey results by explicitly targeting those high-priority properties for action.

- **Implementation: This comment is a method of implementation of "Nomination & Designation" recommendations found on page 129.**

- Phased Designation Goals: Set a timeline for designations (e.g. "Designate 3 new local landmarks and initiate 1 new historic district within 2 years"). Plano's plan did this by outlining goals leading up to the city's 150th anniversary. San Marcos can similarly aim to designate or formally recognize certain sites by specific dates (the plan's Horizon could be 5 or 10 years).

- **Implementation: This step represents an implementation action within the preservation plan, either through work of HPP Oversight Committee or as part of HPC annual work plan; or both.**

- Focus on Underrepresented Heritage: Ensure that the prioritization elevates sites of underrepresented communities. The draft includes community input about gaps (e.g. "Heritage Neighborhood tours focus on historically wealthy white communities"), but it doesn't specify how to correct that. The plan should prioritize protecting and promoting Hispanic and Black heritage sites (like Centro Cultural Hispano, Cuauhtémoc

Hall, the former Mexican American segregated school, the Historic Baptist Church in Dunbar, etc.). This could mean fast-tracking historical marker nominations or cultural district designations for those places. Charleston, SC's approach is instructive: their preservation plan pioneered Area Character Appraisals - detailed neighborhood studies - in historically Black and working-class neighborhoods to document their value and guide policy. San Marcos can likewise commit to special studies or design guidelines for places like Victory Gardens and Dunbar, signaling their high priority.

- **Currently Addressed: Several Solutions point to protecting and promoting Hispanic and Black heritage sites (Plan pp. 128, 130, 132, 136, 142, 146, 147, 151). Prioritization will come through implementation.**
- **Leverage Survey Data:** The plan should explicitly call to act on the 2019 My Historic SMTX survey findings. For example: "Perform additional research and initiate designation for the top 10 high-priority properties identified in the survey within the next 2 years." Currently, the draft suggests the City "conduct additional research on properties identified as 'Medium Priority' by the 2019 survey", but it does not mention the high priority ones. Clearly articulating this step will ensure the most significant resources don't fall through the cracks.
 - **Recommended Revision: Solution 4 on page 128 can be amended as follows: "Conduct additional research on properties identified as "High" and "Medium Priority" in the 2019 survey to assess potential historic significance. To elevate the significance of the Mexican American & Indigenous Cultural Heritage District (MAICHD) Neighborhoods, particular attention should be given to those located in East Guadalupe, Barrio de la Victoria, and Barrio del Pescado to identify potential historic resources that may not have been previously documented.**

By embedding a prioritization plan (possibly as a table or list in the Implementation chapter), the City can more easily defend what to tackle first. This will make the plan far more actionable and aligned with best practices seen in Tyler and Plano.

- **Currently Addressed: The 'Near Term Solutions' in Implementation Matrix are anticipated to begin within 1-2 year of adoption. Adoption at this stage allows the City to proceed with developing these supplemental tools through staff efforts, the forthcoming Historic Preservation Plan Oversight Committee, and future policy and budget processes.**

Missing Implementation Roadmap and Funding Strategy

Observation: The San Marcos draft includes an extensive Implementation Matrix (Appendix A) with dozens of recommended "Solutions," each assigned to leads, partners, and a timeframe. However, this matrix - spanning nearly 20 pages - can be overwhelming and lacks an obvious hierarchy. It's not immediately clear which actions are most important or how they will be

resourced. Key elements of a roadmap are only implied: for example, tasks are slotted into Year 1, Years 2-4, etc., but the plan does not highlight any "quick wins" or critical path. Moreover, funding and staffing needs are not thoroughly addressed. The draft does acknowledge that "City funding available for historic preservation programs is unpredictable" and recommends considering a dedicated budget line for surveys, programs, and events. It also suggests the City "allocate funding in the budget" for certain preservation tasks. Yet, there is no concrete financing plan (no estimates of required funding, no identification of stable funding sources or incentives), nor mention of additional staff capacity. In short, the plan reads like a wish-list of actions without a realistic roadmap for execution.

- **The Plan meets the contract requirement by providing goals, action items, and an implementation framework. Requests for a detailed annual or multi-year work program exceed the executed scope and are typically developed post-adoption through staff or commission work planning.**

Why It Matters: A preservation plan is only as good as its implementation. City leaders and the Historic Preservation Commission (HPC) need a clear roadmap: which actions to do first, who will do them, and how they will be funded. Other cities have tackled this head-on. Plano's Preservation Plan (2018), for example, succinctly outlined a 5-year strategic framework and explicitly noted that it would "be used by city staff, property owners, and stakeholders" to guide efforts, while also clarifying that the plan itself didn't impose new regulations. Plano's plan set overarching goals with key actions and tied them to the city's timeline (leading up to Plano's 150th anniversary) - essentially providing a built-in roadmap. Corpus Christi's draft Historic Preservation Plan (2020-21) was described as "action-oriented" and integrated with the city's broader plans, including environmental and economic goals. This implies that it likely presented actions in a prioritized, cross-cutting manner. Tarrant County's Preservation Plan (2021) - the first county-wide plan in Texas - took a phased approach: Volume I lays out the plan's "important work to be undertaken" by the County's preservation program, and Volume II provides appendices (like survey data and context) to support that work. The key is that these plans don't just list actions; they organize them into a coherent strategy with identified resources.

- **Currently Addressed: Page 152 reinforces the Plan's purpose as a high-level guidance document.**

Recommendations: San Marcos should refine the draft by adding a concise implementation roadmap and resource plan. Some specific improvements:

- **Highlight Top Priorities in the Action Matrix:** Instead of presenting 80+ actions with equal weight, identify a subset as "Priority Actions." For example, if creating a local incentives program or updating the ordinance are foundational steps, mark those as Year 1 priorities in bold. A good practice is to include a short "Implementation Overview" section in the main report summarizing the top 5-10 actions (with timelines and responsible parties). This lets decision-makers quickly grasp the plan's first moves.

- **Implementation:** Currently, the Implementation Matrix identifies all “Near Term” actions with a dark blue fill in the matrix. Identifying the top 5-10 actions for implementation will be the Historic Preservation Plan Oversight Committee’s first task, with review and refinement from the Historic Preservation Commission and City Council. This method is similar to the Vision SMTX Comprehensive Plan implementation process and include in-depth discussions between staff and the Oversight Committee.
- Phasing and Quick Wins: Clearly delineate short-term (1-2 years) vs. medium (3-5 years) vs. long-term actions. The current matrix has columns for Year 1, 2-4, etc., which is helpful, but the plan’s narrative should emphasize what will happen in Year 1 if the plan is adopted. For instance: “Within the first year, the City will establish a Preservation Fund and initiate designation of X and Y landmarks.” Early successes build momentum. Other cities (like Tyler) completed some initiatives within a year of plan adoption - e.g., Tyler quickly formed a new preservation incentive task force and secured a grant for a survey update. San Marcos can emulate this by front-loading attainable goals (like launching a workshop series or developing an educational website - tasks that don’t require lengthy approvals).
 - **Implementation:** See response above.
- Define Roles and Accountability: The matrix lists “Lead(s)” and “Partner(s)” for each action, which is excellent. To add clarity, the plan should explicitly state who will drive the overall implementation. For example, will the Historic Preservation Officer (HPO) coordinate all these tasks? Will an interdepartmental team or an HPC subcommittee help? Perhaps form a small Implementation Task Force (including HPC members, City planning staff, and community advocates) that meets quarterly to monitor progress. Plano’s plan went through adoption by the City Council and became an official policy guide, which gave city staff a mandate to act - San Marcos should do the same and assign oversight to a specific entity (e.g., “the HPO will report progress on the Plan annually to City Council”).
 - **Currently Addressed:** Page 152 outlines the establishment of a City Council-appointed Historic Preservation Plan Oversight Committee. Structuring the committee would be a part of implementation of the plan and the application process will adhere to the established procedures for Boards and Commissions. The term “Lead(s)” is intended to identify the primary party responsible for driving the implementation of the action.
- Detail the Funding/Resource Plan: Strengthen the section on Preservation Funding. Currently, the draft has an appendix listing funding sources (grants, tax credits, etc.) and a recommendation to budget for preservation. This should be expanded into a true funding strategy. Consider:

- Dedicated Funding: Propose creating a Historic Preservation Fund in the city budget (even a modest annual amount) to support small grants, surveys, or seed money for rehabilitation projects. Note that Fort Worth built a preservation funding mechanism via its TIF districts and public-private partnerships, as cited in the draft: in one example, a mix of city, federal, and private funds (including Downtown Fort Worth, Inc.) provided nearly \$1.2 million for improvements in historic districts. San Marcos could pursue a similar blend of funding - for instance, allocate a portion of Downtown TIRZ funds or hotel occupancy tax (HOT) revenues to preservation projects that enhance heritage tourism.
 - **Currently Addressed: The Plan cannot create budget commitments as a policy document. However, several Solutions in Plan include consideration of City budget (Plan pp. 120, 128, 142), and potential funding sources are provided at the end of the Appendix (pp. A-74-A-75). Adopting specific funding through budget occurs after plan adoption.**
- Local Incentives: The plan should not only mention tax credits and state grants but also propose a local incentive program. Many Texas cities offer incentives like property tax abatements or fee waivers for historic property rehabilitation. The draft briefly notes "no local historic preservation incentives exist" as a current condition. The plan could recommend establishing, say, a tax freeze for locally designated landmarks or a matching grant program for facade improvements. This gives property owners tangible reasons to participate in preservation. PlaceEconomics guidance often emphasizes aligning preservation with economic development; for example, it notes that preserving older buildings can spur local investment and job creation - arguments that can help justify City funding for these programs.
 - **Currently Addressed: The Plan identifies the development of financial incentives, such as tax abatements, matching grants, or fee waivers, as a priority for the forthcoming Oversight Committee and City staff to evaluate after adoption; see the Economic Development Focus Area pages 134-141. Comparison of peer cities incentive programs is also provided.**
- Grants and Partnerships: Identify key grant opportunities the City will pursue (e.g. Texas Historic Commission (THC) CLG grants each year, Heritage Tourism grants, etc.). The draft does list some grants conceptually, but the roadmap should say "apply for X grant in 2026 to fund Y project." Also encourage partnerships: for example, working with Texas State University for joint grants (perhaps for an oral history project or an archaeological study at Spring Lake). Corpus Christi's plan stressed integrating preservation with other sectors (environmental, social) - in practice that could mean

tapping non-traditional funding like sustainability grants for reusing historic buildings or community development funds to restore historic housing.

- **Implementation: The selection of appropriate grants and determination of the number of applications will be a charge of the HPC and HPP Oversight Committee. Potential funding sources are provided at the end of the Appendix (pp. A-74-A-75).**
- Staffing/Resources: Acknowledge whether current City staffing is sufficient. San Marcos has one part-time or dual-role HPO (the draft notes Alison Brake has been the HPO since 2017). If the plan's many initiatives are to be realized, the City may need additional support - perhaps hiring a preservation planner or using on-call preservation consultants (a strategy the Interim City Manager and advocates discussed in 2022). Even if hiring is not immediately feasible, the plan can recommend evaluating staff capacity annually and leveraging volunteers or interns (Texas State's public history program could be a pipeline for interns to assist with surveys, for instance). The roadmap should not assume unlimited capacity; it should schedule actions in line with what staff and partners can realistically handle.
 - **Currently Addressed: The Solutions under 'City Staff & Resources' align with this comment; see pg. 120.**

By tightening the implementation framework in these ways, the plan will become a truly usable tool rather than a shelf document. Importantly, showing a credible execution plan, with funding and responsibility clearly delineated, will give City Council confidence during plan adoption and budget discussions.

Documentation Standards, Application Materials, and Archaeological Planning

Observation: The draft plan is missing detail in some technical yet important areas: how to document historic resources, what is required for applications (nominations, COA permits, etc.), and how to handle archaeological resources. These are the nuts-and-bolts that practitioners and citizens will need when implementing the plan.

- **Implementation: Development of forms, checklists, and templates typically occurs in implementation. The scope of this Plan as a high-level guidance document did not include development of these items.**
- Application Materials: There is no appendix or guidance provided on application requirements for landmark or district designation, nor for Certificates of Appropriateness (COAs). The plan does recommend creating a "step-by-step instructions for how to nominate a resource" and making a nomination form available on the website - implying that currently such guidance is lacking. Likewise, it suggests revising the code to clarify designation criteria and processes. However, the draft itself doesn't include examples of these forms or a checklist for applicants.

Without such clarity, property owners or community groups might be deterred from pursuing designations or COAs, slowing down preservation efforts.

- **Implementation: This comment is a method of implementation of "Nomination & Designation" recommendations found on page 123.**

- Documentation Standards: When historic properties are altered or (in worst cases) demolished, standard practice is to require documentation (photos, plans, history) for archival purposes. The plan touches on this: one solution under Demolition Delay is to "require a documentation package as mitigation for all demolition permits issued after a delay", including minimum photographs and a brief history. That is a good start, but it raises questions: What level of documentation is sufficient? Who reviews it? The plan doesn't reference accepted standards like HABS/HAER photography or archival formats. Additionally, outside of demolition cases, there's no mention of documentation for significant buildings undergoing modification. For example, if a historic building is being relocated or significantly altered, will the City require documentation? This is not addressed. The lack of clear documentation protocols could lead to inconsistent outcomes. Notably, the draft's Glossary does define terms like "architectural documentation (measured drawings, photographs, etc.)", but the plan doesn't convert that into policy.

- **Implementation: This comment is a method of implementation of "Nomination & Designation" recommendations found on pages 124-125.**

- Archaeological Planning: San Marcos is extraordinarily rich in archaeological resources - evidence of human habitation at Spring Lake dates back over 12,000 years. Yet, the plan's treatment of archaeology is minimal. It provides background that state law (the Antiquities Code) protects sites on public land and that State Archaeological Landmarks (SALs) are regulated by THC. However, there is no proactive archaeological strategy for the city. For instance, the plan doesn't identify high-probability archaeological zones (such as along the San Marcos River or old mission/settlement sites) or recommend actions like creating an archaeological sensitivity map, coordinating with University archaeologists, or requiring archaeological surveys for certain projects. This omission is stark, given that even the community input phase likely raised concerns about unmarked cemeteries or artifacts (common in an area with indigenous and early Texan history). Failing to plan for archaeology could mean lost opportunities for research and preservation, or worse, inadvertent damage to subsurface resources during development.

- **Currently Addressed: The Plan acknowledges San Marcos' archaeological record and discusses past excavations, pre-contact cultural history, and the City's regulatory role under federal and state laws (pg. 61). It identifies the need for archaeological expertise (e.g., recommending a City Archaeologist or on-call specialists) and proposes adding archaeological review to the pre-development process in identified high-potential areas (p. 120). It also**

notes gaps in current capacity and acknowledges that archaeological sites are under-documented compared to architectural resources.

- **Future Revision/Initiative: Archaeological sensitivity modeling is a technical product outside the scope and budget of this plan.**

Why It Matters: Clear processes and standards are critical for the plan's clarity and utility. One purpose of a preservation plan is to demystify the preservation program for the public and other agencies. If a neighborhood group wants to create a historic district, the plan should readily tell them what documentation and steps are required. If a developer must demolish a derelict historic-age structure after exhausting alternatives, the plan should ensure the history isn't lost by requiring proper recording. Best practices from other plans can guide improvements here:

- **Implementation: Development of forms, checklists, and templates typically occurs in implementation. The scope of this Plan as a high-level guidance document did not include development of these items.**
- Many cities include a "How to Nominate a Landmark" section or an appendix with sample forms. For example, the Tarrant County Preservation Plan (2021), in its appendices, provides guidance on conducting surveys and even templates for documenting sites (given that it's a county plan, they included thematic context statements to guide future surveys). While not exactly application forms, it shows a level of detailed planning to ensure future documentation is systematic. San Marcos's plan could similarly append a Local Designation Application template or at least reference where to find it (perhaps linking to the City's website if the form exists separately).
 - **Implementation: Development of forms, checklists, and templates typically occurs in implementation. The scope of this Plan as a high-level guidance document did not include development of these items.**
- On documentation standards: The National Park Service (NPS) and THC provide models (e.g., HAER/HABS standards, or the Historic American Landscapes Survey for cultural landscapes). The plan should align its language with those best practices. Interestingly, one action item does say: "Revise language in the code regarding historic properties to align with terms used by the NPS." - this is a good intent. It could be expanded to say the City will follow NPS standards for documentation as well. Notably, PlaceEconomics emphasizes the importance of data and documentation in preservation. While PlaceEconomics' "24 Reasons" report is more about benefits, it implicitly supports maintaining robust records of historic assets (for example, to track the economic impact, you need to know what's been preserved). Having consistent documentation ensures San Marcos can measure progress over time.

- Recommended Revision: Solution 4, pg. 124: Require a documentation package as mitigation for all demolition permits that are issued after a delay as a condition of the demolition permit, to include at minimum photographs and a brief history of the property. Consider updating the SMDC to require a documentation package that aligns with the National Park Service's Standards for Documentation for all demolition permits that are issued after a delay as a condition of the demolition permit. Documentation should be guided by Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey documentation guidelines and include at minimum photographs and a brief history of the property. A Story Map and/or measured drawings could also be required on a case-by-case basis, scaled to the resource's significance. In cases of financial hardship, consider City subsidization or partnership with Texas State or other organizations like Preservation Texas for documentation.
- On archaeology: Some Texas cities and counties have begun to integrate archaeology into planning. For instance, Corpus Christi's plan (in progress around 2020) was meant to integrate preservation with environmental and social goals - one can infer this would include sensitive coastal and indigenous sites. Charleston, SC (and Charleston County) actively use "archaeological review" provisions for projects in certain areas, and they treat archaeological sites as an important facet of preservation planning. San Antonio's Office of Historic Preservation also considers archaeological heritage as part of its mission (San Antonio sits on an ancient mission network and have protocols for discoveries). San Marcos's plan should not lag on this front, especially with Spring Lake and the river's importance.
 - Currently Addressed: Solutions 1, 2, and 7 on pg. 120 calls for exploration of adding archeological review to City processes.

Recommendations: Add sections or actions that provide clear guidance on applications, documentation, and archaeology. Key steps:

- Include a User-Friendly Guide/Appendix: The final plan (or accompanying materials) should feature a "How-To Guide" for common preservation processes:
 - Currently Addressed: Plan calls for proposed enhancements to the preservation website including educational materials like the existing "Guide to Preservation" (p. 149). Because guides of this nature are subject to periodic updates, the most appropriate and accessible location for them is an online platform, rather than the appendix of the plan.
- How to Nominate a Landmark/District: Outline the steps (e.g., research the property, complete the application form, get owner consent or note requirements, submit to HPO, HPC hearing, etc.) and list what documentation is needed (narrative history, photographs, map, etc.). The plan already calls to "illustrate clearly the steps in the designation process" by code revisions -

this should be reinforced with educational materials. Even a simple flowchart in the plan could help (some city plans include flowcharts for designation or COA processes).

- **Currently Addressed: Local Historic Designation is outlined on p. 100 and Certificate of Appropriateness process is outlined on p. 102.**
- **Implementation: The scope of this Plan as a high-level guidance document did not include development of these items.**
- Standards for Documentation: The plan should set a baseline for documentation quality. For demolitions or major alterations: require archival-quality photographs (digital high-resolution images deposited with the San Marcos Museum or library), measured drawings or floorplans (if available), and a written history or building description. Specify that such records should be submitted to the City before a demo permit is finalized. By doing so, even if a historic resource is lost, its memory is preserved. The draft's suggestion of "photos and a brief history" can be strengthened to "photographs (exterior and any significant interior features) and a historical narrative, deposited with the City Clerk or local archive prior to demolition." This aligns with National Register documentation practices (though less intensive than a full HAER record, it's a step in that direction). Also, consider requiring that documentation follow the Secretary of the Interior's Standards for Recordation - this might be as simple as referencing those standards in the plan.
 - **Recommended Revision: See above (pp. 19-20 of this memo).**
- COA Applications: While less urgent than designations, providing clarity on what a Certificate of Appropriateness application should include (photos of existing conditions, drawings of proposed changes, materials specs, etc.) would improve clarity. The HPC design guidelines might cover this, but referencing it in the plan ensures completeness.
 - **Currently Addressed: The current COA application includes a checklist requiring colored photographs of the property showing existing conditions and area of alteration, scaled & dimensioned drawings illustrating all existing conditions and proposed conditions.**
- Archaeological Resource Management: Insert a subsection (within the plan's Policy or Implementation chapters) on Archaeology. This could include:
 - Identification: A commitment to identify and map archaeological-sensitive zones in the city. For example, areas around Spring Lake, the San Marcos River, and early settlements (like the former Spanish Colonial outpost or 19th-century industries like the old mill/gin sites) could be marked as areas of high archaeological potential. The plan can recommend working with local universities (Texas State's Center for Archaeological Studies) or the THC to develop this map.

- Future Revision/Initiative: Develop an archaeology sensitivity model and program to mark areas of high archeological potential requires research.
- Policy: A local policy that for any ground-disturbing City project in these sensitive zones, an archaeological survey will be conducted (even if not required by state law). Also, encourage private developers to do the same (perhaps by offering incentives or fast-track reviews if they conduct voluntary archaeological assessments).
 - Currently Addressed: Archeological solutions are provided on page 120.
- Education and Partnerships: The plan could propose an Archaeology Awareness Program - working with the Indigenous Cultures Institute and others to highlight the long span of San Marcos history. This might include updating the Historic Preservation Webpage with info on what to do if someone unearths artifacts, or coordinating with the county historical commission on preserving aquafer-related archaeological finds. Since Spring Lake's artifacts are of national significance, the plan might even suggest pursuing a National Historic Landmark designation for the Spring Lake archaeological site (if not already designated) - indicating a forward-looking vision for archaeology.
 - Recommended Revision: Add Solution to Preservation Website Enhancement goal (p. 148): “Update the City’s Historic Preservation webpage to provide clear guidance on what to do if artifacts are unearthed during construction or other activities. Provide links to Texas State University’s Center for Archaeological Studies (CAS), Texas Historical Commission, and the Hays County Historical Commission to ensure proper preservation of archaeological finds.”
 - Currently Addressed: Archeological solutions, like strengthening the City’s archaeological awareness, review capacity, and partnerships, are provided on page 120. Spring Lake is owned and managed by Texas State University, a state entity, and therefore lies outside the City’s regulatory authority. A National Historic Landmark (NHL) nomination is a federally driven, owner-initiated process requiring extensive documentation, long-term funding, and coordination with the National Park Service and the State Historic Preservation Office. The City cannot direct or initiate an NHL nomination for a property it does not own or control. The Site’s archaeological significance is widely recognized; site 41HY147

which is within Spring Lake, is listed as a State Antiquities Landmark and therefore has a high degree of protection.

- Align with Best-Practice Models: Emulate language from places that excel in these areas. For instance, Charleston's plan implementation includes developing documentation "to assist in planning and future mindful development" - meaning their Area Character Appraisals actually double as documentation tools for neighborhoods, including historic and possibly archaeological features. San Marcos might consider a similar approach: e.g., an "historic context report" for each older neighborhood, which would also document known archaeological and cultural sites in that area, serving as both a planning and documentation tool.
 - **Currently Addressed: Plan recommends development of thematic context statements to document San Marcos' history and help facilitate designation (pg. 128).**
- Make it Accessible: Ensure that once developed, these materials (forms, guidelines) are easily accessible on the City's website and referenced in the plan. The goal is to lower the barrier to entry for citizens. If a neighborhood leader reading the plan can readily see how to start the process to get their area designated - with clear forms and standards - they are more likely to act. Conversely, if such info is absent, the plan's utility is diminished.
 - **Currently Addressed: Updates to the Historic Preservation Program are suggested on pg. 148-149**

By addressing these details, the plan will provide not just the "why" of preservation, but the "how." This improves clarity for users and aligns San Marcos's plan with the thoroughness seen in other communities' plans.

Demolition Delay Policy: Clarify Ambiguities and Align with Best Practices

Observation: The draft plan's section on Demolition Review and Demolition Delay reveals both the strengths and the shortcomings of the City's current policy. It acknowledges multiple issues with the existing ordinance: for example, "the demolition delay ordinance does not specifically address contributing resources in National Register districts," the delay "rarely results in avoidance of demolition," there's "no clear process for developing demolition alternatives," and no mechanism to prevent demolition after the 180-day delay expires. These candid findings (Plan p.124) indicate the City is aware that the tool isn't as effective as intended. The Solutions proposed in the plan attempt to fix these: e.g., clarify the code so NR-district contributing buildings also get the delay; provide info packets to owners on preservation incentives; engage owners during the delay to find alternatives; require documentation if demolition proceeds; and even consider code changes to allow denial of demolition for properties meeting landmark criteria (unless hardship is proven).

While these solutions are proactive, there are ambiguities and potential contradictions, especially regarding alignment with accepted preservation policies:

- The plan suggests possibly allowing outright denial of demolition for certain significant properties. This is a strong measure - essentially it would treat undesignated properties that qualify as landmarks as if they were designated, stopping demolition unless a hardship is shown. However, this might conflict with accepted practice and possibly with NPS/SHPO guidance for Certified Local Governments. Typically, if a property is not officially designated, cities are cautious in halting demolitions; they use delays to negotiate alternatives or to allow time for designation. San Marcos's idea is innovative but could be legally and procedurally tricky. The National Park Service (which oversees the CLG program) expects clear, transparent processes. If San Marcos empowers the HPC to deny demolition on an ad-hoc basis, it could be seen as an unpredictable regulation, unless carefully codified. The plan doesn't fully flesh out how this would work - that's an ambiguity. It also doesn't mention the potential for the City or others to purchase or landmark a property during the delay, which is a common last-resort strategy elsewhere.
 - **Currently Addressed: Ad hoc denial of demolition for undesignated properties is not proposed. Solutions on p. 124 strengthen the demolition delay process to allow time for research, alternatives analysis, and evaluation of whether a property meets local landmark criteria. Strategies such as further research, designation during the delay period, or other preservation outcomes would be addressed during implementation and code revisions, which is consistent with accepted preservation practice and National Park Service expectations.**
- The plan calls for providing information and even creating an HPC committee to brainstorm alternatives during the delay period. This is a great idea, but the draft doesn't reconcile this with the fact that, currently, after 90 or 180 days, the owner can still demolish. In other words, what happens if the committee cannot find an alternative the owner likes? The plan doesn't explicitly say - though one solution is the above-mentioned denial clause, which is left as "consider updating code". This leaves a policy gap: stakeholders reading the plan might wonder, are we moving toward a stricter no-demolition policy, or are we simply adding hoops that still end in demolition?
 - **The intent behind demolition delays is not to prohibit demolitions altogether. These delays serve as a procedural safeguard to allow adequate time for review, documentation, and consideration of historic significance before irreversible actions occur. A complete prohibition on demolitions would require City Council to approve a formal moratorium, which is a separate policy action and not the purpose of the current delay process.**

- Additionally, there's a mention in the draft that contributing buildings in NR districts currently might slip through (if they are under 80 years old or not high/medium priority). The plan fixes that by proposing they be included in delay coverage. But the draft doesn't clarify how to integrate that with National Park Service guidelines. (NPS doesn't directly govern local demo delays, but if San Marcos treats NR-contributing buildings on par with local landmarks for delay, that's fine - just needs to be codified.)

- **Currently Addressed: This is addressed in Solution 1 pg. 124.**

- There's also an implicit conflict: The plan on one hand says demolition should be avoided, yet on the other hand, it emphasizes that when demolition happens, documentation and salvage should occur. Salvage (e.g., requiring the owner to salvage architectural elements) was mentioned as a possible condition. The Secretary of the Interior's Standards generally prioritize preservation in place over salvage; salvage is mitigation, not preservation. So the plan needs to be careful not to present salvage/documentation as an equal alternative to preservation. This nuance isn't clearly addressed and could be confusing or even seen as contradictory to preservation best practices (which would always prefer saving the building, using documentation only as mitigation if loss is unavoidable).

- **Recommended Revision: Add a Finding to page 126: “The Secretary of the Interior’s Standards generally prioritize preservation of material over salvage, which should be seen as mitigation.”**

Why It Matters: Demolition delay ordinances are a critical tool for cities to protect historic resources, but they must be clear, enforceable, and aligned with legal frameworks. If the San Marcos plan leaves ambiguity, it could lead to inconsistent HPC decisions or even legal challenges. For example, telling an owner "we might deny your demo permit because your building could be historic" without a formal designation could trigger resistance or worse. Clear rules, on the other hand, empower the HPC to act decisively and credibly. National Park Service guidance encourages communities to have strong preservation ordinances, but they also stress that decisions should be based on established criteria and due process (to respect property rights while achieving preservation). So, any strengthening of the demo delay needs to be airtight in justification. Other cities have navigated this balance:

- Charleston, SC uses tiered levels of protection. In areas without full protection, they at least have review for demolition of historic materials (San Marcos has something similar - "80 years or older triggers review"). What Charleston did, as noted earlier, was create Area Character Appraisals that help justify why certain "non-protected" areas still shouldn't be drastically altered. That data can support stricter controls. San Marcos may consider a similar documentation approach to bolster any future stricter demo regulations.
- San Antonio has a well-regarded approach: they allow for designation during the delay. If a historically significant building is threatened, the Historic Preservation Officer or Commission can initiate landmark designation within the delay period, which if approved by Council, permanently protects the building (unless the owner proves

hardship). San Marcos's plan hints at this by saying research should be done during the delay to see if the property meets landmark criteria. The plan should explicitly endorse this strategy: i.e., "If during the 90-day delay it is determined the property qualifies as a local landmark, the City may move to designate it, thereby preventing demolition." That's a clear process in some cities and aligns with the idea of denial unless hardship (because once designated, denial is legally supported).

- During the drafting of the demolition review regulations for historic resources in 2019, the Historic Preservation Commission's proposed version included a pathway for properties to achieve local landmark designation. However, this provision was removed by the Planning and Zoning Commission in its recommendation. The City Council subsequently adopted the regulations without incorporating a designation process.
- PlaceEconomics often notes that older buildings are assets and that "demolition of older housing stock is virtually never replaced with more affordable or better options". In other words, there is economic rationale to avoid demolition. Citing such findings can help buttress San Marcos's stricter stance. The plan could reference that preserving a building, even if not landmarked, can have community value that demolition forecloses. By integrating these perspectives, the City can make a stronger case for robust demolition controls in line with broader policy goals (like sustainability and affordability).

Recommendations: San Marcos should clarify and fortify the demolition delay section of the plan, to eliminate ambiguity and align with best practices. Key actions:

- Explicit Policy Statements: The plan should state clearly the intended outcome: "Avoid demolition of historic resources whenever possible." All the tools (delay, negotiation, incentives, documentation) serve that end. By stating this, it aligns with National Register policies that demolition is a last resort.
 - Recommended Revision: Finding 2 on page 124 "Avoiding the demolition of historic resources wherever possible is a core goal of preservation. In practice, the City's demolition delay ordinance rarely results in preventing demolition, and alternative solutions are seldom identified."
- Refine the "deny demolition" idea: If the City is serious about allowing demolition denial for eligible landmarks, the plan must outline how. A potential mechanism: during the delay, the HPC or HPO will prepare a landmark designation for the property in question, and fast-track it to City Council. If Council designates the property as a local landmark, then any demolition requires a Certificate of Appropriateness, which can be denied by the HPC (subject to appeal and hardship provisions in the ordinance). Essentially, rather than an open-ended power to deny, it uses the designation process as the vehicle. The plan should recommend updating the code accordingly (which it already hints at: "consider updating the code to allow denial... unless hardship"). By clarifying this, owners are on notice that truly significant buildings will be considered for permanent protection, not just subjected to a delay.

- State law requires property owner consent to the designation as a local historic landmark. If the owner does not consent to the designation, a $\frac{3}{4}$ vote is required by the Historic Preservation Commission, the Planning and Zoning Commission, and the City Council. Also, the owner may withdraw their consent at any point during the designation process Landmark designation.
- Strengthen Process During Delay: The idea of an HPC committee to work with owners is excellent. The plan should detail this process: for example, "Upon imposition of a demolition delay, a working group (HPC members, preservation nonprofits, community reps) will be convened to explore alternatives: finding a purchaser to rehab the property, assisting the owner in applying for grants/tax credits, or identifying modifications to the project to preserve the structure." The plan could even set a goal for this process, such as "Aim to save at least 25% of structures that go into delay through alternative solutions." Right now, as the plan notes, delay rarely stops demolition; with these measures, that statistic should improve.
 - **Implementation:** This can be implemented through the development of an annual work plan for the Historic Preservation Commission.
- Consistency with NPS Standards: Ensure any new requirement (like the documentation package or salvage) is couched as mitigation, not substitute. For example, revise the language in the plan to: "If demolition ultimately proceeds, the City will require mitigation measures: documentation of the structure and, where feasible, salvage of significant architectural elements for reuse or archival preservation. These measures follow the spirit of the Secretary of the Interior's Standards, which recommend recordation as mitigation for loss." This signals that San Marcos is not contradicting preservation principles but rather following accepted mitigation practice.
 - **Recommended Revision:** Solution 4 on page 120: "Require a documentation package as mitigation for all demolition permits that are issued after a delay as a condition of the demolition permit, to include at minimum photographs and a brief history of the property. ~~A Story Map and/or measured drawings could also be required on a case-by-case basis, scaled to the resource's significance.~~ At a minimum, this should include photographs and a brief history of the property. Where feasible, additional measures such as the salvage of significant architectural elements for reuse or archival preservation should also be implemented. These actions align with the Secretary of the Interior's Standards, which recommend recordation as mitigation for the loss of historic resources. In cases of financial hardship, consider City subsidization or partnership with Texas State or other organizations like Preservation Texas for documentation."
- Educate and Incentivize: The plan already suggests giving applicants a resource packet about grants, tax credits, etc., at the time of demolition application. This is great - it uses carrot, not just stick. The recommendation is to implement that immediately and even consider a "cooling off period": e.g., many cities require that the 90-day delay doesn't start until the owner has met

with the HPO to discuss alternatives. That ensures engagement. The plan can recommend such a procedural tweak.

- **Future Revision/Initiative: Adding a “cooling off period” to the demolition delay requirements requires research of peer cities.**
- Interagency Coordination: Coordinate with other bodies like the Building Official and Code Enforcement to watch out for "demolition by neglect" scenarios. The draft's demolition by neglect findings note it's not common, but there are unclear enforcement components. The plan could recommend establishing a protocol where, if a historic building is cited for serious neglect, the HPO and HPC are notified to potentially intervene before it becomes a demolition case. This way, demolition delay is part of a broader preventive approach.
 - **Recommended Revision: Solution, pg. 125: “Continue to foster a strong relationship between and the Chief Building Official, Code Compliance Office, and the HPO, and HPC to address hazardous conditions before they threaten public safety (at which point a COA or demolition review may be bypassed).**
- Case Studies in Plan: To drive the point home, the plan might include a text box example of a successful save from another city. For instance: "In Austin, TX, the historic Baker School was slated for demolition, but through a demolition delay and proactive landmarking by the city, it was saved and repurposed. San Marcos will pursue similar strategies." Real examples reassure that these tactics can work and aren't unprecedented.
 - **Staff is unaware if the Baker School was slated for demolition, or that a demolition delay ordinance was used to save it. Instead, it appears the building was sold by Austin ISD and purchased by a private owner who always intended to reuse it. The local historic zoning that protects the building was owner initiated, not imposed proactively by the City.**

By ironing out the demolition delay policy and clearly stating how San Marcos will handle threatened buildings, the plan will eliminate confusion and potential conflict with broader policies. It will empower the HPC with a clearer mandate and give property owners a transparent process. In essence, it moves the city toward what PlaceEconomics calls seeing old buildings not as obstacles but as opportunities - keeping what we have, because "one cannot build old housing" again. The result should be fewer demolitions and more creative reuses, which is a win for the city's heritage and future.

Inclusivity, Equity, and Interagency Coordination Gaps

Observation: While the draft plan recognizes the importance of underrepresented history and has numerous community input snippets from diverse voices, it falls short of integrating inclusivity, equity, and interagency collaboration into its concrete strategies. A few examples:

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- Inclusivity & Equity in Preservation: The plan notes issues of representation - for instance, that current heritage tours highlight mainly affluent white history, and it lists Hispanic and Black cultural sites (Centro Cultural Hispano, the Calaboose African American Museum, etc.) as important community resources. It also calls for the HPC to have members that reflect San Marcos's diversity, even suggesting offering childcare to enable broader participation on the HP . These are positive steps. However, the plan doesn't spell out how preservation initiatives will equitably benefit all neighborhoods or protect cultural heritage that isn't architecture-centric. For instance, there is no dedicated discussion of preserving cultural traditions, festivals, or intangible heritage, which are vital to inclusivity. It also doesn't address potential gentrification impacts - preserving a neighborhood could raise property values; how will long-time, possibly lower-income residents be supported so they aren't displaced? Equity in preservation means balancing growth with keeping communities intact. The draft touches on affordability only lightly in the context of encouraging reuse of existing housing, but does not make it a prominent goal.

- **Currently Addressed: Solutions under Cultural Contributions Recognition (p. 146) and Heritage Marketing Expansion (p. 147) provide opportunities for telling more diverse stories. Solutions under the Economic Development Focus Area (pp. 134-141) provide solutions for tax abatements, grants, or low-interest loans for homeowners to maintain their properties.**

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- Interagency Coordination: San Marcos's historic preservation efforts do not occur in a vacuum - the school district (SMCISD), Hays County, and Texas State University (TXST) are major stakeholders that control historic resources. For example, the Lamar School property (with its significant civil rights history) is owned by SMCISD; the City alone cannot repurpose or save that building without working with the school board. The draft plan is largely silent on collaboration with the school district. Likewise, Texas State University has many historic buildings (old dorms, the original 1903 campus building, etc.) and has in the past acquired land near Spring Lake and downtown that has historic importance. The University is not under city preservation ordinances (state entities are exempt from local designation), so the only way to preserve those resources is partnership. The plan mentions Texas State as a partner here and there (e.g., in doing surveys or outreach) , but there's no strategy like "form a University-City Historic Preservation task force" or "regular coordination meetings with TXST on historic properties". Similarly, Hays County: The County manages the Courthouse (a central historic landmark) and perhaps other sites, plus the County Historical Commission can be a powerful ally. Other than listing the Hays County Historical Commission (HCHC) as a partner in some implementation items, the plan doesn't describe how City and County efforts will align. In short, interagency coordination is treated passively, not proactively.

- The Lamar School building, located at 500 W Hutchison Street, is privately owned. City leadership currently meets with Texas State University, Hays County, and SMCISD monthly to discuss relevant initiatives. These entities are identified as key “partners” in the Implementation Matrix and will be instrumental in implementing various solutions in the Plan.
- Recommended Revision: Add to Policy & Programs Statement, p. 94: “As a state institution, Texas State University is exempt from local zoning and historic preservation regulations; therefore, the Solutions in this Plan focus on actions within the City’s regulatory authority and on collaborative coordination where appropriate.”
- Recommended Revision: Add to Plan Implementation & Maintenance section, p. 152: “Staff will communicate with the entities identified as Community Partners to educate on the plan, collaborate on identifying priority solutions, and identify resources or partnerships to realize the Plan.”
- Community Partnerships and Social Equity Programs: The draft plan catalogs many existing organizations (heritage associations, cultural centers) and suggests involving them. But it misses an opportunity to recommend new initiatives that explicitly tie preservation to community benefits. For example, no mention is made of working with affordable housing programs to stabilize historic neighborhoods, or using preservation as a tool for neighborhood empowerment (aside from generic outreach). Contrast this with San Antonio, where the Office of Historic Preservation launched programs linking preservation to equity - the "Opportunity at Risk" report in San Antonio reframed older homes as key to affordable housing. San Antonio actively promoted using historic rehabilitation to provide affordable housing and even training programs for local workers in preservation trades (addressing equity in employment). San Marcos's plan doesn't include such innovative, inclusive programs.
 - **The Plan integrates equity and community benefit in ways appropriate to a preservation plan, through inclusive recognition, adaptive reuse, Legacy Business support, and economic-development tools.**

Why It Matters: A preservation plan in 2025 needs to go beyond buildings - it should acknowledge and uplift the people and stories connected to those buildings. Inclusivity and equity ensure that preservation isn't perceived as only for wealthy or certain groups, but rather as a benefit for the whole community. By engaging diverse histories (Hispanic, African American, indigenous, etc.) and ensuring policies don't inadvertently burden disadvantaged groups, the City builds broader support for preservation. Likewise, active coordination with other government entities prevents working at cross purposes - for example, the City could

invest in saving a building that the University might unknowingly plan to demolish for campus expansion, unless they talk to each other. Other communities provide good models:

- **Currently Addressed: Solutions under the Engagement and Education Focus Area (pp. 146-150) move beyond preservation of buildings. For example, Solution 8, p. 146: Explore a photo banner program to highlight local heritage in the public realm to celebrate community history and identity. San Antonio's Fotohistorias del Westside project could be used as a model.**
- PlaceEconomics research emphasizes that historic districts are often more economically and racially diverse than people assume, and that preserving older housing helps provide naturally affordable homes. This runs counter to the myth that preservation is elitist. The plan could use data like that to reinforce an inclusivity message: preserving modest homes and historically minority neighborhoods is as important as grand Victorian mansions on Belvin Street.
- Charleston, SC (again) provides a lesson: their recent efforts with Area Character Appraisals directly involved residents in documenting what's important in their neighborhoods, including historically marginalized areas. That not only produces a useful study, but also builds community pride and inclusion in the process. San Marcos has neighborhoods with rich Chicano/Mexican American history (like barrio Victory Gardens) and African American history (Dunbar and surrounding). The plan should ensure those communities are partners in next steps - perhaps via a "Community Heritage Committee" or similar.
 - **Implementation: This could be used to implement Solution 1, pg. 128.**
- Tyler's plan (2017), according to the THC summary, had a goal specifically to "Identify and prioritize historic resources" and another to "Promote historic preservation through outreach and education". Part of that outreach was likely making preservation relevant to all of Tyler's citizens, not just in the Azalea District. San Marcos can take a page from that by formalizing outreach to underrepresented communities - maybe hosting preservation workshops at Centro Cultural Hispano or collaborating with the Calaboose museum on Black history programming. Those tactics make preservation more inclusive.
- On the interagency front, consider Plano: their Heritage Preservation Plan was actually integrated as an element of the city's comprehensive plan and coordinated with other city initiatives (parks, etc.) . While not explicitly interagency, it shows alignment with wider city goals. For San Marcos, aligning with the independent school district and university is analogous. Perhaps the plan could call for an MOU (Memorandum of Understanding) between the City and Texas State University to consult on any developments affecting historic sites (for example, if TXST ever wanted to alter the old Spring Lake hotel building, there'd be a process). Likewise, working with the school

district on adaptive reuse of historic schools (Lamar, and also the old Southside School mentioned in the plan).

- **Implementation: Adoption of the Historic Preservation Plan is implementation of the Vision SMTX Comprehensive Plan as well as implementation of a strategic initiative outlined by City Council. Potential agreements between the City and Texas State University could be a component of partner conversations regarding implementation on specific solutions which are relevant to their jurisdiction.**

Recommendations: Integrate inclusive and collaborative strategies throughout the plan, and add a section explicitly addressing these concerns. Some suggestions:

- **Equity as a Guiding Principle:** In the plan's vision or goals (perhaps an early chapter), explicitly state a commitment to inclusive preservation. For instance: "Ensure that preservation efforts benefit all communities in San Marcos and reflect our diverse heritage." Then, thread this through the actions. One action could be to develop an Inclusive Preservation Outreach Program - maybe an annual "Historic Places of San Marcos" event that highlights Hispanic, Black, and Indigenous histories (beyond the traditional narratives). The draft's Engagement & Education implementation items could incorporate this (e.g., partner with Centro Cultural Hispano for a Hispanic heritage preservation workshop).
- **Recommended Revision: Add to the Vision, p. 2: "Using the ability, resources available, and knowledge of preservation to save and acknowledge our cultural landscape and living heritage, foster a strong sense of place and pride, and protect and promote the unique identity of San Marcos, and ensure that preservation efforts benefit all communities and reflect our diverse heritage."**
- **Recommended Revision: Add to Solution 1, p. 151: "Build on the success of past Preservation Month events and continue robust programming in the future. Future topics can highlight underrepresented histories including Indigenous, Mexican American, and Black history to ensure a more complete and factual narrative of the City's heritage. For example, partnering with Centro Cultural Hispano de San Marcos to host a Hispanic heritage preservation workshop."**
- **Cultural Landscapes and Intangible Heritage:** Expand the plan's scope slightly to acknowledge that heritage is not just buildings. Recommend documenting and preserving cultural traditions and stories associated with historic areas. For example, Victory Gardens has community stories that could be recorded as oral histories (Texas State's public history students could assist). The plan might propose creating a Cultural Heritage Commission or task force to work alongside the HPC, focusing on things like murals, music history, cemetery traditions, etc. This signals inclusivity by valuing more than architecture.
- **Currently Addressed: Solutions under the Engagement and Education Focus Area (pp. 146-150) move beyond preservation of buildings. For example,**

Solution 8, p. 146: Explore a photo banner program to highlight local heritage in the public realm to celebrate community history and identity. San Antonio's *Fotohistorias del Westside* project could be used as a model/case study as part of implementation research.

- Affordable Housing and Anti-Displacement: Incorporate strategies that tie preservation to housing equity. For instance, encourage use of state and federal historic tax credits to rehabilitate older multi-family buildings or houses in historically working-class neighborhoods, with the condition of providing affordable units. The plan could recommend exploring Community Development Block Grants (CDBG) or HUD programs to fund rehabilitation of historic homes owned by low-income families. By doing so, the plan aligns with the idea from San Antonio that keeping older housing in good shape is a front-line strategy for affordability. Also, consider advocating for a property tax relief program for longtime homeowners in local historic districts to mitigate the pressure that sometimes comes from rising property values after designation.
 - **Currently Addressed: Solution 3, p. 136, under Maintenance Incentives addresses this.**
- Enhance Interagency Collaboration: Add a dedicated action such as: "Establish a Preservation Coordination Group with representatives from the City (HPC/HPO), Hays County, SMCISD, and Texas State University to meet semi-annually." The purpose: share information on significant properties and upcoming projects. For example, if the school district is considering surplus of an old school, the City/County can step in with preservation options before demolition is on the table. The plan could cite the need for this using Lamar School as a case: Lamar High, with its significant desegregation history, remains vacant - a coordinated effort between the City and SMCISD could explore its adaptive reuse (perhaps as a community center, as citizens suggested).
 - **Currently Addressed: Solution 6 under City Staff & Resources calls for establishment of a proactive communication between the City and other governmental entities when they are considering disposal of surplus property that may have historic value (p. 120). This is a recommendation carried over from the My Historic Resources Survey (2019).**
- With Texas State, the plan might propose partnerships such as historic walking tours connecting campus and city (to reinforce the joint stewardship of heritage) or collaborative grants (the University's history department + City could seek funding for a project like a digital San Marcos heritage map). The key is to move from just naming these entities in a list to actively working with them.

- Currently Addressed: Walking tours and collaborating with neighborhood groups/preservation groups are Solutions under Heritage Marketing Expansion Goal, p. 147.
- Recommended Revision: Staff proposes adding [Texas State University](#) to the "Partners" column in the Implementation Matrix to Solution 4 under Heritage Marketing Expansion, p. 176
- Monitoring and Inclusivity Metrics: How will we know if we're succeeding in being inclusive? The plan could recommend tracking metrics like: number of designations or markers related to underrepresented history, diversity of participants at preservation events, or HPC membership diversity. Setting a goal, for example, to have at least one landmark from each major ethnic/cultural group's history within 5 years, or ensuring HPC has representation from historically marginalized neighborhoods, would give teeth to the inclusivity aim.
 - Implementation: These are great metrics which can be incorporated into the Implementation process.
- Community Leadership in Preservation: Invite community organizations to take leadership roles. For instance, the plan could support the idea of neighborhood-based preservation committees (like a "Victory Gardens Heritage Committee" or a "Eastside History Alliance"). These groups, comprised of residents, could work in tandem with the City on identifying sites and educating neighbors. This empowers communities and spreads the workload.
 - Future Revision/Initiative: Support for grassroots organizations, as described, could be researched and incorporated into an annual update of the plan.

In summary, weaving equity and collaboration into the plan will make San Marcos's preservation program more robust and respected. Preservation will be seen not as an elite project but as a community-building tool. Emulating San Antonio's linkage of preservation with housing, Charleston's deep neighborhood engagement, and PlaceEconomics' data-backed arguments on diversity will modernize San Marcos's approach. Given San Marcos's vibrant multicultural heritage and multiple governance layers (city, university, county), these steps are not just ideal - they are necessary to ensure the plan's long-term success and relevance.

Conclusion

In its current draft, the San Marcos Historic Preservation Plan establishes a solid foundation and affirmatively states that "San Marcos's history...affirms the City's unique identity". However, to transform this plan into a truly effective roadmap, the City should address the gaps in prioritization, implementation strategy, process clarity, demolition policy, and inclusivity identified above. By learning from peer cities and best practices, San Marcos can:

- Prioritize what matters most: focus on saving key historic places (like Lamar School, heritage neighborhoods, etc.) with a clear timeline and task list.

- Follow through with a realistic plan: present an actionable, funded implementation schedule that the City and its partners can commit to year by year.
- Demystify the process: provide clear guidelines and standards so that property owners and developers alike know the "rules of the game" and how to participate in preserving San Marcos's heritage.
- Stand firm on preservation goals: strengthen policies like demolition delay to prevent avoidable losses, aligning them with state/national standards while giving the HPC real tools to succeed.
- Preserve all of San Marcos's heritage: actively include diverse communities and partner agencies, so that preservation is a shared value across the city - from the river's ancient past to the neighborhoods of the present.

By making these adjustments (many of which can be done before final adoption of the plan), San Marcos will not only have a preservation plan that is complete, clear, and useful, but one that is also imbued with the community's voice and geared for action. The revised plan would emulate the strong points of Tyler's strategic direction, Plano's clarity and structure, Corpus Christi's integration with other goals, Tarrant County's thorough planning tools, Charleston's neighborhood-focused techniques, and San Antonio's equity-driven approach, all while staying true to San Marcos's own character and needs.

This draft is a commendable effort - with refinement, it can become a cornerstone for protecting San Marcos's historical and cultural treasures in the years to come. The meeting's discussion can refer to the cited pages for evidence of these gaps and to the examples from other cities as models for improvement. Adopting the recommendations above will ensure the Historic Preservation Plan is not just a document on the shelf, but a living guide that helps San Marcos navigate growth while cherishing the diverse heritage that makes it unique.

Sources:

- City of San Marcos Draft Historic Preservation Plan (June 27, 2025), pp. 113-125, 208 (draft findings, implementation matrix, community input), and Appendix pages A-69 onward (Implementation Matrix).
- City of Tyler Historic Preservation Strategic Plan (2017) - community engagement and prioritization outcomes.
- City of Plano Heritage Preservation Plan "Preservation Plano 150" (2018) - goals, framework and identification of eligible heritage resources.
- City of Corpus Christi Historic Preservation Plan (2021) - action-oriented approach integrating preservation with city-wide goals.
- Tarrant County Historic Preservation Plan (2021) - example of comprehensive planning with survey and context tools.
- Charleston, SC Preservation Plan and Area Character Appraisals - innovative tools for neighborhood character and inclusivity.

- San Antonio OHP "Opportunity at Risk" report (2018) - linking preservation of older housing to affordability and equity.
- PlaceEconomics "24 Reasons Preservation is Good for Your Community" (2020) - evidence on affordability, diversity, and economic benefits of preservation.

Comments received from Ryan Patrick Perkins via email – *Received Monday, January 19, 2026*

Document titled “Addendum - Lamar Campus & Centro Plaza Preservation”: Received via email, Monday, January 19, 2026

Addendum: Lamar School & Centro Cultural Hispano — Preservation in Practice

Recent events underscore why the Draft Historic Preservation Plan must move beyond general aspiration and into prioritized, actionable policy—particularly regarding Lamar School (500 W. Hutchison) and the former Mexican Southside School site, now Centro Cultural Hispano de San Marcos.

In January 2026, SMCISD formally ceased negotiations for land near Centro Cultural Hispano. The reporting makes clear that the district is reassessing its facilities strategy and land needs in this area. This moment is instructive. It illustrates both the fragility of culturally significant places when institutional plans shift and the absence of a coordinated preservation framework between the City, SMCISD, and community stakeholders.

Centro Cultural occupies the former Mexican Southside School—a site born of segregation and now reclaimed as a center of Hispanic cultural life. It is precisely the kind of place this plan identifies as underrepresented heritage deserving elevation and protection. Yet the current framework offers no proactive mechanism to engage the school district, anticipate land-use changes, or ensure that preservation goals inform those decisions before they become *faits accomplis*.

Lamar School presents an even clearer opportunity for the City to act.

If the City is considering consolidating or relocating offices, why not seriously evaluate rehabilitating Lamar School as a municipal campus before removing additional property from the tax rolls elsewhere?

1) Lamar is already identified as a priority reuse candidate

The City’s own preservation work explicitly identifies Lamar as a high-priority resource. It is:

- Flagged by the My Historic SMTX survey as high priority
- Noted for its mid-century school design
- Recognized for its association with early desegregation and Black history
- Identified by the community as a place they want to see adaptively reused
- Marked as vulnerable due to vacancy and redevelopment pressure

If the City means what it says about preservation, a city-led adaptive reuse of Lamar is the most visible “lead by example” project available. It would demonstrate that preservation is not merely regulatory—it is a civic value embedded in capital planning.

2) The rehabilitation toolbox already exists

The draft plan itself outlines the incentive framework:

- Texas Historic Preservation Tax Credit: 25% of eligible rehabilitation costs, including nonprofit and public uses
- Federal Historic Tax Credit: 20% for qualified income-producing rehabilitations
- A growing ecosystem of grants, partnerships, and public-private structures

Even if the City cannot directly monetize every credit, the core point remains: the rehabilitation toolbox exists. The plan repeatedly recommends educating owners and developers about these tools to expand adaptive reuse. Lamar provides the City with the chance to apply its own playbook.

3) Reuse is a fiscal and environmental decision

The plan cites the now-standard principle that “the greenest building is the one already built.” Multiple studies show that adaptive reuse typically outperforms demolition and new construction on environmental impact, particularly when embodied carbon is considered. It can take decades for “new green” construction to offset the climate cost of demolition.

Evaluating Lamar is not nostalgia. It is fiscal prudence and environmental stewardship.

4) Zoning history supports civic reuse

This site has been contentious for over a decade. In 2015, the owner sought to rezone Lamar from Public/Institutional to a Planned Development District with a Mixed Use base under the “Lindsey Hill” concept. In April 2016, Planning & Zoning recommended denial, and the proposal never advanced to Council.

Regardless of one’s view of that project, the lesson is clear: this property sits at the edge of historic neighborhoods where intensity, compatibility, and precedent matter. A civic reuse by the City represents an “area of stability” outcome aligned with neighborhood context and preservation policy, rather than another attempt to force high-intensity redevelopment onto a site with a long record of community concern.

5) Lamar is functionally plausible for civic use

As a municipal campus, Lamar is not speculative:

- The auditorium naturally supports public meetings and Council-style functions
- The building footprint supports departmental offices and flexible planning
- The site already has workable parking and outdoor space

It is a practical option, not a romantic one.

What this Plan should require

Before the City commits to new municipal facilities that expand tax-exempt footprint elsewhere, this plan should require that Lamar School be formally included in the options set and that the City commission a basic feasibility analysis comparing:

- Rehabilitation and phased occupancy at Lamar vs. new construction or acquisition elsewhere
- Lifecycle costs, including energy and maintenance
- A preservation and equity impact statement consistent with adopted goals

If the City is serious about preservation, Lamar is the most visible opportunity to prove it—while meeting operational needs and respecting surrounding historic neighborhoods.

Likewise, the Centro Cultural episode demonstrates why this plan must mandate proactive interagency coordination. The final plan should require:

- Regular coordination between the City, SMCISD, Hays County, and Texas State University on historic properties
- Early consultation when institutional land strategies affect culturally significant sites
- A standing preservation liaison process so that decisions like those near Centro Cultural do not occur in isolation

Preservation is not merely about regulating private owners. It is about aligning public institutions with shared civic values. Lamar and Centro Cultural are not abstract examples—they are real tests of whether this plan will shape outcomes or merely document losses.

- **Staff Response:** The Lamar School building, located at 500 W Hutchison Street, is privately owned. The Plan recognizes the Lamar School as a high-priority resource in survey findings and provides a reuse/incentives toolbox (state/federal tax credits, grants, public-private structures) and environmental/fiscal benefits of reuse. The plan does not provide recommendations on private property acquisitions for municipal purposes; however, such discussions may be directed by City Council and would be out of the scope of this Plan.