

Local_Preservation_Biblio

Authoritative Best-Practice & Guidance Sources for Local Historic Preservation

An Annotated Bibliography for Pennsylvania and Small-Town Preservation Practice

Compiled July 2026

Executive Summary

This annotated bibliography assembles the core body of authoritative guidance for local historic preservation practice, with emphasis on Pennsylvania municipalities and small-town/local contexts. The sources fall into six tiers that together form a coherent "stack" of authority:

- 1. **Federal standards and technical guidance** (National Park Service, Advisory Council on Historic Preservation) supply the substantive review standards — above all the *Secretary of the Interior's Standards* — that nearly every local ordinance, HARB, and design guideline in Pennsylvania incorporates by reference. NPS's *Preservation Briefs* remain the single most-cited technical series in local design review nationwide.

Pennsylvania state agencies (PHMC and its Bureau for Historic Preservation, operating as the PA State Historic Preservation Office / PA SHPO) provide the legally decisive guidance for Pennsylvania: interpretation of the Historic District Act of 1961 (Act 167), the certification process for local historic districts, the Certified Local Government (CLG) program, model ordinance language, design-guideline principles, and the statewide preservation plan (*Historic Preservation: The Keystone of Community*, 2025–2035).

National nonprofit and advisory organizations (National Trust for Historic Preservation, National Alliance of Preservation Commissions, Main Street America) supply commission training (NAPC's CAMP®), economic-revitalization methodology (the Main Street Approach™), and policy research connecting preservation to housing, sustainability, and local economies.

Pennsylvania statewide nonprofits (Preservation Pennsylvania, WeConservePA, Pennsylvania Downtown Center) translate national practice into Commonwealth-specific legal and organizational guidance — WeConservePA's *Local Regulation for Historic Preservation* guide is arguably the best single free treatment of Act 167 vs. MPC ordinance drafting available anywhere.

Regional and county planning bodies (DVRPC, the Chester / Montgomery / Bucks county planning commissions, Delaware County Planning Department, Preservation Alliance for Greater Philadelphia) are the practical engines of ordinance adoption in southeastern Pennsylvania, publishing model ordinances, planning manuals (Chester County's *Preserving Our Places* and its eTools series), and hands-on drafting assistance.

- 6. **Research and data sources** (Center for Rural Pennsylvania ordinance inventory, PA-SHARE, PlaceEconomics-style economic studies) provide the empirical base for advocacy and ordinance

design.

How to use this bibliography. A municipality or advocate beginning a preservation program should start with the PA SHPO "Planning and Ordinances" page and PHMC's *Historic District Designation in Pennsylvania*, then use WeConservePA's guide and the relevant county planning commission manual for drafting; NPS Briefs and the Secretary's Standards for substantive review criteria; and NAPC/Main Street resources for building commission capacity and pairing regulation with economic revitalization. Entries below note the practical role each source plays.

I. Federal Standards & Technical Guidance

1. The Secretary of the Interior's Standards for the Treatment of Historic Properties — National Park Service

Link: <https://www.nps.gov/orgs/1739/secretary-standards-treatment-historic-properties.htm>

The foundational substantive standard for virtually all preservation review in the U.S., defining four treatments (preservation, rehabilitation, restoration, reconstruction), with the Rehabilitation Standards the most commonly incorporated into local ordinances and design guidelines — including most Pennsylvania HARB ordinances (e.g., Cheltenham's Chapter 295 review criteria). Pennsylvania appellate law (*Meyer v. Pittsburgh HRC*, 2019) has held that applying these Standards can satisfy an ordinance's review requirement even where district-specific guidelines don't yet exist, making them the default legal safety net for local commissions. The illustrated *Guidelines* that accompany the Standards are the working reference for what "compatible" means in practice.

2. NPS Preservation Briefs (series of 50+) — National Park Service, Technical Preservation Services

Link: <https://www.nps.gov/orgs/1739/preservation-briefs.htm>

The most-cited technical series in local design review: concise, illustrated guidance on specific materials and problems (repointing mortar joints, historic windows, roofing, storefronts, additions to historic buildings, accessibility, sustainability). HARBs and historical commissions routinely attach or cite specific Briefs in Certificate of Appropriateness decisions, and homeowners' guides published by boroughs frequently crib from them. Free, public-domain, and the best starting point for any "how do I fix this correctly?" question.

3. NPS Preservation Tech Notes & Interpreting the Standards (ITS) Bulletins

Link: <https://www.nps.gov/orgs/1739/preservation-tech-notes.htm>

Companion series to the Briefs: Tech Notes document innovative case-study solutions; the ITS bulletins show how NPS applies the Rehabilitation Standards to recurring situations (rooftop additions, replacement windows, porch enclosures). Useful when a local commission faces a novel proposal and wants federal-level precedent for consistency.

4. Certified Local Government (CLG) Program Guidance — National Park Service

Link: <https://www.nps.gov/subjects/clg/index.htm>

The federal framework (36 CFR Part 61) under which municipalities become CLGs, unlocking dedicated pass-through grants (at least 10% of each state's Historic Preservation Fund allocation) and technical assistance. Includes program requirements, partner-organization directories, and best-practice profiles. Pennsylvania has roughly 49 CLGs, including SEPA participants such as Phoenixville, Chalfont, Lower Makefield, and Haverford Township; the NPS pages explain what commission composition, survey activity, and reporting the designation requires.

5. Advisory Council on Historic Preservation (ACHP) — Section 106 Guidance & Training

Link: <https://www.achp.gov/>

The independent federal agency overseeing Section 106 of the National Historic Preservation Act. Its regulations (36 CFR Part 800), *Citizen's Guide to Section 106 Review*, and free online training are essential whenever a local project involves federal funding, permitting, or licensing (transportation projects, CDBG funds, FCC towers). ACHP also publishes policy statements connecting preservation to housing and climate — increasingly relevant to local ordinance debates. Local reviews are independent of Section 106, but the two processes frequently run in parallel and inform each other.

6. National Register of Historic Places — Bulletins & Guidance — National Park Service

Link: <https://www.nps.gov/subjects/nationalregister/publications.htm>

The *National Register Bulletins* (especially *How to Apply the National Register Criteria for Evaluation*, Bulletin 15) are the canonical guidance for determining what is "historic" — the evaluation vocabulary (significance, integrity, period of significance, contributing/non-contributing) that Pennsylvania local ordinances and historic-resource inventories borrow wholesale. Note the crucial practice point the Bulletins make clear: National Register listing is largely honorific and does **not** restrict private owners; only local ordinances regulate.

II. Pennsylvania State Agencies (PHMC / PA SHPO / BHP)

7. PA SHPO — "Planning and Ordinances" (Community Preservation) — PHMC

Link: <https://www.pa.gov/agencies/phmc/historic-preservation/community-preservation/planning-ordinances>

The single best starting page for a Pennsylvania municipality considering an ordinance. Provides the state's official overview of the two enabling paths — the Historic District Act (Act 167 of 1961) and the Municipalities Planning Code (MPC, Act 247) — plus the PHMC district-certification process (updated policy, 2024), guidance on integrating preservation into comprehensive plans, and the *Principles and Standards for Design Guidelines in Pennsylvania Communities*, the state's guidance on producing effective illustrated design guidelines. Directs communities to their assigned Community Preservation Coordinator, the SHPO staffer who shepherds certification requests.

8. *Historic District Designation in Pennsylvania* — Michel R. Lefèvre, PHMC

The Commonwealth's standard manual on creating and administering Act 167 local historic districts: legal requirements, HARB composition, the Certificate of Appropriateness process, PHMC certification, and administration lessons drawn from long-running programs (Doylestown, West Chester, and peers). Referenced as the authoritative treatment by PA SHPO itself and by the WeConservePA guide. Request current edition/PDF from PA SHPO (RA-BHPmail@pa.gov) or via the Planning and Ordinances page above.

9. *Historic Preservation: The Keystone of Community* — Pennsylvania's Statewide Historic Preservation Plan, 2025–2035 — PA SHPO

Link: <https://www.pa.gov/agencies/phmc/historic-preservation/about-historic-preservation/statewide-historic-preservation-plan.html>

The Commonwealth's official ten-year plan, satisfying NHPA and PA History Code planning obligations. Its goals — reducing real and perceived barriers to preservation, expanding education/training, improving tools and programs — set state funding and technical-assistance priorities, so aligning a local grant application or ordinance initiative with the plan's action agenda is a practical advantage. Includes supporting survey data (Penn State Lion Poll reports) useful for demonstrating public support.

10. PA SHPO Certified Local Government Program (Pennsylvania) — PHMC

Link: <https://www.pa.gov/agencies/phmc/historic-preservation/community-preservation> (CLG section)

Pennsylvania's implementation of the federal CLG program, overhauled in late 2018: eligibility, application, and the dedicated CLG grant stream (used, e.g., by Chalfont for design guidelines and Lower Merion for survey updates). The program pages and the PA SHPO blog's CLG posts are the definitive guidance on what participation requires and funds.

11. Pennsylvania Historic Preservation Blog — PA SHPO

Link: <https://pahistoricpreservation.com/>

The SHPO's working blog and the most current, candid channel for state guidance: series like "3 Things to Know About Local Preservation Programs in Pennsylvania" (source of the definitive Act 167 certified-district counts by county), CLG spotlights, PA-SHARE how-tos, and practice notes for HARBs and historical commissions. Searchable archive going back over a decade; often the only place where PHMC staff interpret gray areas in writing.

12. PA SHPO Laws, Regulations & Forms/Guidance Pages — PHMC

Links: <https://www.pa.gov/agencies/phmc/historic-preservation/about-historic-preservation/laws-and-regulations> and <https://www.pa.gov/agencies/phmc/historic-preservation/about-historic-preservation/forms-and-guidance>

One-stop links to the primary legal texts — PA Constitution Art. I § 27, the PA History Code (Title 37), the Historic District Act (Act 167) full text, and the MPC — plus current SHPO forms, survey guidance, and the State History Code Consultation Policy. The authoritative citation source when drafting ordinance "whereas" clauses or briefing solicitors.

13. PA-SHARE (Pennsylvania's State Historic & Archaeological Resource Exchange) — PA SHPO

Link: <https://share.phmc.pa.gov/>

The state's map-based inventory of historic resources, surveys, National Register listings, and Act 167 local historic district boundaries. The starting point for any local survey or inventory effort and the system through which SHPO consultations now run. Guest access is free; deeper file access requires a subscription or a Harrisburg research visit.

14. Keystone Historic Preservation Grant Program — PHMC

Link: <https://www.pa.gov/agencies/phmc/historic-preservation> (Grants section)

Pennsylvania's dedicated preservation funding: Planning Grants (\$5,000–\$25,000) and Construction Grants (\$5,000–\$100,000), both matching, available to nonprofits and local governments for publicly accessible historic properties. Guidance documents define eligibility and scoring — required reading before any municipal survey, design-guideline, or planning project seeking state support.

III. National Nonprofit & Advisory Organizations

15. National Alliance of Preservation Commissions (NAPC)

Link: <https://www.napcommissions.org/>

The only national organization dedicated specifically to local preservation commissions, HARBs, and boards of architectural review. Key resources: the **Commission Assistance and Mentoring Program (CAMP®)** — the field-standard "boot camp" training covering legal basics, design review, meeting procedure, and ethics, regularly hosted in Pennsylvania with PHMC as partner; *The Alliance Review* quarterly journal; a resources library with sample ordinance language and a preservation glossary; and the biennial FORUM conference. For a new or struggling HARB, hosting a CAMP is the single highest-leverage capacity-building step available.

16. National Trust for Historic Preservation — Preservation Leadership Forum

Link: <https://savingplaces.org/> and <https://forum.savingplaces.org/>

The national preservation nonprofit (est. 1949). The Preservation Leadership Forum publishes practice-oriented journals, toolkits, and legal resources (including amicus and takings-law analysis relevant to demolition-denial ordinances); the Trust's research arm produced *Older, Smaller, Better* and the *Atlas of ReUrbanism*, the leading empirical case that older building fabric supports stronger local economies — heavily used in local ordinance advocacy. Also administers grant funds and the annual list of America's 11 Most Endangered Historic Places.

17. Main Street America (National Main Street Center)

Link: <https://www.mainstreet.org/>

Originator of the **Main Street Approach™** (Four Points: Economic Vitality, Design, Promotion, Organization) — the dominant national framework for preservation-based downtown revitalization in small

towns. Publishes handbooks, webinars, and the Main Street Now conference; its Design point materials are effectively applied preservation guidance for commercial districts. Directly relevant to Pennsylvania boroughs pairing HARB regulation with economic development (Kennett Square, West Chester, Doylestown, Bristol are all Main Street-style success stories).

18. National Conference of State Historic Preservation Officers (NCSHPO)

Link: <https://ncshpo.org/>

The association of the SHPOs themselves; useful for cross-state comparison of local-preservation enabling frameworks, federal policy tracking (Historic Preservation Fund appropriations that fund CLG grants), and its directory of national partner organizations. Secondary for local practitioners but valuable for advocates working on state-level reform (e.g., MPC amendments).

19. Partners for Sacred Places

Link: <https://sacredplaces.org/>

Philadelphia-headquartered national nonprofit focused on historic religious properties — the building type at the center of many suburban demolition fights. Publishes guidance on shared use, adaptive reuse, and congregational stewardship, plus the "Halo Effect" economic-valuation research quantifying the community value of sacred places. Essential for any municipality or advocate dealing with a closing church.

IV. Pennsylvania Statewide Nonprofits

20. Preservation Pennsylvania

Link: <https://www.preservationpa.org/>

The Commonwealth's only statewide private preservation nonprofit: publishes the annual **Pennsylvania At Risk** list (the state's endangered-places program), technical assistance guidance, advocacy alerts on state legislation, and educational resources; administers grant and intervention funds and partners with PHMC on training (including co-hosting NAPC events). The first call for a community fighting a specific threatened building outside Philadelphia.

21. Local Regulation for Historic Preservation — WeConservePA (formerly Pennsylvania Land Trust Association)

Link: <https://library.weconservepa.org/guides/87-local-regulation-for-historic-preservation>

Arguably the best single free guide to Pennsylvania local preservation law: a detailed, solicitor-friendly treatment of Act 167 versus MPC-based regulation, HARB mechanics, resource classification (and the legal risks of differential Class I/II regulation), demolition review, incentives (e.g., Pocopson Township's floor-area bonus), and links to model ordinances (East Goshen, West Chester, Newtown Borough, Chadds Ford, City of Lancaster Heritage Conservation Districts, PHMC's sample Act 167 ordinance). Prepared with input from PHMC and county planning staff; the companion WeConservePA library hosts the sample ordinances themselves.

22. Pennsylvania Downtown Center (PDC)

Link: <https://padowntown.org/>

The state coordinating program for Main Street and Elm Street in Pennsylvania, administering designation and training under DCED's Keystone Communities program. Its guidance on organizing downtown programs, façade improvement, and design assistance is the practical bridge between preservation regulation and borough economic development; many SEPA boroughs' façade grant programs follow PDC templates.

23. Governor's Center for Local Government Services (DCED) — MPC and Planning Series

Link: <https://dced.pa.gov/local-government/>

Publisher of the official annotated *Pennsylvania Municipalities Planning Code* text and the *Planning Series* handbooks (comprehensive plans, zoning, the zoning hearing board, subdivision and land development). Not preservation-specific, but indispensable context: every MPC-based historic overlay, demolition-review provision, or incentive lives inside the procedural machinery these handbooks explain.

V. Regional & County Sources (Southeastern Pennsylvania)

24. *Preserving Our Places: Historic Preservation Planning Manual* — Chester County Planning Commission

Link: <https://www.chescoplanning.org/Publications/PDF/PreservingOurPlaces.pdf>

The model county preservation-planning manual in Pennsylvania (Local Government Handbook No. 7): frameworks for preservation plans in urban, suburban, and rural landscapes; coverage of HARBs, historical commissions, CLGs, Main Street, easements, deed restrictions, and acquisition. Though dated (1998), it remains the conceptual backbone of Chester County's municipal guidance and was a direct source for the WeConservePA guide.

25. Chester County Planning Commission — Municipal Corner eTools (Historic Preservation series)

Link: <https://chescoplanning.org/MuniCorner/eTools/35-HistoricPlanning.cfm>

The current, continuously updated successor to *Preserving Our Places*: concise eTools on Historic & Cultural Resource Preservation Planning and **Historic Resource Protection Standards** (model MPC ordinance language for demolition review, overlays, and incentives). The most actively used ordinance-drafting resource in the four SEPA counties; Chester County municipalities' recent adoptions trace directly to these templates.

26. Montgomery County Planning Commission (MCPC) — Historic Preservation Guidance

Link: <https://www.montgomerycountypa.gov/planning>

MCPC provides hands-on ordinance drafting assistance to member municipalities (e.g., Springfield Township's 2019 incentive-based Ordinance No. 962) and publishes county planning guidance integrating

historic resources into zoning and comprehensive plans, plus the county comprehensive plan's historic-resources element. Contact-driven rather than document-driven: the planners themselves are the resource.

27. Bucks County Planning Commission — Historic Preservation Resources

Link: <https://www.buckscounty.gov/> (Planning Commission)

Serves the county with the most Act 167 certified districts in Pennsylvania (24 as of PHMC's 2014 count). Publishes municipal planning guidance and maintains historic-resource survey data supporting borough HARBs (Doylestown, New Hope, Newtown, Bristol) and township programs; a key partner for CLG applicants like Chalfont and Lower Makefield.

28. Delaware County Planning Department — Heritage Commission & Survey Assistance

Link: <https://www.delcopa.gov/planning/>

Provides historic-resource survey assistance and planning guidance to Delaware County municipalities and staffs the county Heritage Commission. Particularly relevant for townships weighing scattered-site protection (the Radnor debate) and boroughs administering districts (Media, Swarthmore).

29. Delaware Valley Regional Planning Commission (DVRPC) — Historic Preservation & Classic Towns

Link: <https://www.dvrpc.org/>

The federally designated MPO for Greater Philadelphia; publishes regional planning reports connecting preservation to smart growth, the *Classic Towns of Greater Philadelphia* program marketing older boroughs and townships, and municipal implementation tools under the *Connections 2050* long-range plan. Useful for framing preservation as regional revitalization policy and for grant leverage.

30. Preservation Alliance for Greater Philadelphia — Resource Library & Preservation Toolkit

Link: <https://preservationalliance.com/resource-library/preservation-toolkit/>

The region's principal preservation advocacy nonprofit. Although its regulatory guides target Philadelphia's ordinance, its broader library — the "Preservation 101" handbook collection (from *Why Preserve?* to financial incentives), historic religious properties guidance, easement program (the Alliance holds preservation easements regionwide), and new-construction-in-historic-districts design study — travels well to suburban practice. Also publishes *Extant* magazine with Hidden City Philadelphia and maintains an advocacy program (Places to Save) that has engaged suburban sites.

31. Neighborhood Preservation Toolkit — PennPraxis / Philadelphia Historic Preservation Task Force

Link: <https://www.phlpreservation.org/neighborhood-toolkit>

A resident-facing guidebook (English, Spanish, Chinese) organized around goals — "I want to improve design quality," "strengthen small businesses," "influence policy" — with FAQs, guided activities, and case studies. Philadelphia-authored but deliberately written for lay audiences, making it one of the best available

models for community engagement in any small town; the phlpreservation.org resources page also aggregates reports and legal materials.

VI. Research, Data & Economics

32. *Inventory & Analysis of Historic Preservation Ordinances in Pennsylvania Municipalities* — Center for Rural Pennsylvania (Burg, Pomeroy, Cuthbert et al., Shippensburg/Millersville, 2017–2018)

Link: <https://www.rural.pa.gov/publications/research/>

The definitive statewide empirical study: identified 294 Pennsylvania municipalities with preservation ordinances (105 under Act 167, 195 using MPC authority, some both), catalogued the most common tools (demolition delay/restriction, alteration review, overlays, design guidelines), and recommended MPC reform and better state oversight. The evidence base for any argument about what Pennsylvania municipalities actually do.

33. *Older, Smaller, Better* and the *Atlas of ReUrbanism* — Preservation Green Lab / National Trust

Link: <https://savingplaces.org/atlas-of-reurbanism>

Data-driven research (building on Jane Jacobs) showing blocks of older, smaller, mixed-age buildings outperform on local business density, affordability, and vitality — with a Philadelphia fact sheet. The standard citation for the economic case in ordinance hearings and comprehensive-plan updates.

34. *PlaceEconomics* — Economic Impact Studies of Historic Preservation

Link: <https://www.placeeconomics.com/>

The leading consultancy quantifying preservation's economic effects (property values, jobs, heritage tourism, tax credits), with free published studies for many states and cities. Useful methodological models when a Pennsylvania county or borough wants local numbers to counter "preservation kills development" arguments.

Quick-Start Shelf (if you only read five)

PA SHPO "Planning and Ordinances" page (#7) — the official map of your legal options.

WeConservePA, *Local Regulation for Historic Preservation* (#21) — how to actually draft it.

Secretary of the Interior's Standards + NPS Preservation Briefs (#1–2) — what review standards mean in practice.

Chester County eTools / *Preserving Our Places* (#24–25) — the best county-level model, whatever county you're in.

NAPC / CAMP® (#15) — how to make the commission you create actually work.

Notes on currency: URLs verified July 2026 where possible; pa.gov reorganizes periodically, so if a PHMC link breaks, search the title at pa.gov/agencies/phmc or pahistoricpreservation.com. PHMC print publications (e.g., Lefèvre) are available on request from PA SHPO. The 1998 Chester County manual and 2014 PHMC district counts are dated but remain the standard references pending updates.

SEPA_Ordinance_Research

Local Historic Preservation Ordinances in Suburban Philadelphia (SEPA): A Comparative Research Briefing on Montgomery, Delaware, Bucks & Chester Counties

TL;DR

The four SEPA counties host the densest cluster of local preservation ordinances in Pennsylvania, arrayed on a clear spectrum from purely advisory registries to full Act 167 HARB regimes with certificate-of-appropriateness (COA) power; **Bucks County alone had 24 PHMC-certified local historic districts — the most of any county in the Commonwealth — as of 2014, with Montgomery, Chester, and Delaware also in the statewide top five** (Lancaster is the fifth).

The single most important structural fact is that almost NO Pennsylvania municipality can flatly and permanently forbid a demolition: Act 167 (Historic District Act of 1961) HARBS and MPC-based zoning overlays can require review, impose delay, and demand hardship proof, but the elected governing body retains ultimate discretion — a gap dramatized by the 2009 demolition of La Ronda in Lower Merion.

The most restrictive, "teeth"-bearing regimes are the classic borough HARBS (Doylestown, New Hope, West Chester, Kennett Square) plus Lower Merion's township-wide Historic Resource Inventory overlay model; the most permissive are townships with advisory-only commissions or no townshipwide protection at all (Radnor outside its three Wayne districts; Cheltenham outside La Mott and Wyncote).

Key Findings

Two enabling statutes, two philosophies. Act 167 (the Historic District Act, 53 P.S. § 8001 et seq.) authorizes geographically-defined local historic districts, requires PHMC certification of the district's significance before enforcement, mandates a Historical Architectural Review Board (HARB), and makes a Certificate of Appropriateness a prerequisite to any building or demolition permit. The Municipalities Planning Code (MPC, Act 247 of 1968, as amended in 2000) instead lets municipalities protect scattered/individual resources through zoning overlays and subdivision review, and mandates that "zoning ordinances shall provide for the protection of natural and historic features and resources."

The four counties lead the state. Per PHMC's "3 Things to Know About Local Preservation Programs in Pennsylvania": "Between 1961 and 2014, the agency has certified the boundaries of 156 local historic districts in 94 municipalities in 34 of the Commonwealth's 67 counties. The county with the most certified local districts is Bucks (24), with Montgomery, Chester, Lancaster, and Delaware Counties rounding out the top 5."

A spectrum, not a binary. Municipalities range from honorific/advisory (Radnor outside districts, pre-2019 Springfield Township) through demolition-delay and overlay-with-review (Lower Merion's Historic Resource Overlay District, Cheltenham, Whitmarsh/Plymouth) to full COA regimes that will and do deny demolition (Kennett Square, West Chester, Doylestown, New Hope).

Reception is genuinely contested. High-profile losses (La Ronda, 2009) spurred reform pushes; active fights (Kennett Square's boutique-hotel demolition denial, 2017; Cheltenham's Lynnewood Hall /

"Falcon Hill" scattered-site debate; Radnor's decade-long failure to adopt a townshipwide ordinance) show both preservationist mobilization and property-rights/realtor resistance.

A distinct 2015–2026 trend toward MPC-based townshipwide/scattered-site ordinances and demolition review, modeled substantially on Lower Merion, with county planning commissions (especially Chester County's eTools and the Delaware County Planning Department) providing templates, and PA SHPO's revamped Certified Local Government (CLG) program (49 CLGs statewide) drawing in new participants such as Haverford Township and Phoenixville.

Legal Framework Overview: Act 167 vs. MPC vs. Home Rule

Act 167 — the Historic District Act of 1961. This is the "strong" tool. A municipality adopts an ordinance defining a district; PHMC's commissioners must certify the district's historical significance by resolution before the ordinance can be enforced; and the municipality appoints a HARB (membership specified by statute — typically a registered architect, a licensed real estate broker, a building-code person, and lay members who reside/own property in the district). The HARB reviews all exterior changes visible from a public right-of-way — new construction, alteration, demolition, signage — and recommends approval, conditional approval, or denial of a Certificate of Appropriateness. The elected governing body (borough council/board of supervisors/commissioners) makes the binding decision; a COA is a prerequisite to any building or demolition permit, and a written disapproval must state what changes would satisfy the district's standards and is copied to PHMC. Act 167 review is expressly limited to features visible from a public street or way. Act 167 excludes first- and second-class cities (Philadelphia, Pittsburgh), which regulate under home-rule charters.

MPC (Act 247 of 1968). Broader and vaguer. MPC § 603(b) authorizes zoning ordinances to "permit, prohibit, regulate, restrict and determine" the "erection, construction, repair, maintenance, alteration, razing, removal, and use of structures." Section 604 and Article VI overlay authority let municipalities create historic-overlay districts and historic-resource inventories tied to the zoning map, and § 603(b)(5) / § 605(2) support use and density incentives for historic resources. Crucially, the MPC does not require a HARB, does not require PHMC certification, and lets municipalities regulate individual scattered resources (not just contiguous districts). Many townships appoint an advisory "Historical Commission" rather than a HARB. MPC-based protection is favored where resources are dispersed in suburban/rural settings or where there is "insufficient political will to impose HARB review on all structures."

The recurring limitation — no permanent denial power. Under both statutes, the operative reality is *delay plus discretion*, not veto. Where a resource is designated Class I (highest), some ordinances authorize the governing body to deny a demolition COA outright; Class II resources typically get only delay. La Ronda was Class II — legally demolishable after a 90-day moratorium. This is the fulcrum on which nearly every SEPA controversy turns.

Home rule. Lower Merion (a first-class township) layers home-rule/first-class-township authority atop both Act 167 (its local historic districts, created by Ordinance No. 1902 of 1980) and MPC overlay zoning (its Historic Resource Overlay District). This hybrid is the model other SEPA municipalities increasingly emulate.

The Categorized Spectrum

Category 1 — Simple / Permissive (advisory, honorific, or district-limited)

Radnor Township (Delaware Co.). The textbook permissive case. Radnor has three Act 167 HARB-regulated districts in Wayne — North Wayne, South Wayne, and Louella Court (Chapter 178, "Historic Districts Ordinance," enacted under Act 167; COA required for erection, addition, or demolition within those districts). But there is *no townshipwide protection*: per the Radnor Historical Society, "no historic structures outside of Radnor's three historic districts... are protected simply because they are historically significant." A townshipwide/"scattered sites" overlay has been debated for a decade-plus and repeatedly bounced between the Board of Commissioners and Planning Commission without adoption; the Holly Tree House (pre-Revolutionary, arguably the oldest house in Radnor) and the Ardrossan estate remain the marquee at-risk resources. Code: eCode360 Chapter 178.

Springfield Township (Montgomery Co.) — recently graduated. Before December 2019, Springfield had only an advisory historical commission; its new Ordinance No. 962 (adopted December 2019) is an incentive-and-overlay model built with Montgomery County Planning Commission help, providing adaptive-reuse incentives (bed-and-breakfast, cultural studio, home office, academic research center, accessory apartment, assisted living, gallery/museum/antique shop, etc.) rather than hard denial power. It illustrates the migration from Category 1 to Category 2.

Townships with advisory-only historical commissions more broadly (e.g., various Chester County townships using MPC "windshield" atlases without binding review) sit here.

Category 2 — Intermediate (demolition delay, overlays with review, incentive-based, MPC scattered-site)

Lower Merion Township (Montgomery Co.) — the model. Lower Merion is the most-copied intermediate/strong hybrid in the region. Its structure spans multiple code chapters: **Chapter 88** (Historic Districts / HARB and Historical Commission roles), **Chapter 155 Art. VII / § 155-7.1** (Historic Resource Overlay District — HROD, with use and relief incentives), **Chapter 62** (building/demolition definitions), and **Chapter A180** (the Historic Resource Inventory itself, appended to the code as a zoning-map overlay). Two bodies: the **HARB** (created 1980, reviews exterior changes/demolition inside the seven local historic districts) and the **Historical Commission** (created 2000, reviews Class I and Class II resources on the Inventory *outside* local districts). A 1991 state-funded survey identified 80+ potential districts. New Design Guidelines were adopted February 2023. The Inventory approach — Class I resources (National Register-eligible; demolition can be *denied/delayed*) vs. Class II (delay only) — is precisely what the region has emulated. The township continually amends A180 (e.g., Ordinance No. 4287 added/reclassified/removed resources).

Cheltenham Township (Montgomery Co.). MPC-based Historical Architectural Review Overlay District (Chapter 295, Article XVIII, §§ 295-1801 et seq.), covering the La Mott and Wyncote historic districts, requiring COA review against the Secretary of the Interior's Standards, with demolition/relocation documentation and economic-hardship procedures (§§ 295-1811, 295-1812) and PHMC certification of the two districts (§ 295-1815). The two boards were merged by ordinance in 2022. Cheltenham's *gap* — no townshipwide "scattered site" landmark ordinance despite roughly nine years of debate — is the region's clearest cautionary tale (see Case Studies).

Whitemarsh & Plymouth Townships (Montgomery Co.). A rare *joint* HARB governing the Plymouth Meeting Historic District (66 buildings; National Register 1971), administered through Whitemarsh Code Chapter 10 and Plymouth Code Chapter 7, with review of demolition, alteration, and new construction against adopted design guidelines.

Upper Moreland (Montgomery Co.). Cited by Lower Merion's own reform study as a useful demolition-review model (2001 ordinance) requiring financial-hardship proof and documentation before Class 1 demolition — despite a small (32-property) inventory.

Chalfont Borough, New Hope (in part), Newtown Borough & Township operate demolition/relocation provisions with "good-faith effort to move or salvage" language, sitting between delay and denial.

Category 3 — Complex / Restrictive (full HARB + COA, denial "with teeth," proactive districts, strong enforcement)

Doylestown Borough (Bucks Co.). Classic Act 167 HARB (district and HARB established 1970; nine members). COA required *before* any building permit for exterior work over \$2,000, and for *any* demolition, sign, or stucco removal regardless of cost (Code Chapter 4, "Buildings," § 204 et seq.). Council issues written disapprovals copied to PHMC and specifying required changes (§ 211). Cited by PHMC's own Lefèvre publication as an exemplar of long-running, well-administered programs.

New Hope Borough (Bucks Co.). Full HARB ordinance (Chapter 10) under Act 167; COA required for erection, alteration, demolition; council may deny with written reasons; demolition permitted only in "rare cases" with move/salvage efforts.

Newtown Borough & Township (Bucks Co.). Separate HARBS (seven members each) with jurisdiction in their respective districts; COA required, appeals to the Court of Common Pleas of Bucks County. The 1965 razing of "Washington's Headquarters" (a 1757 brownstone) is the founding trauma that produced Newtown's preservation institutions.

West Chester Borough (Chester Co.). One of Pennsylvania's most successfully preserved small towns. HARB established 1988 (Board of Historical Review 1972); the Downtown Historic District is a local HARB district under Act 167 layered on three National Register districts (Zoning Chapter 112, Art. XI; historic-district regulations at § 112-504). All HARB recommendations require Borough Council approval; council can overturn HARB. West Chester also runs an *adaptive-reuse* incentive for its documented Historic Carriage House Inventory. Recent (2024–2025) internal debate about whether the HARB should review projects in the HO-60/HO-75 height-option overlays shows an active, evolving regime.

Kennett Square Borough (Chester Co.). Act 167 HARB with demonstrated denial "teeth." In September 2017, Borough Council — following its HARB — *denied* a conditional demolition request for three contributing buildings sought for a 100+-room boutique hotel of up to 75 feet. Councilman Wayne Braffman declared, "Those buildings are us," and HARB member Clara Saxton said the demolition "would go against everything that the HARB ordinance stands for"; more than 900 residents signed a petition opposing the plan. The borough had overhauled its Historic District Ordinance and map (Zone A/Zone B) in 2014; the district contains 507 National Register buildings.

Norristown (Montgomery Co.). Municipal HARB (Chapter 31) covering two large historic districts (Central and West Norristown), COA required, demolition-by-neglect provisions, appeals process; council streamlined the ordinance via Ordinance 20-18 (Dec. 1, 2020), eliminating Zone B and amending Zone A criteria.

Pottstown and Bristol Borough run HARBS tied to their National Register districts.

Comparative Matrix

Municipality (County)	Legal basis	Body	COA / review scope	Denial "teeth"?	Category
Radnor (Delaware)	Act 167 (3 districts)	HARB	COA in 3 Wayne districts only; nothing townshipwide	Within districts only	1 (permissive outside districts)
Springfield Twp (Montgomery)	MPC overlay (Ord. 962, 2019)	Historical Commission	Incentive/adaptive- reuse overlay	Delay/incentive	1→2
Lower Merion (Montgomery)	Act 167 + MPC + home rule	HARB + Historical Commission	7 districts + townshipwide Inventory (Class I/II); Ch. 88/155/62/A180	Class I yes; Class II delay	2 (strong hybrid, the model)
Cheltenham (Montgomery)	MPC overlay (Ch. 295 Art. XVIII)	BHAR (merged 2022)	COA in La Mott & Wyncote; hardship proof	District- limited; no scattered-site	2
Whitemarsh/Plymouth (Montgomery)	Act 167 (joint)	Joint HARB	COA in Plymouth Meeting district	Delay	2
Doylestown Boro (Bucks)	Act 167 (1970)	HARB (9)	COA all exterior >\$2k + any demo	Yes (council denial)	3
New Hope Boro (Bucks)	Act 167	HARB	COA erection/alter/demo	Yes	3
Newtown Boro & Twp (Bucks)	Act 167	Two HARBs	COA in districts; appeal to Bucks CCP	Yes	3
West Chester Boro (Chester)	Act 167 (1988)	HARB + Historical Commission	COA in Downtown district; carriage- house reuse	Yes	3
Kennett Square Boro (Chester)	Act 167 (updated 2014)	HARB	COA; Zone A/B	Yes — denied hotel demo 2017	3
Norristown (Montgomery)	Act 167 (Ch. 31; amended 2020)	HARB	COA in 2 districts; demo-by-neglect	Yes	3

Notable Case Studies of Controversy & Litigation

La Ronda (Bryn Mawr, Lower Merion, 2009) — the demolition that reshaped regional policy. La Ronda was the 1929 Spanish/Mediterranean Revival mansion by Addison Mizner (his last commission, his only Pennsylvania work, and the only Mizner house north of the Mason-Dixon line). It was purchased in

March 2009 for \$6 million by Joseph D. Kestenbaum behind anonymous corporate fronts; the buyer sought demolition to build a new house. Lower Merion's Historical Commission recommended denial, but because La Ronda was designated **Class II** (not Class I), the township could only impose a delay: "On June 3, 2009, the Lower Merion commissioners approved demolition but issued a 90-day delay." A Florida developer, Benjamin Wohl (who lives in a relocated Mizner house), offered a six-figure sum to buy and relocate the mansion at his own expense; the owner's attorney Joseph C. Kuhls dismissed the offer, and demolition began October 1, 2009. The episode became the region's touchstone argument for stronger ordinances and for closing the Class I/Class II gap, and directly informed subsequent reform studies (the Lower Merion Conservancy's issues report catalogued definitional gaps in "historic resource," "alteration," and "economic hardship").

Kennett Square boutique-hotel demolition denial (2017) — teeth in action. Kennett Realty Group sought conditional approval to demolish three contributing office buildings in the historic district for a 100+-room, up-to-75-foot hotel. Both the HARB and Borough Council denied the demolition, finding no evidence justifying it and that the buildings were sound and contributing; Councilman Wayne Braffman's "those buildings are us... you rip out those buildings, you rip out our heart" captured the sentiment, and public opposition exceeded 900 petition signatures. A rare demonstration of Category-3 denial power actually exercised.

Cheltenham / Lynnewood Hall & "Falcon Hill" (ongoing). Cheltenham protects only La Mott and Wyncote; a townshipwide "scattered site"/local-landmark ordinance has been debated roughly nine years without adoption. Lynnewood Hall — Horace Trumbauer's 110-room Gilded Age mansion for Peter A.B. Widener — was **sold on June 30, 2023 to the nonprofit Lynnewood Hall Preservation Foundation**, whose board chairman Scott Bentley (a founding partner of Bentley Systems) and his wife Susan "contributed \$9.5 million towards the purchase price, making them the principal donors" (Wikipedia records the sale finalized at \$9 million on June 27, 2023; the seller was Rev. Richard S. Yoon's First Korean Church of New York). It was listed on the National Register in 2025, with a projected three-phase restoration budgeted at tens of millions of dollars. Meanwhile, a historic mansion on the "Falcon Hill"/Wyndmoor development site proceeded through zoning/subdivision review (Zoning Hearing Board Appeal 24-3778, January 2025) **without** historic-landmark protection, because no scattered-site ordinance exists — the live embodiment of a Category-1 gap.

Radnor / Ardrossan & Holly Tree House (2013–present). The 311-acre Ardrossan estate (inspiration for *The Philadelphia Story*) and the pre-Revolutionary Holly Tree House remain vulnerable because Radnor never adopted townshipwide protection; the Board of Commissioners repeatedly referred a "scattered sites" ordinance to the Planning Commission, which could not reach consensus. Notably, Lower Merion's own preservation planner has publicly urged Radnor to adopt Lower Merion-style protection.

Leading appellate precedents (with a home-rule caveat). The strongest Pennsylvania appellate law on historic-review authority arises in home-rule cities, not Act 167 municipalities, but sets the deference framework SEPA HARBs operate within:

Turchi v. Philadelphia Board of License and Inspection Review, 20 A.3d 586 (Pa. Commw. Ct. 2011): the Commonwealth Court held that reviewing bodies must give *deference* to a historical commission's interpretation of its own ordinance (the "Dilworth House" case in Society Hill); after remand, in 2015 the court ultimately allowed the partial demolition.

Meyer v. City of Pittsburgh Historic Review Commission, 201 A.3d 929 (Pa. Commw. Ct. 2019): affirmed issuance of a COA for new construction in a historic district, holding that applying the Secretary of the Interior's Standards satisfied the ordinance where district-specific guidelines did not yet exist, and that no written findings are required when *granting* a COA.

COA appeals in the four counties are heard first by the county Court of Common Pleas (e.g., Newtown Township → Bucks CCP; Plymouth/Whitemarsh → Montgomery CCP), in the manner of MPC zoning appeals. No published Commonwealth Court opinion arising from a SEPA Act 167 HARB was located; such disputes typically resolve at Common Pleas.

The constitutional foundation for all of this remains *Penn Central Transportation Co. v. New York City*, 438 U.S. 104 (1978), upholding landmark regulation against a Fifth Amendment takings challenge.

Trends & Observations (2015–2026)

Migration toward MPC scattered-site/townshipwide protection, on the Lower Merion model.

Springfield Township (2019) and the continuing (if stalled) Radnor and Cheltenham debates all reflect a shift from district-only or advisory schemes toward inventory-based, incentive-laden overlays that reach dispersed suburban resources — precisely Lower Merion's Class I/II Historic Resource Inventory approach.

County planning commissions as ordinance factories. The Chester County Planning Commission's "eTools" (Historic Resource Protection Standards) and model MPC language, the Delaware County Planning Department's survey assistance, and the Montgomery County Planning Commission's hands-on drafting help (Springfield) are the practical engines of adoption.

The statewide evidence base has firmed up. The 2017–2018 Center for Rural Pennsylvania / Shippensburg–Millersville "Inventory & Analysis of Historic Preservation Ordinances in Pennsylvania Municipalities" (Burg, Pomeroy, Cuthbert et al.) found **294 municipalities with preservation ordinances — 105 enacted under the Historic District Act/Act 167, 195 using MPC authority (some using both), and 26 with subdivision-and-land-development provisions** (215 urban, 79 rural; by type, 128 second-class townships, 124 boroughs, 21 cities, 20 first-class townships, and one town). It identified the most common tools as demolition restrictions/delays, alteration review, historic overlays, and design guidelines — and recommended MPC reform and better state oversight/reporting.

CLG participation is expanding. PA SHPO overhauled the Certified Local Government program in late 2018; Pennsylvania has 49 CLGs. SEPA participants and recent additions include Phoenixville (Chester Co.), Chalfont (Bucks Co., which used a CLG grant for design guidelines), Lower Makefield (Bucks Co.), and Haverford Township (Delaware Co., among the newest CLGs). Lower Merion used a recent CLG grant to update its historic-resource survey photographs and data. CLG status unlocks dedicated grants and technical assistance and signals a "beyond-the-ordinance" commitment.

Demolition remains the flashpoint, and the Class I/II design choice is decisive. Post-La Ronda, the ordinances that actually stop teardowns are those that (a) reach resources townshipwide, and (b) authorize outright denial (not mere delay) for the highest class. Boroughs with compact Act 167 districts (Kennett Square, West Chester, Doylestown) enforce most effectively; sprawling townships without scattered-site coverage (Radnor, Cheltenham outside districts) keep losing buildings.

Recommendations

For a municipality seeking to strengthen protection (staged):

Immediate / low-conflict: Commission or update a historic-resource survey (the Delaware County Planning Department and PA SHPO help fund these) and adopt an advisory historical commission — the Category-1 baseline and a CLG prerequisite. **Trigger to escalate:** a survey identifying 50+ significant resources outside any mapped district signals the need for Category-2 tools.

Intermediate: Adopt an MPC-based Historic Resource Overlay with a Class I/II inventory on the Lower Merion model, incentive provisions (adaptive-reuse uses, density/relief bonuses under MPC §§ 603–605), and a demolition-review/hardship procedure. **Trigger to escalate:** repeated loss of Class I-caliber resources through delay-only review argues for genuine denial authority.

Restrictive: For compact commercial/residential cores, adopt an Act 167 HARB with COA and PHMC certification, explicitly authorizing **denial** of demolition COAs for the highest resource class (Kennett Square/Doylestown model), and pursue CLG certification for grants and credibility.

For property owners/developers: Confirm district *and* inventory status early (many townships regulate scattered resources outside mapped districts); budget for COA timelines (HARB review cycles are typically 30–60 days) and, in denial-authority jurisdictions, prepare economic-hardship documentation (commonly three independent contractor estimates) before filing.

For preservation advocates (Preservation Pennsylvania, county historical societies, local conservancies): The decisive levers are (1) townshipwide coverage and (2) Class I denial authority; the Cheltenham and Radnor stalemates show that surveys and advisory commissions alone do not prevent demolition. Focus advocacy on ordinance language authorizing denial for the highest class and on closing the "scattered site" gap.

Caveats

The Class I/II denial distinction, not the statute chosen, determines real-world outcomes. Both Act 167 and the MPC can be written strong or weak; La Ronda fell under a strong-reputation township precisely because it was Class II.

Exact current per-county certified-district counts beyond Bucks (24) are not published numerically. The 2014 PHMC figures are the most specific available; the Montgomery, Chester, and Delaware counts appear only in a bar-graph image, and current numbers should be confirmed via PHMC's PA-SHARE database or the Bureau for Historic Preservation.

Cheltenham's townshipwide scattered-site ordinance is treated here as unadopted based on the codified ordinances (current through September 2025), advocacy sources ("Save Lynnewood Hall"), and the Falcon Hill matter proceeding without historic protection; any 2025–2026 council action should be confirmed directly with the township.

The leading appellate cases (Turchi, Meyer) arise under home-rule charters, not Act 167, and are cited for their persuasive deference framework, not as binding SEPA HARB precedents; SEPA COA disputes generally resolve at the county Court of Common Pleas and are rarely reported.

Ordinance chapter/section numbers change with recodification; verify against the live eCode360/Municode/municipal text before relying on a specific citation.

Springfield_Best_Practices_Guide

Historic Preservation Best Practices Guide

Springfield Township, Montgomery County, Pennsylvania

Prepared as a planning-level advisory document for township officials, commission members, and residents considering the township's options for a local historic preservation program.

1. Purpose and How to Use This Guide

Springfield Township (6.7 square miles, ~21,000 residents) is at the beginning of its historic preservation decision-making. This guide is designed to help the township make an *informed, right-sized* choice rather than a reflexive one — in either direction. It draws on the documented experience of more than a dozen comparable municipalities across Montgomery, Delaware, Chester, and Bucks Counties (see the companion research briefing, `SEPA_Ordinance_Research.md`), where fifty years of local practice have produced a well-understood spectrum of program types, costs, and outcomes.

Three principles frame everything that follows:

First, this is a solved problem elsewhere. Pennsylvania municipalities have been running local preservation programs since 1961. As of the most recent statewide inventory, 294 Pennsylvania municipalities have preservation ordinances, and the four SEPA counties host the densest cluster in the Commonwealth. Springfield does not need to invent anything; it needs to select and calibrate from proven models, most of them within a 20-minute drive.

Second, program design — not good intentions — determines outcomes. The region's most instructive failure, the 2009 demolition of La Ronda in Lower Merion, occurred in the township with the region's *strongest* reputation for preservation. The mansion fell because of a single design choice (it was classified in a tier that permitted only a 90-day delay rather than denial). Springfield should decide what outcomes it actually wants *first*, then choose the machinery.

Third, cost and burden scale with restriction, but not linearly. The jump from "advisory" to "demolition review" is administratively modest. The jump from "demolition review" to "full design review of all exterior alterations" is large. Much of this guide is devoted to locating the right stopping point for a township of Springfield's size and character.

2. Springfield's Community Profile and Why It Matters

Program design must match the municipality. The features of Springfield that matter most:

It is a first-class township, not a borough. The classic "strong" preservation regimes in the region — Doylestown, New Hope, West Chester, Kennett Square — are boroughs with compact, contiguous,

walkable historic commercial cores where an Act 167 historic district maps neatly onto the town's identity and economy. Springfield is not that. Its historic resources are characteristic of an inner-ring streetcar and turnpike suburb: dispersed farmhouses, mills and mill-worker housing, estate remnants, early crossroads villages (Flourtown's Bethlehem Pike corridor, Oreland, Wyndmoor, Erdenheim), churches, and early-20th-century planned residential fabric. Dispersed resources argue strongly for a *scattered-site inventory* approach under the Municipalities Planning Code (MPC), not a single geographic district under Act 167. This is the single most consequential fit issue.

It is small and largely built out. At ~21,000 residents and 6.7 square miles with little vacant land, development pressure arrives mainly as (a) teardown/replacement of individual older houses, (b) subdivision of remaining large parcels and institutional campuses, and (c) commercial redevelopment along the pike corridors. The threat model is *episodic individual demolitions*, not wholesale district erosion. A program tuned to Springfield should therefore be strong at the moment of demolition and light everywhere else.

Its government is lean. A township this size typically has a manager, a small planning/zoning staff, and a code office — no dedicated preservation planner. Every option below is evaluated against the realistic assumption that administration lands on existing staff plus volunteers. Programs that succeed in townships like Springfield are the ones that ride on top of *existing* permit workflows rather than creating parallel bureaucracy.

Its neighbors supply both models and cautionary tales. Lower Merion (adjacent county corridor, ~63,000 residents) runs the region's model townshipwide inventory program — but with professional staff Springfield does not have; its structure can be borrowed at reduced scale. Cheltenham (immediately adjacent, ~37,000) protects two districts but has debated a townshipwide scattered-site ordinance for roughly nine years without adopting one, and continues to lose unprotected resources — the live demonstration of what an unresolved decision costs. Radnor (~32,000) shows the same stalemate in Delaware County. Whitmarsh and Plymouth (adjacent) show that even a *joint* HARB is workable for a small district. Upper Moreland shows a minimal demolition-review ordinance functioning with an inventory of only 32 properties.

The demographic reality check. A community of Springfield's profile — established, residential, with strong civic identity attached to its older neighborhoods — will generally *support* preservation in the abstract and *resist* it in the particular when it touches their own renovation plans. Regional experience is consistent: demolition review of significant resources enjoys broad support; design review of paint, siding, windows, and additions on ordinary homes generates organized opposition (realtor and property-rights pushback is documented across the region). The politically durable programs in townships like Springfield regulate *loss*, not *taste*.

3. What the Township Must Think Through

Before selecting a program level, the township should deliberate explicitly on four questions. Skipping this deliberation is the root cause of the region's stalled programs.

3.1 Potential Outcomes — what does the township actually want to prevent or achieve?

Be concrete. The realistic outcome categories, in ascending order of ambition:

- 1. **Knowledge.** The township knows what it has: a documented, mapped, consistently evaluated inventory of historic resources. This is the foundation for everything else and has standalone value (planning, grants, heritage tourism, resident pride) even if nothing regulatory ever follows.
Warning. No historic building can be demolished *by surprise*. A review-and-delay mechanism guarantees time for documentation, negotiation, relocation offers, or purchase — but cannot ultimately stop a determined owner. This is what Lower Merion had for La Ronda (Class II): the township got 90 days, a relocation offer materialized, the owner declined it, and the building fell — lawfully.
- 2. **Prevention (selective).** The township can actually *deny* demolition of its most significant resources, subject to an economic-hardship escape valve. Regionally this exists only where an ordinance explicitly authorizes denial for a defined top tier (Lower Merion Class I) or within certified Act 167 districts where councils have exercised it (Kennett Square's 2017 hotel denial).
- 3. **Stewardship.** Beyond demolition, exterior alterations are reviewed for appropriateness (certificate-of-appropriateness regimes). This is the borough-HARB model and is almost certainly a poor fit townshipwide in Springfield, though it could conceivably apply someday to a small, defined village core if residents there sought it.
- 4. **Incentivized reuse.** Owners of historic properties get something — adaptive-reuse permissions, dimensional relief, accessory uses — in exchange for designation. Springfield's existing Ordinance No. 962 (2019) is built on this model. The regional record on purely voluntary, incentive-only designation is candid: where designation is optional and the incentives are modest, uptake tends to be minimal. Incentives work well as the *carrot alongside* a regulatory stick, and poorly as the entire program.

A critical structural fact governs outcomes 2–4: **under Pennsylvania law, almost no municipality can flatly and permanently forbid demolition.** Both Act 167 and MPC-based regimes operate through *delay plus discretion*, with the elected governing body — not the commission or HARB — holding the final decision, and with economic-hardship provisions constitutionally advisable (the framework descends from *Penn Central v. New York City*, 438 U.S. 104 (1978)). The honest way to describe even the strongest available tool is: "the township may deny a demolition permit for a top-tier resource unless the owner proves that no economically viable use remains." That is real power — Kennett Square used it — but the township should not promise residents an absolute veto, and should not fear that it is enacting one.

3.2 Administrative Expenses — what will this cost in dollars?

Planning-level estimates, calibrated to a municipality of Springfield's size (all figures should be validated with current quotes; survey pricing in particular varies with scope, standards, and firm):

Cost item	Typical range	Notes
Reconnaissance ("windshield") survey, townshipwide	\$45,000– \$150,000	Professional CRM/preservation firm; per-resource documentation to PA SHPO standards; a township of 6.7 sq mi with a few hundred candidate resources sits at the low-middle of this range. Partially grantable (see below).

Cost item	Typical range	Notes
Intensive-level documentation of top-tier candidates	\$1,500–\$2,500 per resource	Only needed for resources proposed for the highest protection class; can be phased over years.
Ordinance drafting	\$0–\$50,000	Montgomery County Planning Commission (MCPC) provides hands-on drafting help to member municipalities at little or no cost — it helped draft Springfield's 2019 ordinance. Chester and Delaware County equivalents publish model language. Solicitor review time is the real cost.
Solicitor time (adoption + first contested cases)	\$5,000–\$20,000/yr in active years	The material legal exposure is a contested demolition denial; budget for it in the year it happens, not every year.
Ongoing administration (staff time)	0.05–0.25 FTE	See §3.3. At the low end this is absorbable; at the high end it implies a part-time consultant or shared-services arrangement.
Design guidelines (only if COA-style review is ever adopted)	\$35,000–\$65,000	Not needed for demolition-review-only programs. Chalfont funded its guidelines with a CLG grant.
Certified Local Government (CLG) participation	Staff time to apply/report	Unlocks dedicated 50/50 matching grants and PA SHPO technical assistance; 49 CLGs statewide including Haverford, Phoenixville, Chalfont, Lower Makefield.
Notification, recording, database upkeep	Nominal	Rides on existing GIS/permit systems; PA-SHARE handles state-side records.

Offsets. Keystone Historic Preservation grants and CLG grants routinely fund surveys and planning at 50% match; county planning departments subsidize drafting; and a phased survey (highest-risk corridors first) spreads cost over 2–3 budget years. A realistic all-in figure for Springfield to go from "no reliable inventory" to "adopted scattered-site overlay with a classified inventory" is **\$50,000–\$200,000 spread over roughly three years**, of which perhaps half is grant-eligible. For scale, that is comparable to the cost of a single mid-sized road-resurfacing project — worth stating plainly in public deliberation, because opponents routinely characterize these programs as open-ended fiscal commitments.

The cost of the survey is not optional at any regulatory level. Every credible program in the region rests on a professionally executed, consistently formatted survey. Volunteer-compiled documentation, however dedicated, is repeatedly found insufficient as a *legal* foundation for regulation: designation decisions must survive challenge on the quality and consistency of the underlying evaluation. Municipalities that regulated from informal lists have faced exactly the challenges one would expect. A survey is also the prerequisite for CLG certification and most grant eligibility. Whatever else the township decides, the survey is the no-regrets first dollar.

3.3 Staff and Volunteer Burden — what will this cost in people?

This is the constraint most often underestimated, and in a township without a preservation planner it deserves more weight than the dollar figures.

Volume drives burden, and Springfield's volume will be low. The workload of any review program is a function of (number of regulated resources) × (rate of regulated actions). A classified inventory in a township like Springfield will plausibly contain 100–300 resources, of which a top tier might be 20–50. Demolition and major-alteration applications touching those properties will likely number **a handful per year** — Upper Moreland runs its demolition-review ordinance on a 32-property inventory with negligible ongoing burden. Contrast a borough HARB reviewing every sign, porch, and window in a dense district: Doylestown's HARB reviews all exterior work over \$2,000. The township should size its ambitions to the review volume its volunteers can sustain *indefinitely*, not just in the enthusiastic first year.

Realistic burden by function:

Function	Who	Burden
Survey oversight	Commission + staff liaison	Heavy but temporary (12–18 months): scoping, RFP, firm selection, review of deliverables. This is the phase where a commission's professional experience matters most.
Inventory adoption	Commission, planning commission, solicitor, board	One-time; the politically intensive phase. Owner notification and hearings are the major staff lift.
Demolition-review caseload	Commission (advisory) + board (decision)	Low steady-state: a few cases/yr; each needs a site visit, a written recommendation, one meeting.
COA/design review (if ever adopted)	HARB + staff	High steady-state: monthly meetings with real caseloads, guideline maintenance, applicant hand-holding. Requires statutorily specified membership (architect, realtor, building official) that small townships find hard to recruit and retain.
CLG reporting, grants, education	Commission + staff	Modest and elective; scales with ambition.

Volunteer sustainability rules of thumb. Six-member commissions in townships this size can sustain: quarterly-to-monthly meetings, a few written case recommendations per year, survey oversight in bursts, and public-education programming. They cannot sustain: functioning as an unstaffed HARB with a monthly design-review docket, maintaining guidelines, or personally performing survey-grade documentation. The region's stalled programs share a pattern of asking volunteers to do professional work; the durable ones buy the professional work (survey, drafting, guidelines) and reserve volunteers for judgment, local knowledge, and continuity.

A note on decision authority. Under both statutes the elected body makes the binding call; the commission recommends. This is not a flaw to be engineered around — it is the constitutional architecture, and programs work best when the division of labor is explicit: the commission owns the *evidentiary record* (significance, integrity, classification), the board owns the *policy outcome* (approve, deny, delay). Ordinances should require that the board receive and respond to the commission's written recommendation before acting, which disciplines both bodies.

3.4 Level of Restriction — what does a community like Springfield actually tolerate and need?

Regional experience sorts municipalities into three categories (permissive/advisory, intermediate/demolition-focused, restrictive/full COA). Matching Springfield against the documented profiles:

What argues against the restrictive (Category 3) end: Springfield lacks the compact certified-district geography that Act 167 HARBs are built for; its resources are scattered; HARB composition requirements are hard to staff from a 21,000-person township; townshipwide design review of ordinary residential alterations would generate the documented realtor/property-rights opposition and likely fail adoption — and failure has a long tail (see Cheltenham and Radnor, each roughly a decade into non-adoption while losses continue).

What argues against staying at the permissive (Category 1) end: Advisory-only and opt-in incentive regimes have a consistent regional record of not preventing loss. The research record is blunt on this: surveys and advisory commissions alone do not stop demolition, and voluntary designation without meaningful pull sees little uptake. A township that stops here should do so as an explicit, eyes-open policy choice ("we document but do not regulate"), not as a default drift.

The fit conclusion: Springfield's profile — dispersed resources, low case volume, lean staff, teardown-style threat model, adjacent proof-of-concept in Lower Merion's inventory structure — points to the **intermediate category: an MPC-based scattered-site overlay with a classified inventory and demolition review**, scaled down from the Lower Merion model to Springfield's administrative reality, and grafted onto the incentive framework the township already adopted in 2019. This is also where the region's 2015–2026 adoption trend is concentrated: townships in exactly Springfield's position have been converging on this model, with county planning commissions supplying the templates.

4. The Spectrum of Options

Five program levels, from lowest cost/most reactive to highest investment/most proactive. Each level is cumulative — it assumes and builds on the ones below it. The township can stop at any level; the design intent is that no money spent at a lower level is wasted if the township later escalates.

Level 0 — Documentation Only (status quo plus)

What it is. Maintain the historical commission as an advisory body; consolidate existing documentation; add historical markers, walking tours, a web presence, National Register nominations for willing owners. No new regulation.

Legal basis. None needed beyond the existing commission resolution/ordinance.

Outcomes. Knowledge and civic identity only. National Register listing, contrary to widespread public belief, imposes *no restriction whatsoever* on a private owner using private funds — it is honorific plus grant/tax-credit eligibility. Nothing at this level slows a demolition by one day.

Cost/burden. Near zero in dollars; volunteer time only.

Honest assessment. This is a legitimate choice for a municipality that decides preservation regulation is not wanted. Its regional record as a *loss-prevention* strategy is unambiguous: it does not prevent loss. Radnor outside its three districts and Cheltenham outside its two are the standing demonstrations. If the township selects this level it should say so explicitly and revisit the decision on a schedule, rather than defaulting into it.

Level 1 — Professional Survey + Classified Inventory (the no-regrets foundation)

What it is. Commission a professional reconnaissance-level survey of the township by a qualified preservation/CRM firm, producing consistent documentation of every candidate resource to PA SHPO standards, entered in PA-SHARE, with a preliminary significance classification (e.g., Class I / Class II / contributing / non-historic). The commission and staff then maintain the inventory. Still no regulation.

Legal basis. None required to conduct a survey; adoption of the inventory *as an appendix to the zoning code* (the Lower Merion Chapter A180 pattern) can wait for Level 3, but the survey should be scoped from day one to be usable that way — meaning professional authorship, uniform evaluation criteria, and defensible boundaries and classifications.

Outcomes. Converts "we think that house is old" into an evidentiary record that (a) supports every higher level, (b) unlocks Keystone/CLG grant eligibility, (c) gives the planning commission and zoning hearing board something citable *today* under the MPC's existing mandate that zoning "provide for the protection of natural and historic features," and (d) survives personnel turnover — the failure mode of volunteer-binder documentation is that it is inconsistent, unmappable, and dies with its authors.

Cost/burden. \$50,000–\$150,000 over 1–2 budget years, up to half potentially grant-funded; heavy-but-temporary commission oversight burden. **Design decisions that matter:** insist on (1) a complete townshipwide sweep, not a sample; (2) explicit, written evaluation criteria; (3) GIS deliverables compatible with the township/county system; (4) a classification scheme designed for eventual regulatory use, with the survey firm flagging its preliminary Class I candidates and the rationale for each.

Honest assessment. This level is the correct *floor* for Springfield regardless of what else is decided, and it is deliberately severable: a commissioner skeptical of regulation can support the survey on pure information grounds, and the regulatory debate can be had later on a factual record. It is also the step where a generation of intermittent volunteer effort gets converted into a permanent asset rather than another binder.

Level 2 — Demolition Notice and Delay (low-cost, reactive protection)

What it is. A short zoning or freestanding ordinance providing that no demolition permit for a property on the adopted inventory may issue until (a) the historical commission is notified and renders a written recommendation, and (b) a waiting period runs — commonly 60–90 days, sometimes tiered by class — during which the township, commission, and third parties may document the resource, negotiate alternatives, or arrange relocation/salvage. Good-faith move-or-salvage language (the Chalfont/New Hope/Newtown pattern) can be included. After the clock runs, the permit issues.

Legal basis. MPC zoning amendment (or first-class township code police powers for a freestanding version). No PHMC certification, no HARB, no design guidelines required.

Outcomes. Guarantees the *warning* outcome (§3.1, level 2): nothing on the inventory disappears over a weekend. It does not and cannot stop a determined owner — this is precisely the La Ronda mechanism, and La Ronda fell. Its real value is threefold: it buys negotiating time (relocation and purchase offers need weeks to materialize; La Ronda's arrived within the delay window); it forces a public moment of accountability; and it produces documentation of what is lost.

Cost/burden. Drafting is nearly free with MCPC help; administration is a code-office routing step plus a few commission cases a year. This is the highest protection-per-dollar point on the entire spectrum.

Honest assessment. For a township not ready for denial authority, this is the defensible minimum for anyone who wants regulation at all, and its adoption politics are the mildest of any regulatory option — it takes nothing from owners but time. Its known failure mode is false comfort: officials and residents believe the resource is "protected" until the first delay expires and the building comes down anyway. If adopted as a terminal state rather than a waypoint, that limitation should be communicated candidly.

Level 3 — Scattered-Site Historic Resource Overlay with Classified Review (the fit recommendation)

What it is. The scaled-down Lower Merion model, which is also the model the region's townships have been converging on since 2015. Components:

- **Adopted inventory as a zoning overlay** — the classified survey product (Level 1) is enacted as an appendix to the zoning ordinance and shown on the zoning map, covering scattered individual resources townshipwide.
- **Two-class (or three-class) structure** — Class I (National Register-listed or –eligible; the township's most significant resources) and Class II (contributing/significant). The class assignment is the decisive design choice in the entire program (see La Ronda), so Class I designations should be conservative in number and armored with intensive-level documentation.
- **Demolition review with real consequences** — Class II: notice, commission review, and delay (Level 2 mechanics). Class I: the board of commissioners may **deny** a demolition permit following commission recommendation, subject to an economic-hardship procedure (owner must demonstrate, with documentation such as independent estimates and marketing evidence, that no reasonable economically viable use remains — the Cheltenham §295-1811/1812 and Upper Moreland patterns).
- **Alteration review, narrowly scoped or omitted.** Springfield can (and, given its profile, probably should) initially limit review to demolition and substantial-demolition ("façade removal") rather than general exterior alteration. This avoids importing borough-style design review into a township that will not tolerate it. Lower Merion reviews Class I/II alterations through its Historical Commission, but has staff; the scope can be widened later if experience warrants.
- **Incentives folded in, not bolted on.** Springfield's existing Ordinance No. 962 adaptive-reuse incentive menu (B&B, studio, accessory apartment, gallery/museum, etc.) becomes the benefit that runs *with* listed status, converting the 2019 ordinance from a stand-alone voluntary program into the carrot half of a balanced regime. Additional MPC §603(b)(5)/§605(2) tools (dimensional relief, use flexibility for Class I resources) can sweeten designation.
- **Owner process protections** — clear application procedures, decision deadlines, written findings for denials, appeal to the Montgomery County Court of Common Pleas in the manner of zoning appeals.

Legal basis. MPC §604 and Article VI overlay authority plus §603(b) (which expressly reaches "razing" and "removal"), with §603(b)(5)/§605(2) supporting use and density incentives; no PHMC certification and no statutory HARB required — the existing historical commission serves as the review body. MCPC drafting assistance available; Chester County's eTools model language is a useful drafting crosscheck.

Outcomes. Selective prevention: the township can actually keep its 20–50 most significant resources standing, absent proven hardship, while everything else gets warning-level protection and owners of designated resources get tangible benefits. This is the level at which the Kennett Square outcome (a demolition denied and the buildings still standing) becomes legally available to Springfield, and the level at which the La Ronda failure mode (delay-only for a signature resource) is designed out.

Cost/burden. Incremental over Levels 1–2: ordinance drafting/adoption (largely subsidized; solicitor review the real cost), owner notification and hearings (the major one-time staff lift and the political center of gravity), intensive documentation of Class I candidates (\$1,500–\$2,500 each, phaseable), and a steady state of a few review cases per year. Contested denials, when they occur, carry meaningful solicitor cost in that year — budget contingently. Steady-state burden fits a six-member volunteer commission with a staff liaison.

Honest assessment. This is the option this guide recommends Springfield work toward, on a phased schedule (§6). Its principal risks are political, not administrative: (a) the owner-notification moment, when several hundred property owners learn their homes are "listed" — mitigated by leading with the incentive package, by the narrow demolition-only scope of review, and by candid materials explaining what listing does *not* regulate (paint, windows, interiors, ordinary maintenance, additions); and (b) classification inflation, where advocacy pressure pushes marginal resources into Class I, degrading the tier's legal defensibility — mitigated by conservative, professionally documented Class I criteria fixed in the ordinance.

Level 4 — Act 167 Certified District(s) + CLG Certification (high-investment, proactive)

What it is. For one or more compact, contiguous, high-integrity areas (a village core such as Flourtown's pike corridor would be the type-case *if* survey results and resident sentiment support it): a PHMC-certified local historic district under Act 167 with a statutory HARB and certificate-of-appropriateness review of all exterior changes visible from a public way — demolition, alteration, new construction, signage. Separately (and independently valuable at lower levels), pursue **Certified Local Government** status with PA SHPO for dedicated grant access and technical assistance.

Legal basis. Act 167 (53 P.S. §8001 et seq.): district ordinance, PHMC certification of the district's significance by resolution *before* enforcement, HARB with statutorily specified membership (registered architect, licensed real estate broker, building official, plus lay members), COA as a prerequisite to any building/demolition permit, written disapprovals stating what would satisfy the standards, copied to PHMC.

Outcomes. The strongest available protection — the Doylestown/West Chester/Kennett Square regime — including practical denial power exercised through the COA process, plus design continuity for the district's streetscape. CLG status adds a 50/50 matching grant stream (surveys, guidelines, planning — Chalfont funded design guidelines this way; Lower Merion re-photographed its survey) and signals institutional maturity.

Cost/burden. The full stack: district-level intensive survey and certification submission; design guidelines (\$35,000–\$65,000); HARB recruitment (the architect/realtor/building-official slots are genuinely hard to fill and keep filled in a small township); monthly meeting cadence with real caseload; staff support for applicants; guideline maintenance. This is a permanent, professionalized commitment.

Honest assessment. Not recommended as a starting point for Springfield, and possibly never appropriate townshipwide. It becomes worth evaluating only if (a) the Level 1 survey reveals a compact district-caliber core, (b) residents *of that area* demonstrably want it (borough experience shows district programs succeed where the district is the community's self-image), and (c) the Level 3 program has run smoothly enough to prove administrative capacity. CLG certification, by contrast, should be decoupled from this level and pursued once Levels 1–3 are in place — it does not require a HARB district, and several regional townships hold it on inventory-based programs.

Summary Matrix

	Level 0 Document	Level 1 Survey	Level 2 Demo Delay	Level 3 Overlay + Class I Denial	Level 4 Act 167 / CLG
Stops surprise demolition	No	No	Yes	Yes	Yes
Can prevent demolition	No	No	No	Yes (Class I, hardship-tested)	Yes (in district)
Reviews alterations	No	No	No	Optional/narrow	Yes (all exterior)
Owner incentives	—	—	—	Yes (Ord. 962 folded in)	Yes
Approx. new dollars	~\$0	\$45–150k (½ grantable)	~\$0 incremental	\$35–65k incremental + contested-case reserve	\$50–100k + permanent program
Steady-state burden	Volunteer only	Volunteer + liaison	+routing step, few cases/yr	+hearings, few cases/yr	Monthly HARB docket, staff support
Adoption politics	None	Mild	Mild	Moderate (notification moment)	Hard (district residents must want it)
Regional analogues	Radnor (outside districts)	Prerequisite everywhere	Chalfont, Newtown pattern	Lower Merion (scaled), Upper Moreland	Doylestown, West Chester, Kennett Square

5. Decision Framework: Triggers and Sequencing Logic

Rather than a single up-or-down vote on "preservation," the township should adopt a staged decision path with explicit escalation triggers — the approach the regional record supports:

Proceed to Level 1 now. There is no fact pattern under which a professionally surveyed township is worse off than an unsurveyed one, and every subsequent decision is better-informed and cheaper for having it. Fund it, scope it for eventual regulatory use, and pursue grant match.

Trigger for Level 2: completion of the survey — or sooner, as an interim measure, if a significant resource comes under demolition threat during the survey period. (Several municipalities have adopted interim demolition-notice provisions precisely to protect the survey investment while it is underway.)

Trigger for Level 3: the survey identifying a meaningful population of significant scattered resources — the regional rule of thumb is that 50+ significant resources outside any plausible district signals the need for scattered-site tools. Given Springfield's age and fabric, the survey will almost certainly cross this threshold; the township should expect to face this decision within 18–24 months of commissioning the survey and can begin the political groundwork (owner outreach strategy, incentive-package design) in parallel.

Trigger for Level 4 evaluation (not adoption): either (a) the survey delineating a compact, high-integrity, district-caliber core *and* resident interest within it, or (b) 3+ years of smooth Level 3 operation plus commission appetite for CLG grant programming.

De-escalation honesty: if the township examines this framework and concludes it will never be willing to adopt Level 3's denial authority, it should still adopt Levels 1–2 — but should then also formally document that policy choice, because the alternative (Cheltenham/Radnor-style indefinite deferral, in which the question is perpetually "under study" while resources are lost) is the worst-performing posture in the regional record. A clear "no" enables advocates, owners, and heritage organizations to plan around reality; a decade of "maybe" serves no one.

6. Recommended Program for Springfield: A Three-Year Phased Path

Year 1 — Foundation. Budget and commission the townshipwide reconnaissance survey (RFP through standard procurement; require PA SHPO standards, GIS deliverables, classification scheme, and preliminary Class I recommendations). Apply for Keystone/CLG-adjacent grant match with PA SHPO and coordinate scope with MCPC. Adopt an interim demolition-notice provision for resources in the existing documentation while the survey runs. Begin quarterly public communication — survey-as-civic-project framing (resident photo contributions, local history programming) measurably improves the later adoption climate.

Year 2 — Warning layer + design. Accept the survey; adopt the inventory-linked demolition notice-and-delay ordinance (Level 2) as the first regulatory step. In parallel, have MCPC and the solicitor draft the Level 3 overlay: two-class structure, conservative Class I criteria, demolition-focused review scope, hardship procedure, appeal provisions, and the Ordinance 962 incentive menu integrated as the designation benefit. Run the owner-outreach process *before* introduction: individual notice, plain-language FAQ (what listing does and does not regulate), and at least one open house. Commission intensive-level documentation for the preliminary Class I list.

Year 3 — Protection layer. Introduce, hear, and adopt the Level 3 overlay. Stand up the administrative routine: permit-office routing checklist, commission case procedures and written-recommendation templates, decision timelines. After the first full year of operation, apply for CLG certification to open the grant stream, and set a standing five-year cycle for inventory updates and a program review.

Standing advice throughout: keep the commission's role evidentiary and the board's role decisional, in writing; never present the program to the public as an absolute veto or as cost-free; track every case (including delays that end in demolition) in an annual one-page report to the board — the municipalities that sustain political support are the ones that can show their program's record.

7. Pitfalls Observed in the Region (and How Springfield Avoids Them)

The decade of deferral. Cheltenham (~9 years debating a scattered-site ordinance, unadopted; losses continuing at sites like the Falcon Hill mansion) and Radnor (10+ years of referrals between board and planning commission; Ardrossan and the Holly Tree House still unprotected) show that the most expensive option is prolonged indecision — it incurs the political cost of the debate repeatedly while capturing none of the protection. *Countermeasure: the staged path with explicit triggers (§5), which converts one large contested decision into several small, separately defensible ones.*

The wrong-class catastrophe. La Ronda was lost not for lack of an ordinance but because a signature resource sat in the delay-only class. *Countermeasure: conservative but genuinely protective Class I designation, backed by intensive documentation, done before the crisis arrives — classification cannot be fixed mid-application.*

The toothless-program trap. Advisory commissions and voluntary/opt-in designation produce activity without protection; the statewide inventory research and the regional record agree that the common denominators of programs that actually stop teardowns are townshipwide reach and top-tier denial authority. *Countermeasure: be explicit at every stage about which outcome tier (§3.1) each adopted tool actually delivers.*

Volunteer burnout by professional workload. Programs that ask commissions to perform survey-grade documentation, draft ordinances, or run design review without staff support stall and lose their best members. *Countermeasure: buy professional deliverables; spend volunteers on judgment, local knowledge, and continuity.*

Overreach at adoption. Programs that lead with alteration/design review of ordinary homes trigger organized opposition and often take the whole ordinance down with them. *Countermeasure: demolition-focused scope, incentive-forward presentation, and honest FAQ materials about what is not regulated.*

Survey debt. Regulating from inconsistent volunteer documentation invites legal challenge to individual designations and reputational challenge to the program. *Countermeasure: the Level 1 professional survey as the non-negotiable foundation.*

8. Caveats and Verification Notes

This guide is a planning-level advisory document, not legal advice; ordinance drafting and adoption must run through the township solicitor. Cost figures are planning ranges calibrated to comparable municipalities and should be validated with current quotes and grant-cycle terms (PA SHPO grant programs and CLG requirements change; confirm current terms at phmc.pa.gov / PA-SHARE). Statutory and code citations follow the companion research briefing (*SEPA_Ordinance_Research.md*) and its caveats apply, in particular: chapter/section numbers shift with recodification and should be verified against live code; the leading appellate cases (*Turchi*, *Meyer*) arise under home-rule charters and are persuasive rather than binding on MPC/Act 167 municipalities; and the constitutional framework for hardship provisions descends from *Penn Central*. Neighboring-municipality program details (Cheltenham, Radnor, Lower Merion) reflect the record through 2025–2026 and should be confirmed directly with those municipalities before public citation. Finally, the population, area, and governmental-capacity characterizations of Springfield Township used here should be checked against current township data before this document is used in budget deliberations.

Companion document: SEPA_Ordinance_Research.md — comparative research briefing on local preservation ordinances in Montgomery, Delaware, Bucks, and Chester Counties.

CRM_Consulting_Decision_Tree

CRM Consulting Decision Tree

When Can Springfield Township Handle It In-House — and When Must It Hire a Professional Firm?

A step-by-step screening tool for township staff, historical commission members, and the board of commissioners. Companion to [Springfield_Best_Practices_Guide.md](#) and [SEPA_Ordinance_Research.md](#).

How to Use This Document

Work through the **Master Decision Tree** (Part 2) from Question 1 in order. Each question has a YES/NO branch; follow the instruction on your branch. The tree routes every task to one of four dispositions, defined in Part 1. Part 3 explains each professional trigger in depth. Part 4 is a one-page quick-reference table for common task types. Part 5 covers the hybrid model — how to combine volunteer effort with professional work without compromising either.

The governing principle behind every branch: the question is never "are our volunteers smart or dedicated enough?" It is "*who must be able to stand behind this product, in what forum, against what challenge?*" Work product that only informs is volunteer territory. Work product that must **certify, comply, or survive an adversarial test** requires a professional whose qualifications are themselves part of the product's validity.

Part 1 — The Four Dispositions

[A] IN-HOUSE. Volunteers and/or township staff handle it fully. No professional required.

[B] IN-HOUSE WITH PROFESSIONAL SPOT-CHECK. Volunteers/staff produce the work; a qualified professional reviews, corrects, or certifies discrete elements (typically a few hours to a few days of consultant time, engaged directly or through the county planning commission or PA SHPO technical assistance).

[C] PROFESSIONAL REQUIRED — PRESERVATION/CRM FIRM. The township must engage a firm or consultant whose principal investigators meet the **Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61)** in the relevant discipline (history, architectural history, archaeology, architecture). Volunteer/staff involvement is limited to scoping, oversight, and local-knowledge support.

[D] PROFESSIONAL REQUIRED — LEGAL TEAM (+ EXPERT SUPPORT). The matter is litigation or quasi-judicial. The township solicitor leads; a 36 CFR 61-qualified professional may be needed as an expert witness or to author the defensible record. The commission's role narrows to fact witness and record custodian.

Part 2 — Master Decision Tree

Answer the questions **in order**. The first YES that routes you to a disposition ends the analysis for that task (the triggers are ordered from most to least binding).

Q1. Is there any federal nexus — funding, permit, license, or land?

Does the project involve federal money (including pass-through: CDBG, transportation funds, FEMA, ARPA-adjacent programs), a federal permit or approval (e.g., Army Corps §404 for stream/wetland work, FCC tower licensing, PennDOT projects using federal aid), or federal land or agency involvement?

YES → [C], mandatory — this is Section 106 territory. Compliance documentation (identification of historic properties, eligibility determinations, effect assessments) must be prepared to federal and PA SHPO standards by 36 CFR 61-qualified professionals. Volunteer-prepared submissions will be rejected or, worse, accepted and later invalidated. See Part 3, Trigger 1. *Note: the federal agency or its applicant — not necessarily the township — usually bears this cost; the township's job is to recognize the nexus and insist the process runs, not to do the work.*

NO → Q2.

Q2. Will the work product become part of a legal proceeding, or is one reasonably foreseeable?

Is the township defending (or anticipating) an appeal of a demolition denial, a challenge to a designation or classification, a takings claim, an economic-hardship dispute, or any matter headed to the Zoning Hearing Board or the Court of Common Pleas?

YES → [D], mandatory. Solicitor leads; retain a qualified professional to author or shore up the evidentiary record and, if needed, testify. Volunteers must stop generating new analysis the moment litigation is foreseeable — well-meaning commission memos become discoverable admissions. See Part 3, Trigger 4.

NO → Q3.

Q3. Will the product serve as the *evidentiary basis for regulation* of a specific property?

Is this document the thing the township will point to when it designates a resource, assigns it Class I/II status, denies or delays a permit, or requires hardship proof? (Examples: the townshipwide survey; intensive-level documentation of Class I candidates; an integrity assessment supporting classification; a significance evaluation attached to the zoning overlay.)

YES → [C]. Regulation stands or falls on the quality, consistency, and *authorship* of its evidentiary foundation. A designation challenged in court is defended first by the credentials and methods of whoever wrote the evaluation. This is why the Best Practices Guide treats the professional survey as

the non-negotiable floor: three decades of volunteer binder-building, however diligent, cannot be enacted as a zoning appendix. See Part 3, Triggers 2 and 3.

NO → Q4.

Q4. Does the task carry formal qualification or standards requirements even outside regulation?

Check each:

(a) **Grant-funded work** (Keystone, CLG, most PA SHPO programs): grant conditions almost always require 36 CFR 61-qualified personnel for survey, context, nomination, and planning deliverables → [C] for the funded scope.

(b) **National Register nominations**: technically a private citizen may prepare one, but PA SHPO review is unforgiving, and a defensible nomination for anything beyond the simplest individual property is professional work → [C], or [B] for a simple, well-documented individual resource where volunteers draft and a professional revises.

(c) **Federal/state historic tax credit applications (Parts 1–3)**: owner's burden, not the township's, but staff should *refer* owners to qualified consultants, never advise on eligibility → [A] for the referral itself.

(d) **Any ground disturbance where archaeological resources are plausible** (trail construction, utility work at a mill seat or crossroads village, cemetery-adjacent work): archaeology is **never** a volunteer activity — legally (unmarked burial laws, PHMC permitting on public land) and ethically → [C].

(e) **PHMC certification submissions** (if an Act 167 district is ever pursued): → [C].

Any YES above → the indicated disposition for that scope.

All NO → Q5.

Q5. Does the task require *synthesis or judgment* beyond documented local knowledge?

Two common cases:

(a) **Historic context development** — writing the thematic framework (e.g., "Agriculture and Milling in Springfield Township, 1680–1900," "Streetcar Suburbanization, 1895–1930") against which individual resources are evaluated. Contexts determine *comparative* significance: they require command of regional historiography, NR criteria application, and the discipline to conclude that some beloved local buildings are *not* significant. → [C], or [B] where volunteers compile the primary-source research under a professional's outline and the professional writes the evaluative synthesis. See Part 3, Trigger 2.

(b) **Complex architectural integrity assessments** — anything beyond "the building appears largely unaltered": layered alteration histories, moved buildings, reconstructed elements, evaluating whether integrity of design/materials/workmanship survives to support significance, or any integrity opinion that will decide a classification or permit outcome. → [C] if it feeds regulation (you already got here via Q3 in most such cases); [B] if it is preliminary screening. See Part 3, Trigger 3.

Neither applies → Q6.

Q6. Is the task advisory, educational, custodial, or procedural?

Examples: staffing the demolition-review process (site visit, written recommendation to the board on a pending application under adopted procedures); maintaining the inventory database and files; owner outreach and FAQ materials; walking tours, markers, lectures, school programs; photographing and monitoring resources; commenting on subdivision plans as a referral body; drafting the commission's annual report; scoping and overseeing consultant contracts; grant *administration* (as opposed to grant deliverables).

- **YES → [A].** This is the core, permanent, irreplaceable volunteer/staff role. Note that even the commission's *regulatory-adjacent* work — case recommendations under an adopted ordinance — is [A], because the ordinance assigns that advisory role to the commission and the evidentiary foundation (the professional survey/classification) already exists. The commission applies the record; it does not create it under fire.
- **NO → the task is probably mis-scoped.** If a task reaches this point without a disposition, split it into components and rerun each through the tree — most "unclassifiable" tasks are bundles (e.g., "update the inventory" = database maintenance [A] + re-evaluation of changed resources [C/B]).

The Tree at a Glance

- Q1 Federal nexus (funding/permit/license/land)?
 - └ YES → [C] Section 106 professional (usually at applicant's cost)
 - └ NO ↓
- Q2 Legal proceeding, actual or foreseeable?
 - └ YES → [D] Solicitor + expert; volunteers stop writing
 - └ NO ↓
- Q3 Evidentiary basis for regulating a property?
 - └ YES → [C] Qualified professional authorship
 - └ NO ↓
- Q4 Formal qualification/standards requirement?
 - | (grants, NR nominations, tax-credit referrals,
 - | ground disturbance/archaeology, PHMC submissions)
 - └ YES → [C] (or [B]/[A] per sub-item)
 - └ NO ↓
- Q5 Evaluative synthesis or judgment required?
 - | (historic contexts, complex integrity assessments)
 - └ YES → [C] or [B] (volunteers research, professional evaluates)
 - └ NO ↓
- Q6 Advisory / educational / custodial / procedural?
 - └ YES → [A] In-house – the permanent volunteer role
 - └ NO → Split the task and rerun components

Part 3 — The Four Major Triggers, Explained

Trigger 1: Section 106 Compliance (Q1)

What it is. Section 106 of the National Historic Preservation Act requires every federal agency to take into account the effects of its "undertakings" on historic properties, in consultation with the SHPO. The definition of undertaking is broad — federal *assistance* counts, not just federal construction — and pass-through funding routinely surprises small municipalities.

Why it is an absolute professional trigger. Identification and evaluation work under Section 106 must meet the Secretary's Standards, and PA SHPO reviews submissions through PA-SHARE against those standards. The consequences of defective compliance fall on the project (delay, re-review, in bad cases litigation under NHPA/NEPA), not just on the document.

What Springfield should watch for. The township is more often a *consulting party* than the responsible party: PennDOT corridor projects on the pikes, cell-tower applications, utility undertakings, and federally assisted redevelopment all trigger 106 around the township. The commission's in-house role [A] here is valuable and real: request consulting-party status, supply local documentation, and comment on eligibility and effects — but the compliance documents themselves are always [C], and almost always at the applicant's or agency's expense. **A township-adopted inventory materially strengthens its consulting-party voice** — 106 identification efforts must consider local inventories, which is an underappreciated regulatory return on the survey investment.

Trigger 2: Historic Context Development (Q5a)

What it is. A historic context is the scholarly framework — theme, place, time period — that makes significance evaluation possible. "Is this farmhouse significant?" is unanswerable except against a context: how many survive, which are the best examples, what story do they tell.

Why it is a professional trigger. Context writing is the most intellectually demanding product in local preservation. It requires comparative knowledge beyond the township's borders, disciplined application of the National Register criteria, and — hardest for any community — the willingness to conclude that some resources do not rise to significance. Volunteer-written contexts characteristically inflate everything local into significance, which destroys the classification system's defensibility (every Class II owner will ask why their house is less protected than a comparable Class I; the answer must be methodological, not sentimental).

The efficient hybrid [B]. Volunteers are often superb primary-source researchers — deeds, atlases, tax records, newspapers, oral histories. The cost-effective model: the professional writes the context outline and research design, volunteers execute the documentary research to that design, the professional writes the evaluative synthesis and applies the criteria. This can cut context costs substantially and is a scope worth negotiating explicitly into any survey RFP.

Trigger 3: Complex Architectural Integrity Assessments (Q3/Q5b)

What it is. Significance asks "does the story matter?"; integrity asks "does enough physical fabric survive to convey it?" The National Register's seven aspects (location, design, setting, materials, workmanship, feeling, association) are terms of art, and the hard cases are genuinely hard: a c.1740 farmhouse re-stuccoed in 1925 and re-windowed in 1980; a mill converted to apartments; a moved springhouse; a Colonial Revival "restoration" that replaced more than it restored.

Why it is a professional trigger when stakes attach. Integrity is where demolition applicants attack. The predictable defense strategy of an owner facing Class I review is an architect's or consultant's report arguing the building has lost integrity and never merited its classification. The township's classification must already rest on a professional assessment of equal or better rigor — created *before* the dispute, because an assessment commissioned mid-fight looks like advocacy. Routine cases ("is this porch original?") can be [B]: volunteer screening with professional confirmation where the answer will matter.

Trigger 4: Legal Challenges to Demolition Denials (Q2)

What it is. The scenario the whole program must be built to survive: the township denies (or substantially delays) a demolition permit for a Class I resource; the owner appeals to the Court of Common Pleas, and/or raises an economic-hardship claim or a takings theory under the *Penn Central* framework.

Why the disposition changes to [D]. The forum changes everything. The questions are no longer preservation questions ("is it significant?") but administrative-law questions: Was the ordinance validly enacted? Was the classification supported by substantial evidence? Did the board follow its own procedures, make written findings, and act within statutory time limits? Regional experience shows COA/permit appeals resolve at the county Court of Common Pleas under a deference framework that *rewards* municipalities whose records were professionally built (*Turchi's* deference to a commission's interpretation of its ordinance is the persuasive touchstone) and punishes improvisation.

The commission's discipline in a [D] matter. Three rules. First, the record is closed — the commission's job was done when it transmitted its written recommendation; supplementing the record after appeal is both procedurally improper and strategically damaging. Second, all communication routes through the solicitor. Third, if expert testimony on significance or integrity is needed, it comes from a 36 CFR 61-qualified professional retained for the litigation — a commissioner testifying as an expert converts a neutral record-keeper into a cross-examinable advocate.

The budget note. As the Best Practices Guide advises, this cost is contingent, not annual: budget a solicitor/expert reserve in any year a contested Class I denial is plausible. One well-defended first case is a program-defining investment; a badly defended one can take the ordinance down with it.

Part 4 — Quick-Reference Table: Common Springfield Tasks

Task	Disposition	Notes
Townshipwide reconnaissance survey	[C]	The foundational purchase; scope per Best Practices Guide Level 1
Intensive documentation of Class I candidates	[C]	Pre-dispute armor; phaseable
Historic context(s) for evaluation	[C] / [B]	Hybrid research model saves money (Part 3, Trigger 2)
Maintaining inventory database, files, GIS layer	[A]	Custodial

Task	Disposition	Notes
Demolition-review case recommendation (adopted ordinance)	[A]	Commission applies the existing professional record
Integrity re-evaluation when owner disputes classification	[C]	Stakes attached; see Trigger 3
Ordinance drafting/amendment	[B]	County planning commission + solicitor; commission scopes policy
Economic-hardship application review	[B]/[D]	Staff/commission screen completeness; contested valuation needs professionals; litigation posture → [D]
Appeal of a denial to Common Pleas	[D]	Solicitor + retained expert
Section 106 consulting-party participation	[A]	Comment and supply documentation; never author compliance docs
Section 106 identification/effects documentation	[C]	Usually applicant's/agency's cost
National Register nomination (simple individual property)	[B]	Volunteer draft, professional revision, SHPO pre-consult
National Register nomination (district/complex)	[C]	
Grant application <i>writing</i> (Keystone/CLG)	[A]/[B]	Staff can write applications; deliverables inside the grant are [C]
Design guidelines (if ever needed)	[C]	CLG-grantable
Walking tours, markers, lectures, oral history	[A]	Core public-benefit programming
Owner FAQ / outreach materials	[A] with solicitor read	Accuracy about what the ordinance does/doesn't do is legally sensitive
Photographic monitoring of listed resources	[A]	Annual volunteer sweep; feeds demolition-by-neglect awareness
Salvage/documentation during an approved demolition	[B]	Volunteers photograph/measure; professional recordation if required as a condition
Any excavation, archaeological monitoring, cemetery work	[C]	Never in-house, no exceptions
Referring owners to tax-credit consultants	[A]	Refer, never advise on eligibility

Part 5 — Making the Hybrid Model Work

Most of Springfield's preservation budget risk lies not in choosing [A] vs. [C], but in managing [B] and [C] engagements badly. Five practices:

Scope for regulatory end-use, always. Every professional product should be commissioned as if it will someday be Exhibit A — because the ones that matter will be. This costs little at commissioning time (it is mostly a matter of standards language in the RFP) and cannot be retrofitted.

Buy evaluation, contribute research. The professional's scarce value is *judgment against standards* — criteria application, integrity analysis, classification. Documentary legwork, photography to spec, and local knowledge are legitimate volunteer contributions that reduce billable hours *if the RFP is structured to accept them* (specify formats and QA responsibility, and let the firm reject substandard inputs without friction).

Use the free professionals first. The Montgomery County Planning Commission (ordinance drafting, mapping), PA SHPO technical assistance and CLG staff, and Preservation Pennsylvania field services cover a surprising share of [B]-level needs at no consultant cost. The paid firm is for products that must carry professional authorship.

Keep a standing qualifications file. Rather than procuring from scratch at each need, maintain a short list of pre-vetted 36 CFR 61-qualified firms (via PA SHPO's consultant directory and peer-municipality references) so that time-critical needs — an integrity dispute, a litigation expert, an unexpected 106 consultation — can be met in weeks, not procurement cycles.

Log the dispositions. When the commission routes a task through this tree, record the answer and the reasoning in a meeting minute. Over a few years this builds a consistent administrative practice — which is itself evidence of a well-run program when the program's judgment is eventually questioned.

Caveats

This is an administrative screening tool, not legal advice; dispositions [C] and [D] in any live matter should be confirmed with the township solicitor, and Section 106 applicability with the responsible federal agency or PA SHPO. Professional-qualification requirements cited here (36 CFR Part 61) and grant conditions should be verified against current PA SHPO program terms. The regulatory assumptions (classified inventory, demolition review, Class I denial authority) reflect the program architecture recommended in `Springfield_Best_Practices_Guide.md` ; if the township adopts a different architecture, rerun the affected branches — the tree's logic (compliance, litigation, evidentiary foundation, qualification requirements, synthesis, and routine administration, in that order) transfers to any program design.