

**PROGRAMMATIC AGREEMENT
FOR VARIOUS HUD-FUNDED PROGRAMS
AMONG
THE CITY OF SAVANNAH AND
THE GEORGIA STATE HISTORIC PRESERVATION OFFICER.
(HP-090925-002)**

WHEREAS, the City of Savannah (the City) administers several programs funded by the U.S. Department of Housing and Urban Development (HUD) including, but not limited to, the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership Program (HOME), the Emergency Shelter Grant Program (ESG), and the Neighborhood Stabilization Program (NSP), for which HUD has delegated environmental review responsibilities to the recipient of HUD assistance in accordance with 24 CFR Part 58.

WHEREAS, the administration of HUD funded programs has the potential to affect properties included in or eligible for inclusion in the National Register of Historic Places (NRHP) and therefore require compliance with Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and its implementing regulations (36 CFR Part 800); and

WHEREAS, the Advisory Council on Historic Preservation (ACHP) has adopted a Policy Statement on Affordable Housing and Historic Preservation and Principles for Implementation (Policy Statement), which encourages a flexible approach to implementing affordable housing projects that affect historic properties; and

WHEREAS, the ACHP's Policy Statement are incorporated herein and will be taken into consideration by all parties when carrying out the stipulations of this Programmatic Agreement; and

WHEREAS, for the purpose of this agreement the City's HUD-assisted programs may encompass the following activities: housing rehabilitation and construction, commercial rehabilitation and construction, facade improvements, rehabilitation of homeless facilities, infrastructure and public facility repair and improvements including streets, drainage, sidewalks, parks, and neighborhood centers that may be located in a NRHP listed or eligible historic district, and

WHEREAS, in accordance with 36 CFR Section 800.13 the City and the Georgia State Historic Preservation Office (SHPO) have agreed to develop a Programmatic Agreement to expedite the necessary historic preservation review for HUD funded projects to meet the needs for safe, decent and affordable housing; and

WHEREAS, the City's Housing and Community Development Departments will be assigned to oversee and ensure the City's compliance with this Programmatic Agreement; and,

WHEREAS, the City has consulted with the Metropolitan Planning Commission (MPC) Urban Planning and Historic Preservation Department in development of this PA, and will partner with the MPC for professional services to include a Preservation Professional to carry out the terms of this Agreement; and

WHEREAS, pursuant to 36 C.F.R. 800.14(b), the City has made a reasonable and good-faith effort to identify Indian Tribes that attach traditional religious and cultural significance to historic properties that may be affected by HUD-assisted program undertakings, including those Tribes that are now located at great distances from the undertaking's area of potential effect and found none; and

WHEREAS, pursuant to 36 C.F.R. 800.14(b), the City has consulted with the Advisory Council on Historic Preservation (ACHP) and submitted this Agreement for review, and the ACHP has declined to participate in this Agreement; and

WHEREAS, this Programmatic Agreement will cover HUD-assisted Program Activities carried out from January 1, 2016 through January 1, 2021, with option to renew through January 1, 2026.

NOW, THEREFORE, the City and the SHPO agree that the HUD funded programs shall be implemented in accordance with the following stipulations in order to take into account the effect of these undertakings on historic properties.

STIPULATIONS

The City will ensure that the following measures are carried out:

I. ADMINISTRATION OF THE PROGRAMMATIC AGREEMENT

- A. The City shall ensure that all historic preservation work performed pursuant to this Agreement by the MPC is performed by or under the direct supervision of a person or persons meeting at a minimum *The Secretary of the Interior's Professional Qualification Standards* (48 FR 44738-9) (hereafter, Preservation Professional) who has completed the ACHP's Section 106 training course for Historic Preservation and Archaeology, as appropriate.
- B. If a qualified Preservation Professional is not on staff or under contract with the City, then all Section 106 Reviews will be sent on a case-by-case basis to the SHPO in accordance with NHPA and ACHP regulations until a Preservation Professional has been hired.
- C. All activities that are carried out under this Programmatic Agreement that have the potential to impact historic properties that are listed or eligible for listing in the National Register of Historic Places or archaeological sites with unknown eligibility will be submitted to the Preservation Professional by the environmental review preparer. The request will include a detailed work description; drawings; photographs of impacted exterior and interior work areas including front, side and rear facades clearly showing typical windows and doors; and a location map.

II. LONG-RANGE IDENTIFICATION

- A. In areas that are most likely to be affected by programs covered under this agreement, the City will support efforts to survey districts, sites, buildings, structures and objects to ascertain if they meet the criteria for listing in the NRHP. Through the Certified Local Government Program, the City will coordinate any of its survey efforts with those of the SHPO's statewide survey program.
- B. Where possible, the City will concentrate any of its surveys in areas outside NRHP-listed Historic Districts, and will conduct these in accordance with the Georgia Survey Manual using the Georgia survey form issued by the SHPO. The City will conduct these surveys in a manner that meets *The Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716)*, and in the order of their priority according to the schedule of proposed projects.

III. EXEMPT ACTIVITIES

The review of proposed HUD-funded projects is not required if the City determines that program activities are limited to one or more of those listed below because these activities present a limited potential to affect historic properties. Exemptions include:

- A. Properties less than fifty (50) years old; unless such properties are determined to have achieved exceptional significance or,
- B. Federally-funded community development activities limited solely to the following:
 1. General community development activities that will not involve the alteration of potentially historic properties including;
 2. Grants or loans to participants in any Economic Development program funded by CDBG which may be used for working capital, equipment, furniture, fixtures, and debt refinancing, or acquisition of non-historic buildings for reuse. Such activities shall

require Section 106 review only if such activities should involve changes to structures that are either listed in or are eligible for inclusion in the National Register;

3. Upgrading of infrastructure and public facility repair and improvements including streets, drainage, sidewalks, in existing right-of-way or utility corridors, and neighborhood centers, except where significant historical materials retain their integrity from the historic period and exhibit distinctive materials, methods of construction or elements of design that would contribute to the character of a NRHP-listed or eligible historic district or property;
4. Projects consisting of grants or loans to eligible families or entities to be applied solely to the purchase of residence or businesses;
5. Acquisition of property which is limited to the legal transfer of title with no physical improvements or changes proposed;
6. Demolition of non-contributing due to age or condition, non-attached secondary structures (garages, sheds, etc.);
7. Rehabilitation of housing units fifty (50) years of age or older will be exempt when the following activities occur:
 - a. Repair of foundations and structural elements in a manner that is compatible with the scale and historic character of the district and property. Underpinning and ventilation of crawlspaces is permitted and, whenever original brick piers remain in place, shall be accomplished by setting the underpinning material at least three (3) inches behind the outer face of piers;
 - b. In-kind rehabilitation of existing historic features. Cement-based material (i.e. Hardi-Plank siding or trim) may be an acceptable replacement material when more than fifty (50) percent of the historic siding is deteriorated beyond repair on non-street facing elevations, with consolidated historic siding materials being used on the primary façade;
 - c. Repainting of exterior surfaces provided that destructive surface preparation treatments, including sandblasting, are not used. Repainting will use colors consistent with other properties in the neighborhood. Vinyl paint products and similar products will not be permitted;
 - d. Rehabilitation of existing historic features will be considered and undertaken whenever possible, but if not economically feasible then repair and/or replacement of windows and doors with new materials which match the original in material composition, design, color, texture, scale, and proportion. Elimination of doors located in exterior walls on non-street facing elevations. Snap-in or between-the-glass grills will not be permitted;
 - e. Change in size or elimination of windows on secondary, non-street facing elevations;
 - f. Repair and/or replacement of deteriorated roof materials with similar materials;
 - g. Repair or re-framing of structural roof elements as required to improve the drainage and durability of the roof as long as the appearance of the roof lines on street facing elevations are not effected;
 - h. Repair, replacement, or installation of gutters and down spouts;
 - i. In-kind repair or re-pointing of chimneys, brick or other masonry features which are elements of the front elevation, elimination of non-character defining chimneys above the roof line if not visible from a public right-of-way. When repairs are made, the work shall follow the recommended approaches in ***Preservation Brief #2: Repointing Mortar Joints in Historic Brick Buildings***;

- j. Weatherization or energy conservation activities which do not adversely affect the exterior appearance, especially the street facing elevations, including:
 - Attic, floor and wall insulation;
 - Caulking, weather-stripping, and other air infiltration control measures;
 - Storm windows or doors, and wooden screen doors which do not harm or obscure historic windows or trim;
 - Repair and weather-stripping of window and doors in a manner which does not harm or obscure historic windows or trim;
- k. Repair, replacement or installation of the following systems provided the proposed work does not have an adverse physical impact on historic interior or exterior materials and finishes.
 - Electrical supply, switch/outlets, and fixtures;
 - Plumbing supply, drainage, and fixtures;
 - HVAC Systems;
 - Smoke, CO, alarms, security lighting or other safety devices;
 - Electrical or mechanical ventilation systems;
- l. Kitchens, bathrooms, and utility room repairs and/or improvements that are not a component of floor-plan reconfiguration change
- m. Installation of door and/or window locks and/or electronic security apparatus;
- n. Alterations necessary to comply with the American Disabilities Act (ADA) or to improve handicap accessibility for current or anticipated residents of properties, which are carried out in accordance with *Preservation Brief #32: Making Historic Properties Accessible*.
- o. Replacement of existing utilities such as sewer, water, storm drains, electrical and gas.

IV. IDENTIFICATION OF HISTORIC PROPERTIES

If the Preservation Professional determines that the planned activities are not exempt activities as listed in Stipulation III above, then the following steps shall be taken within 30 days:

- A. When rehabilitation of a property is proposed on properties not previously evaluated for NRHP eligibility, the Preservation Professional shall determine and document the proposed project's area of potential effect (APE) taking into account direct and indirect effects and identify properties within the APE fifty (50) years old or older and evaluate their eligibility for listing in the NRHP. If the Preservation Professional determines that no NRHP-eligible or -listed properties are within the APE, the Preservation Professional shall submit this determination of No Historic Properties Affected and document it for inclusion in the Annual Report; and the City has no further obligations under this stipulation. Properties that are determined to be individually eligible for the NRHP or are contributing elements of a NRHP-listed or eligible historic district shall be subject to further review pursuant to this Agreement.
- B. The City shall maintain a file on the identification and NRHP evaluation of each subject property. The file shall include the following data used in the determination:
 - 1. Building photographs
 - 2. Context photographs
 - 3. Information indicating whether the property and/or district meet the criteria for NRHP inclusion
 - 4. Location map with APE outlined.
- C. If the Preservation Professional is not able to determine or needs assistance in determining a property's eligibility for the NRHP, the Preservation Professional shall forward the information listed above in Stipulation V.B. to the SHPO for a thirty (30) day review or, as necessary, obtain a formal determination of eligibility from the Keeper of the NRHP in accordance with 36 CFR Part 800.4(c)(2) and notify the SHPO accordingly.

V. TREATMENT OF HISTORIC PROPERTIES

Properties listed in the NRHP, or eligible for listing in the NRHP, shall be treated as follows:

A. Rehabilitation

1. The Preservation Professional shall review work write-ups or plans and specifications for all rehabilitation activities not listed as exempt in Stipulation IV above to ensure they are developed in accordance with the recommended approaches in The Secretary of the Interior's *Standards for the Treatment of Historic Properties* (Standards)", and the ACHP's Policy Statement and issue a letter noting the project as such. Prior to the initiation of rehabilitation activities, the City shall submit work write-ups or plans and specifications, which meet the Standards, to the Preservation Professional. The Preservation Professional will review this documentation for compliance with the Standards
2. If the Preservation Professional determines that the proposed project meets the Standards and that NRHP-eligible or –listed properties will not be adversely affected by the proposed project, the Preservation Professional shall submit a "No Adverse Effect to Historic Properties" letter to the City and document it as such for the Annual Report
3. Should the Preservation Professional recommend modifications to the work write-ups or plans and specifications, to ensure that the project meets the Standards; the City shall make the appropriate modifications and submit revised work write-ups or plans to the Preservation Professional. If the Preservation Professional determines that the proposed project does not meet the Standards and that NRHP-eligible or –listed properties will be adversely affected by the proposed project, the Preservation Professional shall submit an "Adverse Effect to Historic Properties" letter to the City and document it as such for the Annual Report. If the City determines that the Standards cannot be met for the project, the City shall consult with the SHPO under Resolution of Adverse Effect procedures outlined in Stipulation VIII.

B. New Construction

Whenever the City is planning to do new construction including, in-fill construction, or additions to existing buildings in a NRHP eligible or listed historic districts, the Preservation Professional shall:

1. Review the plans of proposed exterior materials to ensure that all work is compatible with the architecture of the historic district or adjacent historic buildings in terms of set-backs, size, scale, massing, design, color features, and materials; and is responsive to the recommended approaches for new construction set forth in the Standards and input received through any required public notification process.
2. If the Preservation Professional determines that the proposed project meets the Standards and that NRHP-eligible or –listed properties will not be adversely affected by the proposed project, the Preservation Professional shall submit a "No Adverse Effect to Historic Properties" letter to the City and document it as such for the Annual Report.
3. Review final plans and specifications and provide comment prior to the initiation of construction activities. If feasible the City shall consult with the Preservation Professional to develop a set of historically compatible model replacement house plans in advance of any planned reconstruction activities, which shall be shared with the public. If such standard replacement house plans are developed, they will be sent to the SHPO for review and comment.
4. If the City determines that the Standards cannot be met for the project, the City shall consult with the SHPO under Resolution of Adverse Effect procedures outlined in Stipulation VIII.

C. Site Improvements and Public Improvements

1. Site improvement (e.g. landscaping, fencing) or public improvement projects (e.g. parking, sidewalks) associated with new construction or rehabilitation projects or carried out using HUD funds shall adhere to the Standards and be designed to ensure that character defining elements of historic properties are preserved.
2. Final plans and specifications for site and public improvement projects will be submitted to the Preservation Professional for review and comments if such activities should involve changes to structures that are either listed in or are considered eligible for inclusion in the NRHP;
3. If the Preservation Professional determines that the proposed project meets the Standards and that NRHP-eligible or –listed properties will not be adversely affected by the proposed project, the Preservation Professional shall submit a “No Adverse Effect to Historic Properties” letter to the City and document it as such for the Annual Report.
4. Should the Preservation Professional recommend modifications to the work write-ups or plans and specifications, to ensure that the project meets the Standards; the City shall make the appropriate modifications and submit revised work write-ups or plans to the Preservation Professional. If the Preservation Professional determines that the proposed project does not meet the Standards and that NRHP-eligible or –listed properties will be adversely affected by the proposed project, the Preservation Professional shall submit an “Adverse Effect to Historic Properties” letter to the City and document it as such for the Annual Report.
5. If the City determines that the Standards cannot be met for the project, the City shall consult with the SHPO under Resolution of Adverse Effect procedures outlined in Stipulation VIII.

D. Lead-Based Paint Abatement

Lead-Based Paint Abatement and hazard reduction activities include the removal of lead-based paint and dust-lead hazards; the permanent enclosure or encapsulation of lead-based paint; the replacement of components or fixtures painted with lead-based paint; and the removal or permanent covering of soil-lead hazards, all preparation, cleanup, disposal, and post abatement clearance testing activities associated with such measures. Lead-Based Paint Abatement activities will comply with the guidelines listed in 24 CFR Part 35 and, where possible, *Preservation Brief #37: Appropriate Methods for Reducing Lead-Paint Hazards in Historic Housing* and HUD’s “Guidelines for the Evaluation & Control of Lead-based Paint Hazards in Housing.”

- E.** The City shall take into account the comments and recommendations made by the Preservation Professional for both rehabilitation and new construction activities. If the Preservation Professional determines that the proposed project meets the Standards and that NRHP-eligible or –listed properties will not be adversely affected by the proposed project, the Preservation Professional shall submit a “No Adverse Effect to Historic Properties” letter to the City and document it as such for the Annual Report.
- F.** If the Preservation Professional determines that a project meets the Criteria of Adverse Effect as defined at 36 CFR Part 800.9(b), the Preservation Professional shall submit an “Adverse Effect to Historic Properties” letter to the City and document it as such for the Annual Report. If the City determines that the Standards cannot be met for the project, the City shall consult with the SHPO under Resolution of Adverse Effect procedures outlined in Stipulation VIII.

VI. TREATMENT OF ARCHAEOLOGICAL SITES

When the City’s identification efforts in accordance with 36 CFR Part 800.4 indicate that archeological sites are likely to be discovered during implementation of an undertaking, the City shall notify the Preservation Professional when ground disturbing activities, to include excavation for footings and foundations; installation of utilities such as sewer, water, storm drains, electrical, gas, leach lines, and septic tanks, are proposed as part of an undertaking

- A. The City shall request the SHPO's opinion regarding the potential effect of such activities on archeological properties prior to initiation of project activities. If the SHPO can document that there is a high probability for the presence of significant archeological sites or cultural remains within the project area, the City shall contract SOI qualified archaeologists to conduct archeological surveys. The City shall forward the scope of work for the archeological survey to the SHPO for review and approval.
- B. If the City and the SHPO determine that there is the potential for archeological properties listed on or eligible for listing on the NRHP to be affected by the undertaking, the SHPO shall advise the City of the appropriate treatment for the archeological properties. If the City cannot avoid the archeological properties or preserve them in-situ, the City shall develop a data recovery plan that is consistent with the Secretary of the Interior's Standards and Guidelines for Archeological Documentation (48 CFR 44734-37) and take into account the Council's publication "Treatment of Archeological Properties," and subsequent revisions made by the Council and appropriate State guidelines. The City shall submit treatment plans to the SHPO for review and approval and shall ensure that the approved plan is implemented by qualified archaeologists.

VII. UNANTICIPATED DISCOVERIES

- A. If previously unidentified historic properties, including archaeological sites, are discovered during project construction, that portion of the project will stop until a revised Environmental Review demonstrating compliance with 36 CFR Part 800 has been completed by the City.
- B. If human remains are present within the area of potential effect, the City shall notify the police and initiate consultation as set forth at 36 CFR Part 800.5 (e) and Georgia Code OCGA 31-21-6.

VIII. RESOLUTION OF ADVERSE EFFECTS

- A. In the case of a project determined by the Preservation Professional to have adverse effects on historic properties, the City and the SHPO will consult on ways to avoid, reduce, or mitigate the adverse effects, and specified in a Memorandum of Agreement (MOA) in accordance with 36 CFR § 800.6(c) and filed with the ACHP upon execution. The City will provide SHPO with a record of mitigation measures for each project that adversely affects eligible historic properties. The City should also provide records of the mitigation to a local repository as designated in the MOA
- B. If the City and the SHPO cannot come to an agreement, the City shall notify the ACHP and initiate consultation as outlined in Stipulation IX.

IX. DISPUTE RESOLUTION

Should any signatory or concurring party to this Agreement object at any time to any actions proposed or the manner in which the terms of this Agreement are implemented, the City shall consult with such party to resolve the objection. If the City determines that such objection cannot be resolved, the City will:

- A. Forward all documentation relevant to the dispute, including the City's proposed resolution, to the ACHP. The ACHP shall provide the City with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the City shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. The City will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the City may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the City shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the Agreement, and provide them and the ACHP with a copy of such written response.

- C. The City's responsibilities to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute remain unchanged.

X. PUBLIC PARTICIPATION

The City's Community Planning and Development Department will publicize and hold open meetings to discuss the effects of this agreement and HUD-funded programs when developing the Consolidated Housing and Community Development Plan. These meetings will be publicized in one or more of the following manners: insertion of an advertisement in a major local newspaper, placement of flyers in the neighborhood community center of the target area, letters delivered to neighbors of targeted properties, and letters to interested individuals and organizations inviting them to attend the public meeting. At a minimum, the public meetings will include a discussion of the HUD programs' overall effect on historic properties.

XI. REVIEW OF PUBLIC OBJECTIONS

The City will respond to any objector who submits a substantive objection related to and the implementation of this Agreement. In the event an objection is not resolved by the City, the City will notify SHPO of the unresolved issue.

XII. EMERGENCY DEMOLITION

When a federally-funded emergency demolition of a historic property is required to eliminate an imminent threat to the health and safety of residents as identified by the Director of Building Inspection with the approval of the City Manager, the City shall adhere to the following procedures:

- A. The City shall give the Preservation Professional and SHPO seven working days to respond, if conditions allow. In such cases, the City shall telephone the Environmental Review Historian at the SHPO and give warning of an emergency demolition review package on route to the SHPO for a seven-day review turn around. The following information shall be forwarded by the City to the Preservation Professional and SHPO for concurrent review:
 1. Identification of the historic property involved including current condition of the building and photographs detailing the current condition, nature of the emergency and Area of Potential Effect;
 2. Clear statement about the nature (structural condition, threat to adjacent properties, etc.) of the emergency;
 3. Evidence of the City's identification of the emergency status and the time frame allowed by local officials to respond to, or correct, the emergency situation.
 4. A USGS topography map.
- B. The SHPO will either concur or object within seven (7) working days. If the SHPO does not respond, the City may assume concurrence and proceed with demolition.
- C. Within seven (7) working days, the SHPO will notify the City of the effect determination reached (NAE, AE). The City will propose mitigation measures to the SHPO to be implemented prior to demolition (e.g. recordation, architectural salvage, etc.) and the SHPO will either concur with the proposed measures or propose an alternative measure. The Preservation Professional shall ensure that, to the extent feasible, all mitigation measures are implemented and appropriate documentation is kept on file at the City and forwarded to the SHPO within fourteen (14) days following the completion of demolition activities.
- D. If the SHPO objects to the emergency demolition, the City shall notify the ACHP and request its comments in accordance with 36 CFR Part 800.5 (e).

XIII. MONITORING AND REPORTING

- A. The SHPO may monitor any activities carried out pursuant to this Agreement if requested. The City will work with the SHPO should they request to monitor or to review project files or visit project sites.
- B. The City shall provide the SHPO with an annual report that summarizes activities carried out under the terms of this Agreement. Reports shall be submitted within 90 days of the end of the prior calendar year and include the following:
1. List of projects reviewed and exempted from review, including proposed rehabilitation/development activities; location of the projects, either by address or neighborhood or on a map.
 2. Preservation activities;
 3. Information on any public objections and their status;
 4. Training completed by the staff, the Preservation Professional;
 5. Any change in staffing of the Preservation Professional;
 6. Whether any surveys were completed;
 7. Other activities undertaken pursuant to this Agreement.

XIV. RECORD RETENTION

The City shall retain records relating to activities covered by this Agreement for a period of three years

XV. AMENDMENTS

This Agreement may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

XVI. TERMINATION

If any signatory to this Agreement determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation XV, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the Agreement upon written notification to the other signatories.

Once the Agreement is terminated, and prior to work continuing on the undertaking, the City must either (a) execute an Agreement pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. The City shall notify the signatories as to the course of action it will pursue.

Execution of this Agreement by the City and SHPO and implementation of its terms evidence that the City has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

XVII. RENEWAL

The City may request that the Agreement be extended for an additional 5 year period to January 2026 prior to its termination in January 2021. If all signatories agree to the City's request, an amendment shall be executed which extends the effective date of the Programmatic Agreement to January 2026.

XVIII. FAILURE TO COMPLY WITH THIS AGREEMENT

In the event that the City does not carry out the terms of this Agreement, the City shall comply with 36 CFR Section 800.3 through 800.6 with regard to each individual, federally assisted undertaking.

Execution and implementation of the Programmatic Agreement evidences that the City has taken into account the effects on historic properties for all individual undertakings it completes through the programs listed in paragraph one (1) of this Agreement.

SIGNATORIES

Stephanie Cutter
City Manager, City of Savannah

Date

Dr. David Crass
Deputy SHPO, Georgia State Historic Preservation Office

Date

APPENDIX