



United States Department of the Interior



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IN REPLY REFER TO:

I.A.2

Memorandum

AUG 28 2018

To: Regional Director, Southeast Region

From: Chief, Cultural Resources, Partnerships and Science

Subject: Health of the Savannah National Historic Landmark (NHL) District

The National Park Service (NPS) recently assessed the integrity and condition of the Savannah National Historic Landmark (NHL) District. An NHL is a place with “exceptional value or quality in illustrating and interpreting the heritage of the United States.”¹ While most communities include special places that are important to local or state history, only a few are important to American history as a whole. Places like the Savannah NHL District help us to understand the most significant patterns, movements, and themes in American history.

The Savannah Town Plan has been cared for and maintained for generations since it was designed by James Oglethorpe in the 1730s. The plan is part of the Savannah NHL District, is central to the city’s historic identity and on-going cultural and economic vitality, and is an irreplaceable part of American History. Its preservation is in the interest of the entire Nation.

Historic districts like the Savannah NHL District are challenging to preserve. They are often vibrant commercial and social centers, which must adapt to meet the needs of local residents and visitors. Furthermore, no single entity can care for a historic district alone. Federal, state, and local governments, along with private groups and individuals, share in the stewardship responsibilities. Adding to the complexities of managing a historic district are the wide-range of resource types they contain. For example, the Savannah NHL District contains: a variety of building types with varied styles that date to different periods; structures and circulation features such as squares, roads, paths, steps and walls; small scale features such as fences and sculptural objects; an archeological record of its inhabitants; and natural resources like trees. All of these elements contribute to the historic character of the district.

The NPS is part of a team devoted to the care and stewardship of the Savannah NHL District. Considering the national significance of the district, its large size and the many management challenges it faces, it is important that the NPS take an active role in supporting local and state officials, private groups, and individuals in their efforts to preserve the District.

¹ 36 CFR 65.4(a)

National Historic Landmark Program Role

The NPS administers a number of preservation assistance programs, including the NHL Program, to promote historic preservation and community revitalization. NHLs are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, just over 2,500 historic places bear this national distinction. Working with citizens throughout the nation, the NHL Program draws upon the expertise of NPS staff who guide the nomination process for new NHLs and provide assistance to existing NHLs. Designation as an NHL places no restrictions on property owners (including private citizens, state and local governments) who are responsible for the care of NHL properties.

The NPS is charged with maintaining a continuing relationship with NHL owners, monitoring NHLs, and advising owners on accepted preservation standards and techniques (36 CFR 65.7). NPS monitors and provides information about the health of landmarks so that owners, stewards, policy makers, and the public can take steps to preserve NHLs. To monitor the condition of NHLs the NPS has established four condition categories:

- **Satisfactory** (Priority 3) indicates that there is no known current or potential threats to the landmark.
- **Watch** (Priority 2) indicates NHLs that face impending actions or circumstances that likely will cause a loss of integrity.
- **Threatened** (Priority 1) indicates NHLs that have suffered, or are in imminent danger of, a severe loss of integrity.
- **Emergency** indicates that recent catastrophic damage has occurred that requires immediate intervention.

Condition categories, along with supporting information, give the public an understanding of the health of an NHL. This information allows owners, stewards, policy makers, and the public to take steps, if necessary, to preserve NHLs. Condition monitoring calls attention to NHLs that exhibit known or anticipated damage or threats to their integrity. Only in rare cases does categorization as “watch” or “threatened” presage withdrawal of NHL designation. NHL designation would be withdrawn only if the qualities for which a historic property was originally designated were lost or destroyed (36 CFR 65.9).²

Designation and Significance of the Savannah National Historic Landmark District

The Secretary of the Interior designated the Savannah National Historic Landmark District in 1966. At the time of its designation, the current guidance on documentation of historic properties

² The term “historic property” is used to refer to any prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places. This is a common term used by preservation professionals and comes from the National Historic Preservation Act (54 U.S.C. §300308).

had not been published.³ An eleven page narrative, describing the significance of Savannah, was prepared as documentation for the NHL designation in 1966. In 1969, Jerry L. Rogers, of the NPS' National Register Program, prepared a National Register of Historic Places form for the District. Rogers indicated several areas of significance, including Art, Commerce, Political, and Urban Planning. This form allowed for a preparer to check general time periods/centuries as significant periods (i.e. pre-Columbian, 15th century, 16th century, etc...). Rogers checked the boxes to indicate the property was significant in the 18th and 19th century. In 1977 James Dillion, an architectural historian with the NHL Program, prepared an NHL nomination for the District. This nomination used the National Register form, as was the convention at the time. Dillion selected Architecture and Other-Town Planning as areas of significance. Dillion selected "1700-1799," "1800-1899" and "1900--" as significant periods. Please note, National Register and National Historic Landmark nominations do not have "rolling end dates," the fact that the 20th century was selected on this form does not mean that all resources constructed in the 20th century are contributing. Readers should not expect National Register forms prepared before current guidance was developed to provide the same level and specificity of information that would be found in a nomination today. In 1985 an amendment was made to the National Register Historic District to extend the period of significance to 1934. This amendment did not add any additional areas of significance.

While it is evident that the District would benefit from an updated nomination, a careful reading of the existing documentation makes clear that the primary significance of the Savannah NHL District is the distinctive Savannah Town Plan (or as commonly known, Oglethorpe Plan) and the many buildings of architectural merit that rest upon that plan. The narratives of the 1966, 1969, 1977, and 1985 forms are devoted to the topics of Town Planning and Architecture. The Savannah Town Plan is characterized by a series of wards, each of which contains four elements: four groups of house lots (called "tything blocks"); four blocks reserved for civic buildings (called "trust blocks" that later also accommodated grand homes); a multifunctional central square, serving as a site for public gatherings, exercise, and markets, among other uses; and streets and lanes, which provide access and connect the wards.⁴

Savannah Integrity and Condition Assessment (2018)

To help stewards of the Savannah NHL District and the District's preservation partners understand the current condition of the District, the NPS commissioned a study, prepared by New South Associates, to document in narrative and graphic formats the major changes that have occurred within and adjacent to the District since its designation in 1966.⁵ The contractor was directed to evaluate the current integrity of NHL District as a whole, using the integrity criteria

³ National Register Bulletin, *How to Prepare National Historic Landmark Nominations*, was published in 1999. Bulletin 16A, *How to Complete the National Register Registration Form*, was first published in 1977. It was subsequently revised in 1986, 1991, and 1997.

⁴ For a more detailed discussion of the elements of the Savannah Town Plan see: Thomas D. Wilson, *The Oglethorpe Plan: Enlightenment Design in Savannah and Beyond* paperback ed. (Charlottesville, Virginia: University of Virginia Press, 2015) 85-89.

⁵ A technical review panel, consisting of subject matter experts from the National Park Service and the Georgia State Historic Preservation Office, selected New South Associates through a competitive process.

in the NHL bulletin, *How to Prepare National Historic Landmark Nominations*.⁶ The contractor was also asked to include an analysis of issues that had the possibility to effect the District's integrity and to recommend the categorization of the District into one of the established condition categories.

To aid in the assessment effort, NPS collaborated with staff from the Georgia State Historic Preservation Office (SHPO), the Chatham County-Savannah Metropolitan Planning Commission (MPC), the City of Savannah (City), and the Historic Savannah Foundation (HSF).⁷ The study, which began in November 2016, involved research, a reconnaissance survey, photographic documentation, and Geographic Information Systems (GIS) analysis and mapping. The study also involved a non-scientific survey, which was sent to preservation experts and other informants known to have strong associations or knowledge of the NHL District. This survey was used to gather local area knowledge and inform areas of investigation.

The resulting study, *Integrity and Condition Assessment: Savannah National Historic Landmark District* (the study), which was completed in 2018, definitively demonstrates that the Savannah NHL District retains the qualities for which it was originally designated as an NHL. The study confirms that the NHL designation is merited and that the District is not a candidate for de-designation. The study found that the majority of Savannah's squares retain a high level of both architectural and landscape integrity in relation to their retention of the Savannah Town Plan. The study highlights a number of preservation successes, such as planning policies adopted by the City of Savannah to restore the Savannah Town Plan to its original design, which provide the opportunity to reestablish "lost wards" into the larger mosaic of the District, as with the restorations of Franklin and Ellis Squares.⁸

However, the study also showed that the Savannah NHL District has lost some integrity and faces preservation challenges. No one project was identified as *the* "threat" to the Savannah NHL District. Rather, numerous challenges and issues were identified: these challenges included new construction and its effects on the Savannah Town Plan; the vulnerability of resources not specifically addressed in the NHL nomination, such as archeology, pavement, cultural landscapes and small scale features; natural disasters; and a series of intangible threats, like noise and traffic. These issues are discussed in more detail below. As a result of the multiple issues identified, the study's authors recommended that the NPS place the Savannah NHL District in the "threatened" condition category.

As part of the overall effort to understand the health of the Savannah NHL District, NPS staff held two public forums and two listening sessions in Savannah (May 10-11, 2018) and solicited public comment through an online project website (<https://go.nps.gov/savannah>). A summary of public comments, along with NPS comment responses, is included as an attachment to this

⁶ *National Register Bulletin: How to Prepare National Historic Landmark Nominations* (Washington D.C.: National Park Service, 1999) 36-37.

⁷ All collaborators attended a project orientation meeting and were asked to review and comment on all drafts.

⁸ Patrick Sullivan, Rebecca Fenwick, and Mary Beth Reed, *Integrity and Condition Assessment: Savannah National Historic Landmark District*, 2018. The full study is available online: <https://go.nps.gov/savannah>

memo. NPS staff also reviewed Savannah Zoning Board of Appeals decisions and City Council actions affecting the NHL District from 2004 to July 2018.⁹

Challenge: Preservation of the Ward Elements

The Savannah Town Plan is a character-defining feature of the NHL District; in other words, in order for the District to illustrate its national significance the Savannah Town Plan must retain integrity. The City of Savannah has done a commendable job enacting measures to protect the plan, specifically the 2009 Historic District Ordinance that mandates “development shall preserve or reconstruct the historic ward pattern of streets and lanes within the Oglethorpe Plan Area.” Other elements of the Savannah Town Plan (Trust and Tything Blocks and Squares) are not specifically addressed in the City’s Zoning Ordinance. These elements are essential features of the Savannah Town Plan. As described in previous sections, each of these elements serves a specific purpose within the Plan. To maintain integrity of the District the legibility of the Savannah Town Plan must be retained, a visitor to the District should be able to identify all the elements that compose the Savannah Town Plan (trust lots, tything blocks, squares, and streets and lanes).

The NPS is hopeful that in the future the City of Savannah will be able to realize its objective of “reconstruct[ing] the historic ward pattern of streets and lanes”.¹⁰ The NPS was pleased to see that on July 5, 2018, the Savannah City Council approved a text amendment to strengthen the existing protection of streets and lanes. As a result of the amendment, monumental buildings are now also subject to the streets and lane provision.¹¹ The streets and lanes provision of the Historic District Ordinance includes a map that identifies closed or privately-owned streets or lanes, which new development “shall preserve or reconstruct”. All the streets and lanes discussed here are identified on the map.¹² It is important to note that local, state, and federal governments are not subject to the local Historic District Ordinance, although these entities can voluntarily follow the local ordinance.

Currently there is at least one project which may diminish the integrity of the Savannah Town Plan. The Federal Government through the General Services Administration (GSA) is currently designing a Courthouse Annex in Heathcote Ward that has the potential to alter the Savannah Town Plan. GSA is engaged in a robust consultation process and recently, in response to community and stakeholder input, has made significant changes to their first proposed design, a

⁹ Meeting Minutes for Savannah Zoning Board of Appeals are available online: <https://www.thempc.org/Archive/Szba>. At the request of NPS, MPC Staff provided NPS with information related to City Council actions.

¹⁰ Savannah Zoning Ordinance Section 8-3030(n)(1).

¹¹ Savannah City Council Meeting Minutes, <http://agenda.savannahga.gov/publishing/july-5-2018-council-work-session/minutes.html>, accessed July 17, 2018. Monumental Buildings are defined as, “An institutional building such as a church, sanctuary, governmental building, school or institution of higher learning with the primary use as education, theater or museum, having special or unique form because of the nature of its use.” Savannah Zoning Ordinance Section 8-3030(a)

¹² See Savannah Zoning Ordinance Section 8-3030(n)(1). Other elements of the Savannah Town Plan—tything blocks, trust lots, and the squares—are not specifically addressed in the ordinance.

building that would have spanned President Street. GSA's revised plans are an improvement, but will still negatively affect the Savannah Town Plan. As GSA continues to consult with stakeholders, the NPS is optimistic that the final design will be compatible with the Savannah Town Plan.

Other projects present an opportunity to reconstruct streets and lanes, which would be a major step in strengthening the District's integrity. These projects have the potential to fulfil the aim, articulated in the City of Savannah's Historic District Ordinance, of "reconstruct[ing] the historic ward pattern of streets and lanes within the Oglethorpe Plan Area." For example, NPS understands that a Chatham County project at the County Courthouse complex is proposed. As part of this project York Lane, in Elbert Ward, has the potential to be reconstructed, as prescribed by the local ordinance.¹³ A second project, which could result in reconstruction of a lane is a proposal for development over East Oglethorpe Lane, in Crawford Ward. Initial project plans show development on top of historic East Oglethorpe Lane and NPS understands from the meeting minutes of the June 21, 2018, City Council Meeting that an attorney for the project's proponent (Geyer/Morris) has expressed uncertainty that the project will be able to comply with the local ordinance.¹⁴ However, NPS is hopeful that the City of Savannah will be able to work with the project's proponent to find a solution that meets the community's needs while honoring the local ordinance. One opportunity to reconstruct the ward pattern of streets and lanes was recently lost. The footprint of the City of Savannah's Cultural Arts Center (currently under construction) sits atop what should be a historic tything block in Elbert Ward, spanning the former location of West Oglethorpe Lane.

Challenge: Preserving Historical Development Patterns

The Savannah Town Plan provides the framework for the built environment in the NHL District. As described in the MPC's *Design Manual for the Savannah Historic District*, the "Trust and Tithing blocks dictate the development pattern within the city." Trust lots were historically reserved for public uses, and the civic buildings built upon them generally filled their 60 foot lot width. Tything blocks, set aside for residential development, were generally broken into 60 foot residential lots. Primary facades faced the squares and the rear of the buildings were accessible by east/west lanes. Division of the tything blocks into 60 foot-wide lots resulted in development that was generally some variation of 60 or 30-feet. Similarly the standard 90 foot depth of the lots resulted in homes that were generally built 45 or 50 feet deep, with a 20 foot carriage house

¹³ File Number 12-000373-COA. In 2012 Dewberry Architects, Inc. made a petition approval of demolition of the Chatham County Jail and new construction, Part I Height and Mass. This Certificate is now expired. <https://www.thempc.org/Archive/Hdbr2012>, accessed, July 2018.

¹⁴ Eric Curl. "Potential buyer's plan for city property rejected by planning commission," Savannah Now <http://www.savannahnow.com/news/20180605/potential-buyers-plan-for-city-property-rejected-by-planning-commission>, accessed July 2018. Savannah City Council Regular Meeting Minutes, <http://agenda.savannahga.gov/publishing/june-21-2018-city-council-regular-meeting/minutes.html>, accessed July 2018.

and a 20 to 25 foot courtyard.¹⁵ As a result of the Savannah Town Plan, a distinctive rhythm and scale developed throughout the town's architecture.

A review of historic Sanborn [fire insurance] maps, compared to Google Earth imagery (aerial and street views), reveals that today certain blocks that were previously composed of multiple buildings now accommodate fewer, larger buildings.¹⁶ This change has the potential to alter the feel of a street and negatively affect the pedestrian experience. An example of a large building that encompasses an entire tything block is the Juliette Gordon Low Federal Building (U.S. Army Corps of Engineers Building) in Heathcote ward. That is not to say that all large buildings would be damaging to the integrity of the District. It is possible to construct large buildings in a sympathetic manner that is compatible with historical development patterns.

Another example of how historical development patterns are changing is the trend of expanding structures to encompass previously empty space.¹⁷ For example, additions built to connect main residences with their associated carriage houses disrupt the house-courtyard-carriage house rhythm, described above. Combined, such changes to historical development patterns can alter the historic character and feel of a district.

Challenge: Other Pressures

In addition to pressures on the Savannah Town Plan, the study noted other challenges for preservation within the District such as the response to natural disasters—a challenge faced by all property owners—and intangible threats, such as noise and traffic, which can affect the overall feeling of a district. Several of the challenges noted relate to historic resources that were not specifically mentioned in National Register or National Historic Landmark documentation, such as archeology and historic pavement. These are important issues. Savannah undoubtedly contains a rich archeological record whose study could inform many areas of research, including histories of marginalized groups. The Georgia Trust for Historic Preservation contends that the lack of an archeological ordinance has resulted in the loss of countless archeological sites.¹⁸ Dr. Robin Williams, a professor at the Savannah College of Art and Design, has undertaken extensive study of historic pavement and has mapped the location of historic pavement types within the City of Savannah. Dr. Williams' work demonstrates that Savannah, compared to other American cities, can boast of having among the largest variety and greatest extent of historic street and sidewalk pavements and curbs.¹⁹

¹⁵ The Chatham County-Savannah Metropolitan Planning Commission, *Design Manual for the Savannah Historic District*, 2011, 2.

¹⁶ 1884 and 1888 Sanborn maps were consulted.

¹⁷ New South Associates, *Integrity and Condition Assessment: Savannah National Historic Landmark District*, 2018, 51.

¹⁸ The Georgia Trust for Historic Preservation included "Underground Savannah" in its 2018 Places in Peril list.

¹⁹ Robin B. Williams, *Savannah's Historic Street and Sidewalk Pavements: Threats and Opportunities*. Prepared for Savannah City Manager Rob Hernandez. Unpublished, March 27, 2017. Also see Robin B. Williams, *Savannah's Historic Street Features and Pavements: Benefits of a Municipal Ordinance*. Prepared for City of Savannah Staff. Unpublished, June 7, 2017. Also see <http://www.historicpavement.com/about/>.

In June 2018, the City of Savannah notified the NPS that it had established a new Planning and Urban Design Department in January 2018 and that by the end of this year that body will have assisted with the development and adoption of two new ordinances to protect archeology and historic pavement.²⁰ The City's commitment to preserving archeological resources and historic pavement is to be applauded and the NPS looks forward to development and implementation of the ordinances.

Challenge: Cumulative Effect

The Savannah NHL District, is a large historic district. Historic districts are inherently difficult to manage and preserve: they are most often living cities, which must evolve to meet the needs of their residents. They often have a range of resource types and multiple owners and stewards. Historic districts are also difficult to preserve because effects to a district can be extremely difficult to evaluate. A historic district derives its significance from the interrelationships among its constituent resources. The individual structures within a district combine to form an assemblage that provides a visual sense of the overall historic environment. When too many small changes occur within a historic district, the district may lose its ability to convey significance as a unified entity. Considered individually many impacts may seem minor, but cumulatively they can be substantial. Stewards must be careful to guard against incremental changes that over time can lead to a severe loss of integrity.

As part of this assessment NPS staff reviewed decisions of the Savannah Zoning Board of Appeals and City Council actions affecting the NHL District from 2004 to the present. In reviewing the decisions it is evident that interpreting the Historic District Ordinances requires a great deal of expertise and knowledge of historic preservation. Many decisions by Historic District Board of Review and the Metropolitan Planning Commission regarding projects within the District have been complex and nuanced. NPS' review of previous decisions underscored the importance of subject matter experts, like the staff of the MPC, in offering guidance to decision makers and highlighted the critical need for historic preservation professional, including architectural historians, historical landscape architects, historians, and archeologists. This review also highlighted the need to continually evaluate decisions within the context of the wider district. Considered individually many projects may appear to have little impact, but when combined they can significantly diminish a district's historic character.

Current Condition Category, Monitoring, and Recommendations

As mentioned previously, overall the Savannah NHL District retains integrity and continues to meet the requirements of the NHL program. The preservation of the Savannah NHL district is a testament to the hard work and dedication of many groups and individuals, including the City of Savannah, the Chatham County-Savannah Metropolitan Planning Commission, the Historic Savannah Foundation, the Savannah College of Art and Design, the Downtown Neighborhood Association and other groups and countless individual private property owners and advocates.

²⁰ Rob Hernandez, City Manager, City of Savannah, PEPC Comments, June 29, 2018.

The challenges addressed in this memo are not a reflection on the efforts of the groups listed above. The challenges are complex, stem from multiple sources, and will require concerted effort and collaboration to address. As a result of these varied challenges, NPS considers the Savannah NHL District to be in the “threatened” condition category.²¹ In this context, “threatened” refers to the possibility that historic character of the District may be lost, not that the landmark designation may be revoked. NPS will remove the District from the “threatened” condition category when the proposed actions and conditions that may diminish the District’s historic character have been addressed:

- NPS staff will continue to monitor currently proposed projects that may diminish the integrity of the Savannah Town Plan, such as closing a street or lane or constructing an inappropriate structure on a trust lot. The preservation of these spaces is critical to the protection of the Savannah Town Plan.
- NPS staff will await the development and implementation of the aforementioned archeology and historic pavement ordinances, which will do much to protect historic resources within the NHL District.

Listed below are preservation practices or tools that can be developed to facilitate management and improve the overall health of the District:

- Consideration should be given to updating the NHL District’s documentation. An updated nomination would establish a more specific period of significance, consider new areas of significance, and consider resources, such as archeology and cultural landscapes, which were not evaluated previously. An updated nomination would serve as a baseline, which would help in the management of the District.
- The Savannah NHL District, is a designed landscape that features both natural and cultural resources, which contribute to the District’s significance. Consideration should be given to preparing a Cultural Landscape Report, which would document the built environment, including features such as pavement and curbing, along with biotic resources and spatial interrelationships between the buildings/architecture and the Savannah Town Plan. Cultural Landscape Reports can make treatment recommendations and are particularly helpful when new projects or developments are proposed. In adopting a comprehensive view of the District as a historic designed landscape, it may be easier to discern and address cumulative effects.
- Following the example of the 2009 Historic District Ordinance addressing streets and lanes, the City of Savannah may consider enacting measures that would protect or encourage reconstruction of all elements of Savannah Town Plan.

²¹ The last comprehensive assessment of the Savannah National Historic Landmark District was conducted by the NPS in 2002. NPS provided a cursory rating of satisfactory in 2006 when we learned plans were adjusted to construct a proposed bus terminal outside of the District.

- Similarly, consideration should be given to developing methods of review that consider the NHL District more holistically. The Secretary of Interior's Standards were revised in 1992 so that they could be applied to all historic property types, including districts and cultural landscapes. Their application on a district-wide level could better inform decisions. For example, when changes to the height map in one area of the District are proposed, it would be beneficial to consider the height map and the district as a whole.
- Understanding that the NHL District does not have a uniform historic character, the MPC has identified several character areas of the District, including Factors Walk and the Beach Institute area. These areas have been identified as having a distinct character that sets them apart from the rest of the NHL District. There are other areas of the NHL District that should likely be considered as character areas.
- The Savannah NHL District benefits from the MPC's knowledgeable staff, who provide professional guidance to the Historic District Board of Review (Board). The 11 member Board is composed of both professional preservationists and non-professionals. The Historic District Ordinance states that the Board "shall include one or more representatives from a preservation related profession such as architect, architectural historian, or restoration contractor and an attorney."²² Given the complex nature of the NHL District, consideration should be given to professionalizing or requiring training in historic preservation to members of the Board (i.e. a course on the Secretary of the Interior's Standards as they relate to Cultural Landscapes).
- Consideration should be given to developing a more robust emergency response plan to account for historic resources, including cultural landscapes, archeology, historic infrastructure, and historic structures.
- Lastly, consideration should be given to implementing a system to track projects within the NHL District as a way to monitor, determine trends, and measure progress. Such a system would help establish guideposts to aid in stewardship.

Moving Forward

NPS will continue to monitor the Savannah NHL District and welcomes new information concerning the issues discussed in this memo. NPS will reconsider the Savannah NHL District's condition category when we learn that projects identified as potentially damaging to the District's integrity have been reconsidered and/or that other steps have been taken to better preservation within the District.

Maintenance of any historic property, whether it be a single building or a large district, requires constant attention and active management. Still applicable today are the concluding words of the NHL nomination. In 1977 James Dillon, the nomination's author, noted:

²² Savannah Zoning Ordinance Section 8-3030(d)(1)

Old Savannah is not by any means perfect. It has intrusions into the continuity and spatial patterns of the plan. It has gasoline stations, gaping parking lots, crude commercial adaptations of fine old buildings, and an occasional building badly placed or out of scale with the rest. On the whole though, a great deal more is left of the best of Savannah's unique fabric of streetscapes, than is not, so that the occasional tear in the material is just another chore for the now-vigilant local guardians to recognize and repair.²³

The "now-vigilant guardians" referenced in the nomination are still on watch in Savannah. Attendance during the May 10-11 public forums and comments received through the project website confirmed that an engaged citizenry that is informed and dedicated to the preservation of the Savannah NHL District. Likewise, correspondence from the City of Savannah emphasized the local government's commitment to preservation.²⁴ And the Federal Government (GSA) has shown a remarkable willingness to work with the local community to avoid diminishing the integrity of the Savannah NHL District. The NPS looks forward to assisting these groups as they strive towards the common goal of protecting the unique qualities that make Savannah a place of national importance.

Please contact Cynthia Walton, Southeast Regional National Historic Landmark Program Manager, at (404) 507-5792 if you have any questions or require additional information.

Attachment

Public Comment Summary and NPS Responses to Comments (PEPC Project 79971)

²³ James Dillon, *The Savannah Georgia NHL Historic District*, National Register of Historic Places Nomination Form, National Historic Landmarks Program, 1977, 4.

²⁴ Rob Hernandez, City Manager, City of Savannah, PEPC Comments, June 29, 2018

Public Comment Summary and NPS Responses to Comments (PEPC Project 79971)

The comment period for the *Integrity and Condition Assessment: Savannah National Historic Landmark District* was open from March 30 to June 30, 2018.¹ In total 47 comments were received.² Comments received addressed the findings of the study as well as commenters' perceptions of the NHL district. In the table below NPS has summarized main points and provided responses where appropriate.

- 3 Comments were received as letters or position papers.
- 3 Comments were received as phone calls or emails.
- 41 comments were recorded through the Project's Website (PEPC Project 79971).

Topic	Concern Statements	Response
Insensitive Architecture	Numerous comments expressed concern that new construction within and adjacent to the NHL District was not sympathetic to historic architecture within the District. Commenters specifically mentioned concerns regarding height, mass and scale. Design and materials were mentioned to a lesser extent. Some respondents expressed concern over effects of new construction on the city's skyline. Federal and local government projects, as well as hotel development were specifically cited.	Comments Noted
Design Review Process	Numerous commenters expressed the opinion that the existing design review process did not offer adequate protections for the District. Commenters expressed their view that the existing system, including the Historic Design Review Board and the role of the local government, allowed for architecture that was insensitive to the historic context. Several commenters expressed frustration over the perception that not all applicants "played by the rules."	Comments Noted

¹ Comments submitted outside the comment period were also considered and are included in this summary.

² One commenter submitted comments via phone, email, and submitted two comments through PEPC, these four comments were substantially the same. Consolidation of these four comments results in a total of 44 comments.

Public Comment Summary and NPS Responses to Comments (PEPC Project 79971)

	Other commenters expressed their opinion that tourism is prioritized over historic preservation.	
Design Review Process	Some commenters expressed a positive view of the current design review process, which they felt offered adequate protections.	Comments Noted
GSA Project	Several comments expressed negative views of the current GSA Courthouse Annex proposal on Telfair square, which they felt will damage the historic character of the district.	Comments Noted. NPS is engaged in the GSA consultation process.
Archeology	Multiple comments expressed concern over the vulnerability of archeological resources in Savannah, specifically respondents were concerned about the lack of local protections.	Comments Noted
Cultural Landscapes (trees and tree canopy)	Comments expressed concern regarding preservation of the district's cultural landscapes and biotic resources, specifically trees and the tree canopy.	Comments Noted
Traffic	Comments expressed concern over traffic	Comments Noted
Demolition	Comments expressed concern over demolition, one comment specifically cited a historic building on Broughton Street.	Comments Noted
Short Term Vacation Rentals	Comments expressed concern that Short Term Vacation Rentals were negatively effecting quality of life within the district.	Comments Noted
Short Term Vacation Rentals	A comment argued that Short Term Vacation Rentals have historical precedent and are positively effecting preservation within the district	Comment Noted

Public Comment Summary and NPS Responses to Comments (PEPC Project 79971)

		Comment Noted
Mid-Century Resources	A commenter expressed concern that mid-century buildings will suffer as part of an attempt to “restore” 19 th century Savannah, specifically that the Civic Center, an example of monumental New Formalism architecture, might be demolished.	
Buffer Zones	A commenter recommended “buffer zones” to the east, west, and south to protect the historic context of the NHL district.	Comment Noted
Study’s Examination of Positive Projects	<p>A few commenters noted that study did not thoroughly address projects that benefitted the historic district. Projects cited by commenters include:</p> <ul style="list-style-type: none"> • Creation of the City Market District • Broughton Street Commercial District restoration and enhancement; • Restoration of Franklin Square; • Enhancements of Savannah’s historic riverfront; elimination of many surface parking lots; • streetscape improvements along the city’s primary corridors including Bull Street, Bay Street, Martin Luther King, Jr Boulevard, Liberty Street, and River Street; • Historic Savannah Foundations efforts to save over 350 historic buildings from demolition; • Savannah College of Art and Design’s renovation of more than 75 historic properties and their adaptive repurposing of the renovated buildings to create an award-winning urban campus • Forsyth park has been improved and enhanced; • individual buildings that have been restored; • places of public art 	<p>NPS notes that most of these projects were identified in the study, however they were not discussed in great detail. NPS also notes that several of these project, for example streetscape improvements, are not necessarily “preservation” projects. Aesthetics are not considered when evaluating the historic integrity of historic properties. Properties that are historically important need not be beautiful.</p> <p>NPS also notes that by its very nature, a condition assessment is aimed at identifying issues that can be improved. Similar to a home inspection or a doctor’s visit, there is limited value in detailing items that require no action. The value of a condition assessment comes from pointing out what issues need to be addressed.</p>

Public Comment Summary and NPS Responses to Comments (PEPC Project 79971)

Survey Methods	Commenters expressed concern that the survey, which the study employed, was unscientific and not a representative sampling of the county population or annual visitors.	The scope of work directed the contractor to interview local historic preservation professionals and others knowledgeable about issues that could affect the integrity of the District. To accomplish this task the contractors employed a survey. The survey was non-scientific and targeted towards preservationist and informants with associations to the district. It was not intended to capture a representative sampling of all who visit Savannah. The survey informed areas of investigation for the researchers.
Study Methodology	A commenter expressed concern that the study focused on integrity rather than original areas of significance.	The National Register of Historic Places and National Historic Landmark Programs are preservation programs. Properties can be significant for a variety of reasons, but they must all retain historic integrity (physical) to qualify for inclusion in the programs. The study focused on the integrity criteria because these criteria are used to determine whether a property retains the physical qualities necessary to convey historical associations.
Study Methodology	The report fails to reference or identify any of the NPS's own published standards for new and compatible development.	In assessing whether a project is compatible or sensitive to a historic property, NPS evaluates whether the project will affect the characteristics of a historic property that qualify it for inclusion in the National Register/National Historic Landmark programs. This evaluation involves applying the seven aspects of integrity (location, design, setting, materials, workmanship, feeling, association). These aspects of integrity are explained in the National Register bulletin, <i>How to Prepare National Historic Landmark Nominations</i> (Washington D.C.: National Park Service, 1999) 36-37.
Study Methodology	A commenter expresses concern as to why NPS asked the contractor to include adjacent properties.	NPS asked the contractor to include assessment of adjacent properties in order to properly evaluate the

Public Comment Summary and NPS Responses to Comments (PEPC Project 79971)

		District's setting. Setting is one of the seven aspects of integrity by which integrity of historic properties are judged.
Study Methodology	A commenter noted that many buildings, including all the buildings noted as "Excellent or Exceptional" on a Historic Savannah Foundation Inventory are preserved.	Comment Noted
Criteria for Examining Loss of Integrity	A commenter noted that large-scale commercial buildings have always been a part of Savannah's history.	NPS agrees that Savannah has historically had large-scale buildings. However research in Historic Sanborn maps shows that the number of large-scale buildings is increasing.
Criteria for assessing NHL Condition	A commenter expressed concern that the standards used to assess condition categories could not apply to historic districts.	These criteria can be applied to any type of historic property.
Criteria for assessing NHL Condition	A commenter expressed concern that the period of significance extends from 1700 to 1999 and that intrusions identified as threats could be eligible to the National Register.	Although the Period of Significance for the district is unclear due to the outdated documentation for the district, the Period of Significance does not extend to 1999. The Period of Significance cannot possibly date to after the publication of the nomination. However, NPS agrees that there could be resources that have achieved significance in their own right and are individually eligible to the National Register, which may have had a negative effect on the Savannah NHL District.
Missing Information	Commenters noted that the report does not note that the Savannah NHL District was moved to Satisfactory in 2006.	This information was missing from the report. NPS moved the District to Satisfactory in 2006 when we learned that plans were adjusted to construct a proposed transit terminal outside of the District.
Study Process	Commenters expressed concern regarding the lack of public engagement.	Assessment of NHL Condition Categories are undertaken by historic preservation professionals. Historically NPS has publicized the results of assessments so that the public can take steps to preserve a resource, if warranted. NPS agrees that it is beneficial to alert the public when a study is

Public Comment Summary and NPS Responses to Comments (PEPC Project 79971)

Study's Examination of Positive Projects	<p>Commenters made note of steps the City of Savannah has/will be taken to improve preservation within the NHL District:</p> <ul style="list-style-type: none"> • Updated Design Review Standards (including the streets and lane ordinance) • Taken steps with the long-term goal of removing the I-16 flyover. • Restoration of Decker Ward (Ellis Square). • Text amendment to remove density restrictions on residential development. • Created a short-term vacation rental ordinance. • Prepared an Assessment and Restoration Plan to preserve the City's building inventory. • Adopted a Hotel Overlay District to restrict the location of hotels in residential districts and limit the location of large-scale hotels downtown. • Adopt a Tourism Management Plan to balance tourism and residential life. • Beginning the development of a new arena complex on the west side of town which will allow City to remove current Civic Center and restore Elbert Ward 	<p>undertaken. NPS will consider how to better involve the public in future assessments.</p> <p>NPS has noted these efforts and will continue to monitor the NHL District to see how recently enacted measures/proposed measures are affecting the health of the district.</p> <ul style="list-style-type: none"> • NPS agrees that the local preservation ordinance plays a significant role in preserving the NHL District. NPS will continue to monitor enforcement of the local ordinance. • NPS notes that a review of the Hotel Overlay District shows an increase in the areas where large hotels (75 rooms or more) are permitted. Approximately 340 parcels now allow large hotels where they previously were not permitted. The expanded large hotel area is mostly outside the NHL boundary on the western edge and in the northern portion of the District near the river. Approximately 20 parcels no longer allow hotels where they were previously were permitted. • As noted in a previous comment, the Civic Center may have achieved significance in its own right. NPS would urge the City to engage historians, architectural historians, and other preservation professionals as plans to remove the Civic Center move forward.
Study's Findings	One commenter noted that the report lists changes that impact the NHL District that the City has no authority to prevent.	<p>NPS agrees. There is no one steward of the Savannah NHL District. The purpose of condition assessments, like the one produced for Savannah, is to provide information to all who have stewardship responsibilities.</p>