

Preservation Approach

University of Georgia Mission and Character

The historic resources of the University of Georgia system that are the subject of this study are essential features of the University, contributing significantly to the character of its campuses, research institutes, and other properties. The Mission statement notes the importance of the University's history and historic resources to its overarching character. As noted in the 1999 University of Georgia Master Plan, the mission of the University is as follows:

The University of Georgia is a land and sea-grant university as well as the state's flagship institution of higher education.

The University's Mission is defined by the following core characteristics:

1.1 Integration of Three Missions

The integration of teaching, research, and service is a defining characteristic of the university as a land and sea-grant institution.

1.2 Commitment to Undergraduate Learning

The university has increased the presence of senior faculty in the classroom and intends to deepen its commitment to undergraduate students by creating a better learning environment.

1.3 Pursuit of Scholarship

The University embraces a broad array of scholarly inquiry in the form of research and creative works in most fields of advanced studies.

1.4 Call to Service

Throughout its history, the university has brought its expertise to bear on a host of public service programs affecting Georgians in every county.

1.5 Balancing Act on Enrollment

To cope with the escalating demand, the university has correspondingly raised admissions standards in order to maintain a balance between enrollment growth and the quality of the learning environment.

1.6 A Culture of Quality

With the state's support, the university aspires not only to maintain but also to improve the quality of its faculty and staff by raising salaries to region-leading levels.

1.7 Advocate for the Environment

The university has established environmental literacy and stewardship as an institutional priority.

1.8 Partnership with Industry and Peers

State-supported schools everywhere are being called upon to improve their efficiency and accountability - to make the most of their budgets. One of the best ways to accomplish this is through cooperative agreements with other University System institutions and with private industry.

1.9 Contributions to Georgia's Development

In fulfilling its mission of instruction, research, and public service, the university is actively involved in the economic, social, and cultural development of the state.

1.10 Cultural Diversity

University initiatives promoting cultural diversity serve to enrich the academic environment and build respect for cultural differences.

1.11 A Global View

Through technological innovation and economic interdependence, the university is compelled to extend its mission to international programs and development projects.¹⁸⁸

Guiding Principles

Based on research and analysis conducted for this study, and in consultation with University project team members and the workshops conducted by the University in conjunction with this study, the following guiding principles have been established for the Historic Preservation Master Plan and for preservation of the University's historic resources:

1. Relate historic preservation to the University of Georgia's mission and vision.
2. Recognize the central role that historic preservation plays in campus character.
3. Take a holistic approach to historic preservation, recognizing the interrelationships of landscapes, buildings, site features, and archeological resources.
4. Fully incorporate historic preservation concepts into University planning, processes, and procedures.
5. Endeavor to develop a clear and easy to use protocol and process for addressing historic preservation needs within the University system.
6. Emphasize the preservation of authentic historic fabric.
7. Recognize the ongoing need to accommodate change in University programs and infrastructure.

188. Ayers Saint Gross, 1–2.

8. Be flexible and creative in design and execution, always striving for the highest possible quality.
9. Use appropriate treatments for historic building and landscape systems and fabric.
10. Engage appropriate professionals to address the specific needs of each historic resource.
11. Engage students, faculty, administrators, alumni, residents, and the general public in cultivating historic preservation interests and values.
12. Emphasize livability, sustainability, and quality of life.
13. Recognize that University of Georgia is a collection of campuses, sites, buildings, structures, and landscapes spread across a large geographic area that present a wide range of preservation needs.
14. Recognize that the historic contexts associated with each campus, site, building, structure, and landscape should be considered when making preservation decisions.
15. Recognize that there are existing national, state, and local laws and policies that need to be respected when endeavoring to make preservation and stewardship decisions.
16. Share the collected knowledge of what makes historic buildings, landscapes, and archeological sites worthy of preservation and stewardship.

Key Issues Related to Historic Preservation

The issues faced by the University in addressing its historic resources are many and varied, ranging from the need to identify landscapes, buildings, and archaeological sites of historic significance so that they are understood to merit special consideration, to the challenges of evaluating properties for continued use or potential repurposing, to the overarching requirements of condition assessment, repair, and maintenance.

The University of Georgia maintains its resources in very good condition. Thus, some of the physical issues of threats commonly encountered in assessing historic resources are less prominent here. However, budget, schedule, and staffing needs continue to present challenges to all of the campuses and properties with the University System.

Key issues related to historic preservation of the University's historic resources have been identified based on discussion with University project team members, comments by participants in the Guiding Principles Workshop and stakeholders' meeting convened in coordination with this project, and conditions observed during field work by the project team.

Functional and Design Issues

One of the greatest threats to the University's historic resources is lack of an apparent current use, or future reuse, for a building or structure. Where continued use or reuse meets functional requirements, design for alterations needs to

respond to and protect the historic character of the resource. Alterations, if major or extensive, can result in a loss of historic fabric and diminished integrity of design, materials, and workmanship. Relocation of a resource is sometimes appropriate, but may also pose a threat to integrity as the physical context and setting of the resource is lost or altered. Buildings and structures that are vacant are more vulnerable to vandalism and other threats than those that are occupied and/or in use. In addition, unless properly weatherproofed during periods when they are not in use, vacant buildings are vulnerable to moisture leakage, animal or pest infestation, and other threats.

University staff generally employ maintenance techniques that are appropriate to the structures being repaired; however, if inappropriate maintenance techniques are used, or maintenance efforts are inadequate due to lack of funding or available skilled personnel to perform the work, the integrity of resources could be threatened.

Preservation and rehabilitation measures implemented on the University's historic resources should follow the Secretary of the Interior's Standards for the Treatment of Historic Properties and be appropriate for the specific application. If inappropriate measures are implemented, the integrity of the resources may be threatened.

Condition and Maintenance Issues

Buildings and structures are potentially vulnerable to a range of threats. Many are addressed by regular maintenance and monitoring, thus many threats are noted and addressed before resource integrity is compromised. If resources for repair and maintenance are not available or are limited, these issues remain of concern. Buildings and structures that are not in current use, or are at remote locations, tend to be at greater risk of deterioration due to damage caused by weather, vandalism, fire, and other threats.

Deterioration of resources occurs naturally due to aging of materials and exposure to weather. Deterioration through mechanisms such as water infiltration pose a threat to resource integrity unless careful maintenance efforts are ongoing. Severe deterioration can lead to unsafe conditions, or to eventual loss of the resource.

Development and Context Issues

Private or public development on adjacent lands, ranging from buildings and structures to new roadways and electrical transmission lines, can present a threat to viewsheds as well as to the setting of some historic resources.

In general, weather presents a threat to historic resources. Severe weather events—wind storms, tornadoes, hurricanes—can result in significant damage or loss of resources, while normal weather generally contributes to deterioration of resources over time. The potential for severe weather events is anticipated to increase in coming years due to climate change. Flooding is of concern for buildings and structures in low-lying areas, especially after extreme rainfall. Coupled with weather conditions such as wind and rain, erosion contributes to the deterioration of historic resources. Erosion of resource sites, such as through flooding, can lead to severe damage or loss of constructed resources.

Finally, operations and use need to be taken into consideration in developing a preservation approach for historic resources. As examples, users of historic resources may inadvertently damage character-defining features; overuse of a building or landscape can result in deteriorated conditions and diminished integrity; and vehicular access where not anticipated or accommodated can result in damage to fragile landscapes and archaeological sites. Without advance planning to prevent damage, these types of threats can result in requirements for more frequent and sometimes more extensive repair and maintenance.

Awareness and Mitigation Issues

As can be seen from consideration of several of the issues identified above, training and education of facilities personnel is essential to the protection of the University's historic resources. Working to increase the awareness of members of the University community—staff, faculty, and students—as well as neighbors and partners of University properties, of the value of historic resources is an important step in ensuring their protection. Continued integration of cultural resources education into curricula and University culture will help to foster this type of awareness.

Regular updating of survey data for historic buildings and structures, cultural landscapes, and archaeological sites is also important to ensuring preservation of these resources. Survey information should be accurate and as comprehensive as possible within the constraints of the survey program.

The Role of the National and Georgia Historic Registers

The National Register of Historic Places

The National Register of Historic Places is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Park Service's National Register of Historic Places is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.

In order for a property to be eligible for inclusion in the National Register of Historic Places, it must possess significance under one of four criteria. The Criteria for Evaluation state:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.¹⁸⁹

In addition, the Criteria for Evaluation identify the following criteria considerations:

Criteria Considerations

Ordinarily cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past fifty years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- b. A building or structure removed from its original location but which is primarily significant for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life; or
- d. A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- g. A property achieving significance within the past 50 years if it is of exceptional importance.¹⁹⁰

Guidance in evaluating the significance of historic resources is provided by the National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*.¹⁹¹

The historic nature of significant properties is defined by their character, which is embodied in their identifying physical features. For example, character-defining

189. National Register Bulletin: *How to Apply the National Register Criteria for Evaluation* (Washington, D.C.: Department of the Interior, 1997).

190. *Code of Federal Regulations, Title 36, Part 60*, "The National Register Criteria for Evaluation."

191. National Register Bulletin.

features for a building can include its configuration; materials, craftsmanship, interior spaces, and features; and different components of its surroundings.¹⁹²

Assessment of integrity is based on an evaluation of the existence and condition of the physical features which date to a property's period of significance, taking into consideration the degree to which the individual qualities of integrity are present. The seven aspects of integrity as defined in the National Register Criteria for Evaluation are location, design, setting, materials, workmanship, feeling, and association. As noted in the National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*:

Location is the place where the historic property was constructed or the place where the historic event occurred. . . . Design is the combination of elements that create the form, plan, space, structure, and style of a property. . . . Setting is the physical environment of a historic property. . . . Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. . . . Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. . . . Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. . . . Association is the direct link between an important historic event or person and a historic property.¹⁹³

The property must retain the essential physical features that enable it to convey its historical significance. The essential physical features are those features that define both why a property is significant (National Register criteria) and when it was significant (period of significance). The National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*, defines integrity as “the ability of a property to convey its significance.”¹⁹⁴

Georgia Register of Historic Places

Similar to the National Register, the Georgia Register of Historic Places is the state's official listing of historic resources. Listing in the Georgia Register is a form of recognition that makes individually listed structures eligible for state property tax incentives and provides for a review of some state-funded undertakings. The Georgia Register is maintained by the Historic Preservation Division (HPD) of the Georgia Department of Natural Resources.

Current National Register Status of University Properties

The following provides an overview of the current National Register status of University of Georgia properties. All National Register-listed properties within the University of Georgia System are located in Athens, with the exception of Rock Eagle. National Register-listed University of Georgia properties in Athens are shown in the figure that follows later in this chapter.

192. Lee H. Nelson, FAIA, *Preservation Brief 17: Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character* (Washington, D.C.: National Park Service, Technical Preservation Services, 1988).

193. National Register Bulletin, 44–45.

194. *Ibid.*

- **Old North Campus Historic District.** Listed in 1972.¹⁹⁵ Contributing resources indicated in the nomination include:
 - North Quadrangle
 - South Quadrangle
 - Arch and fence (1858)
 - Old College (also Franklin College) (1801–1805)
 - Waddel Hall (1820)
 - New College (1822–1823)
 - Demosthenian Hall (1824)
 - The Chapel (1832)
 - Phi Kappa Hall (1836)
 - Lustrat House (1847)
 - Moore College (1874)
 - Academic Building (1903), from the Ivy Building (1832) and the Library (1859)
- **Garden Club of Georgia Museum** (Headquarters House, Founder’s Memorial Garden) (1857; 1939–1946). Lumpkin Street, University campus. Listed 1972.¹⁹⁶
- **Bishop House** (Bishop Cottage) (1837). Jackson Street, University of Georgia campus. Listed 1972.¹⁹⁷
- **Governor Wilson Lumpkin House** (Rock House) (1842–1844). Cedar Street, University of Georgia campus. Listed 1970.¹⁹⁸
- **Cobb-Treanor House** (Treanor House, John A. Cobb House (1848–1849). 1234 Lumpkin Street. Listed 1972.¹⁹⁹
- **Jackson Street Cemetery** (Old Athens Cemetery). South Jackson Street, University of Georgia campus. (1810–1959) Listed 2009.²⁰⁰

195. John C. Waters, *National Register Nomination Form: Old North Campus*. (Athens, Georgia: Athens-Clarke Heritage Foundation, June 2, 1971), Section 8.

196. John C. Waters, *National Register Nomination Form: Founders Garden*. (Athens, Georgia: Athens-Clarke Heritage Foundation, June 2, 1971), Section 8.

197. John C. Waters, *National Register Nomination Form: Bishop House*. (Athens, Georgia: Athens-Clarke Heritage Foundation, June 2, 1971), Section 8.

198. John C. Waters, *National Register Nomination Form: Governor Wilson Lumpkin House*. (Athens, Georgia: Athens-Clarke Heritage Foundation, June 2, 1971), Section 8.

199. Kenneth H. Thomas and Richard Cloues, *National Register Nomination Form: Cobb-Treanor House*. (Atlanta, Georgia: Georgia Department of Natural Resources, November 1978). Section 8.

200. Janine Duncan, *National Register Nomination Form: Jackson Street Cemetery* (Athens, Georgia: University of Georgia, September 5, 2007), Section 8.

- **Athens Warehouse Historic District** (1888–1926). Bounded by Hancock and Thomas Streets and the Railroad, Athens, Georgia. Listed 1988.²⁰¹
- The **Hodgson Oil Refinery complex** is a contributing resource of the district located along Oconee Street.²⁰²
- **Lucy Cobb Institute Campus** (1858; 1882–1885). 200 North Milledge Avenue, Athens. Listed 1972. Contributing buildings include the Lucy Cobb Institute and Seney-Stovall Chapel.²⁰³
- **University President’s House** (Benjamin Hill House, Grant-White-Bradshaw House) (1856). 570 Prince Avenue, Athens, Georgia. Listed 1970.²⁰⁴
- **Naval Supply Corps Museum** (Carnegie Library Building) (1910). 1401 Prince Avenue, Athens, Georgia. Listed in 1975.²⁰⁵
- **Oglethorpe Avenue Historic District** (State Normal School Historic District) (1891–1932). Oglethorpe Avenue. Listed in 1987.²⁰⁶
 - Winnie Davis Hall (1902)
 - Rhodes Hall (1906)
 - Carnegie Library (1910)
 - Pound Hall (1917)
 - Miller Hall (1917)
 - Brick Entrance Posts at Buck Road entrance, Prince/Oglethorpe intersection, Prince Avenue entrance to Winnie Davis Plaza, Prince Avenue with brick wall
 - Plaza entrance between Winnie Davis Hall and Prince Avenue
 - Walks
 - Parade grounds

201. Lisa Raflo, *National Register Nomination Form: Athens Warehouse* (Atlanta, Georgia: Georgia Department of Natural Resources, August 26, 1988), Section 7.

202. *Ibid.*, 7-2.

203. John C. Waters, *National Register Nomination Form: Lucy Cobb Institute*. (Athens, Georgia: Athens-Clarke Heritage Foundation, June 2, 1971), Section 8.

204. John C. Waters, *National Register Nomination Form: University President’s House*. (Athens, Georgia: Athens-Clarke Heritage Foundation, June 2, 1971), Section 7.

205. Belle Massey, Pat Cooper. *National Register Nomination Form: Navy Supply Corps Museum*. (Athens, Georgia: Navy Supply Corps School, August 16, 1974), Section 7.

206. Kenneth H. Thomas, *National Register Nomination Form: Oglethorpe Avenue Historic District*. (Atlanta, Georgia: Georgia Department of Natural Resources, June 4, 1987), Section 8. There may be additional buildings indicated within the naval supply corps portion of the district that are not distinguishable from others on Oglethorpe Avenue as they are grouped together in the nomination as craftsman style residences.

- **Athens Factory (The Old Mill)** (1883). Baldwin Street and Williams Street. Listed 1980.
- **White Hall** (White Hall Mansion Forestry School) (1892). Simonton Bridge Road and Whitehall Road. Listed 1979.²⁰⁷
- **Rock Eagle Site (pre-historic)**. Rock Eagle site, near Eatonton, Putnam County, Georgia. Listed 1978.²⁰⁸
- **Singer-Moye Archaeological Site**. Prehistoric mound site in Stewart County, Georgia. Listed 1975.

National Register Eligibility of University Properties

As indicated by the summary provided above, the University of Georgia—particularly the Athens campus—has a number of historically and architecturally significant resources that are already listed in the National Register of Historic Places. Several resources are individually listed, while others are listed as contributing resources within historic districts.

Research and analysis conducted for this study have identified additional resources that may be eligible for listing. Using the categorization system developed for this study, resources already individually listed as well as resources greater than fifty years of age that may meet the criteria for be eligibility are assess as Category 1. Resources already listed as contributing to a historic district as well as those that may meet the criteria for eligibility as contributing to a historic district are assessed as Category 2. Resources fifty years of age or greater that are not individually significant or contributing within a historic district, but which are of value for their contribution to the University of Georgia, are assessed as Category 4. Resources less than fifty years of age that possess inherent value to the University are assessed as Category 4; this category includes resources that may be eligible for listing when they reach the National Register fifty-year age consideration. Finally, resources that are currently assessed as non-historic and as not meeting National Register eligibility requirements, and do not have other inherent value to the University, are assessed as Category 5; resources in this category that are less than forty years of age that should be re-evaluated when they reach forty to fifty years of age, and moved to another category if appropriate.

Assessment of individual resources using the above categories is provided within the individual chapters of this report. Resources currently listed or meeting the criteria for listing, either individually or as contributing resources within historic districts, are discussed in the Summary Assessment section of each campus chapter. The categorization of all resources addressed in this study is also provided in tabular form in the Resource Tables provided in Appendix A.

207. Kenneth H. Thomas and Richard Cloues, *National Register Nomination Form: White Hall* (Atlanta, Georgia: Georgia Department of Natural Resources, June 4, 1987), Section 8.

208. National Park Service, "National Register Digital Assets." <https://npgallery.nps.gov/AssetDetail/NRIS/78001001>, accessed November 14, 2018.



Figure 45. Map of Athens campus, with National Register-listed properties highlighted in red. (Source: Wiss, Janney, Elstner Associates, Inc., 2016)

Policies and Regulations

The State Agency Historic Property Stewardship Program

The State Agency Historic Property Stewardship Program, developed by the Historic Preservation Division of the Georgia Department of Natural Resources based on Section 110 of the National Historic Preservation Act and adopted in 1998, defines the broad historic preservation responsibilities of State agencies including the University System of Georgia.²⁰⁹ The State Stewardship Program ensures that state agencies develop comprehensive plans for preservation, protection, use, and maintenance of historic properties, and that funding provided by state agencies is used in a positive manner to achieve these goals. The State Stewardship Program requires that each state agency implement a Historic Preservation Plan to address the use, preservation, and protection of its historic properties.

The requirements of the State Agency Historic Property Stewardship Program comprise seven standards or guidelines, as follows:

Standard One

Each state agency establishes and maintains a historic preservation program that is coordinated by a qualified Preservation Officer, and is consistent with and seeks to advance the purposes of the State Agency Historic Property Stewardship Program. The head of each State agency is responsible for the preservation of historic properties owned by the agency.

Standard Two

An agency provides for the timely identification and evaluation of historic properties under agency jurisdiction and/or subject to effect by agency actions.

Standard Three

An agency nominates historic properties under the agency's jurisdiction to the Georgia Register of Historic Places.

Standard Four

An agency gives historic properties full consideration when planning or considering approval of any action that might affect such properties.

Standard Five

An agency consults with knowledgeable and concerned parties outside the agency about its historic preservation related activities.

Standard Six

An agency manages and maintains historic properties under its jurisdiction in a manner that considers the preservation of their historic, architectural, archeological, and cultural values.

209. The State Agency Historic Property Stewardship Program is described in detail at http://georgiashpo.org/state_stewardship. Section 110 of the National Preservation Act requires federal agencies establish their own historic preservation programs for the identification, evaluation, and protection of historic properties, and to develop a plan for the protection or management and use of those properties.

Standard Seven

An agency gives priority to the use of historic properties to carry out agency missions.

Georgia Environmental Protection Regulation

As noted in the Board of Regents *Campus Historic Preservation Guidelines*:

The Georgia Environmental Policy Act (GEPA) was enacted in recognition that the protection and preservation of the diverse aspects of Georgia’s environment is of the highest public priority. The Act requires that State “government agencies,” including the University System of Georgia and its individual Institutions, consider the effects of their actions on the environment. Historic and cultural resources are included among the various aspects of the environment as it is defined by the Act.²¹⁰

The act also requires the disclosure of effects of proposed state projects, including preparation of an Environmental Effects Report for all projects that the responsible agency official determines may significantly affect the quality of the environment, including historic and archaeological resources.²¹¹ Review of proposed actions is conducted by the Georgia Department of Natural Resources, Historic Preservation Division.²¹²

Section 106 Compliance

Section 106 is a provision of the National Historic Preservation Act of 1966 that requires federal agencies to determine the effect of proposed construction projects that use federal funds on properties listed in or eligible for the National Register of Historic Places. The Advisory Council on Historic Preservation is provided the opportunity to comment on projects under Section 106. This process affords protection to properties listed on or eligible for the National Register.

For the University of Georgia system, Section 106 of the National Historic Preservation Act applies to projects conducted by the university when those projects are the beneficiary of federal funding or require federal permitting or licensure. Campus administrators are responsible for compliance under the Act. The act requires a project review and consultation process similar to that prescribed by the Georgia Environmental Protection Act and the State Stewardship Program.²¹³

210. Lord, Aeck & Sargent, with Sasaki Associates, The Jaeger Company, and Southern Research Historic Preservation Consultants, Inc. *Campus Historic Preservation Plan Guidelines*. Prepared for the University System of Georgia, Board of Regents, 2005, 36–37.

211. Georgia Department of Natural Resources, Historic Preservation Division, <https://georgiashpo.org/>, accessed November 14, 2018.

212. Board of Regents, *Campus Historic Preservation Plan Guidelines*, 36–37.

213. *Ibid.*, 37.

Historic Resource Assessment Categories, Definitions, and Standard Operating Procedures

Board of Regents Campus Historic Preservation Plan Guidelines

The Board of Regents *Campus Historic Preservation Plan Guidelines* offers guidance on assessment of buildings and landscape in terms of their preservation potential. This guidance is provided within the context of identifying appropriate treatment approaches and project-level procedures. The *Campus Historic Preservation Plan Guidelines* defines two categories of resources, as follows:

4.1.1 CATEGORY I – LONG-TERM PRESERVATION

Buildings and landscapes that are worthy of long-term preservation and investment because they possess high integrity and meet one or more of the following criteria:

- Possess central importance in defining or maintaining the historic, architectural, natural, or cultural character of the Institution.
- Possess outstanding architectural, engineering, artistic, or landscape architectural characteristics.
- Possess importance to the interpretation of history, development, or tradition of the Institution.
- Have considerable potential for continued or adaptive reuse.
- Are otherwise highly valued by the Institution.

4.1.2 CATEGORY II – CONSIDERATION FOR LONG-TERM PRESERVATION

All remaining identified historic buildings and landscapes fall under Category II. Buildings and landscapes that possess integrity, continuing or adaptive use potential, or other value to merit consideration for long-term preservation, but that do not meet the criteria for assignment to Category I. Examples of Category II resources have the following characteristics:

- Have historical or aesthetic value, but are not central to defining or maintaining the character of the Institution.
- Are good, but not outstanding examples of architectural styles, engineering methods, artistic values, or landscape architecture.
- Can contribute to the interpretation of the history, development or tradition of the Institution but that are not necessary to that interpretation.
- Have some potential for continued or adaptive reuse.

The two overarching Board of Regents categories provide the basis for a more detailed categorization system developed as part of this study for the University of Georgia campuses and resources. This categorization system is discussed below. (Treatment guidance provided in the Board of Regents *Campus Historic Preservation Plan Guidelines* is discussed in the Preservation Guidelines section of this report.)

University of Georgia Historic Preservation Master Plan Categories

The following definitions are provided for reference in understanding the Standard Operating Procedures described below.

Category 1 – Resources that are individually listed or meet eligibility criteria

- Individually listed in the National Register or as a National Historic Landmark.
- Not listed but meeting the criteria for eligibility for listing in the National Register.

Category 2 – Contributing resources within a listed or eligible historic district

- Contributing resource within a historic district listed in the National Register or as a National Historic Landmark.
- Contributing resource within a historic district not listed but meeting the criteria for eligibility for listing in the National Register.

Category 3 – Other resources fifty years of age or greater with historic value

- Resources fifty years of age or greater that are not individually significant or contributing within a historic district per the National Register of Historic Places, but which are of value for their contribution to the character of the University of Georgia.

Category 4 – Other resources less than fifty years of age of inherent or potential value

- Resources less than fifty years of age that possess inherent value (e.g., architectural) to the University of Georgia. Includes resources that may be eligible for listing when they reach the fifty-year age consideration.
- Resources forty to fifty years of age that the University plans to reassess when they reach fifty years of age. Includes resources that may be eligible for listing when they reach the fifty-year age consideration.

Category 5 – Non-historic resources

- Resources that are non-historic and/or do not meet National Register eligibility requirements for listing, and lack other inherent value to the University of Georgia.
- Resources in this category that are less than forty years old at the time of the current assessment should be re-evaluated when they reach forty to fifty years of age, and moved to another category if appropriate.

Standard Operating Procedures

These Standard Operating Procedures integrate historic preservation management practices into the day-to-day facilities planning and operations of the University of Georgia. The goal is to ensure that historic resources are given due consideration in the planning process and that appropriate consultations and review processes are followed in a timely manner. The goal is to create a

transparent process to guide decision making when exploring options to demolish, maintain, rehabilitate, or add on to existing historic grounds or facilities.

How to Use These Standard Operation Procedures

These Standard Operating Procedures (SOPs) consist of two parts: SOPs 1 through 4 establish foundational historic preservation activities based in established preservation practice and the agency requirements of the State Stewardship Program, while SOPs 5 through 12 establish consultation and review procedures for various type of projects involving historic resources.

The *Implementation Matrix* (shown below) facilitates navigation of the consultation and review process and connects proposed actions with specific procedures.

All historic resources identified in the Historic Resource Inventory (HRI) have been assigned an *Assessment Category* that takes into consideration the age, history, context, significance, condition and integrity of buildings and landscape features, and suggests National Register of Historic Places eligibility and other potential significance using five classifications (1, 2, 3, 4, and 5), as noted above. The *Assessment Category* for specific University of Georgia resources may be found on the *Summary with Tabular Identification and Evaluation of Cultural Resources* section found in the appendix of this Historic Preservation Master Plan. Summaries are arranged by campus association, character area, and building number, with landscape resources following buildings in each character area. The *Assessment Category* of a building or landscape resource may also be obtained by contacting the Campus Preservation Officer (CPO) (see SOP1) or utilizing the information tab on the Interactive Campus Map where available (for more information see <https://www.architects.uga.edu/CampusMap/>).

The Implementation Matrix cross-references the resource Assessment Category with eight potential Actions including Master Planning, Routine Maintenance, Corrective Maintenance, Minor/ Moderate Rehabilitation, Extensive Rehabilitation, Additions/New Construction, Demolitions/ Dispossessions, and Excavations/Archaeology. By cross-referencing the resource Assessment Category with the proposed Treatment the matrix directs the user to the specific SOP for that action. Note that actions involving Excavation/Archaeology always default to SOP 5 as there is no way to apply an Assessment Category to a hidden condition.

Actions

Master Planning– Master planning encompasses a range of activities oriented toward the articulation of a long-term vision for growth and/or transformation at scales ranging from an individual facility to the entire campus.

Routine Maintenance – Routine Maintenance involves in-kind replacement and finish refreshes. Maintenance activities that do not impact historic details, materials, features, spaces, or buildings may be conducted using Best Management Practices. Where historic materials, features, spaces, or buildings are proposed for change or removal, the CPO must be consulted.

Corrective Maintenance – Corrective Maintenance involves the disruption, removal, and/or replacement of worn or damaged materials including exterior and interior architectural details, selective window/door replacement, floor/wall/ceiling wall repair or replacement, exterior surface coatings, masonry repointing, and roof penetrations, among others. Corrective Maintenance also includes emergency procedures. Where historic materials, features, spaces, or buildings are proposed for change or removal, the CPO must be consulted.

Minor/Moderate Rehabilitation – Minor/Moderate Rehabilitation involves substantial alteration to interior or exterior spaces and/or materials including large-scale finish alteration, comprehensive window and door replacement, exterior penetrations, small exterior additions (non-programmatic), majors systems upgrades (MEP/FP), roof replacement, room subdivision and consolidation, accessibility alterations, and additions (elevators, ramps, steps).

Major/Extensive Rehabilitation – Major/Extensive Rehabilitation involves the comprehensive rehabilitation of complete buildings, floors, or wings, including complete MEP/FP systems installation/replacement, and substantial reconfiguration of or alteration to existing building volumes, spaces, and circulation patterns.

Additions/New Construction – Additions/New Construction involves an addition to an existing building or new out-of-the-ground buildings, and typically entails substantial ground disturbance/ excavation, which triggers archaeological review.

Demolition/Dispossession – All activities resulting in the demolition, removal, or transfer of any property 50 years of age or older requires Georgia State Historic Preservation Office (SHPO) consultation and Board of Regents (BOR) approval. BOR will not review Demolition/Dispossession proposals until Determinations of Eligibility and Assessments of Effects have been issued by the SHPO.

Ground Disturbance – Land disturbing activities involving boring, excavation, trenching, grading, cut and fill, and grubbing trigger archaeological review.

Environmental Site Assessment – A BOR Environmental Site Assessment (ESA) is intended to identify any recognized environmental conditions which previously existed or currently exist at the subject property that may cause the BOR liability or cost concerns, and/or may preclude development of the site (for more information, see http://www.usg.edu/building_project_procedures/chapter4/App4B.pdf).

Environmental Effects Report – The Georgia Environmental Policy Act (GEPA) states that an Environmental Effects Report (EER) is necessary when a government action may adversely affect the quality of the environment. The EER should identify the impact of the action, propose alternatives, and delineate potential mitigation efforts.

Historic Resource Inventory – The University’s CPO maintains a Historic Resource Inventory (HRI) (SOP 1) database of all structures 40-plus years of age or older. All historic building and landscape resources are identified in the

database using the base format of the “Georgia Historic Resources” inventory form.

State Historic Preservation Office – Each state has a federally mandated and partial federally funded State Historic Preservation Office (SHPO). Each office must have an appointed State Historic Preservation Officer. These offices typically manage both federal and state level historic preservation issues as is the case in Georgia. (See HPD below).

Historic Preservation Division – Used interchangeably with State Historic Preservation Office. The Historic Preservation Division (HPD) is a division of the Department of natural Resources and is the seat of the State Historic Preservation Officer.

Standard Operating Procedure 1: Campus Preservation Officer (CPO)

The campus will designate a Campus Preservation Officer (CPO) who meets the *Secretary of the Interior’s Professional Qualifications Standards* (for more information, see http://georgiashpo.org/sites/uploads/hpd/pdf/CD_PQStandards.pdf). The CPO will review and ensure coordination of all projects involving historic properties and archaeological considerations with the appropriate stakeholders, including communications with the Georgia State Historic Preservation Office (SHPO). The CPO will be available to provide technical assistance and procedural advice during all phases of a project involving historic properties and archaeological considerations.

The current Campus Preservation Officer is:

Scott Messer, MHP
Director, Historic Preservation
Office of the University Architects for Facilities Planning
382 East Broad Street
Athens, Georgia 30602
(706) 542-7331
smesser@uga.edu

The CPO will involve professional consultants or appropriate individuals from the University staff with specific expertise, such as archaeology or historical landscape architecture, as needed for specific operations.

Standard Operating Procedure 2: Consultation and Reporting

The Campus Preservation Officer (CPO) will be responsible for providing technical assistance and procedural advice when requested or as prescribed by these procedures. Planned construction associated with or alterations to historic buildings and landscapes, and/or with the potential to disturb known or potential archaeological resources, must be preceded by consultation with the CPO. The CPO will be responsible for maintaining a log of all consultations. This list will be made available for State Historic Preservation Office (SHPO) review on an annual basis.

Standard Operating Procedure 3: Recordation

All activities resulting in changes to historic buildings and landscapes will be recorded and documented, and the documentation filed in a designated location for easy access and retrieval. The purpose of this process is to create a record of changes made over time to the University's historic buildings and landscapes, while facilitating resource-related decision making as well as future research efforts. The University's Facilities Management Division (FMD) Facility Inventory currently collects and catalogs all as-built documentation (drawings and specifications) as part of its standard operations. Utilization of the University's existing as-built documentation process for this purpose is anticipated.

Facilities Inventory
 Facilities Management Division
 University of Georgia
 1180 East Broad Street
 021 Chicopee Complex
 Athens, Georgia 30602
 facilities-inventory@fmd.uga.edu
<https://www.fmd.uga.edu/facilitiesinventory>
 (706) 542-9365

At the same time, documentation records should be considered for inclusion in the University of Georgia Special Collections Libraries. Both recordation documentation as well as any materials collected as part of background research into a property should be compiled and submitted to the University of Georgia Special Collections Libraries. The Campus Preservation Officer (CPO) will develop protocols for archiving materials with University of Georgia Special Collections Libraries, including determining a list of construction-related documents of interest, potentially including reports, contracts, correspondence, meeting minutes, and buildings material samples.

The permanent archival records that are used to meet Georgia State Historic Preservation Office (SHPO) mitigation requests will also be submitted to the *University of Georgia Special Collections Libraries* (see also Standard Operating Procedures 3 and 13).

University Archivist
 Richard B. Russell Building Special Collections Libraries
 University of Georgia Libraries
 300 South Hull Street
 Athens, Georgia 30602
 (706) 542-0667
 sarmour@uga.edu
 sclib@uga.edu
<http://www5.galib.uga.edu/scl/#>
 (706) 542-0667

Where archaeological activities result in the recovery of pre-historic or historic artifacts, these items will be submitted along with documentation to the University of Georgia Laboratory of Archaeology for permanent curation. In most instances, this transfer will be handled by the registered archaeologist

responsible for the investigation. All archaeological sites will be recorded at the Georgia Archaeological Site File.

University of Georgia Laboratory of Archaeology
The Georgia Archaeological Site File
UGA Laboratory of Archaeology
110 Riverbend Road
Athens, Georgia 30602-4702
(706) 542-8737
fax (706) 542-8920
gasf@uga.edu

The University will develop a Geographic Information System (GIS) file to identify known archaeological sites and those identified in the future. The file will serve as an initial tool for assessing proposed ground-disturbing activities. Sites that have been examined and determined not-eligible will not require additional consideration unless there remains the potential for other archaeological sites to be located nearby, or if the site is deemed significant and would require further remediation prior to disturbance.

Standard Operating Procedure 4: 10-Year Reevaluation

Every 10 years, the University will review the database of building and landscape resources to update the list of resources 40 years of age or older. This will help to maintain a 10-year “look ahead” window to understand which resources will reach the 50-age consideration associated with historic status.

Every 10 years the University will also review and, if necessary, update the Historic Preservation Master Plan and Standard Operating Procedures to reflect the University’s contemporary protocols and preservation approaches.

Standard Operating Procedure 5: Excavation and Archaeology

The purpose of archaeological investigation, is to identify, and if possible preserve archaeological resources on University property, as well as to avoid unintentional destruction of resources. This procedure defines various undertakings that will initiate an archaeological investigation, and outlines steps that are to be taken in such an investigation. Archaeological investigation is to be initiated in the case of land-disturbing activity or timber harvesting. These two undertakings lead to different steps in archaeological investigation.

Land-disturbing activity is defined here following elements of the 1991 Georgia Environmental Policy Act (GEPA) Guidelines, the 2011 Georgia Department of Natural Resources Historic Protection Division (HPD) Timber Harvest Archaeology Protocol A land disturbing activity is one that:

- Involves scraping, plowing, clearing, dredging, grading, soil compression, excavating, transporting or filling of land that affects an area of greater than 100 total square feet (with the exception of cultivation).
- Involves the placement of any structure or impervious surface, or dam.
- Timber harvesting of more than five acres of land.

Should a land-disturbing activity be planned, the first step is to notify the Campus Preservation Officer (CPO), who will review the Georgia Archaeological Site File records for the property to determine whether or not the location has been previously assessed by an archaeologist. If it has, and no significant archaeological sites have been documented, no further archaeological work will be required. If it has, and significant archaeological sites have been documented at that location, then the CPO will aid in reconfiguration of the planned undertaking to avoid the archaeological site, or develop and oversee archaeological testing of the site.

If no archaeological survey has been done on the location, the CPO will engage an archaeologist to direct, perform, assess, and report on the archaeological investigation. The archaeologist should meet the Secretary of Interior's *Professional Qualifications Standards* (36 CFR 61 and *Federal Register* 48:44739).

If no significant archaeological sites are encountered in the survey, then no further archaeological work will be required. If the archaeologist identifies a potentially significant archaeological site, this site should be avoided, or its significance should be tested through more thorough investigation.

If a potentially significant archaeological site is to be avoided, the CPO will assist in the development of a plan to avoid the site and ensure its implementation.

Following a Phase I survey, GNAHRGIS records will be updated to include the surveyed area and the results of the survey.

Archaeological testing for significance is a process that determines if a site has sufficient integrity and value to warrant preservation or study. A plan to test the site must be developed by a qualified archaeologist. This plan must be reviewed and approved by the CPO as well as the Georgia State Historic Preservation Officer (SHPO). Though each significance test of a site is unique and designed to meet the characteristics of the individual site, certain standards apply, and are detailed in the Georgia Council of Professional Archeologists (GCPA) guideline in section III.E. The results of the test, along with the treatment and curation of any artifacts collected should be compiled into a report that meets the guidelines for such a report in the GCPA guideline in section V. This report will include a section that fully assesses the significance of archaeological site.

If the site is found not to warrant preservation or study, then no further archaeological work will be required. If the site is found by the archaeologist to be significant, and the CPO and the Georgia SHPO concur, then the site should be avoided, or a plan to mitigate the effect on the site by the undertaking must be developed and implemented. Such a plan must be developed by the archaeologist in consultation with the Campus Preservation Officer and the Georgia SHPO to meet the needs of all stakeholders.

All documents produced and artifacts collected should be curated at the University of Georgia Laboratory of Archaeology according to their guidelines. All archaeological investigations must be recorded on Georgia Archaeological Site File to avoid duplication.

Should inadvertent discovery of archaeological materials be made in an activity that does not meet the definition of land disturbing activity, or in an area that has been identified as not having a significant archaeological site, the CPO should be contacted for initial assessment immediately.

Standard Operating Procedure 6: Historic Resource Studies

The appropriate management of historic resources often benefits from research, documentation, and analysis presented in different types of historic resource studies. The purpose of historic resource studies is to identify and compile relevant archival documents, develop a historic context for and a physical description of the resource, assess historic integrity, and evaluate significance in accordance with Georgia and National Register of Historic Places criteria. For example, historic structure reports are a recognized type of study used in assessment and management of historic buildings and structures.

The management of historic landscapes in particular, which are not currently well represented in the University's historic resource database, will benefit from additional historic resource studies, such as cultural landscape reports, to address the complexities of place. The Campus Preservation Officer (CPO) will recommend the preparation of a historic resource study for historic landscapes when insufficient information is available to assess a proposed action.

Historic resource studies will be developed under the direction of the CPO. They will be prepared by a qualified Cultural Resource Management firm with personnel who meet the *Secretary of the Interior's Professional Qualifications Standards*.

Standard Operating Procedure 7: Best Management Practices

Three options are presented herein for complying with the Standard Operating Procedures for treating historic resources. The first entails conformance with Best Management Practices (BMPs) for actions that are not anticipated to remove or alter historic materials or character-defining features. (Refer to the Preservation Guidelines chapter that follows for further discussion of appropriate BMPs for historic buildings and structures, landscapes, and archaeological resources.) The other two involve consultation with the Campus Preservation Officer (CPO), or consultation with Georgia State Historic Preservation Office (SHPO), contingent upon the proposed action and the category of the resource.

BMPs are used to guide instances of routine maintenance and corrective maintenance activities, where the action does not remove or alter historic materials or character-defining features. BMPs assume for the most part that actions involve "in kind" changes, with alterations to historic materials and spaces that are reversible. Where actions are not reversible, the CPO will be consulted. While BMP activities generally do not require consultation with the CPO or the SHPO, the CPO will be available for technical assistance and consultation.

Because most of the actions involving historic resources are anticipated to fall under the treatment approach of rehabilitation as defined by the Secretary of the Interior, and the rehabilitation standards are consistent with the goals of the University noted above, these form the basis for the BMPs outlined in this

Standard Operating Procedure. *The Secretary of the Interior's Standards for Rehabilitation*, (available at https://www.nps.gov/tps/standards/four-treatments/standguide/rehab/rehab_standards.htm), are as follows:

1. A property will be used as it was historically, or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and special relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Standard Operating Procedure 8: Campus Preservation Officer (CPO) Consultation

Three options are presented herein for complying with the Standard Operating Procedures for treating historic resources. The first entails conformance with Best Management Practices (BMPs) for actions not anticipated to remove or alter historic materials or character-defining features. The other two involve consultation with the Campus Preservation Officer (CPO), or consultation with Georgia State Historic Preservation Office (SHPO), contingent upon the proposed action and the category of the resource.

When BMPs are insufficient to address a proposed action to a historic resource due to the extent of the proposed treatment, or the category of the resource, consultation with the CPO will be required. The CPO will specifically be consulted as regards:

- All environmental site assessments (including property acquisitions, sales, and transfers). These assessments may also require additional SHPO consultation;
- Routine maintenance or corrective maintenance results in alterations to historic materials or character-defining features;
- All minor/moderate rehabilitations and major/extensive rehabilitations.
- Facility or campus master planning activities involving or adjacent to historic structures or landscapes;
- All ground-disturbing activities and archaeological investigations and excavations;
- All demolition/dispossession of all properties. Historic properties will also require SHPO review prior to BOR approval;
- All planning and new construction activities involving federal funding, licensing, or permitting. Historic properties will also require SHPO Section 106 review.

Consultation will be initiated before critical scope and budget decisions are made.

When deemed necessary, the Campus Preservation Officer may seek formal or informal consultation from the State Historic Preservation Office (SOP 9)

Standard Operating Procedure 9: State Historic Preservation Office (SHPO) Consultation

Three options are presented herein for complying with the Standard Operating Procedures for treating historic resources. The first entails conformance with Best Management Practices (BMPs) for actions not anticipated to remove or alter historic materials or character-defining features. The other two involve consultation with the Campus Preservation Officer (CPO), or consultation with Georgia State Historic Preservation Office (SHPO), contingent upon the proposed action and the category of the resource.

SHPO consultation is required for:

- Potentially problematic issues raised by Environmental Site Assessments;
- Unresolvable issues arising from CPO review;
- All planning and construction activities involving federal funding, licensing, or permitting are subject to Section 106 (National Historic Preservation Act 1966) review. The SHPO is responsible for all formal review for Section 106 compliance, UGA is responsible submitting Section 106 reviews to SHPO unless the responsibility is previously designated to another federal or state agency (for example, the Army Corps of Engineers).
- All extensive/major historic rehabilitation projects.

- Demolition and dispossession of any historic buildings and all real estate;
- Archaeological survey, testing, and mitigation (refer to Standard Operating Procedure 5).

The University of Georgia is solely responsible for communication, consultation, and submissions to and with the SHPO. All correspondence and consultations with the SHPO must be coordinated through the CPO. Consultant-based communication, consultation, and submissions will only be permitted with the foreknowledge and permission of the CPO.

Formal SHPO submissions will be completed using the Georgia SHPO Environmental Review Form (available at <http://www.georgiashpo.org/review>). The review will be initiated no later than the Schematic Design (35 percent) phase of a construction project. The SHPO may request additional submittals later in the design process, depending on the complexity of the preservation issues involved. The SHPO has 30 days to respond to submittals. The 30-day clock restarts whenever additional information is requested to support the submittal. Adequate time should be included for this review within the overall design/planning process and schedule.

When SHPO consultation is required, projects are likely to benefit from the historic resource study process addressed in Standard Operating Procedure 6. Historic resource studies have been found to greatly facilitate the review process by providing the types of information commonly requested as additional information by the SHPO, helping to expedite the review window.

Historic resource studies will be required for all extensive/major rehabilitations and demolitions/dispossessions, and recommended for minor/moderate rehabilitations where SHPO review is anticipated. They are also recommended for actions within eligible historic districts to address historic landscape considerations.

Formal SHPO submittals consist of three parts: “Determination of Eligibility” (Standard Operating Procedure 10); “Assessment of Effect” (Standard Operating Procedure 11); and “Mitigation” (Standard Operating Procedure 13).

Standard Operating Procedure 10: Determination of Eligibility

A property that is considered eligible for listing in the state or federal register is subject to GEPA/State Stewardship as well as Section 106 review if the project includes federal funding, permitting, or licensing. Properties assessed as Category 1 and 2 in the resource inventory are considered eligible for listing in the state or federal register. (Properties in Category 4 may be eligible when they reach the 50-year age consideration.)

A Determination of Eligibility is made first by the agency and then referred to SHPO for concurrence as part of the consultation process. Historic resource studies (Standard Operating Procedure 6) are useful in providing the type of information required to submit a Determination of Eligibility and can reduce the review period by reducing SHPO requests for additional information. The Campus Preservation Officer (CPO) will be consulted regarding the need for and approach to obtaining a DOE. Category 1 and 2 resources will be considered eligible for inclusion. The University may simply concede eligibility in an effort

to save time and submittal paperwork. Formal requests for Determination of Eligibility are best reserved for Category 3 resources.

Any property that is determined not-eligible by the SHPO may be reassigned as to Categories 3, 4 or 5 in the Historic Resource Inventory as appropriate.

Standard Operating Procedure 11: Assessment of Impact/Effect

A property that has been determined eligible for listing in the state or federal register by the State historic Preservation Officer (SHPO) is then subject to an “Assessment of Impact/Effect” of the proposed action. The words “Impact” and “Effect” are used interchangeably, “Impact” is used specific to state level reviews (GEPA/State Stewardship) and “effect” for federal level reviews (Section 106). The Assessment of Impact/Effect weighs the proposed scope of work against the historic significance and integrity of the resource(s) and assesses the impact/effect of the action on character-defining features and historic materials.

Historic resource studies are useful in providing the type of information required to submit an Assessment of Effect form, and can reduce the review period by reducing SHPO requests for additional Information.

As part of the SHPO submittal process, a narrative including a discussion of avoidance and minimization measures/alternatives should be provided. The narrative should discuss alternatives explored to avoid potential adverse impact/effect and, if unavoidable, to minimize the adverse impact/effect. Backup documentation including alternate designs, budgets, etc. should be included where necessary.

There are four types of impacts/effects:

1. No Impact/Effect – The proposed action does not affect any historic resources.
2. No Significant Impact/Effect – The proposed action has a minor, but insignificant, effect that is recognized but does not require mitigation.
3. Conditional No Significant Impact/Effect – The proposed action has a minor effect that is recognized and can be readily avoided with recommendations provided by SHPO.
4. Significant Impact/Effect – The reposed action is deemed to have a significant adverse effect to the historic resources. The action will require some type of mitigation (Standard Operating Procedure 13).

Standard Operating Procedure 12: Demolition

Proposed demolition actions relating to historic resources will be developed in consultation with the Campus Preservation Officer (CPO), and sent to the SHPO for review. Dispossession of land holdings will also subject to the State Historic Preservation Office (SHPO) review if the environmental site assessment indicates the presence of historic or archaeological resources.

Demolition of a state or federal register-eligible structure constitutes an “Significant Impact/Effect.” The finding of “Significant Impact/Effect” does not preclude demolition. A review letter provided by the SHPO will inform the Board of Regents (BOR) and the Governor’s office of SHPO concerns. However,

the authority to demolish/dispossess remains with the Board and the Governor as Owners. A finding of “Significant Impact/Effect” usually results in a request for mitigation (Standard Operating Procedure 13) by the SHPO. One of the essential mitigation measures recommended for all properties subject to demolition or dispossession is documentation, and preparation of a Permanent Archival Record per the SHPO “Guidelines for Establishing a Permanent Archival Record” (Standard Operating Procedures 3 and 13).

Any building 50 years of age or older that has not already been assessed for demolition or dispossession by the SHPO (Category 5) must be reviewed by SHPO prior to the demolition due diligence submission to the BOR. BOR will not accept or approve demolition due diligence submittals without the inclusion of a letter from SHPO.

Standard Operating Procedure 13: Mitigation

Avoiding, minimizing and mitigating are at the heart of the historic preservation planning and related environmental review.

When an adverse effect to historic properties cannot be avoided, the University, the State Historic Preservation Office, and the Board of Regents (BOR) will identify possible measures to mitigate the adverse effect. The idea behind mitigation is to balance the loss (or diminishment) of the historic resource(s) through some public benefit.

Standard mitigation measures of photographic documentation for structures and excavation for archaeological sites often provide important new information. It is generally required that this information is made available to the public. Other mitigation measures include community outreach and/or education to help provide more public benefit.

When photographic documentation is agreed upon as a mitigation strategy for historic properties with state and local levels of significance, please use HPD’s *Guidelines for Establishing a Photographic Permanent Archival Record (PAR)* (http://www.georgiashpo.org/sites/uploads/hpd/imagefield_default_images/GuidelinesforEstablishingPAR.pdf)

Standard Operating Procedure 14: Public Hearings

The University’s existing Georgia Environmental Policy Act (GEPA) policy calls for the publication of an Environmental Effect Report (EER) if a proposed action will “significantly adversely affect the quality of the environment.” The EER will be published in the Legal Organ of the county or counties of the proposed action. If within 30 days of publication the Associate Vice President for Environmental Safety Division (VPESD) receives 100 written requests for a public hearing on the action, the Vice President or his designee will schedule a public hearing in the county or counties of the proposed actions. At his discretion, the VPES may call for a public hearing without written requests from the public.

Upon review of all comments and public hearing findings, the VPESD will publish a “Notice of Decision” in the Legal Organ of the county or counties of the proposed action.

		ACTIONS							
		Master Planning	Routine Maintenance	Corrective Maintenance	Minor/Moderate Rehabilitation	Extensive Rehabilitation	Additions and New Construction	Demolition and Disposition	Ground Disturbance
ASSESSMENTS	Category 1	SOP 8	If NO material or character altering change SOP 7 If material or character altering change SOP 8	SOP 8	SOP 8	SOP 6 SOP 9 SOP 10	SOP 5 SOP 6 SOP 9 SOP 10	SOP 5 SOP 6 SOP 9 SOP 10	SOP 5
	Category 2	SOP 8	If NO material or character altering change SOP 7 If material or character altering change SOP 8	If NO material or character altering change SOP 7 If material or character altering change SOP 8	SOP 8	SOP 6 SOP 9 SOP 10	SOP 5 SOP 6 SOP 9 SOP 10	SOP 5 SOP 6 SOP 9 SOP 10	SOP 5
	Category 3	SOP 8	SOP 7	SOP 7	If material or character altering change SOP 8	SOP 6 SOP 8	SOP 5 SOP 6 SOP 8	SOP 5 SOP 6 SOP 9 SOP 10	SOP 5
	Category 4	SOP 8	SOP 7	SOP 7	If material or character altering change SOP 8	SOP 6 SOP 8	SOP 5 SOP 6 SOP 8	SOP 5 SOP 6 SOP 9 SOP 10	SOP 5
	Category 5	NONE	NONE	NONE	NONE	NONE	NONE	NONE	SOP 5 SOP 6 SOP 9 SOP 10

Notes:
 1) When necessary, the CPO may elevate any request for additional consultation by SHPO.
 2) "Ground Disturbance" may accompany any of the other actions.

Figure 46. Implementation matrix showing assessment categories and actions, with associated Standard Operating Procedures.