
2 THE CAMPUS HISTORIC PRESERVATION PLAN (CHPP) PROCESS

2.1 WHAT IS THE PURPOSE OF A CHPP?

The purpose of creating a CHPP is to establish a future direction or vision for historic and cultural resource preservation and protection, and to promote specific ways to achieve that vision in a clear, concise fashion. Beyond this, the creation of the document will satisfy several other objectives including:

- Inform the Campus Physical Master Plan process by providing historic and cultural resource information and articulating the Institution's vision for integrating these resources into the developing campus environment.
- Provide information and procedural guidelines that will assist the Institution in meeting its compliance responsibilities with regard to existing Federal, State and local historic preservation legislation and policy.
- Address campus cultural resources in a comprehensive manner and provide guidance to Institution staff and decision makers for the appropriate management of these resources.

A multi-disciplined team approach is often required to provide sufficient expertise for the various resource types present on USG campuses.

2.2 DOES EVERY INSTITUTION REQUIRE A CHPP?

The 1993 State-Owned Building Survey demonstrated that not all USG Institutions have historic buildings, but this does not preclude those Institutions from completing a CHPP. It is likely that other resource types such as historic landscapes or archaeological sites are present on their campus and the same consideration provided to historic buildings must be applied to other types of cultural resources. In addition, the identification of resources is an ongoing process. As time passes, architectural and landscape resources on these campuses will reach the 50-year benchmark and will therefore require evaluation for significance and consideration during the planning process. Given this, it is required that all USG Institutions develop a CHPP.

Development of a CHPP should include a process for seeking, discussing, and considering the views of stakeholders both inside and outside of the Institution.

2.3 HOW IS THE CHPP PROCESS INITIATED?

Although a CHPP can be developed at any time, it is likely that its creation will occur within the larger context of a Physical Master Plan. The initiation of a Physical Master Plan or Master Plan update results from a mutual agreement between the Institution and the Board of Regents Vice Chancellor for Facilities. Examples of circumstances which may prompt the need for a new Master Plan or an update are provided in Section II of the Master Planning Guidelines and Resources for Updating Master Plans for the University System of Georgia.

When co-developed with a Physical Master Plan, the CHPP process will parallel the “Master Plan Work Program” as outlined in the USG/BOR Physical Master Planning Template. Advantages to pairing the CHPP with the Master Plan Process include:

- For Institutions using the Physical Master Planning Template, historic preservation considerations are truly integrated within the master planning process.
- Information developed by the CHPP is necessary for the Physical Master Plan document.
- Efforts that are duplicative between the CHPP and the creation of the Physical Master Planning document can be eliminated.

2.4 WHO PREPARES THE CHPP?

Generally, Campus Historic Preservation Plans are produced by professional historic preservation consultants versed in context development, and the identification, evaluation and management of cultural resources. A multi-disciplined team approach including preservation architects, landscape architects and professional archaeologists is often required to provide sufficient expertise for the various resource types present on USG campuses. However, if a CHPP is being created as part of a larger master planning effort, a campus-planning consultant may coordinate the development of the CHPP document in cooperation with preservation professionals.

The selection of qualified consultants is critical to ensuring the success of the CHPP. The Secretary of the Interior Standards and Guidelines outline accepted industry standards for professional qualification for Archaeology and Historic Preservation (Federal Register 36CFR 60). These qualification

standards should be used to certify selection of the CHPP consultant team.

- *For a detailed description of professional qualification standards, refer to Appendix E.*

2.5 CHPP DOCUMENT STRUCTURE

The CHPP document is structured for clarity and ease of use. The document is organized in four major parts: Executive Summary, Campus Historic Context, Identification & Evaluation of Cultural Resources, and Recommendations for Treatment & Use.

This division of information allows the document to be updated over time. For instance, the Campus Historic Context and Identification of Cultural Resources should remain relatively consistent, barring any acquisition of new property or changes in the condition of resources. Resource Evaluations and Recommendations, however, are more likely to change as the campus develops and time progresses.

- *See Part III Document Guidelines for a detailed description of the CHPP document.*

2.6 CHPP CONSULTATION, DISTRIBUTION, AND REVIEW

Development of a CHPP should include a process for seeking, discussing, and considering the views of stakeholders both inside and outside of the Institution. Where feasible, the Institution should seek agreement with these groups on how historic properties should be identified, considered and managed. These interested groups include State and Regional Agencies, Certified-Local Governments (city and county, Neighborhood Groups, and Historic Preservation Commissions).

Consultation with these groups should be built upon an exchange of ideas and should be ongoing. In order to facilitate such consultation the Institution should:

1. Make its interests and constraints clear to stakeholders at the beginning of the consultation process.

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2. Make clear any rules, processes or schedules applicable to the consultation process.
 3. Acknowledge others' interests and seek to understand them.
 4. Develop and consider a full range of options.
 5. Try to identify solutions that will leave all parties satisfied.

Each Institution is required to consult with knowledgeable and concerned parties about its historic preservation related activities. This applies to both project-related activities as well as broad policy and procedural issues such as the creation of a CHPP. The following is a list of primary reviewers for historic preservation compliance.

- *Contact information for the following groups is provided in Appendix A.*

2.6.1 *GEORGIA DEPARTMENT OF NATURAL RESOURCES, HISTORIC PRESERVATION DIVISION (HPD)*

The Historic Preservation Division works in partnership with federal and state agencies, local governments, preservation organizations, community groups and individuals to achieve a greater appreciation and use of historic resources in the context of everyday life. Working at the state level, the Historic Preservation Division helps bring together national, regional and local interests to support community and economic development throughout Georgia. Georgia's state preservation program encourages regional and local planning, neighborhood conservation, downtown revitalization, economic development, heritage tourism and archaeological site protection.

Each state's historic preservation office receives financial assistance through the Historic Preservation Fund of the National Park Service, Department of the Interior, and provides matching state funds to carry out the nation's preservation partnership. The National Park Service establishes broad policies, programs and standards for state and local participation in the national program. Preservation incentives, such as the National Register of Historic Places, tax credits and grants, as well as compliance requirements established through the National Historic Preservation Act and other federal legislation, encourage preservation activity. States enact programs and services that complement the national program

and address the special character and needs of their state. In Georgia, the General Assembly mandates a number of specific preservation programs such as a state property tax freeze, state rehabilitation grants, archaeology protection and stewardship of state-owned buildings.

2.6.2 *REGIONAL DEVELOPMENT CENTERS (RDCs)*

The 1957 Georgia Planning Enabling Act established Regional Development Centers throughout the state. Over the years, program initiatives and technical assistance have expanded to include historic preservation. Today, these centers facilitate coordinated and comprehensive planning activities at the local and regional levels in conformity with minimum standards and procedures established pursuant to Georgia law. For this reason, USG Institutions should inform the Historic Preservation Coordinator of their Regional Development Center of any planning activities related to cultural resources.

2.6.3 *GEORGIA ARCHAEOLOGICAL SITE FILES (GASF)*

While the GASF is not a reviewer of historic preservation compliance, it is the repository of data about all officially recorded archaeological sites in the state of Georgia. As such, the GASF is a basic resource in determining whether any previously recorded sites exist in a specific area and should receive all archaeological survey reports.

The GASF data include site location data in a variety of graphic and text formats. Due to the sensitive nature of the material and the security risks to recorded sites, direct access to all of the GASF material is restricted to archaeologists, archaeology students, and government agencies and organizations involved in research and resource management.

Archaeologists working with colleges and universities on a CHPP will need to interact with the GASF both before and after a campus survey. Pre-project contact will include a site file search and determination if any previously recorded sites existed in the study area and whether any recorded archaeological surveys or other levels of investigation were conducted. Post-project contact includes the completion of a new site form or updated form for each site discovered during

the survey, or for each site further investigated beyond initially documented work.

It is important to note that the presence or absence in the GASF of archaeological sites on a campus is not an accurate reflection of the number of sites on that campus, or even in a particular area of the campus, since the majority of campuses have not been systematically surveyed.

2.7 PLANNING IMPLEMENTATION & CULTURAL RESOURCE STEWARDSHIP

Implementation of Campus Physical Plans in coordination with a CHPP and its individual components relies on the leadership and direction provided by an Institution's Assistant Preservation Officer. The BOR has delegated this authority and responsibility in a uniform manner among its Institutions by appointing the Chief Business Officer (CBO) to hold this position. In some instances this responsibility has been further delegated to the Campus Architect or Facilities Director. Each Institution should identify a specific hierarchical management or reporting relationship for handling preservation-related issues within their administrative structure.

In order to ensure that the CHPP results in an effective preservation program, implementation of the recommendations of the CHPP should be reflected in budgetary and funding processes. Opportunities for continued education and professional development should be provided for Institution staff that manage or conduct historic preservation related activities. New Institution staff with responsibilities that relate to facilities or other aspects of the campus physical environment should additionally be made aware of the CHPP.

2.7.1 NOMINATION OF RESOURCES TO THE GEORGIA/NATIONAL REGISTER OF HISTORIC PLACES

Once the Institution has identified and evaluated its cultural resources, a process for nominating those resources to the Georgia/National Register of Historic Places (GNRHP) should be established, in cooperation with the HPD.

The following benefits are associated with Georgia/National Register listing:

- a. Listed properties are recognized for their architectural or historic worth, an intangible benefit that is nonetheless valuable. Listing in the Register is primarily an honor, meaning that a property has been researched and evaluated according to established procedures and determined to be worthy of preservation.
- b. Property tax benefits are available to owners who rehabilitate their properties according to preservation standards. For taxable years beginning after December 31, 2001, any person (assignor) may sell, assign, convey or transfer tax credits earned in the restoration and preservation of a qualified historic property. The taxpayer acquiring the credit (assignee) may use the amount of the acquired credit to offset up to 100% of its tax liability for either the taxable year in which the qualified rehabilitation plan was first placed into service or the taxable year in which the acquisition was made. Unused credit amounts claimed by the assignee may be carried forward for up to five years, except that all amounts shall be claimed within 10 years following the tax year in which the qualified rehabilitation plan was first placed into service.
- c. State grant assistance is available for qualified public agencies and nonprofit organizations to rehabilitate eligible properties.
- d. Alternatives for fire and life-safety code compliance may be considered when rehabilitating historic buildings.
- e. All properties and districts listed in or eligible for listing in the National Register are considered in the planning of federal undertakings. Federal undertakings also include activities sponsored by state or local governments or private entities if they are licensed or partially funded by the federal government. Federal undertakings do not include loans made by banks insured by the FDIC or federal farm subsidies. National Register listing does not provide absolute protection from federal actions that may affect the property. It means that if a federal undertaking is in conflict with the preservation of a Georgia/National Register property, HPD will negotiate with the responsible federal agency in an effort to eliminate, minimize, or otherwise take into account the undertaking's effect on the historic property. This review procedure applies to properties that are determined eligible for the National Register in the day-to-day environmental review process, as

When using Federal funds, actual listing in the GNRHP does not increase the Institution's responsibility under the law.

well as those actually listed in the Georgia/National Register.

The following may sometimes be regarded as restrictions on Georgia/National Register listed properties:

1. Any work undertaken using federal funds must generally use the Secretary of the Interior's Standards for Rehabilitation Projects. Please note, however, that if a property is not listed, but is eligible for listing, the same requirements apply. In other words, actual listing in the GNRHP does not increase the Institution's responsibility under the law.
2. A local agency may tie listing in the National Register to restrictions imposed locally, such as design review. This does not come automatically with listing, however, but must come about as a result of separate local action. Check with your local government.

There are some common misconceptions about the implications of Listing in the Georgia/National Register does not:

1. It is not true that the federal, state, or local government assumes any property rights in the building as a result of listing. It is possible that the property could be so altered, however, that it would be removed from the Register.
2. Unfortunately, it is also not true that there are large sums of money available to assist owners and local agencies in rehabilitating National Register properties. Funds are very limited, with the federal tax credits being the most generally available financial assistance.

2.7.2 PROTECTION OF CULTURAL RESOURCES DURING MINOR MAINTENANCE, REPAIR, AND RENOVATION

Proper maintenance must be recognized as the first step in the preservation of cultural resources. For buildings and landscapes, a maintenance and repair regimen that addresses the unique qualities of historic materials and construction should be developed as part of CHPP implementation. Proper custodial care helps to preserve historic fabric by countering the forces that cause deterioration. However, improper maintenance practices and repairs can damage or destroy irreplaceable

Each Institution should develop guidelines to ensure preservation consideration and compliance responsibilities are integrated into project-level procedures.

building elements in a piecemeal fashion. Likewise, mature plant and tree specimens may be progressively damaged by insensitive grounds-keeping activities.

Annually, individual USG projects receive funding from the Board of Regent's Major Repair and Renovation (MRR) program. These projects, although less involved than a complete building rehabilitation, must be implemented with the same sensitivity to cultural resources as a Major Capital Project. For these projects, Institutions and design professionals are instructed to consult with their BOR Program Manager concerning their GEPA obligations.

Archaeological resources may also be impacted by new construction, landscaping activities which will result in ground disturbance below 8", and or groundbreaking activities such as systems installation that require excavation below 8". Therefore, the results of archaeological survey must be provided to campus facilities staff and outside contractors and referenced in campus maps prior to performing this work.

2.7.3 MAJOR AND MINOR CAPITAL PROJECTS

A BOR Environmental Site Assessment (ESA) is intended to identify any recognized environmental conditions, including cultural resources, which exist at a property proposed for development. For Major Capital Projects, an ESA must be conducted during the programming/site selection or pre-planning phase. For Minor Capital Projects, Institutions and design professionals are instructed to consult with their BOR Program Manager concerning these issues.

For Major Capital Projects, GEPA evaluation is required during the schematic design phase. This evaluation can be completed at an earlier date through a combined GEPA-ESA report. The completed GEPA evaluation (or the combined GEPA-ESA report) shall be submitted to the BOR Program manager in a timely fashion to obtain the necessary approvals. As a note, preliminary design documents shall not be approved without an approved GEPA evaluation. For Minor Capital Projects, Institutions and design professionals are instructed to consult with their BOR Program Manager concerning these issues.

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- *The minimum required cultural resource data for GEPA review is listed in Appendix D.*

To strengthen Campus Planning initiatives, each Institution should develop guidelines to ensure preservation consideration and compliance responsibilities are integrated into capital projects. These guidelines should extend from initial project conception through construction and into maintenance plans. The guidelines should follow the Institution's standard workflow process for both rehabilitation and new construction projects to ensure that appropriate historic preservation activities are being addressed and are accounted for in project budgets and schedules.

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2.8 ADVERSE EFFECTS & CULTURAL RESOURCE MITIGATION

In some cases, a concurrent Physical Master Plan, or a pre-existing plan, may propose demolition of historic buildings and landscapes, or disturbance and destruction of archaeological sites as part of the campus development. Pre-existing and concurrent Physical Master Plans are unlikely to have included intensive archaeological survey; therefore one cannot assume that no archaeological sites are located in the project area unless such a survey has been completed. When these proposals are known, Preservation Planners should inform Institutions of standard mitigation procedures for these and other adverse effects.

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the Georgia/National Register in a manner that would diminish the integrity of the property's location, design, settings, materials, workmanship, feeling or association. Consideration shall be given to all qualifying characteristics of a property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the (Georgia) National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

Adverse effects on cultural resources include:

1. Physical destruction of or damage to all or part of a property;
2. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous materials remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties and applicable guidelines;
3. Removal of a property from its historic location;
4. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
5. Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
6. Transfer, lease, or sale of a property out of State ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The policy of the Board of Regents concerning the loss or demolition of cultural resources states that the decision should be an explicit one; and only considered after consultation with HPD and careful examination of alternatives, cost/benefit, and feasibility. In addition, internal procedures must be followed prior to loss, including the completion of an Environmental Effects Report (EER) including all the required elements contained in standard BOR due-diligence for demolition. The EER must be approved by the Office of the Institution's President and the Board of Regents. Where an Institution determines that loss is the only practical alternative, a plan for mitigating this activity through recordation and/or other mutually agreed upon measures must be implemented before the cultural resource is altered or destroyed.

- *For a description of recordation standards required for cultural resource mitigation, refer to Appendix H.*

2.9 CHPP UPDATE

The identification and evaluation of cultural resources is an ongoing process, and therefore must be reexamined on a routine basis. Concurrent with the Physical Master Planning process

and/or continuing at 10-year intervals, the Institution, in consultation with HPD, should reassess recommendations of completed architectural, landscape, and archaeological surveys and identify and evaluate, according to Georgia/National Register criteria, buildings, landscapes, and archaeological sites that have reached 50 years of age that are owned or managed by the Institution. For these reasons, a typical CHPP will have an effective lifespan of 10 years.

As time progresses and an Institution expands, the recommendations of a CHPP are subject to change due to unforeseen circumstances and new findings of information. However, the information prepared for the Institution's Historic Context and Identification of Cultural Resources may remain relatively consistent, barring any acquisition of new property or changes in a resource's condition.

