

United States Department of the Interior

NATIONAL PARK SERVICE

Atlanta Federal Center 1924 Building 100 Alabama Street, SW Atlanta, GA 30303



IN REPLY REFER TO: 1.A.2

September 26, 2022

Leah G. Michalak
Director of Historic Preservation
Chatham County – Savannah Metropolitan Planning Commission
110 East State Street
Savannah, GA 31401

Dear Ms. Michalak:

The National Park Service (NPS) is eager to reengage with the Metropolitan Planning Commission and other interested parties regarding the ongoing health of the Savannah National Historic Landmark (NHL) District.

The NPS remains an eager partner in the thoughtful management of this remarkable place and is concerned about several proposed projects within the Savannah NHL district, including recent approval of new construction at 336 Barnard Street that negatively impacts the ready discernibility of the Savannah Town Plan. NPS concern relates to the cumulative effects of such incremental changes which may diminish the integrity of the Plan. As is widely appreciated, the Savannah Town Plan is integral to the Savannah NHL District and therefore central to the city's historic identity, its on-going cultural and economic vitality, and is an irreplaceable part of American history.

The City of Savannah has done a commendable job enacting measures to protect the plan, specifically the language in the Historic District Ordinance that mandates "development shall preserve or reconstruct the historic ward pattern of streets and lanes within the Oglethorpe Plan Area." Other elements of the Savannah Town Plan, such as the trust and tything blocks and squares, are not specifically addressed in the City's Zoning Ordinance, yet these elements are also essential features of the plan, and each serves a specific purpose. To maintain the NHL integrity of the District, the discernability of the plan must be retained so residents and visitors are able to identify all the features that compose the Savannah Town Plan—elements that include the trust lots, tything blocks, squares, and streets and lanes.

NPS notes the Savanah Historic District Board of Review met on August 10, 2022, and again on September 14, 2022, regarding matters including proposed new construction of a single-family residence with a primary façade at 336 Barnard Steet. While we readily acknowledge the Savannah NHL District is a large historic district and no one project is identified as *the* "threat," this project is representative of the sort of incremental change that, collectively, can result in ill effects to the integrity of the NHL District. NPS is heartened to learn that a meeting is scheduled for September 30, 2022, to revisit the subdivision of tything lots and a number of related topics which, over time, are collectively likely to imperil the character-defining features that are the building blocks of the Oglethorpe Plan. As we understand it, the September 30 meeting will be the first in a series of conversations addressing such matters as:

- subdivision and recombination of tything and trust lots,
- development of corner lots,
- entrances on tything lots on north-south streets,
- principal dwelling units adjacent to lanes,
- height of lane buildings (accessory dwelling units and structures), and
- footprint of lane buildings (accessory dwelling units and structures).

We agree these topics are ripe for fuller examination. My branch lead for Archeological and Historic Preservation Partnerships and I would like to attend this meeting virtually.

As you are aware, the NPS National Historic Landmarks program is tasked with monitoring the condition of landmarks to identify those that exhibit damage or face threats to the integrity of their resources. Building on the groundwork established in the *Integrity and Condition Assessment: Savannah National Historic Landmark District* (2018) and the accompanying memorandum titled "Health of the Savannah NHL District"—both of which are available online at parkplanning.nps.gov/savannah—we are heartened by this "pause" for important conversations to avoid compounding loss of integrity and to ensure the continued health of the landmark. Toward that end, NPS NHL staff can contribute technical assistance in the form of short presentations on a number of relevant subjects, including cumulative effects and the loss of integrity; the value of a Cultural Landscape Report to document the important spatial interrelationships among the landscape, built environment, and Savannah Town Plan; and strategies for updating the National Historic Landmark District documentation. We hope these might be welcome additions to the ongoing conversations initiated on the 30th of this month. These presentations could be delivered virtually and made accessible to all interested parties. Moreover, if desired, we would be pleased to visit with you and members of the Savannah community in coming months to revisit our common goal of protecting the unique qualities that make the Savannah NHL District a place of national importance.

Thank you for the opportunity to provide our input, offer of assistance, and request to attend the September 30, 2022, meeting virtually. Please do not hesitate to contact me (julie_ernstein@nps.gov; 404.909.2240) with questions or to discuss logistics for NPS presentation(s) or a future visit in support of the ongoing conversations happening regarding the Savannah NHL District.

Sincerely,

Julie H. Ernstein, Ph.D., RPA

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Division Chief, Cultural Resources, Partnerships, and Science

cc: Jennifer Dixon, Deputy SHPO, Georgia Historic Preservation Division Bridgit Lidy, Director of Planning, Zoning, and Urban Design, City of Savannah Melanie Wilson, Executive Director, Chatham County – Savannah Metropolitan Planning Commission