



United States Department of the Interior



NATIONAL PARK SERVICE

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IN REPLY REFER TO:

1.A.2 (SERO CR)

Ms. Bridget Lidy
Director
Planning & Urban Design
P.O. Box 1027
Savannah, Georgia 31402

Dear Ms. Lidy:

Thank you for your recent letter inquiring about an update to the Savannah National Historic Landmark (NHL) District in Chatham County, Georgia. We have reviewed the letter and conferred with NHL Program staff in our Washington Support Office. We believe your proposal is in keeping with the National Park Service's (NPS) 2018 recommendation regarding preservation practices to facilitate management and improve the overall health of the NHL District. For updated NHL documentation, an entirely new form must be prepared that is based on the original nomination with the addition of the new information.

The Secretary of the Interior designated the Savannah NHL District in 1966. In 1977, NHL documentation was prepared using a National Register form, as was the convention at the time. The 1977 NHL nomination documents the district's significance in community planning and development and architecture but was prepared at a time before current standards had been published, including establishing a period of significance and an inventory of contributing and non-contributing properties. Additionally, the documentation does not include a map that clearly identifies the boundary which has resulted in confusion over the inclusion of the northern portion of Forsyth Park. We appreciate your patience while the NHL staff weighed the many aspects of the proposed changes to the period of significance, the updated content of the documentation, and the amended boundary.

Recommended Areas of Significance

Existing NHL documentation for the Savannah NHL District supports an argument for the District's significance under NHL Criterion 4, for its distinctive city plan devised by James Oglethorpe in the 1730s and the many buildings of architectural merit that rest upon that plan, and NHL Criterion 5 as a designed landscape comprised not only of a collection of buildings and structures but also of characteristics and features including spatial organization, circulation, vegetation, possible archeological sites, and small-scale features. NPS recommends updated

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documentation expand upon the arguments laid out in the 1977 documentation and add additional context. As your letter acknowledges, there is a need to tell a more complete story of how the built environment reflects the diversity of Savannah. NPS staff agree with your proposal to provide a thorough and inclusive history of underrepresented communities including Black, Indigenous, People of Color (BIPOC) and other minority populations. The October 2011 “Slavery and Freedom in Savannah” symposium inspired recent scholarship on untold stories and is a good reference for the nomination. An updated nomination should explore the role of the urban enslaved to Savannah as a port city as well as the impacts and relationships of the colonizers with the Indigenous community.

The history and significance of the Savannah NHL District is tied to the national rise of 20th-century historic preservation. The district appears to meet Criterion 1 for its important role in the historic preservation movement. However, more research is needed before we recommend the inclusion of an additional argument for significance to address the district’s role in historic preservation in the United States. If recommended, discussion of this historic context should include multiple narratives, including exploration of how the historic preservation movement in Savannah chose to highlight or diminish the roles of various groups within the history of Savannah.

Period of Significance

Your letter proposes extending the Savannah NHL District’s period of significance to 1976 based on the “fifty-year rule.” In contrast to guidance for determining a National Register period of significance, continued use or activity is not sufficient justification for defining the period of significance for an NHL. The NHL period of significance should solely reflect the time during which a property’s nationally significant history occurred or when the physical character for which it is significant was established. Some properties may have more than one period of significance. For example, the Savannah NHL District may have one period of significance under Criterion 4 for its distinctive plan and another for its architecture. There would certainly be an additional period of significance tied to the District’s potential Criterion 1 significance in the historic preservation movement. A possible period of significance for this latter area of significance would begin in 1955 when a group of citizens organized Historic Savannah Foundation to save the Isaiah Davenport House from demolition, and conclude in 1973 with the establishment of the Historic District Board of Review.

Boundary Alterations

Your letter also mentions incorporating Forsyth Park into the Savannah NHL District’s boundary. We believe the northern portion of Forsyth Park, bounded roughly by Gaston Street on the north, Drayton Street on the east, Hall Street on the south, and Whitaker Street on the west, contributes to NHL Criteria 4 and 5. A 2017 letter from NPS to the Trustees’ Garden Club suggests incorporating the northern, pre-Civil War part of the park into the existing Savannah NHL District. The letter states, “Thus, the portion extending roughly to Hall Street and creating a square green space that was fully designed by Wilhelm Bischoff by 1858 could possibly be

added to the NHL district with sufficient justification.”¹ According to your letter, Forsyth Park “was established in the 1840s as a premier example of the role of landscape architecture and urban planning in this country during the 19th century.” We believe the southern portion of Forsyth Park, bounded roughly by Hall Street on the north, Drayton Street on the east, Park Avenue on the south, and Whitaker Street on the west, also contributes to NHL Criteria 4 and 5. As the nomination is developed and a period of significance for Criteria 4 and 5 are established, new information presented in the *Cultural Landscape Report: Forsyth Park, Savannah, Georgia* from 2019, may justify inclusion of the entire park.

Other Recommendations

Overall, the Savannah NHL District retains a high degree of integrity for location, setting, feeling, and association, a requirement of the NHL program. The *Integrity and Condition Assessment: Savannah National Historic Landmark District* from 2018 found that the majority of Savannah’s squares retain a high level of both architectural and landscape integrity in relation to the historic Savannah Town Plan. The Study provides a solid analysis of the integrity of the District, which can be built upon to provide within the nomination a thorough understanding of the District’s current integrity, inclusive of changes that have occurred since the Study was published.

Comparative analysis is an important aspect of an NHL designation or update to documentation. Therefore, any documentation update of the Savannah NHL District should include gathering additional information about how Savannah compares with other British colonial cities, for example, including the Beaufort and Charleston NHL Districts in South Carolina. In particular, the list of comparable properties should be honed to the most recent representative examples of similar properties, with Nantucket Historic District in Massachusetts and Old Salem Historic District in North Carolina as some leading examples. The updated documentation will need to affirm Savannah’s national significance under Criterion 4 among the comparable properties. If the updated documentation proposes Criterion 1 significance in the area of historic preservation, the nomination will need to evaluate the Savannah Historic District in comparison with preservation efforts in other historic districts nationwide.

Please reference the NPS’s *NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations*, updated version issued in 2023 and available at www.nps.gov/subjects/national-historiclandmarks/nhl-bulletin.htm, which replaces the 1999 version as the core guidance for understanding NHLs and the process by which they are identified, nominated, designated, and updated. NPS’s *National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes*, is a useful tool in evaluating this type of property, and we recommend it be used in your further analysis of the Savannah NHL District.

Thank you for providing us the opportunity to consider updated documentation for the Savannah NHL District which is treasured as one of the country’s premier examples of historic

¹ Christopher Hetzel, NHL Program Manager, letter to Karen B. Pannell, Trustees’ Garden Club President, July 26, 2017.

preservation. We are excited for the project and look forward to working with you. Should you have any questions or concerns, and for assistance through the remainder of the NHL update process, please feel free to contact Alesha Cerny at (404) 276-5092 or alesha_cerny@nps.gov.

Sincerely,

Julie H. Ernstein, Ph.D., RPA
Division Chief, Cultural Resources, Partnerships and Science

cc: Evelyn Causey, National Historic Landmarks (WASO)
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