

August 11, 2021

Melvin Moore
Real Estate Specialist
Columbus Consolidated Government
420 Tenth Street
Columbus, Georgia 31901

**RE: CDBG: Demolish 2610 Sixteenth Avenue, Columbus
Muscogee County, Georgia
HP-200526-004**

Dear Mr. Moore:

The Historic Preservation Division (HPD) has received the final Memorandum of Agreement (MOA) for the above-referenced project. Our comments are offered to assist the U.S. Department of Housing and Urban Development (HUD) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act, as amended.

HPD has reviewed the final MOA for the proposed project, which our office received July 19, 2021. HPD agrees that the stipulations proposed in the MOA are appropriate to address the adverse effect associated with this undertaking. Therefore, HPD is forwarding the signed agreement to your office for review and processing.

Please refer to project number **HP-200526-004** in any future correspondence regarding this project. If we may be of further assistance, please contact Stacy Rieke, Environmental Review Historian, by email at Stacy.Rieke@dca.ga.gov or by telephone at (404) 486-6434.

V/r,



Dr. David Crass
Division Director and
Deputy State Historic Preservation Officer

DCC/smr

cc: Ramona McConney, HUD
Kathleen Vaughn, DCA
Allison Slocum, River Valley Regional Commission

**MEMORANDUM OF AGREEMENT
BETWEEN COLUMBUS CONSOLIDATED GOVERNMENT AND THE
GEORGIA STATE HISTORIC PRESERVATION OFFICER
REGARDING THE DEMOLITION OF 2610 16TH AVENUE, COLUMBUS, MUSCOGEE
COUNTY, GEORGIA
HP-200526-004**

WHEREAS, the US Department of Housing and Urban Development (HUD) plans to fund Columbus Consolidated Government (CCG) plans to carry out the demolition of 2610 16th Avenue (undertaking) under the Community Development Block Grant (CDBG) program pursuant to 24 CFR Part 58; and

WHEREAS, the CCG, pursuant to 24 C.F.R. § 58.4 of the regulations governing environmental review procedures for HUD, assumes the responsibility for environmental review, decision making, and action that would otherwise apply to HUD; and

WHEREAS, the undertaking consists of the demolition of the circa 1932 house located at 2610 16th Avenue in Columbus, Georgia; and

WHEREAS, CCG has defined the undertaking's area of potential effects (APE) as 2610 16th Avenue and surrounding properties with a view of the house; and

WHEREAS, CCG has determined that the undertaking will have an adverse effect on 2610 16th Avenue, which is contributing to the National Register of Historic Places (NRHP)-eligible expansion of the NRHP-listed Weracoba-St. Elmo Historic District, and has consulted with the Georgia State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108); and

WHEREAS, CCG has determined the project scope does not include activities that will affect historic properties of religious and cultural significance to the Tribes and therefore did not conduct Tribal consultation; and

WHEREAS, CCG has consulted with the River Valley Regional Commission (RVRC) and the public through solicitations for public comment on the undertaking and no response was received from RVRC and comments regarding historic properties were received (included as Attachment A); and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), CCG has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

NOW, THEREFORE, CCG and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties

STIPULATIONS

CCG shall ensure that the following measures are carried out by a professional meeting the applicable Secretary of the Interior's Professional Qualifications Standards:

I. ARCHIVAL PHOTOGRAPH RECORDATION

- A. Prior to demolition, digital photographs of the building(s) located at 2610 16th Avenue will be taken including views of the exterior and interior and structural or decorative detailing such as roof, mantels, interior molding, exterior woodwork and structural systems on the underside of the building, etc. Digital photographs showing the overall complex and its setting will also be included.
- B. The photographer shall comply with the minimum level standards necessary for document retention at SHPO pursuant to the *Guidelines for Establishing a Photographic Permanent Archival Record* (Appendix A). A draft copy of the photographic record will be provided to SHPO for review and acceptance. Upon approval, a final hardcopy and digital copy will be submitted to SHPO and a second copy will be provided to the Columbus State University Archive.

II. DURATION

This Memorandum of Agreement (MOA) will expire if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, CCG may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation V below.

III. MONITORING AND REPORTING

Each year following the execution of this MOA until it is fulfilled, expires or is terminated, CCG shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in CCG's efforts to carry out the terms of this MOA.

IV. DISPUTE RESOLUTION

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, CCG shall consult with such party to resolve the objection. If CCG determines that such objection cannot be resolved, CCG will:

- A. Forward all documentation relevant to the dispute, including the CCG's proposed resolution, to the ACHP. The ACHP shall provide CCG with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, CCG shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. CCG will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) daytime period, CCG may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, CCG shall prepare a written response that takes

into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.

- C. CCG's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

V. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

VI. TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation V, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, CCG must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. CCG shall notify the signatories as to the course of action it will pursue.

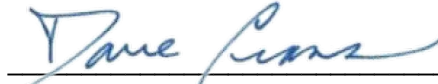
Execution of this MOA by the CCG and SHPO and implementation of its terms evidence that CCG has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

COLUMBUS CONSOLIDATED GOVERNMENT

Date
Isaiah Hugley, City Manager
Responsible Entity, Columbus Consolidated Government

GEORGIA STATE HISTORIC PRESERVATION OFFICER

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Date August 11, 2021
Dr. David Crass
Division Director and Deputy SHPO