

David Crass <David.Crass@dnr.state.ga.us>

July 2, 2013 8:30 AM

To: "david.rotenstein@earthlink.net" <david.rotenstein@earthlink.net>

Cc: Leigh Burns <Leigh.Burns@dnr.state.ga.us>, Carole Moore <Carole.Moore@dnr.state.ga.us>, William Hover <William.Hover@dnr.state.ga.us>

See below

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From: David S. Rotenstein [mailto:David.rotenstein@earthlink.net]

Sent: Tuesday, June 25, 2013 1:22 PM

To: David Crass

Subject: City of Decatur 2010 HPF grant

Dear Dr. Crass,

Per your earlier email, here are the questions I have for you about the Historic Preservation Fund grant awarded to the City of Decatur in 2010:

1. In its application, the City of Decatur described the former Beacon and Trinity schools as a "fragile resource" and one of the city's "most valuable historic resources." The city's application cited the 2009 citywide comprehensive historic resources survey, yet the 2009 survey document failed to mention the property in its list of "Landmark Buildings" (pp. 16-17) and the property was misidentified in the appended survey forms. Did HPD staff review the 2009 survey document prior to evaluating the 2010 grant application? If so, why were these omissions not questioned at the time?

As I believe both Leigh and Carole have already indicated, we did not fund the Decatur survey you reference. While we are open to reviewing such documents as a professional courtesy (staff time permitting), there is no statutory or regulatory requirement to do so.

2. The 2009 Decatur survey also failed to mention African Americans in its historic context and there were no African American heritage resources recommended for landmark status or preservation. Since Decatur is a CLG and receives substantial benefits deriving from that status, does your office find it problematic that Decatur's official historic preservation planning document omits a significant part of the city's population and, by extension, their historic properties?

As indicated above, we did not review the document you reference; hence, we would not know of any omissions.

3. After HPD staff discovered that the 2010 HPF grant application involved a property for which the city was pursuing a substantial redevelopment plan that included demolition and construction activities not consistent with the Secretary of the Interior's Standards, why did HPD decide to disburse the full amount of the approved grant (\$10 thousand)? Also, the HPD records show that in July 2011, HPD informed the City of Decatur that the agency would only disburse half of the grant amount yet a few months later a second letter was sent to the City of Decatur informing it that a check for the entire \$10 thousand was cut. What influenced that decision?

HPD staff learned of potential development plans for the site from a website, which also indicated that there was no funding for the project, only AFTER the grant was awarded. I made a carefully considered decision at that point (and one that I would make again) that I wanted the city to have the best possible information at hand in the event redevelopment did in fact go forward. After thorough review of the first 2 drafts of the report that HPD funded and a finding that the report did not meet our standards, we informed the city that HPD would only fund half the original amount. After further discussions with the city and a third and final draft which WAS technically sufficient, we funded the remainder of the grant.

4. In April 2013 the City of Decatur began demolition and redevelopment at the Beacon property. Those activities altered the property's integrity described in the draft National Register of Historic Places inventory form submitted to support the City of Decatur's 2010 HPF grant application. The draft NRHP form noted that the property appeared to be eligible for listing in the NRHP under Criteria A and C (associational and architectural significance) and that it retained a significant amount of integrity. The property now appears to be no longer eligible for listing in the National Register. Do you have an opinion on the property's change in NRHP eligibility after the end of the 2010 grant cycle?

No one from the city has asked HPD for a judgment on the school's current eligibility status.

5. What changes has HPD made in evaluating HPF grant applications after what you described in your March 3, 2011 email to Carole Moore regarding "lessons learned"?

Although I recall the email you note, it was not in our grant file.

However, I was referencing our internal communication processes, which at the time needed tightening up. We in fact did that subsequently via DNR Board Rule which you can read here: <http://rules.sos.state.ga.us/docs/391/5/13/05.pdf>.

Thank you for offering to answer questions about the 2010 HPF grant and I look forward to receiving your replies.