



January 24, 2020

2019-HAM-44425

Beth Johnson
Urban Conservator
City of Cincinnati
805 Central Avenue, Suite 500
Cincinnati, OH 45202

RE: Amendment to Programmatic Agreement for HUD-funded programs

Dear Ms. Johnson :

This is in response to your correspondence dated December 26, 2019, conveying an amendment to the Programmatic Agreement for Coordination between the City of Cincinnati and the State Historic Preservation Office for the Administration of Programs Using HUD Allocated Funds with Delegated Review Responsibilities Authorized Under 24 CFR Part 58.

I have signed the amendment on behalf of the State Historic Preservation Office. We have retained a copy of the document for our files.

The City must submit a copy of the executed amendment to the Advisory Council on Historic Preservation pursuant to 36 CFR Section 800.6(b)(1) and may use the cover letter available at <https://www.ohiohistory.org/renewpa>.

If you have any questions, please contact me by phone at 614-298-2000 or by email at dwelling@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Welling", is written over the printed name.

Diana Welling

Department Head & Deputy State Historic Preservation Officer for
Resource Protection & Review
State Historic Preservation Office

cc (via email): Omri Gross, HUD
Rob Milburn, HUD

Diana Welling, Department Head
Resource Protection and Review
State Historic Preservation Office
800 East 17th Avenue
Columbus, Ohio 43211

Dear Ms. Welling:

Re: Execution of Amendment to Programmatic Agreement for HUD-funded programs

Please find enclosed an Amendment to the Programmatic Agreement between the Ohio State Historic Preservation Office (SHPO) and the City of Cincinnati for programs that use funds originating from the U.S. Department of Housing and Urban Development for which HUD has delegated compliance responsibility pursuant to 24 CFR Part 58.

The **City of Cincinnati** has prepared the amendment following the instructions provided by SHPO, signed the amendment, and is forwarding it for your signature.

Please sign the amendment, keep a copy for your files, and return the original to us. We will mail a copy of the executed amendment to the Advisory Council on Historic Preservation. Thank you.

Sincerely,



Beth Johnson
Urban Conservator
City of Cincinnati

Enclosures:

Amendment to the Programmatic Agreement for HUD-funded programs signed by authorized community official

Copy:

Omri Gross, HUD, 200 N. High St., 7th Floor, Columbus, Ohio 43215

Tim Allen, ODSA, Office of Community Development, 77 S. High Street, Columbus, Ohio 43215

PROGRAMMATIC AGREEMENT**between**

City of Cincinnati

and the**Ohio State Historic Preservation Office****for the****Administration of Programs Using HUD Allocated Funds with Delegated Review
Responsibilities Authorized Under 24 CFR Part 58**

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") has allocated Community Development Block Grant (CDBG) and other funds to City of Cincinnati (hereinafter referred to as "grantee"); and

WHEREAS, HUD has also allocated CDBG and other funds to the State of Ohio Department of Development ("State"); and

WHEREAS, the State has the authority to award certain CDBG and other funds to the grantee; and

WHEREAS, the funding sources covered by this Programmatic Agreement may include, but are not limited to Community Development Block Grant (CDBG), Home Investments Partnership (HOME), Economic Development Initiative (EDI), Emergency Shelter Grants, Supportive Housing, Housing Opportunities for Persons with AIDS (HOPWA) and Neighborhood Stabilization Program (NSP) Grants; and

WHEREAS, the grantee has determined that the undertakings it carries out using the above-listed HUD funding sources may affect properties that are listed in or eligible for listing in the National Register of Historic Places ("National Register"); and

WHEREAS, in accordance with 24 CFR Part 58, the grantee assumes responsibility for environmental review, decision-making, and actions that would otherwise apply to HUD under the National Environmental Policy Act (NEPA) and other provisions of law, and this agreement coordinates the analysis and review of projects as provided under 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. 306108), in order to meet the purposes and requirements of both statutes in a timely and efficient manner; and

WHEREAS, the grantee has consulted with the Ohio State Historic Preservation Office (SHPO) regarding the development of this agreement pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act; and

WHEREAS, the grantee has consulted with Cincinnati Preservation Association regarding the implementation of this agreement and public notification procedures and invited it to concur in this agreement; and

WHEREAS, the grantee and the SHPO agree that by following the procedures outlined in this agreement, the grantee will be able to meet its obligations pursuant to 36 CFR Part 800 to take into account the effects of federally assisted projects on historic properties and provide the ACHP with an opportunity to comment.

NOW, THEREFORE, the grantee and the SHPO have agreed to carry out their respective responsibilities pursuant to Section 106 and Section 110(f) of the NHPA and the regulations at 36 CFR Part 800, in accordance with the following stipulations:

STIPULATIONS

The will ensure that the following stipulations are implemented.

I. Preservation Professional

- A. The grantee shall employ or contract with at least one Preservation Professional having professional qualifications in history, architecture, architectural history, or historic architecture as specified in the Secretary of the Interior's *Professional Qualification Standards* (36 CFR Part 61 Appendix A), hereinafter referred to as the Preservation Professional.
 - 1. Should the grantee elect to contract with a private Preservation Professional to provide services, the grantee must also designate a Preservation Contact employed by the grantee that must respond to questions posed by SHPO and the public regarding activities that are carried out under the terms of this agreement.
 - 2. The Preservation Contact may also carry out some activities required by this agreement that the contracted Preservation Professional cannot legally complete on the grantee's behalf within the program's administration.
- B. The Preservation Professional will be responsible for administering those terms of this Agreement that require his/her professional expertise and for coordinating with appropriate grantee departments, authorities and agencies regarding the delegated local review of program-assisted activities. All historic preservation work carried out pursuant to this Agreement will be undertaken by or under the supervision of said Preservation Professional, including the identification of historic properties and evaluation of project effects.
- C. The grantee will provide the SHPO with the qualifications and name(s) of the Preservation Professional(s) designated to carry out the terms of this Agreement, as well as the Preservation Contact that it may also designate. The SHPO will review their qualifications to ensure that the Preservation Professional meets the Secretary of the Interior's *Professional Qualification Standard*. The grantee will also provide the SHPO with appropriate documentation that the Preservation Professional(s) has the required Individual User Account to SHPO's Online Mapping System.

- D. The grantee will notify the SHPO **within 30 days** when their Preservation Professional changes or leaves employment. If the grantee does not have a qualified staff person in place and does not employ a qualified consultant then the grantee will comply with 36 CFR Part 800.3 through 800.13 with regard to individual undertakings, until such time as a qualified person is available, as required by this agreement.
- E. The Preservation Professional and/or Preservation Contact may consult with the SHPO at any time regarding the identification of historic properties or the evaluation of effects for an individual project, using the Section 106 Review Project Summary Form to request SHPO comments. The grantee may also elect to submit any complex project to SHPO for review that might otherwise be exempt under the terms of this Agreement. Any such submission will include the documentation that is typically required for standard Section 106 reviews, as well as an explanation of the basis for the decision to request standard review by SHPO.

II. Project documentation

- A. The grantee shall establish internal procedures that provide for the routine preparation of individual files for program-assisted projects in support of delegated local reviews conducted by the Preservation Professional and/or Preservation Contact under the terms of this agreement. The Preservation Professional and/or Preservation Contact may request that grantee staff from other program areas assist in the preparation of information that is sufficient to support their reviews.
- B. All grantees that enter into this agreement are required to have a plan that outlines the local procedures by which projects will be reviewed under its terms and submit it to the SHPO. Before any amendment to extend this agreement may be executed, the grantees shall submit an updated local procedures plan to SHPO for review and approval.
 - 1. This outline must include at a minimum:
 - a. A list of the local departments, authorities, and agencies that administer program-assisted activities that will be covered by this agreement.
 - b. The name and contact information of the grantee's Preservation Professional and/or Preservation Contact.
 - c. A list of grantee staff who are authorized to determine whether projects involve only exempt activities.
 - d. A summary of information provided by grantee staff that will be submitted to the Preservation Professional for use in delegated local reviews and project record-keeping.
 - e. A recommended timeline to be used by grantee staff in coordinating delegated local project reviews with the Preservation Professional.

- f. A summary of how projects will be authorized internally, relative to this agreement.
 - g. Copies and/or descriptions of any internal forms developed under the terms of this agreement.
 - h. A description of how the grantee will provide information to the public about individual projects and solicit their reviews regarding projects that affect historic properties.
 - i. Confirmation that procedures for complying with local ordinances will not be used to substitute for the actions required under this agreement.
 - 2. A copy of this outline will be provided to all grantee staff who will be involved in the preparation of information in support of delegated local reviews. The intent is for the procedures summarized in this outline to assist the Preservation Professional and/or Preservation Contact in the implementation and monitoring of all projects considered under the terms of this agreement.
- C. No program-assisted project covered by the terms of this agreement may be authorized to proceed until the Preservation Professional and/or Preservation Contact has confirmed to local program staff that either the delegated local review or an individual project review involving the SHPO has been completed.
- D. The individual files for program-assisted projects shall include files for both exempt and non-exempt projects, as defined by terms of this agreement. All individual files will include general information about the proposed project, including a description of proposed project activities and the basis for the decisions made during the delegated local review that was conducted under the terms of this agreement.
- E. The Preservation Professional and/or Preservation Contact may generate internal forms and tracking mechanisms to help meet this stipulation, so long as any internal form provides sufficient information to understand the basis for the decisions made under the terms of this agreement.
- F. These individual files will also be used to generate annual monitoring reports that will be submitted to the SHPO under Stipulation XI of this agreement. The individual files will also be used to provide information to the public or other consulting parties about the delegated local review of projects on request.
- G. All individual files generated in conjunction with this agreement shall be maintained for a minimum of 5 years after the completion of project activities.

III. Program Activities Exempt from Individual Review

- A. The program activities listed in Appendix A have limited potential to affect historic properties and do not require individual review by the SHPO when receiving

program assistance. The Preservation Professional, or other grantee staff that have been trained in the use of this agreement, will review all program-assisted projects in order to determine whether proposed activities are limited only to exempt activities that are included within Appendix A. The grantee shall record the basis for how each project was determined to be exempt in the project files in order to document that the scope of work was limited to exempt activities.

- B. The grantee may also propose to SHPO the addition of exempt activities to a new Appendix B to this Agreement that requires the use of professional judgment and will be administered by the Preservation Professional as part of their delegated local review.
 - a. These exempt activities must be based on the recommended treatments that are described in Preservation Briefs issued by the National Park Service. It is the intention of this stipulation that these activities would be limited to specific, narrow applications that would include activities related to particular building types or to building features present in historic districts.
 - b. SHPO will review information submitted by the grantee in support of the special exemption, including an evaluation of possible effects and documentation to demonstrate the limited impact of its implementation.
 - c. SHPO may approve the addition of the special exemption as an amendment to this agreement that will be added in a new Appendix B.

IV. Non-exempt Program Activities

- A. Consideration of the Secretary of the Interior's *Standards for the Treatment of Historic Properties* in Project Planning

The grantee shall ensure that all non-exempt projects carried out under the terms of this agreement are designed and planned in such a way as to conform to the Secretary of the Interior's *Standards for the Treatment of Historic Properties* whenever possible, particularly when the Area of Potential of Effects includes historic properties that might otherwise be affected by project activities.

- B. Archaeological resources

New construction is not exempt and must be submitted to the SHPO for review

- 1. In the event that the grantee plans any ground disturbance as part of new construction, site improvements, or other undertakings, the grantee will consult with the SHPO to determine whether an archaeological property that is eligible for or listed in the National Register of Historic Places may be present within the project area. This stipulation shall not be applied to the rehabilitation of residential properties, when no additions are proposed.
 - a. The Preservation Professional and/or Preservation Contact will provide information describing the proposed project activities and information about the project area's history and current condition to the SHPO,

including maps and photos. SHPO staff will then make a recommendation about whether an archaeological survey should be conducted.

- b. If the SHPO recommends that no survey is justified, then the Preservation Professional and/or Preservation Contact will document the outcome of this consultation within the individual file. Projects that would otherwise be exempt from review may then conclude review at the local level.
 - c. For projects where the SHPO recommends that an archaeological survey is justified, the grantee will follow the process outlined in Stipulation IV-C to identify historic properties and submit the results of the survey to the SHPO, along with a Project Summary Form, and request standard project review under 36 CFR Part 800.
2. This stipulation shall not be interpreted to include projects where sidewalks or other minor paving or resurfacing shall occur in areas where previous sidewalks or paving already exists. It shall not be interpreted to include projects for the repair or replacement of existing water lines, sewer lines or septic systems within previously excavated trenches, or other exempt activities that are described in Appendix A.

C. Identification of Historic Properties

- 1. For all non-exempt projects, the Preservation Professional shall establish an Area of Potential Effects (APE), plan to identify historic properties, and evaluate any properties greater than fifty years of age located within the APE in accordance with the process described in 36 CFR Part 800.4. The Preservation Professional will document all eligibility findings for properties within the APE in the individual project file.
 - a. The Preservation Professional should reference the SHPO's Online Mapping System in order to consider past surveys of the area, including the National Register of Historic Places, the Ohio Historic Inventory, and the Ohio Archaeological Inventory. In addition, local survey information and any available historic background information that pertains to the project area should be considered.
 - b. The Preservation Professional may also determine that in order to meet this stipulation, it is necessary to conduct a historic resource survey for a specific project area, either by a consultant or the Preservation Professional. Survey work will be conducted in accordance with the Secretary of the Interior's *Archeological and Historic Preservation: Standards and Guidelines (1983)*, SHPO guidelines and previous studies. The grantee may coordinate the planning of any surveys with technical assistance from staff in the SHPO's Department of Inventory and Registration. All survey reports and inventory forms will be submitted to the SHPO for review and acceptance.

D. Evaluation of project effects

1. If no historic properties are present within the APE, then the Preservation Professional will document that no historic properties will be affected and conclude the delegated local review process for that project.
2. If historic properties are identified within the APE, then the Preservation Professional will apply the Criteria of Adverse Effect, as described at 36 CFR Part 800.5(a)(1).
 - a. If the Criteria of Adverse Effect are not met, the Preservation Professional will document that the project will have no adverse effect on historic properties and conclude the delegated local review process for that project.
 - b. If the Criteria of Adverse Effect are met, the Preservation Professional and/or the Preservation Contact will work with grantee staff to determine if project activities can be modified to avoid adverse effects. If adverse effects can be avoided through project modification, the Preservation Professional and/or Preservation Contact will document that the project will have no adverse effect on historic properties and conclude the delegated local review process for that project.
 - i. If adverse effects cannot be avoided through project modification, the Preservation Professional will prepare documentation for individual submission to the SHPO that includes a completed Section 106 Project Summary Form and any mitigation proposals, requesting consultation to resolve adverse effects.
 - ii. The SHPO will review and respond to the information submitted and may concur with the adverse effect determination, request additional information, or object to the finding or its basis. Upon receipt of concurrence from the SHPO, the Preservation Professional will also notify the ACHP as required by 36 CFR Part 800.6(a)(1).
 - iii. The grantee will consult with the SHPO and any additional consulting parties to resolve adverse effects. Agreement among required signatories regarding the terms of mitigation proposed for the project will be memorialized in an MOA executed under 36 CFR Part 800.6.
3. At any time during consultation, the grantee or the SHPO may request advice from the ACHP or ask for their involvement in consultation, in accordance with either 36 CFR Part 800.6(b)(2) or 36 CFR Part 800.7.

V. Lead Hazard Abatement Activities

A. Standard Treatment Protocol

For rehabilitation projects that involve lead hazard abatement at historic properties, activity exemptions under Appendix A may still apply for most project activities. Lead hazard abatement projects that cannot meet the Secretary of the Interior's *Standards for Rehabilitation* but would otherwise be exempt from individual review may comply with the following Standard Treatment Protocol. Such projects may be resolved through delegated local review without requiring individual submission to the SHPO to resolve adverse effects. This stipulation is guided by the ACHP's "Policy Statement on Affordable Housing and Historic Preservation", adopted on November 9, 2006.

1. All historic windows on the primary elevation and any historic decorative window sash on secondary elevations will be retained. Any necessary repairs or reglazing will be completed before these windows are repainted. Historic decorative window sash can include, but are not limited to, leaded glass, stained glass, colored glass, novelty sash, eyebrow dormers, lattice or diamond glass windows.
 - a. Non-decorative window sash on secondary elevations can be replaced by new window sash closely matching the original in material, size, configuration, and profile. As an alternative, the Preservation Professional may also agree to the installation of restoration grade, vinyl or aluminum clad replacement windows that match the original in size, configuration, and profile.
 - b. If stripping is required, windows will be stripped of their lead paint in accordance with NPS Preservation Briefs: *#10 Exterior Paint Problems on Historic Woodwork*, *#37 Appropriate Methods for Reducing Lead-Paint Hazards in Historic Housing*.
2. Exterior surfaces (such as wood siding, shingles, porch columns, and other painted surfaces) can be treated with lead encapsulant paint provided that the paint is applied in compliance with manufacturer's recommendations. A cost comparison analysis completed by the Preservation Professional or grantee staff should show that the use of lead encapsulant paint will be substantially less expensive than stripping off the lead paint and applying conventional paint.
3. Significant historic trim, including interior doors, baseboards, chair rails, wainscoting, paneling, fireplace mantels, stair balusters, newel posts, window and door casings, door trim and frames, and other decorative features should be retained in most cases.

- a. Lead-based paint may be removed by wet scraping, wet sanding, low-heat or careful chemical stripping.
 - b. Non-significant flat stock trim may be removed and replaced in kind.
 - c. New carpet and sheet flooring may be installed on previously painted floors or stair treads, where those areas are identified as a lead hazard.
 - d. New door thresholds and vinyl window pan liners may be installed.
4. Lead specific cleaning including interior preparation, washing and vacuuming as outlined in HUD's *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing: Chapter 11 - Interim Controls* (June 1995 and as amended).

B. Standard Mitigation

For rehabilitation projects that involve lead hazard abatement activities for historic properties that (a) are not included in the exemptions listed in Appendix A and (b) cannot meet the Standard Treatment protocol described in Stipulation V.A, the grantee may choose to complete Standard Mitigation, as follows.

1. The Preservation Professional shall complete a detailed Ohio Historic Inventory Form for the property and submit it to the SHPO for review and approval through the online I-form system. An email shall be sent to the SHPO Survey and National Register Manager that notifies them of the preparation of the form and requests its review under the terms of this Agreement. If an Ohio Historic Inventory Form already exists for the property, then it shall be updated with current information and photographs.
 - a. The Preservation Professional may elect to propose alternative mitigation to fulfill this stipulation, in consultation with and upon approval by the SHPO.
 - b. The grantee may offer to provide any interested local repository with copies of mitigation documents prepared in conjunction with this stipulation.
2. All projects treated under this Standard Mitigation stipulation shall be individually documented, as described in Stipulation II, with annual reporting to the SHPO as required by Stipulation XI. If the project meets the terms required for the use of Standard Mitigation, no Memorandum of Agreement will be necessary to complete the delegated local review for Lead Hazard Abatement activities.

C. Exceptions to use of Standard Treatment Protocol and/or Standard Mitigation

1. This stipulation shall not apply to any project that includes the installation of any synthetic siding or the replacement of historic decorative windows on the primary elevation of the building. Any such project shall be submitted for individual review to the SHPO under Stipulation IV.D.2.b. Historic decorative windows can include, but are not limited to, leaded glass, stained glass, colored glass, novelty sash, eyebrow dormers, lattice or diamond glass windows.
2. This stipulation shall not apply to any project that is submitted for consideration for the Ohio Historic Preservation Tax Credit or the federal Historic Preservation Tax Credit programs.
3. This stipulation shall not be used for any property that is individually listed or individually eligible for listing on the National Register of Historic Places.
4. In all cases, opinions regarding the use and/or applicability of the Standard Treatment Protocol or Standard Mitigation shall not be interpreted to supercede or substitute for the requirements of any local ordinances.
5. The grantee may submit any project that cannot easily meet this Stipulation to the SHPO for individual review, as described in Stipulation IV.D.2.b.

VI. Technical Assistance and Educational Activities

Staff in the SHPO's Resource Protection and Reviews Department will provide technical assistance, consultation, and training of grantee staff as required by the grantee or as proposed by the SHPO in order to assist the grantee in carrying out the terms of this agreement. SHPO may also request that appropriate members of the grantee's staff should attend training specifically in the use and interpretation of this agreement, or the overall regulatory process described in 36 CFR Part 800.

VII. Public Involvement and Participation

- A. The public notification procedures outlined in 24 CFR Part 58 for a Notice of Intent to Request Release of Funds (NOI/RROF) and Finding of No Significant Impact (FONSI) require the grantee to make information about individual projects available for public inspection, and to consider the views of the public and consulting parties in decision-making about individual projects
- B. For individual projects located in locally designated districts or those that may affect locally listed properties, the appropriate local review board will be presented with information regarding the proposed project for consideration as

part of their regularly scheduled hearing, along with any project alternatives considered.

- C. Grantees are required to provide the SHPO with a description of citizen participation procedures used by the grantee to make information about individual projects available for public inspection. These procedures will also be used to solicit the views of the public and consulting parties, as described at 36 CFR Part 800.2(d). Before any amendment to extend this agreement may be executed, the grantees shall submit an updated description of citizen participation procedures to SHPO for review and approval.

VIII. Emergencies

- A. In the event that the grantee determines that a project must be completed on an expedited basis due to an imminent threat to life or property or in response to a natural disaster or emergency, the grantee may set aside any timelines established in their local review procedures in order to facilitate expedited delegated local review by the Preservation Professional. The grantee may also elect to submit a request to SHPO for an expedited review, but will first notify SHPO by phone of its intention to submit a project for expedited review under this stipulation.
 - 1. For projects where the delegated local review cannot be completed with local staff, the Preservation Professional and/or Contact will submit a request to SHPO for an expedited review time of five business days, including the following documentation:
 - a. The address of the property and the nature of the emergency.
 - b. Recent photographs of the property.
 - c. A signed copy of any local order compelling immediate action.
 - d. An Ohio Historic Inventory Form or other documentation regarding the National Register eligibility of the affected property.
 - e. Any additional information necessary to describe the grantee's plans for emergency action or a mitigation proposal
 - 2. The SHPO shall promptly notify the grantee of its concurrence with the grantee's effect determination or may request additional information. SHPO may recommend to grantee that resolution of adverse effects requiring the execution of a Memorandum of Agreement is necessary, but may agree to grantee's recommendation to defer completion of such an agreement until the necessary emergency actions have been taken.

- B. If the grantee determines that special circumstances do not permit the five day SHPO review period established in this stipulation, the Preservation Professional will notify the SHPO regarding the emergency activities undertaken as soon as practicable with a description of affected historic properties and any mitigation that may be proposed.
- C. In all emergencies, the grantee may also elect to follow the procedures described at 36 CFR Part 800.12(c).

IX. Post Review Discovery

- A. In consultation with the SHPO, the grantee may develop a plan that will govern the actions to be taken when historic properties are discovered during the implementation of undertakings. The grantee will submit the plan to the SHPO for review and acceptance. The grantee will work with the SHPO to determine a mutually-agreeable plan. When the SHPO has accepted the plan, the grantee will insure that the plan is adopted and implemented by the applicants for assistance, when appropriate.
- B. The grantee may also elect to follow the process established at 36 CFR Part 800.13 for individual projects. In all cases of discovery or unanticipated effects, the grantee will contact SHPO as soon as practicable and provide sufficient information so that SHPO can make meaningful comments and recommendations.
- C. In the event that human remains are discovered during the development or construction of any project subject to this agreement, construction will cease in the area of the discovery. The grantee will contact SHPO and the County Sheriff and/or County Coroner within 48 hours. The grantee will also consult with SHPO, HUD and the County Sheriff and/or Coroner to develop and carry out a treatment plan for the care and disposition of human remains.
- D. When the human remains are determined to be of Native American Indian origin, the treatment plan will also be developed in consultation with appropriate federally recognized Native American Indian Tribes. The grantee shall also call upon representatives of HUD for assistance in conducting meaningful and respectful discussions with tribal representatives on a government to government basis.

X. Dispute Resolution

- A. Should any party to this agreement object at any time to any actions proposed or the manner in which the terms of this agreement are implemented, the grantee

shall consult with such party to resolve the objection. If the grantee determines that such objection cannot be resolved, the grantee will:

1. Forward all documentation relevant to the dispute, including the grantee's proposed resolution, to the ACHP. The ACHP shall provide the grantee 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, the grantee 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. The grantee will then proceed according to its final decision.
2. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the grantee may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the grantee 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.

- B. The grantee's responsibility to carry out all other actions subject to the terms of this agreement that are not the subject of the dispute remains unchanged.

XI. Monitoring

- A. Within 60 days after the end of each calendar year that this agreement is in force, the grantee will submit to the SHPO a list of undertakings exempted from review under Stipulation III or treated under Stipulations IV and V of this agreement
- B. For each undertaking exempted from review under Stipulation III or treated under Stipulation V of this agreement please include in the list; the project location, age of building, full project description of each activity undertaken, PA Stipulation used to exempt from review, and name of person who reviewed the project.
- C. The grantee should also include in their submission three (3) random samples of individual projects, with copies of the information that was available to support the project's consideration under the terms of this agreement.
- D. The grantee should also include in their submission three (3) random samples of exempt projects under Stipulation III, on buildings 50 years old and older, with copies of the information that was used to support the determination.

XII. Definitions

The definitions provided in the National Historic Preservation Act and the regulations at 36 CFR Part 800 apply to terms used throughout this agreement, such as "historic property" and "effect."

XIII. Amendment & Duration

This agreement will continue in full force until December 31, 2024 and may be reviewed for modifications, termination, or renewal before this date has passed. At the request of either party, this agreement may be reviewed for modifications at any time. 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.

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

SIGNATORIES:

City of Cincinnati



12/20/19

Signature

Date

[name and title of the head of the jurisdiction - such as mayor or county commissioner - or authorized representative - such as city manager or planning director], [grantee]

Patrick Duhaney, City Manager City of
Cincinnati

Contact Information:

801 Plum Street
City of Cincinnati, OH 45215

CITY OF CINCINNATI

RECOMMENDED BY:


Art Dahlberg, Director
Department of Buildings & Inspections

APPROVED AS TO FORM:


Assistant City Solicitor

CITY PURCHASING APPROVAL:

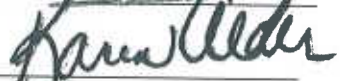

Bobbi Hageman, Chief Procurement Officer

CERTIFICATION OF FUNDS:

Date: _____

Funding: _____

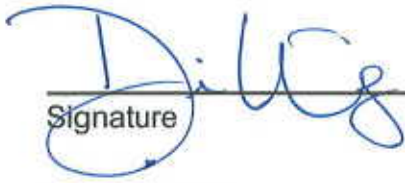
Amount: \$0.00


Karen Alder, Finance Director

CERTIFICATION OF
FUNDS NOT REQUIRED

20 DEC 2019

Ohio State Historic Preservation Office


Signature

1/23/2020
Date

Diana Welling
Deputy State Historic Preservation Officer for
Resource Protection and Review

Contact Information:
800 E. 17th Avenue
Columbus, OH 43211
dwelling@ohiohistory.org
614.298.2000

Concurring Party (optional):

SIGNATORIES:



Signature

12-11-19

Date

[name and title of the head of local historical society or historic preservation organization]

Beth Johnson, Urban Conservator
City of Cincinnati

Contact Information:

805 Central Avenue Suite 500
Cincinnati, OH 45202
beth.johnson@cincinnati-oh.gov
513-352-4848

Concurring Party (optional):

SIGNATORIES:



Signature

12-11-19

Date

[name and title of the head of local historical society or historic preservation organization]

Paul Muller, Executive Director Cincinnati
Preservation Association

Contact Information:

Paul Muller
Cincinnati Preservation Association
430 Reading Road, Suite 300
Cincinnati, OH 45202
director@cincinnati-preservation.org
513-721-4506

Appendix A:

Exempt Activities

New construction is not exempt and must be submitted to the SHPO for review. If the proposed undertaking falls within one of the following categories, the activities shall be deemed exempt:

1. Non-Construction Work and Development, General Exclusions

- a. Public service program that does not physically impact buildings or sites.
- b. Architectural and engineering design fees and other non-construction fees and costs.
- c. Rental or purchase of equipment that does not physically impact buildings or sites.
- d. Temporary board-up, bracing, or shoring of a property, provided that it is installed without permanent damage to the building or site.
- e. Mortgage refinancing where no change in use, new construction, or rehabilitation will occur.
- f. Acquisition of vacant land when no subsequent redevelopment of the property is anticipated (including land banking).
- g. Acquisition of land with demolition or rehabilitation of buildings that are less than fifty years old (including land banking).
- h. Rehabilitation of mobile and manufactured homes
- i. Loans used to fund rehabilitations of buildings less than fifty years old.

2. Site Work

- a. Repair, line painting, paving, resurfacing, and maintenance of existing streets, roads, alleys, parking lots, sidewalks, curbs, ramps, and driveways where no change in width, surfaces, or vertical alignment to drainage is to occur; the replacement in kind of concrete sidewalks where no change in width occurs.
- b. New curb cuts and simple accessibility improvements at roadway crossings to meet ADA requirements. Any improvements that require retaining walls or multiple levels shall be submitted for review.
- c. Maintenance and repair of existing landscape features, including planting, fences, retaining walls, and walkways.
- d. Installation of exterior lighting on poles outside of individual properties, including parking lots, sidewalks, and freestanding yard lights; installation of new or replacement lighting fixtures that are to be attached to a building greater than fifty years old. This exemption is not meant to include street lighting that will serve multiple properties.
- e. Installation of warning sirens on existing poles and new poles; installation of emergency public warning sirens to a building less than fifty years old.
- f. Within previously excavated trenches, the repair, maintenance, or replacement of existing residential water and sanitary sewer service connections and lines. This exemption does not apply to the installation of

water or sewer main lines, but only to connections between individual properties and existing public systems.

- g. Repair, in kind replacement, or reconstruction of existing catch basins.
- h. Replacement of utility meters on buildings in the same location as existing.

3. Exterior Rehabilitation

- a. Rebuilding of existing wheelchair ramps, or installation of new ramps on secondary building elevations where the building is not located on a corner lot.
- b. Repair (not replacement) of porches, cornices, exterior siding, doors, windows, balustrades, shutters, stairs, or other trim as long as any new materials match existing feature in composition, design, color, texture, and other visual and physical qualities.
- c. Foundation repair.
- d. Exterior scraping with non-destructive means and painting of wood siding, features, and trim; exterior painting of masonry, if existing surfaces are already painted. This does not apply to the use of lead encapsulant paint. No abrasive cleaning is permitted for the removal of any building materials.
- e. Caulking, reglazing, and weather-stripping.
- f. Installation of screens and storm windows, provided that they:
 - i. Completely fill the original window opening.
 - ii. Match the meeting rail or other major divisions.
 - iii. Interior storms must not cause damage to the original interior trim.
 - iv. Interior storms must be designed to seal completely so as to protect the primary window from condensation.
- g. Installation of storm doors, if they are undecorated and have a painted finish to match existing trim or the existing door.
- h. Installation of replacement basement windows on secondary elevations, with vented or screened window units only.
- i. Repair or replacement of asphalt, fiberglass, and asbestos shingle roof coverings with the same materials as long as the shape of the roof is not changed.
- j. Replacement of a flat roof not visible from a public right-of-way as long as the shape of the roof is not changed.
- k. Repair or replacement of metal gutters and downspouts; and relining, repainting, and repair of box gutters. This does not apply to the replacement of box gutters.

4. Interior Rehabilitation

- a. Repair or installation of new basement floors.
- b. Installing insulation in attics between floor joists or in floors between a heated and unheated storey, or in side walls from the interior with a vapor barrier on the heated side.

- c. Repair (not replacement) of existing interior walls, floors, ceilings, doors, decorative plaster or woodwork provided the work is limited to repainting, in-kind patching, refinishing, or repapering.
 - d. Kitchen and bathroom remodeling if no walls, windows, or doors are removed or relocated so as to alter the floor plan. Venting only allowed through roof or secondary wall.
 - e. Installation of new furnace, boiler, or water heater, or furnace cleaning or repair.
 - f. Installation or repair of all electrical, plumbing, heating, ventilation, and air conditioning systems as long as no alteration is made to structural features or decorative features.
 - g. Installation of simple, functional light fixtures to replace missing or broken interior and exterior light fixtures.
 - h. Installation of new ceiling openings for attic access or pull-down stairs; removal and sealing up of obsolete pull-down stairs.
 - i. Asbestos abatement activities that do not involve removal or alteration of structural or decorative features.
 - j. Lead paint hazard abatement such as HEPA cleaning and HUD approved paint removal or stabilization. Any decorative features shall be treated with care and retained for re-installation after treatment.
5. Activities defined in 24 CFR Part 58.34 of the "Environmental Review Procedures for Entities Assuming HUD Environmental Review Responsibilities, as amended" are exempt from review under this agreement.
6. Activities defined in 24 CFR Part 58.35(b) of the "Environmental Review Procedures for Entities Assuming HUD Environmental Review Responsibilities, as amended" are exempt from review under this agreement.

Appendix B:
Additional Exempt Activities Approved by SHPO

This Appendix reserved for future exempt activities proposed by grantee and approved by SHPO as described in Stipulation III B.

Per I.C. of the Programmatic Agreement between the City of Cincinnati and the Ohio Historic Preservation Office, we are submitting the qualifications of our Preservation Professional to confirm that she meets the Secretary of the Interior's Professional Qualification Standards:

Beth Johnson

Bachelor of Urban Planning, Bachelor of Science in History, Minor in Historic Preservation College of Architecture and Planning, Ball State University

Masters of Arts in Historic Preservation Planning, College of Architecture, Art & Planning, Cornell University.

Senior Planner, City of San Antonio, Texas; 2006-2007

Preservation and Planning Specialist, City of Covington, Kentucky; 2007-2015

Deputy Historic Preservation Officer, City of Austin, Texas; 2015-2016

Urban Conservator, City of Cincinnati, Ohio; 2016-Present

Emily Ahouse

Bachelor Science in Design and Environmental Analysis, College of Ecology, Cornell University

Masters of Arts in Historic Preservation Planning, College of Architecture, Art & Planning, Cornell University.

Architectural Historian, Janus Research, Miami, Florida; 2007-2012

Historic Preservationist, City of Coral Gables, Florida; 2013-2015

Preservation and Planning Specialist, City of Covington, Kentucky; 2015-2018

Executive Director, Walnut Hills Redevelopment Corporation, Cincinnati, Ohio 2018-2019

Supervising Management Analyst, Zoning Administration, City of Cincinnati, Ohio; 2019-Present

Douglas Owen

Bachelor Arts in History and Minor in Historic Preservation, University of Cincinnati

Principal Investigator History/Architecture, Gray and Pape, Cincinnati, Ohio, 2006-2015

Zoning Plans Examiner with focus in Historic District Reviews, City of Cincinnati, Ohio; 2015-Present

City of Cincinnati Local Review and Public Participation Procedures

A. Local departments, authorities and agencies administering program-assisted activities. (These departments may change as new funding is awarded and only projects funded under HUD 58 will be eligible under the PA)

1. City of Cincinnati Department of Community and Economic Development: CDBG, HOME, ESG, HOPWA, HUD Lead Hazard Control Grant, Neighborhood Stabilization Program
2. City of Cincinnati Department of City Planning: CDBG
3. City of Cincinnati Department of Buildings and Inspections: CDBG
4. Cincinnati Recreation Commission: CDBG
5. Cincinnati Metropolitan Housing Authority: Capital Fund Improvement

B. Preservation Contact (PC) and Preservation Professional (PP)

Beth Johnson, Urban Conservator
Historic Conservation Office
Department of Building and Inspections
Two Centennial Plaza - Suite 500
805 Central Avenue
City of Cincinnati, Ohio 45202
Phone: 513.352.4848
Fax: 513.352.4853
Cell: 513-432-5716
Email: beth.johnson@cincinnati-oh.gov
urban.conservator@cincinnati-oh.gov

C. A list of grantee staff who are authorized to determine exempt activities:

Beth Johnson, Urban Conservator
Emily Ahouse, Supervising Management Analyst
Douglas Owen, Zoning Planes Examiner

D. Summary of Information Provided by Grantee

Program staff shall submit to Urban Conservation Staff

1. Environmental Review Application
2. If the project is non-exempt:
 - a) Photographs of buildings included in the project; buildings that will be rehabilitated, demolished, or are located within the project area. If interior work is to be done, interior photographs are to be submitted.
 - b) Photographs of the site and context adjacent to the project; this will provide a sense of place for the project
 - c) Location map
 - d) Site/parcel map of location of proposed project; Include Tax Parcel(s) ID# and confirm ownership
 - e) Architectural Drawings to include but not limited to elevations, floor plans, and site plans of proposed project
 - f) If the project is new construction, how does the new project relate to the existing buildings? Illustrate in elevation drawings.

- g) Reports from qualified professionals detailing cost prohibitive nature in rehabilitating existing buildings for re-use or lack of structural soundness, etc.
- h) Description of property condition as it relates to proposed work
- i) Detailed description or specifications of work proposed
- 3. Department Commitment Form for federally funded programs.
 - a) Submitted yearly for each federally funded program for review by Environmental Review Officer, Urban Conservator, Department Director, and Community Development Administrator. Approved form is submitted to Accounts and Audits for account set up in the Cincinnati Financial System

E. Recommended Timelines

- 1. The Section 106 reviews for exempt historic activities are recommended to be completed within 5-10 business days from receipt of the completed forms, based on the type of program or project.
- 2. The Section 106 reviews for non-exempt historic activities are recommended to be completed within 15-30 business days from receipt of the completed forms, based on the type of program or project.

F. Project Authorization

- 1. Programs are authorized by the Cincinnati City Council in the annual budget allocations.
- 2. Program Staff completes an Environmental Review Application, including making an initial determination under what stipulation in the Programmatic Agreement the activity is exempt or non-exempt, submits the application to it to the Environmental Review Officer in the Department of City Planning. The Environmental Review Officer will provide the application to the Urban Conservation Staff. The Program Staff can also alternatively submit a Google Form with the required information for a Historic Review directly to the Urban Conservation Staff.
- 3. **Determination: Exempt.** The Urban Conservation Staff shall review and provide concurrence within 5 business days of receipt and will log the exempt activity into the SECTION 106 EXEMPT ACTIVITY Excel log sheet that is required for the annual report. The Urban Conservation Staff will return the signed copy of the application to the Environmental Review Officer. If the Program Staff has submitted the Google Form document, the approved form will be sent to both the Program Staff and the Environmental Review Staff for submission into HEROS.
- 4. **Determination: Non-Exempt.** If activities are non-exempt the Urban Conservation Staff will make a determination if the property and/or properties in the Area of Potential Effect (APE) is listed or eligible for listing on the National Register of Historic Places.
 - a) The determination of both an individual property's eligibility as well as an Area of Potential Effect will be made on a case by case basis using up to date and current photographs, site visits, property research and when needed a new survey of the property and properties within an APE.
 - b) The Urban Conservation Staff will consult the Ohio State Historic Preservation Office Online Mapping System when making the determination for both an individual property's eligibility as well as for properties within the Area of Potential Effect (APE).
 - c) The Urban Conservation Staff will review within 15 business days of receipt.

- d) If the property and properties within the APE is not eligible for listing, the Urban Conservation Staff will log the non-exempt activity into the SECTION 106 NON-EXEMPT ACTIVITY Excel log sheet that is required for the annual report and return the application to the Environmental Review Officer.

5. **Determination: Potentially Affected.** If the property or other properties within the APE is listed or eligible for listing in National Register the program staff will need to submit the required information listed in D.2 to the Urban Conservation Staff for determination of Effect. The Urban Conservation Staff will make one of the following findings within 15 business days of the receipt of the required information. Site visits are conducted on an as needed for a case by case files and could extend the review period.

- a) NO HISTORIC PROPERTIES EFFECTED. The undertaking will not affect historic properties.
- b) NO ADVERSE EFFECT. The undertaking will affect one or more historic properties, but the effect will not alter historic features or significance . Examples may include, but are not limited to rehabilitation complies with the Secretary of the Interior's Standards for Rehabilitation (Standards). Complying with the Standards will mean repairing existing materials, or replacing with the same materials (i.e., wood replacing wood, etc.), building infill construction on a previous building's footprint, infill construction that reflects the height, massing, and spacing of the existing context, etc.
- c) ADVERSE EFFECT. The undertaking will alter historic features of significance to one or more historic properties. Examples may include, but are not limited to rehabilitation does not comply with the Standards, includes introduction of modern materials (vinyl), is infill construction that is larger or smaller than existing context, demolishes a historic building or removes historic features that are elemental to the structure, etc. Proceed to Step 7.

6. **Findings: No Effect or No Adverse Effect:** If there is a finding of NO HISTORIC PROPERTIES EFFECTED or NO ADVERSE EFFECT, the Urban Conservation Staff will log the non-exempt activity into the SECTION 106 NON-EXEMPT ACTIVITY excel log sheet that is required for the annual report and return the application to the Environmental Review Officer.

7. **Findings: Adverse Effect:** If the Urban Conservation Staff makes a finding of ADVERSE EFFECT, the Urban Conservation Staff will consult with the project manager/project team. Consultation will include addressing the following points:

- a) Avoid: Is it possible to:
 - 1. Not proceed with the project?
 - 2. Move the project to another location?
 - 3. Construct building(s) that reflect the size, massing, height of the context?
 - 4. Not use modern materials (i.e., vinyl) and repair or replace materials in kind?
 - 5. Rehabilitate the building(s) using the Secretary of the Interior's Standards for Rehabilitation
- b) Minimize: Is it possible to:
 - 1. Move the project to another location?
 - 2. Lessen the adverse effects by retaining a portion of the building(s)?
 - 3. Rehabilitate existing structure(s) using the Secretary of the Interior's Standards for Rehabilitation?

- c) Mitigate: If it is not possible to alter the project so that it complies with the Secretary of the Interior's Standards for Historic Preservation and thus no longer adversely affects historic properties, then the project's adverse effects must be mitigated.
 - 1. Is there a plan to lessen the adverse effects to historic properties?
 - 2. What is the responsibility of the recipient of the financial assistance?
 - 3. Is it specified in a Memorandum of Agreement (MOA)?
 - 4. Can there be documentation of the historic structure in accordance with Historic American Building (HABS) Standards, development of strategies to preserve other historic structures, the development of brochures and marketing materials that speak about historic preservation, etc.?
- 8. If an ADVERSE EFFECT cannot be avoided, the Urban Conservation Staff, with input from the Project Staff, will prepare documentation for individual submission to the Ohio SHPO that includes a completed Section 106 Project Summary Form and any mitigation proposals to request consultation to resolve adverse effects.
- 9. The Ohio SHPO will have 30 days from receipt to review the submission. It is likely that the Ohio State Historic Preservation Office will have questions about the project and possible revisions; therefore there may be several 30-day review segments.

G. Copies of Internal Forms – Environmental Review Application

H. Providing Public Information for HUD funded projects (i.e. Citizen Participation Procedures)

- 1. The City of Cincinnati has a public notice magazine, "City Bulletin". Federally funded programs are advertised in the "City Bulletin" and local newspapers by the City's Community Development staff. Non-exempt case-by-case projects will be advertised in the "City Bulletin" on a monthly basis by the Preservation Professional.
- 2. All federally funded programs and projects will be posted on a centralized city project webpage, which will be launched by April 15, 2016 using the following guidelines:
 - a) The City of Cincinnati will create a webpage within the Buildings and Inspections/Historic Conservation section specifically to address public input for Environmental Reviews (ER) required for federally funded programs with projects and Case-by-Case sites. The webpage will solicit public input and provide the email address, direct phone number and the City business address of the City Urban Conservator who acts as the "Preservation Professional" (PP) as stipulated by HUD and the City Programmatic Agreement with the Ohio Historic Preservation Office. The webpage will post weekly the non-exempt case-by-case projects sites. The non-exempt cases will be provided to the PP through the ER application and the PP will hold the non-exempt applications until the public comment period is complete. The public will have 15 business days to submit comments to be considered in the Section 106 review. The public will be informed of this website and the process through a public information campaign to include a press release and email blasts to interested parties, community councils and other community groups.
 - b) Once the PP determines that a project is non-exempt, they will contact the program staff of the Cincinnati Metropolitan Housing Authority and inform them that they are to print and post in a public area (ie., reception desk) a list

containing the address, a brief description of the activity being reviewed. Public comments will be directed to the phone number, email address or the postal address of the PP.

- c) At least fifteen days after the list has been posted on the website and in a public area of the office, any public comments received by the grantee department office or the PP will be reviewed for consideration in the finding and put in the case-by case file.
- d) The City of Cincinnati also has a Public Records policy that follows the Ohio Public Records Act. If an individual or group want to request information regarding any program, case by case project, or type of project that has received funds through the City of Cincinnati, they can also submit a Public Records Request to the Environmental Review Officer or the PP. The application form can be found on the City's website.

Per I.C. of the Programmatic Agreement between the City of Cincinnati and the Ohio Historic Preservation Office, we are submitting the qualifications of our Preservation Professional to confirm that she meets the Secretary of the Interior's Professional Qualification Standards:

Beth Johnson

Bachelor of Urban Planning, Bachelor of Science in History, Minor in Historic Preservation College of Architecture and Planning, Ball State University

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Senior Planner, City of San Antonio, Texas; 2006-2007

Preservation and Planning Specialist, City of Covington, Kentucky; 2007-2015

Deputy Historic Preservation Officer, City of Austin, Texas; 2015-2016

Urban Conservator, City of Cincinnati, Ohio; 2016-Present

Emily Ahouse

Bachelor Science in Design and Environmental Analysis, College of Ecology, Cornell University

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Architectural Historian, Janus Research, Miami, Florida; 2007-2012

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Preservation and Planning Specialist, City of Covington, Kentucky; 2015-2018

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Principal Investigator History/Architecture, Gray and Pape, Cincinnati, Ohio, 2006-2015

Zoning Plans Examiner with focus in Historic District Reviews, City of Cincinnati, Ohio; 2015-Present

City of Cincinnati Local Review and Public Participation Procedures

- A. Local departments, authorities and agencies administering program-assisted activities.** (These departments may change as new funding is awarded and only projects funded under HUD 58 will be eligible under the PA)

1. Cincinnati Metropolitan Housing Authority: Capital Fund Improvement County Wide
2. City of Cincinnati: Lead Based Paint Hazard Reduction Demonstration Grant Program County wide outside of the City of Cincinnati City limits

B. Preservation Contact (PC) and Preservation Professional (PP)

Beth Johnson, Urban Conservator
Historic Conservation Office
Department of Building and Inspections
Two Centennial Plaza - Suite 500
805 Central Avenue
City of Cincinnati, Ohio 45202
Phone: 513.352.4848
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Email: beth.johnson@cincinnati-oh.gov
urban.conservator@cincinnati-oh.gov

C. A list of grantee staff who are authorized to determine exempt activities:

Beth Johnson, Urban Conservator
Emily Ahouse, Supervising Management Analyst
Douglas Owen, Zoning Planes Examiner

D. Summary of Information Provided by Grantee

Program staff shall submit to Urban Conservation Staff

1. Environmental Review Application
2. If the project is non-exempt:
 - a) Information on the property from the Historic Resource Inventory Survey
 - b) Photographs of buildings included in the project; buildings that will be rehabilitated, demolished, or are located within the project area. If interior work is to be done, interior photographs are to be submitted.
 - c) Photographs of the site and context adjacent to the project; this will provide a sense of place for the project
 - d) Location map
 - e) Site/parcel map of location of proposed project; Include Tax Parcel(s) ID# and confirm ownership
 - f) Architectural Drawings to include but not limited to elevations, floor plans, and site plans of proposed project
 - g) If the project is new construction, how does the new project relate to the existing buildings? Illustrate in elevation drawings.
 - h) Reports from qualified professionals detailing cost prohibitive nature in rehabilitating existing buildings for re-use or lack of structural soundness, etc.
 - i) Description of property condition as it relates to proposed work

- j) Detailed description or specifications of work proposed
- 3. Department Commitment Form for federally funded programs.
 - a) Submitted yearly for each federally funded program for review by Environmental Review Officer, Urban Conservator, Department Director, and Community Development Administrator. Approved form is submitted to Accounts and Audits for account set up in the Cincinnati Financial System

E. Recommended Timelines

- 1. The Section 106 reviews for exempt historic activities are recommended to be completed within 5-10 business days from receipt of the completed forms, based on the type of program or project.
- 2. The Section 106 reviews for non-exempt historic activities are recommended to be completed within 15-30 business days from receipt of the completed forms, based on the type of program or project.

F. Project Authorization

- 1. Programs are authorized by the Cincinnati Metropolitan Housing Authority and the Cincinnati City Council in their respective annual budget allocations.
- 2. Program Staff completes an Environmental Review Application, including making an initial determination under what stipulation in the Programmatic Agreement the activity is exempt or non-exempt, submits the application to it to the Environmental Review Officer in the Department of City Planning. The Environmental Review Officer will provide the application to the Urban Conservation Staff. The Program Staff can also alternatively submit a Google Form with the required information for a Historic Review directly to the Urban Conservation Staff
- 3. **Determination: Exempt.** The Urban Conservation Staff shall review and provide concurrence within 5 business days of receipt and will log the exempt activity into the SECTION 106 EXEMPT ACTIVITY Excel log sheet that is required for the annual report. The Urban Conservation Staff will return the signed copy of the application to the Environmental Review Officer.
- 4. **Determination: Non-Exempt.** If activities are non-exempt the Urban Conservation Staff will make a determination if the property and/or properties in the Area of Potential Effect (APE) is listed or eligible for listing on the National Register of Historic Places.
 - a) The determination of both an individual property's eligibility as well as an Area of Potential Effect will be made on a case by case basis using up to date and current photographs, site visits, CMHA inventory, property research and when needed a new survey of the property and properties within an APE. If a detailed historic and archeological survey of the property with deed, map and directory research is not completed and will be required the Urban Conservation Staff will consult with CMHA or the City of Cincinnati Department of Community and Economic Development on finding a Qualified Preservation Professional to perform the research and submit an Ohio Historic Resource Survey Form.
 - b) The Urban Conservation Staff will consult the Ohio State Historic Preservation Office Online Mapping System and CMHA owned resources historic inventory and GIS database when making the determination for both an individual

property's eligibility as well as for properties within the Area of Potential Effect (APE).

- c) The Urban Conservation Staff will review within 15 business days of receipt.
- d) If the property and properties within the APE is not eligible for listing, the Urban Conservation Staff will log the non-exempt activity into the SECTION 106 NON-EXEMPT ACTIVITY Excel log sheet that is required for the annual report and return the application to the Environmental Review Officer.

5. **Determination: Potentially Affected.** If the property or other properties within the APE is listed or eligible for listing in National Register the program staff will need to submit the required information listed in D.2 to the Urban Conservation Staff for determination of Effect. The Urban Conservation Staff will make one of the following findings within 15 business days of the receipt of the required information. Site visits are conducted on an as needed for a case by case files and could extend the review period.

- a) NO HISTORIC PROPERTIES EFFECTED. The undertaking will not affect historic properties.
- b) NO ADVERSE EFFECT. The undertaking will affect one or more historic properties, but the effect will not alter historic features or significance. Examples may include, but are not limited to rehabilitation complies with the Secretary of the Interior's Standards for Rehabilitation (Standards). Complying with the Standards will mean repairing existing materials, or replacing with the same materials (i.e., wood replacing wood, etc.), building infill construction on a previous building's footprint, infill construction that reflects the height, massing, and spacing of the existing context, etc.
- c) ADVERSE EFFECT. The undertaking will alter historic features of significance to one or more historic properties. Examples may include, but are not limited to rehabilitation does not comply with the Standards, includes introduction of modern materials (vinyl), is infill construction that is larger or smaller than existing context, demolishes a historic building or removes historic features that are elemental to the structure, etc. Proceed to Step 7.

6. **Findings: No Effect or No Adverse Effect:** If there is a finding of NO HISTORIC PROPERTIES EFFECTED or NO ADVERSE EFFECT, the Urban Conservation Staff will log the non-exempt activity into the SECTION 106 NON-EXEMPT ACTIVITY or SECTION 106 NON-EXEMPT ACTIVITY HAMILTON COUNTY excel log sheet that is required for the annual report and return the application to the Environmental Review Officer.

7. **Findings: Adverse Effect:** If the Urban Conservation Staff makes a finding of ADVERSE EFFECT, the Urban Conservation Staff and CMHA or the Department of Community and Economic Development to begin consultation with the Ohio State Historic Preservation Office and potential consulting parties. The Consultation and guidance will include addressing the following points:

- a) Avoid: Is it possible to:
 - 1. Not proceed with the project?
 - 2. Move the project to another location?
 - 3. Construct building(s) that reflect the size, massing, height of the context?
 - 4. Not use modern materials (i.e., vinyl) and repair or replace materials in kind?
 - 5. Rehabilitate the building(s) using the Secretary of the Interior's Standards for Rehabilitation
- b) Minimize: Is it possible to:

1. Move the project to another location?
2. Lessen the adverse effects by retaining a portion of the building(s)?
3. Rehabilitate existing structure(s) using the Secretary of the Interior's Standards for Rehabilitation?
- c) Mitigate: If it is not possible to alter the project so that it complies with the Secretary of the Interior's Standards for Historic Preservation and thus no longer adversely affects historic properties, then the project's adverse effects must be mitigated.
 1. Is there a plan to lessen the adverse effects to historic properties?
 2. What is the responsibility of the recipient of the financial assistance?
 3. Is it specified in a Memorandum of Agreement (MOA)?
 4. Can there be documentation of the historic structure in accordance with Historic American Building (HABS) Standards, development of strategies to preserve other historic structures, the development of brochures and marketing materials that speak about historic preservation, etc.?
8. If an ADVERSE EFFECT cannot be avoided, CMHA or the Department of Community and Economic Development with guidance from the Urban Conservation Staff will prepare documentation for individual submission to the Ohio SHPO that includes a completed Section 106 Project Summary Form and any mitigation proposals to request consultation to resolve adverse effects.
9. The Ohio SHPO will have 30 days from receipt to review the submission. It is likely that the Ohio State Historic Preservation Office will have questions about the project and possible revisions; therefore there may be several 30-day review segments.

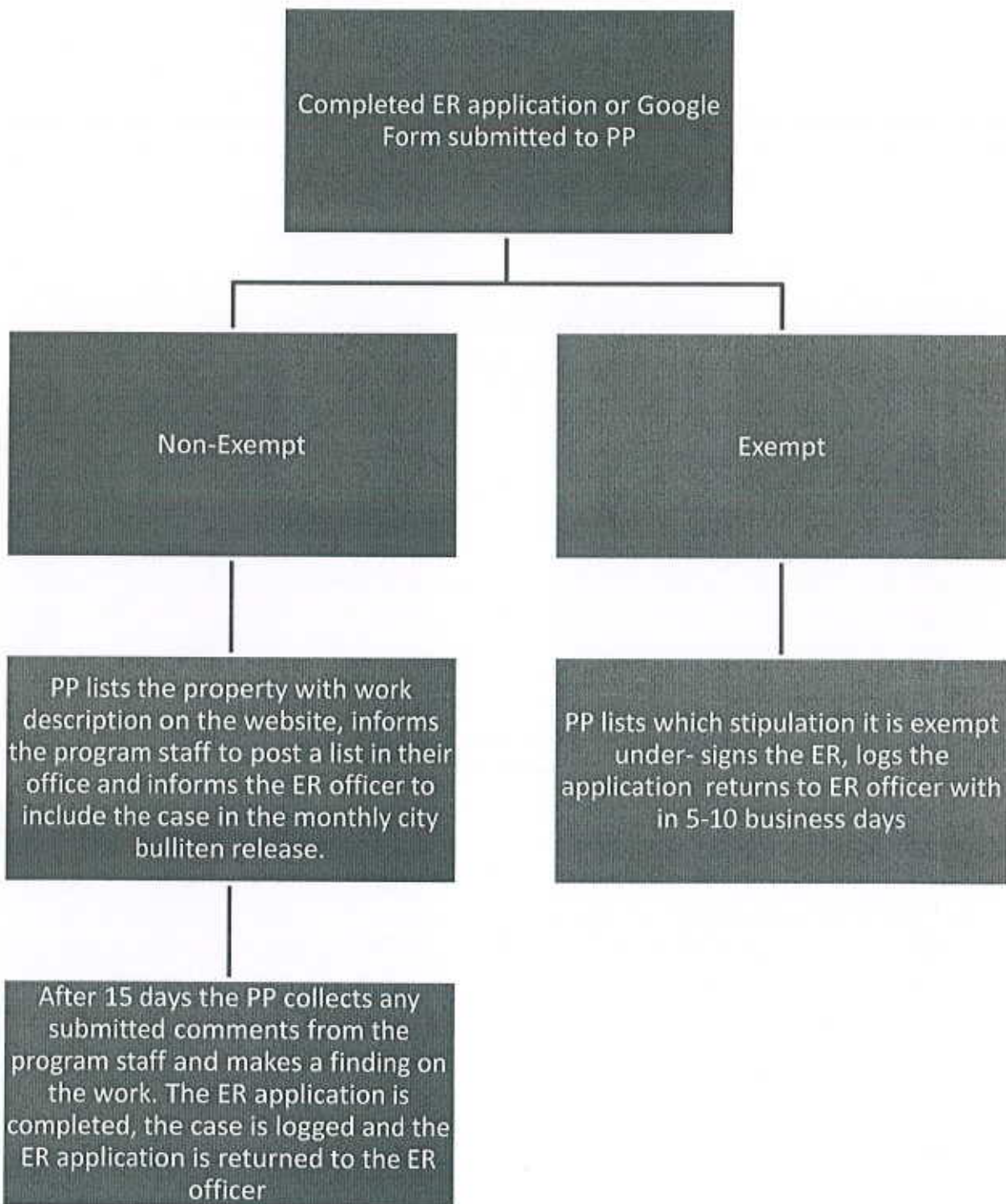
G. Copies of Internal Forms – Environmental Review Application

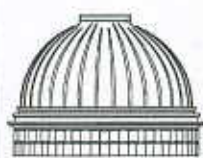
H. Providing Public Information for HUD funded projects (i.e. Citizen Participation Procedures)

1. All federally funded programs and projects will be posted on a centralized city project webpage, which was launched by April 15, 2016 using the following guidelines:
 - a) The City of Cincinnati will create a webpage within the Buildings and Inspections/Historic Conservation section specifically to address public input for Environmental Reviews (ER) required for federally funded programs with projects and Case-by-Case sites. The webpage will solicit public input and provide the email address, direct phone number and the City business address of the City Urban Conservator who acts as the "Preservation Professional" (PP) as stipulated by HUD and the City Programmatic Agreement with the Ohio Historic Preservation Office. Any non-exempt reviews that are outside of the City limits and inside Hamilton County will be posted in a separate document with the title "Hamilton County- Non Exempt Section 106 Reviews" with the date they are published. The non-exempt cases will be provided to the PP through the ER application and the PP will hold the non-exempt applications until the public comment period is complete. The public will have 15 business days to submit comments to be considered in the Section 106 review. The public will be informed of this website and the process through a public information campaign to include a press release put out by CMHA.

- b) Once the PP determines that a project is non-exempt, they will contact the program staff of the **Cincinnati Metropolitan Housing Authority** or the **Department of Community and Economic Development** and inform them that they are to print and post in a public area (ie., reception desk) a list containing the address, a brief description of the activity being reviewed. Public comments will be directed to the phone number, email address or the postal address of the PP.
- c) At least fifteen days after the list has been posted on the website and in a public area of the office, any public comments received by the grantee department office or the PP will be reviewed for consideration in the finding and put in the case-by case file.
- d) The Cincinnati Metropolitan Housing Authority also has a Public Records policy that follows the Ohio Public Records Act. If an individual or group want to request information regarding any program, case by case project, or type of project that has received funds through the City of Cincinnati, they can also submit a Public Records Request to the Environmental Review Officer or the PP. The application form can be found on the City's website.

Section 106 Review and Public Information Posting Process





Beth Johnson, AICP

Education:

Cornell University, College of Architecture, Art and Planning, Ithaca, NY
Master of Art, Historic Preservation Planning
Summa Cum Laude

Ball State University, College of Architecture and Planning, Muncie, IN
Bachelor of Urban Planning: Double major History, minor Historic Preservation
Honors Degree and Magna Cum Laude

Overview and Highlights of Work Experience:

City of Cincinnati Buildings and Inspections Department Cincinnati, OH
Urban Conservator

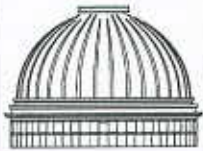
- Administer the review and permitting process in the local historic districts and historic landmarks
- Provide technical expertise in project review and staff reports to the Historic Conservation Board
- Coordinate the Certified Local Governments Program and grant funds
- Administer and lead negotiations in the Section 106 process for the City of Covington.
- Provide resources and assistance for residents doing historic building research and rehabilitations.
- Provide general design, historic, and planning expertise to both public and private projects.

Planning and Zoning Department, Austin, TX
Senior Planner/Deputy Historic Preservation Officer

- Administer the review and permitting process in the local historic districts, National Register Historic Districts, and Local Landmarks.
- Staff the Historic Landmark Commission
- Coordinate the Certified Local Governments Program and grant funds
- Manage the RFP, consultant selection and contractors for a 2000+ property, \$300,000 historic resource survey.
- Provide resources and assistance for residents doing historic building research and rehabilitations.
- Coordinating Historic Preservation rewrite on CodeNext/Zoning Code update.
- Supervisory role over Planner I, II and III positions.

City of Covington Community Development Department, Covington, KY
Preservation and Planning Specialist (formally Historic Preservation Officer)

- Administer the review and permitting process in the local historic districts.
- Staff the Urban Design Review Board (Covington's Local Preservation Commission).
- Coordinate the Certified Local Governments Program and grant funds (Averaged \$15,000-\$20,000 in grant funds each year, 20% of the total grant fund pool for the state).
- Administer and lead negotiations in the Section 106 process for the City of Covington.
- Managed and created preservation plans for City Funded rehabilitation programs.
- Project manager for NKY Restoration Weekend.
- Give general assistance for Federal and State Tax Credit programs
- Updated and revised the Covington Historic Design Guidelines as well as wrote various guidelines for Development Plans and Agreements.
- Provide resources and assistance for residents doing historic building research and rehabilitations.
- Project Manager for the Roebling Point Small Area Study, a land use and design feasibility study.
- Liaison and/or coordinate implementation teams for three Small Area Plans.
- Provide general design, historic, and planning expertise to both public and private projects.
- Provide educational opportunities to residents and professionals including an annual lecture series with the Kenton County Library and NKY Home Builders Association.
- Helped establish one of Kentucky's first five Cultural and Heritage Districts in Covington.
- Created various historic walking tours for special interest groups and conferences.
- Managed the survey and nomination of an individual listing and two proposed National Register Districts with a total of 1200 resources and the resurvey of 6 existing Districts with 1800 resources.



Beth Johnson, AICP

Special Projects:

Color Covington

2009

Project Manager

Fund-raised over \$10,000 through local grants and selling ads to create a forty page coloring book of historic sites in Covington, Kentucky that is used as a teaching tool about Cultural History in Covington. As Project Manager, I was in charge of all fund-raising and hiring the consultants that created the artwork, formatted, and printed the book.

Experience Covington Tour

2008-2009

Oral Historian and Project Coordinator

Worked on a team that created an audio-digital walking and driving tour of Covington that was funded through a Preserve America Grant. As a trained oral historian, I was charged with coordinating and interviewing about 20 people for the product. I also helped coordinate visual media products and was on the advising committee for the project. I coordinated the opening event/launch of the tour.

Historic Preservation: Saving Place

2011

Executive Producer and Script Writer

Created a 23 minute award winning video, in partnership with the City of Bellevue and funded through Certified Local Government Grants, that was aimed at educating the importance of historic preservation and rehabilitation. The video can be found at <http://vimeo.com/35608673>

Living History: The Architecture of Northern Kentucky

2013

Executive Producer and Script Writer

Created a 48 minute video, in partnership with the City of Bellevue and funded through Certified Local Government Grants, that was aimed at educating about the main styles of architecture that are found in the River Cities of Northern Kentucky. The video can be found at <http://vimeo.com/76638467>

Northern Kentucky Restoration Weekend

2012, 2013, 2014

Project Manager and Presenter

Managed a group of local preservationists, vendors, and craftsman to create a two day event/conference focused on homeowner and professional education. The event provides between 20-30 classes each year, a keynote speaker, vendors fair, continuing education classes for AIA and AICP, and Preservation Trade Network craftsman demonstrations. Yearly attendance averages at 300 participants. Fundraised an average of \$12,000 each year to put on the program.

Covington Design Guidelines

Adopted June 2014

Project Manager

Worked with committee of members of our local design review board, developers, architects, and other preservation professionals to evaluate the existing guidelines that were written in 1988 to update them to fit the current preservation climate of Covington and to be more customer friendly and accessible. These guidelines received a Stewardship award from Cincinnati Preservation Association.

Village Breeze- Covington Historic Preservation

2009-2010

Guest columnist

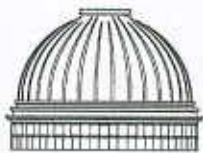
Wrote a column in the quarterly newspaper, *The Village Breeze*, published by a business owner and resident of one of Covington's local historic districts.

Ten Reasons Historic Preservation Makes Covington a Better Place to Live, December 2009

What Does it Mean to Be Historic and Other Common Historic Preservation Questions, April 2010

Tips to Making your Historic Building Energy Efficient, October 2010

How to Properly Insure your Historic Home, February 2011



Beth Johnson, AICP

Trainings and Skills:

- Grant Writing
- Section 106 Essentials and Advanced
- National Alliance for Preservation Commission's Short Course Commission Training
- Main Street 101
- Pine Mountain Preservation School: Wood Window Restoration
- Preservation Leadership Training/ Advanced Real Estate and Finance
- Brownfields Basics
- Microsoft Office Suite
- Adobe Creative Suite
- ArcMAP and GIS info
- Proficient in evaluation and manipulation of Census and Statistical data
- Graphic design, composition and layout including Website, logo and document design
- Public speaking and presentation/class instruction
- Historic Document research
- Oral History Documentation
- Building documentation (survey, photography, measured drawings, architectural descriptions)
- Historic Building Condition Analysis and Assessment- Over 200 buildings assessed
- Architectural drafting and design, exterior and interior design
- Writing of Design Guidelines, Building/Plumbing/Zoning Code updates, MOU/A, PA
- Rehabilitation project feasibility analysis and project management- Over 100 projects completed
- Rehabilitation Tax Credit applications, state and federal- Over a dozen projects completed
- National Register research, documentation, and nominations

Achievements:

- Meet and exceed the Secretary of the Interior's Professional Qualifications for Historic Preservation
- American Institute of Certified Planners (AICP) Outstanding Student of the Year Award, 2004
- Ball State University Department of Urban Planning Academic Achievement Award, 2004
- Ball State University College of Architecture and Planning Valedictorian, 2004
- Cornell Preservation Thesis Achievement Award, 2006
- Kentucky Colonel Recognition- 2008
- Ida Lee Willis Service to Preservation Award for "*History Preservation: Saving Place*", 2012
- NAPC Best Practices: Public Service/Advocacy for "*History Preservation: Saving Place*", 2012
- Professional Remodeler's Magazine's top 40 under 40, 2012
- Preservation Kentucky- Edith Bingham Award for Excellence in Preservation Education for NKY Restoration Weekend, 2013
- Preservation Kentucky- David L. Morgan State Historic Preservation Tax Credit for Excellence in Residential Rehabilitation, 2013
- Kentucky American Institute of Architects- John Russell Groves Citizens Laureate Award- 2013
- Cincinnati Preservation Association Stewardship Award for the *Historic Covington Design Guidelines*- 2014
- Wrote the Architecture of Covington chapter in *The Gateway City: Covington, Ky*- 2014

Memberships/Community work:

- National Trust for Historic Preservation- Forum Member
- Preservation Kentucky
- American Institute of Certified Planners, member since 2012
- American Planning Association, Kentucky Chapter of the APA
- Cornell Historic Preservation Planning Alumni-Board Member, Executive Board (Treasurer)
- University of Kentucky's Department of Historic Preservation Advisory Board Member
- Covington Public School Mentoring Program and Holmes 180 Volunteer
- Keep Covington Beautiful/Great American Clean-up Volunteer
- Center for Great Neighborhoods- Covington Quest Volunteer



Beth Johnson, AICP

Lectures and Presentations:

"House Stories: Putting the Pieces Together of the History of Your Home" - Kenton County Library (yearly in the spring since 2008), NKY Restoration Weekend March 2012, February 2013, March 2014

"How to Have Legally Defensible Architectural Review Board" - Covington, KY UDRB Training, January, 2009, Bellevue, KY Architectural Review Board Training, Scheduled for March 2013.

"The Architecture of Latonia" - Rittes Corner and West Latonia Neighborhood Association Summit, March 2011

"Greening your Historic Home" - Rittes Corner and West Latonia Neighborhood Association Summit, March 2011

"Getting the Message Out: Using Media to Your Advantage" - KAPA (Kentucky Chapter of the APA) conference, September 2011

"Paint: Why is it Failing and How to Pick the Right Colors" - NKY Restoration Weekend March 2012, February 2013

"CLG: Putting the Certified Local Government Program to Use" - KY State Preservation Conference, October 2012

"Historic Preservation: Local Districts and Guidelines" - Northern Kentucky Home Builders Association, 3 classes over fall 2012 and 3 classes in Spring 2013

"Putting on a Restoration Fair" - KY State Preservation Conference, October 2012

"The History of MainStrasse: Facts and Fables as Seen Through Our Buildings" - Kenton County Public Library, October 2012

"Section 106: The What, Why, and Hows" - Training with the Northern Kentucky Department of Health, February 2013

"The Architecture of Bellevue: Styles and Important Details" - Bellevue Ky, Architectural Review Board Training, Scheduled for March 2013.

"Replacement Materials: How to Decide Whats Acceptable" - Bellevue Ky, Architectural Review Board Training, Scheduled for March 2013.

"Building Relationships with Applicants" - Bellevue Ky, Architectural Review Board Training, Scheduled for March 2013.

"The Architecture of Northern Kentucky." Northern Kentucky Home Builders Association, 3 classes over spring 2014

"I Have Bought a Historic Home, Now What?" NKY Restoration Weekend, March 2014

"Hellman Lumber National Register Individual Listing Nomination." November 2014

"Chapter 6: From Art to Architecture: The Visual Arts in Covington. " in Gateway City: Covington, Kentucky, 1815-2015. March 2015

Emily S. Ahouse

Phone: (607) 592-1985

Email: emily.sheckels@gmail.com

EDUCATION

Cornell University, College of Architecture, Art, and Planning, Ithaca NY

- Master of Arts Degree, Historic Preservation Planning, 2006
Thesis - *The Preservation of Fenway Park: Power, Politics, and Persuasion*

Cornell University, College of Human Ecology, Ithaca NY

- Bachelor of Science Degree, Design and Environmental Analysis, Interior Design, 2003

CURRENT EMPLOYMENT

Walnut Hills Redevelopment Foundation, Cincinnati, Ohio (September 2018-Present)

Executive Director

- Provide leadership and idea-generation in developing policy, programs, and organizational & financial plans that aid the projects, team, Board of Directors, and partners.
- Foster sound working relationships and cooperative arrangements with funders, community organizations, neighborhood groups, businesses, and institutions.
- Track and report all significant information on the implementation of long- and short-term goals to the Board of Directors.
- Serve as ombudsman to the community, businesses, and neighborhood groups.
- Provide leadership and represent the WHRF in planning and development issues that impact the community.
- Oversee all real estate development undertaken by the WHRF.
- Represent the organization's mission, programs, and goals to government agencies, organizations, and the public.
- Develop and drive strategies for the WHRF Equitable Development Scorecard.
- Develop relationships with established and new funders to create new opportunities for organizational funding.
- Expand revenue and fundraising to support existing programs and fund new, creative and innovative solutions to complex issues in Walnut Hills.
- Responsible for the recruitment, supervision, and release of all paid staff, interns, and operational volunteers.

RELEVANT EXPERIENCE

City of Covington, Covington, Kentucky (June 2015-August 2018)

Preservation and Planning Specialist

- Reviewed all Certificate of Appropriateness permits for exterior alterations to properties within Historic Preservation Overlay Zones.
- Administered the City's Certified Local Government Program, providing all necessary reporting to the Kentucky Heritage Council and ensuring compliance with all program requirements.
- Facilitated neighborhood meetings for public input on new developments and planning issues, and serves as City liaison to Small Area Study planning groups responsible for implementing neighborhood plans.
- Promoted historic preservation in the City through social media, educational events, outreach, and the development of promotional videos.

- Staffed the Urban Design Review Board, preparing all staff reports and public notices, and presenting Certificate of Appropriateness and Zoning Code Design Waiver items at monthly meetings.
- Responsible for issuing Requests for Proposals and serving on review committees for City planning and development activities.
- Involved in creative placemaking activities and partnerships within the City, and served as the City representative on the regional NKY Public Arts Network.
- Responsible for grant writing and oversight of all historic preservation and planning related grants.
- Conducted Section 106 Compliance reviews in accordance with a Programmatic Agreement with the Kentucky Heritage Council and Advisory Council for Historic Preservation.
- Served on the Executive Board and Design Committee for Renaissance Covington, a Main Street America program.
- Served as Interim Zoning Administrator, responsible for review of all Zoning Permits, amendments to the Zoning Code, and Staffing of the Board of Adjustment (November 2015-February 2016).

City of Coral Gables, Coral Gables, Florida (January 2013-June 2015)

Historic Preservationist

- Responsible for ensuring compliance with the Historic Preservation Ordinance.
- Provided technical assistance and information about the City's historic preservation program to property owners.
- Made presentations, prepared staff reports, and assisted in other duties as necessary to staff the Merrick House Governing Board and the Historic Preservation Board.
- Attended weekly Board of Architects review meetings to provide input on all work proposed to Local Historic Landmarks.
- Assisted in the planning and staffing of Department sponsored workshops and events.
- Reviewed and signed plans for permitting, and conducted inspections to verify compliance with Certificates of Appropriateness.
- Reviewed ad valorem tax relief applications and prepared staff recommendations.
- Prepared Staff Reports and presentations to the Historic Preservation Board regarding zoning variances for local historic landmark properties.
- Conducted archival research and assisted in historical significance determinations as part of the City's demolition review process.
- Assisted in the supervision of work related to the restoration of City-owned historic resources.

Janus Research, Miami, Florida (February 2007-December 2012)

Architectural Historian

- Led historic resource survey, historic preservation planning, and Section 106 compliance projects for government agencies, local governments, and private clients throughout South Florida.
- Conducted local history research which included analyzing historic aerial photographs, historic plat maps, Sanborn Fire Insurance maps, tax records, deed records, plans, correspondence, historic photographs, and conducted interviews with local informants.
- Completed the cultural resources documentation for all phases of the NEPA and Section 106 compliance process including resource identification, evaluation of effects, and the preparation and execution of memorandum of agreement between the affected parties.

SKILLS AND QUALIFICATIONS

Historic Real Estate Finance Professional Certification, National Development Council
Meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History
Completed The Section 106 Essentials Course, Advisory Council On Historic Preservation

AWARDS

2018 – AIA Kentucky Allied Professional Award
2019 – Summit Country Day School Alumni Meritorious Service Award

Douglas R. Owen

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EDUCATION

University of Cincinnati, Cincinnati, Ohio
Degree: Master of Arts, September 2005
Major: History - Minor: Historic Preservation
Historic Preservation Certification

West Virginia Wesleyan College, Buckhannon, West Virginia
Degree: Bachelor of Arts, May 2002
Major: History - Minor: English

EXPERIENCE

11/15 – present

City of Cincinnati, Zoning Plan Examiner

Cincinnati, Ohio

- ☐ Conduct Zoning reviews on new development projects
- ☐ Conduct Zoning reviews on Certificate of Appropriateness applications on Historic properties
- ☐ Answer questions from the public regarding Zoning regulations and Historic guidelines

4/06 – 6/15

Gray & Pape, Inc., Principal Investigator – History/Architecture

Cincinnati, Ohio

- ☐ Project Manager for Phase I and Phase II Architectural History projects in compliance with Section 106 of the National Historic Preservation Act
- ☐ Authored reports for National Register of Historic Places nominations and Historic Tax Credit applications
- ☐ Performed field work identifying and recording historic resources within specific project areas
- ☐ Researched historic structures, township and county histories for Section 106 reports, National Register Nominations, HABS/HAER documentation, and Historic Tax Credit applications
- ☐ Conducted primary research in local archives, libraries, historical societies, and other repositories
- ☐ Coordinated with multiple departments to integrate all aspects of multi-disciplinary reports
- ☐ Developed and presented mitigation options to clients and agencies
- ☐ Presented research results to agencies and the public

6/05 – 09/05

Cincinnati Preservation Association, Intern

Cincinnati, Ohio

- ☐ Performed site inspections on historic tax easement properties
- ☐ Researched historic homes and ownership information
- ☐ Acted as official docent for home tour of historic East Walnut Hills

9/02 – 6/04

University of Cincinnati, Teaching Assistant

Cincinnati, Ohio

- ☐ Competitively selected for University of Cincinnati History Department teaching assistantship
- ☐ Conducted American History lectures for classes of more than 100 students
- ☐ Graded exams, papers, and other assignments
- ☐ Lead class review sessions and discussions
- ☐ Advised and assisted undergraduate students on weekly basis

9/00 – 12/00

Supreme Court of the United States, Intern

Supreme Court of the United States (Office of the Curator), Washington D.C.

- ☐ Conducted in-depth public lectures on the Court's history and process of oral arguments
- ☐ Lead guided tours of the Supreme Court, providing detailed accounts of the history of the Supreme Court, and detailed knowledge of the justices and the Court's proceedings
- ☐ Operated the Information Desk, answered questions, and informed guests about the Court's history
- ☐ Coordinated Supreme Court material for Smithsonian exhibit

