

# **Downtown Revitalization Program Design & Impact Workshop**

**July 29, 2015**

**Des Moines, Iowa**

**IOWA**  
economic development

# Downtown Revitalization Program Impacts and Design

**CDBG**  
Community Development Block Grant

**IOWA**  
economic development



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Community Investment  
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# Agenda

- » **10:00 – 10:30: Introduction to CDBG**
- » **10:30 – 11:15: Slum and Blight Inventory**
- » **11:15 – 11:30: Q & A**
- » **11:30 – 12:15: Lunch**
- » **12:15 – 2:00: Finalizing Designs**
- » **2:00 – 2:30: Tips for a Successful Project**
- » **2:30 – 3:00: Q & A**

# INTRODUCTION TO CDBG

# HUD CDBG Program Overview

## » The Community Development Block Grant Program:

A program created by the Housing & Community Development Act of 1974, signed into law by President Gerald Ford on August 22, 1974.

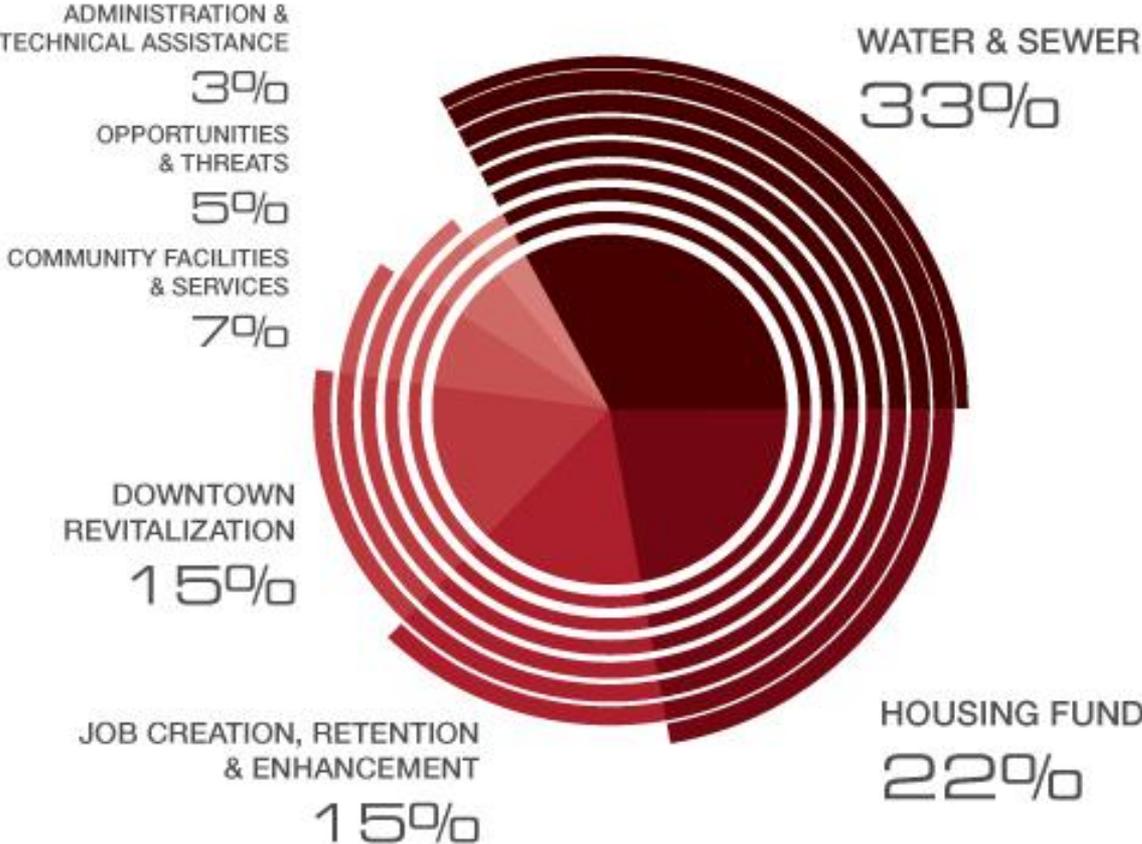
Result of the Nixon Administration pushing the consolidation of seven previous programs into one program.

# Community Development Block Grant

- » Main goal is to “develop viable communities by providing decent housing and suitable living environments and expanding economic opportunities, principally for persons of low- and moderate-income.”
- » Funded through the U.S. Department of Housing and Urban Development (HUD)
- » State’s program only for non-entitlement communities (cities under 50,000 population and counties)
- » 2015 Iowa Allocation = \$21.4 mil.
- » National Objectives
  - Low- and Moderate-Income Benefit (70% of total funding)
  - Slum and Blight Elimination – used to justify DTR Program
  - Urgent Need

# 2015 Allocation Chart

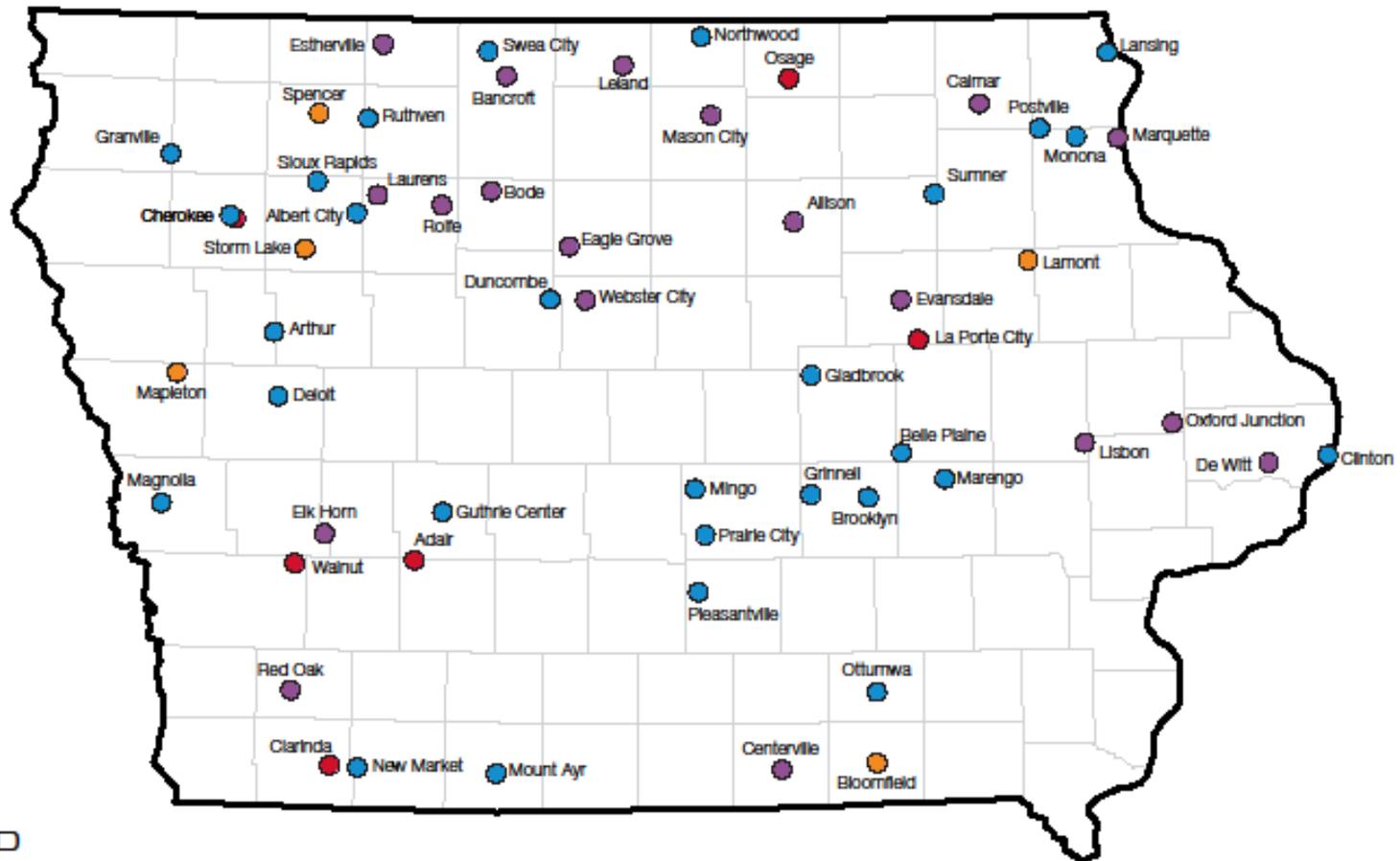
## PROPOSED ALLOCATION OF CDBG FUNDS



# State of Iowa Active CDBG Components

- » Economic Development – EDSA & PFSA
- » Public Infrastructure – Water & Sewer
- » Housing Sustainability – HSG
- » Community Facilities
- » Section 108 Guaranteed Loan Program (New)
- » Workforce Training - Career Link
- » Imminent Threat – true emergencies relating to health and safety
- » Downtown Revitalization – DTR
- » *Note: Iowa's CDBG components typical to many other states but several do not have a DTR type of component.*

# 2015 CDBG AWARDS



## LEGEND

- Water/Sewer
- Housing
- Downtown Revitalization
- Community Facilities

# CDBG Funding Status

- » Iowa's CDBG allocation has declined by over \$7 million since 2010
  - 2015- \$21.4 million
  - 2010 - \$28.51 million
  - Relatively stable in last few years but future allocations always uncertain
- » Congress has approved 2015 funding for CDBG Program
- » Allocation Agreement expected by late summer
- » Awards remain conditional until notified in writing. Can proceed with environmental and engineering work.
- » *TIMELY EXPENDITURE OF FUNDS MORE CRITICAL THAN EVER*

# Water & Sewer Program

» **2015 set-aside: circa \$ 7.1 mil.**

» **Fund Ceilings**

- 0-999 population                      \$300,000      (max. of \$1,000 per person)
- 1,000-2,499                              \$500,000
- 2,500-14,999                              \$600,000
- 15,000-49,999                              \$800,000

» **Eligible Activities**

- Water and wastewater treatment facilities
  - Expansion, rehabilitation, new construction
- Water and wastewater collection systems
  - Rehabilitation, new construction
- Water storage
- Wells
- Storm water/sanitary sewer separation

» **National Objective**

- LMI – Area Benefit



# Housing

- » **2015 set-aside: circa \$ 4.7 mil.**
- » **Single-family, owner-occupied structure rehabilitation only**
- » **Per Unit Limit = \$37,500**
  - \$24,999 hard rehabilitation costs
  - \$4,500 technical services
- » **National Objective**
  - LMI – Direct Benefit



# Community Facilities and Services Fund

» **2015 set-aside: circa \$ 1.5 mil.**

» **Fund Ceilings**

• 0-999 population	\$300,000	(max. of \$1,000 per person)
• 1,000-2,499	\$500,000	
• 2,500-14,999	\$600,000	
• 15,000-49,999	\$800,000	

» **Eligible Activities**

- Child Care Centers
- Facilities for Physically and Mentally Challenged
- Senior Centers
- Homeless Shelters
- Storm water & Drainage

» **National Objective**

- LMI - Area Benefit or serving Limited Clientele



# Job Creation, Retention and Enhancement

- » **2015 set aside: circa \$ 3.2 mil.**
- » Economic Development activities to create and maintain jobs for LMI individuals.
- » Iowa Economic Development Authority bundles multiple business finance programs to incentivize economic development including CDBG Economic Development Set Aside (EDSA) & Public Facilities Set Aside (PFSA).
- » On-going Application Receipt and Review
- » National Objective
  - LMI
  - As LMI jobs are created they are documented and reported for a defined period of time.



# Section 108

## » Guaranteed Low Interest Loan Fund

- **Set Aside: Up to \$40 mil in funds over next five years**
- Applications open about October 1, 2015

## » Eligible Activities / Program Objectives:



- Relatively large dollar and large impact projects aimed at economic development through a business location or expansion and job creation or legitimate retention
- Large scale and comprehensive adaptive reuse or conversion of vacant or underutilized buildings for residential purposes
- Consolidated rehabilitation of groups of upper story residential units in a single market encouraging mixed use development
- Availability of affordable single family housing units and/or remediation of blighted, vacant single family housing units.

## » National Objective

- LMI Direct Benefit or Elimination of Slum and Blight



## » Job Training Program

- No actual annual allocation set aside
- Rarely utilized but available
- Industry-driven training program that invests in projects that assist the underemployed and working poor to obtain the training and skills they need to move into available higher-skill, higher wage jobs
- Training often provided through a community college
- Specific private industry job openings must be identified in the application
- Program is presently being expanded to include funding for the transportation of workers to job sites
- No set maximum but is based on “reasonable” cost per person trained
- Competitive apps. will have 25% cash match; 15% in-kind
- National Objective – LMI Jobs

# Opportunities & Threats

## » 2015 Set Aside: circa \$ 1.07 mil

- CDBG reserves some funds to assist communities that are facing an imminent threat to public health, safety or welfare that requires immediate assistance or those cities or counties that see an opportunity to demonstrate sustainable community activities.
- An immediate threat must exist to health, safety or community welfare that requires immediate action
- The project must be eligible under the CDBG program
- For Sustainable Community Activities, the project must be consistent with sustainability and smart growth principles, and
- The project provides a beneficial impact on the standard of living and quality of life
- National Objective: **Urgent Need (typically)**



# Iowa's Downtown Revitalization Program

- » **2015 Set Aside: circa \$ 3.2 mil.**
- » Competitive Applications Support and Demonstrate:
  - Innovation (project, funding partners, policies)
  - Broad downtown district impact within downtown plan
  - Significant impact on select, blighted downtown structure(s)
  - Sustainable community principles (Iowa Green Streets)
  - Sustainable long-term revitalization
  - Historic Preservation
- » **National Objective**
  - » **Elimination of Slum & Blight**



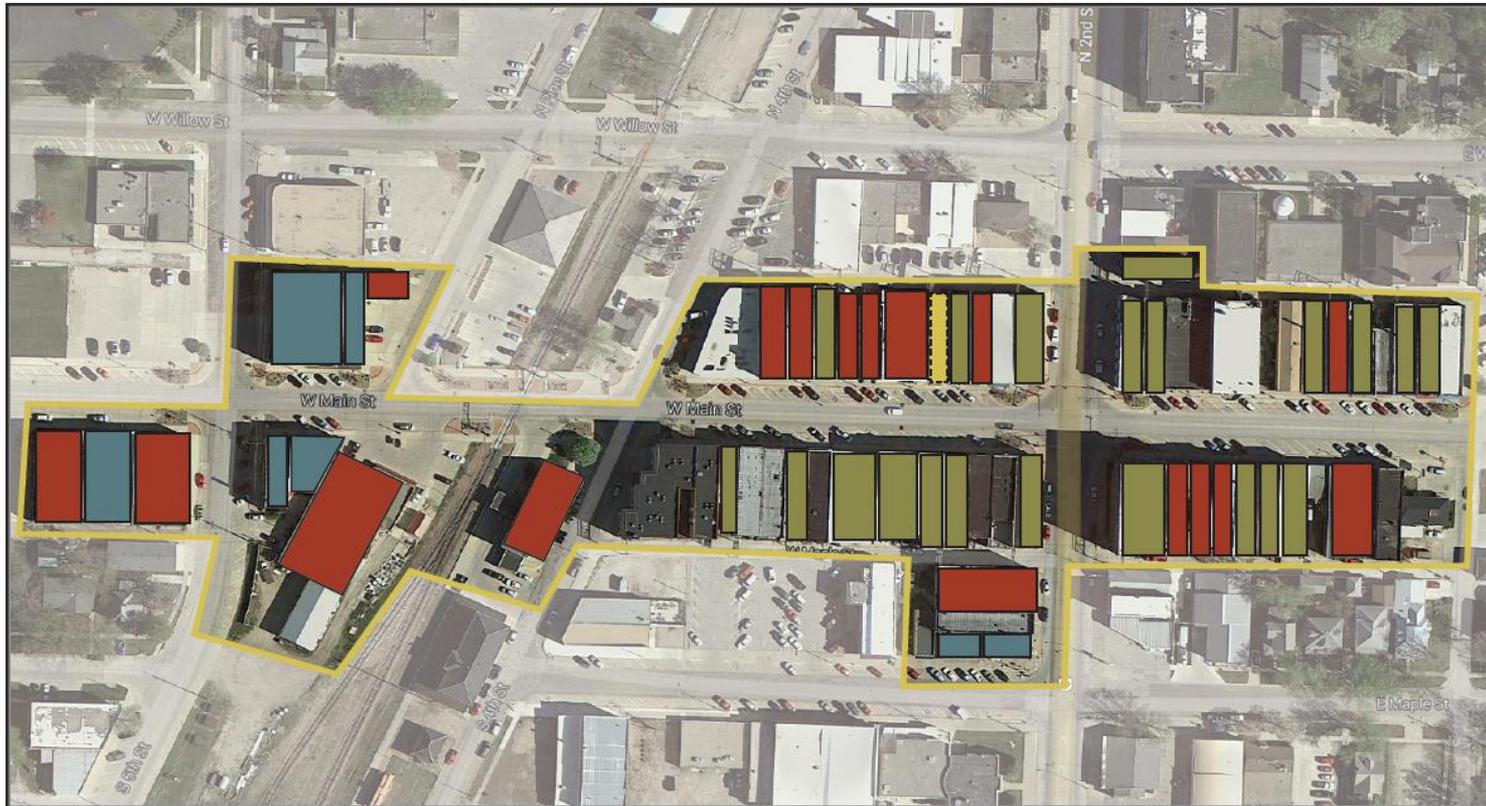
# SLUM & BLIGHT INVENTORY

# Slum and Blight Inventory Form

## » **Slum and Blight Inventory Form:**

- Used to document the existing conditions of buildings in a defined area
- All buildings are determined to be in Excellent, Good, Fair or Poor condition based on documented existing conditions
- A defined area must have at least 25% of the buildings defined as Fair or Poor to be considered Blighted – by HUD definition
- Only community target areas that meet the definition of blighted are eligible to be awarded CDBG DTR funds, and only buildings identified as Fair or Poor condition are eligible to be participating properties
- Slum and Blight forms are used to make these determinations and act as back-up documentation for HUD eligibility
- Photographs and narrative descriptions are required for this documentation

# Target Area Map



## CHEROKEE - MAP LEGEND

-  - BUILDING DEMOLITION/FUTURE GREEN POCKET PARK
-  - BUILDINGS 1<sup>ST</sup> PHASE
-  - BUILDINGS 2<sup>ND</sup> PHASE
-  - BUILDINGS RATED GOOD OR EXCELLENT
-  - TARGET AREA BOUNDARY



# Revised Inventory Form

## » Changes Made Going Forward:

- Instructions amended in term's of types and number of photos to be added and by inserting clear wording indicating the requirement that buildings chosen for project participation must demonstrate deteriorating conditions
- Exclusion of any 'windshield' survey data
- Mandatory inclusion of physical deterioration detail
- Deletion of items asking for zoning and land use; vacancy; assessed valuation, roofing and signage
- Expansion of component category descriptions
- Change in layout of building conditions section to provide more space
- Establishing more tie-in between slum & blight forms and final design
- Entire form to now be filled out electronically, by address, directly onto lowagrants
- **For new applications OR new buildings added to existing programs**

# Slum and Blight Inventory Forms (Cont.)

## » 2016 Forms that do any of the following...

- Have an insufficient number or quality of pictures of buildings
- Do not complete a rating for the property components
- Do not provide adequate descriptions of deteriorating conditions
- Classify buildings in Fair or Poor condition without visual justification
- Propose minor or purely cosmetic improvements for buildings that do not address primary blighting factors
- Classify buildings in Good condition that are then proposed as CDBG funded projects
- Do not demonstrate that the project meets a CDBG National Objective

.....**WILL NOT BE COMPETITIVE**

# Revised Inventory Form (Cont.)

## Slum and Blight Inventory Form: Complete one per building in the targeted area

Building Address(es): \_\_\_\_\_

Business/Occupants Name (if applicable): \_\_\_\_\_

Main material of building (i.e. brick, stucco, wood, etc.): \_\_\_\_\_

Number of stories: \_\_\_\_\_

Use(s) on first floor: \_\_\_\_\_

Year Building Built: \_\_\_\_\_

Is this property contributing to slum and blight, in fair or poor condition, as documented on this form? YES NO

Is this property being proposed for improvements with CDBG funds YES NO

(\*Note: Only those properties determined to be in fair or poor condition are eligible to receive CDBG DTR funds.)

Upload Photograph of Primary Façade (be sure to include the entire height and width of the building:

Upload Photograph of Side of Building (if applicable)

Upload Photograph of Rear of Building (if applicable)

# Revised Inventory Form (Cont.)

<b>Building Component:</b>	<b>Description of existing condition:</b> (Include in this section if the condition is fair or poor)	<b>Rank in order of worst to best</b> (1= worst, 6=best)	<b>Photo</b> Upload photographs as they are relevant to the building being surveyed. Include close-up detail of any deteriorating conditions and areas targeted for improvements with CDBG funds.
Storefront			Upload photograph of storefront
Doors and Entry Ways			Upload photograph of doors/entry ways
Windows : (above first floor)			Upload photograph of windows (above first floor)
Exterior Walls & Surfaces			Upload photograph(s) of exterior walls and surfaces
Porch/stairs/deck/ramp			Upload photograph of any porch, stair, deck or ramp
Foundation			Upload photograph of foundation

# Good Written Description Examples

## » Exterior Walls & Surfaces

- Brick work, primarily on second story, showing discoloration, face deterioration and missing or crumbling mortar. Some bricks appear to be loosening and out of alignment. Others are cracked, chipped, or pitted and much of paint cover has worn off. A degree of bowing has been noted on the exterior wall of the first floor. Lintel appears to be sagging and beginning to lose structural integrity. Cornice in need of cleaning and restoration of NE end decorative elements.

## » Windows

- A total of four windows on second floor are missing and openings have been filled in with plywood that is beginning to rot. Two other windows are clearly not operational. Upper sash on one second floor window is cracked. All window frames showing signs of rot. First floor windows showing moisture damage; need to be resealed – caulking and weather stripping. Transom windows covered with metal panel that exhibits significant rust.

# Incomplete Written Description Examples

## » Exterior Walls & Surfaces

- Brick in bad shape all over building. Lots of tuck-pointing called for.
- Looks like there has been some water damage.
- Wall could use repainting.

## » Windows

- Several windows either broken, missing or probably can't be opened.
- Some windows may not be weather tight.
- Window frames need work.

## » Doors & Entry Ways

- Front door is in bad condition.
- Recessed entrance way looks old and dirty.
- Signage dated.

# Building Inventory Form on lowagrants

- » Significantly revised from current form
- » Drop down items have been inserted when possible
- » Intention is to have all information associated with each individual property in one place rather than scattered
- » End result will be better organization, less confusion and easier reference for both reviewers and administrators
- » Forms no longer paper copied into PDF documents but are now to be typed into directly on lowagrants
- » Please make sure that addresses and, to the greatest extent possible, cost figures are uniform throughout the whole application

# Building Inventory Form on lowagrants

- » **List of required uploads with completed form:**
  - Color photos of primary façade(s)
  - Photos of storefront, windows, doors/entryways, porch/deck/ramp, foundation, other
- » **List of other related uploads associated with each property:**
  - Scope of work
  - Itemized cost estimates
  - Architect's renderings
  - Owner commitment letters

# Inventory Form: lowagrants (Screenshots)

***UNDER CONSTRUCTION;  
SLIDES TO BE HANDED OUT AT WORKSHOP***

# National Objective - Elimination of Slum & Blight

- » Is the only way in which DTR projects qualify for CDBG funds, (not LMI benefit or an urgent need)
- » Slum & blight need must be documented in the application AND such need must be substantially addressed by the project activities
- » More specifically, whatever was shown on the slum and blight inventory forms or in accompanying photographs to claim fair or poor condition for project buildings must be a priority of the work
- » Addressing these items first may not be what the property owner necessarily wants and may not be what the architect would like to see but HUD requires it and, therefore, so must IEDA
- » Before and after photos should be used to show the elimination of blighted conditions

# National Objective - Elimination of Slum & Blight

- » Covering up or hiding blighting conditions is not addressing them
- » Deterioration/neglect/damage etc. must be directly remedied
- » A building determined to be historic must address blight in conformance with the Secretary of the Interior Rehabilitation Standards for historic properties
- » It is important to realize that focusing on blighted conditions may not result in the most aesthetically pleasing end result.
- » However:
  - Aesthetics is not the charge or direct concern of the CDBG program
  - The best projects, and those we always hope for, are those that eliminate blight and, at the same time, make a marked impact on the visual appearance of the downtown
  - The two goals are not mutually exclusive; in fact, they can be complimentary

# Good S & B Evidence Photos (1)



Front Detail

Deteriorated Stone & Open Joints:



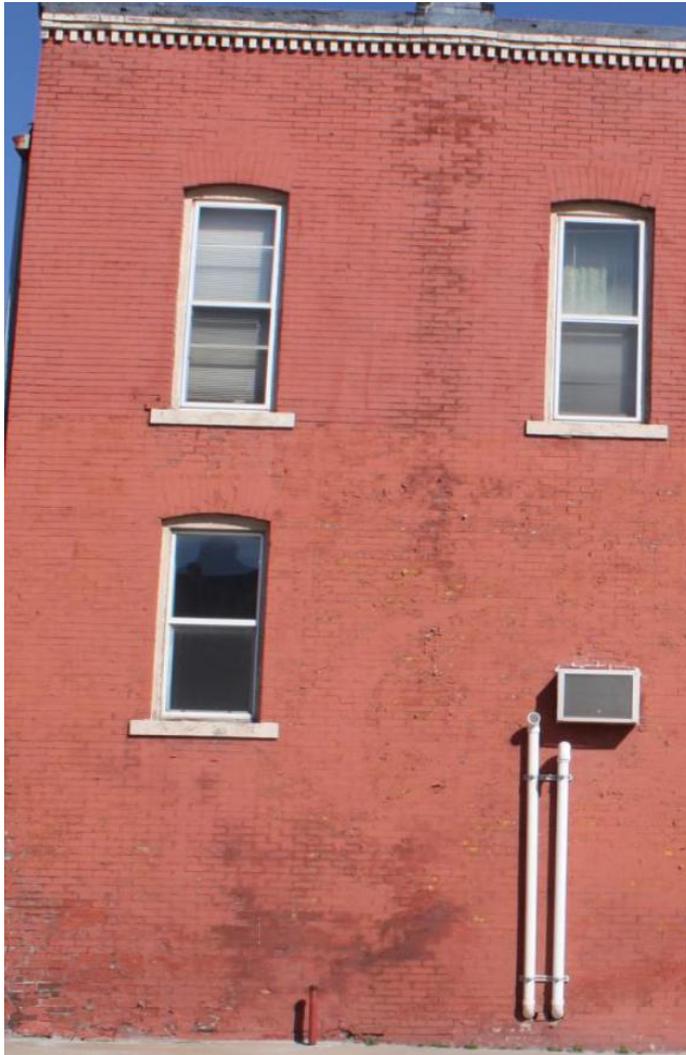
# Good S & B Evidence Photos (2)



# Good S & B Evidence Photos (3)



# Good S & B Evidence Photos (4)

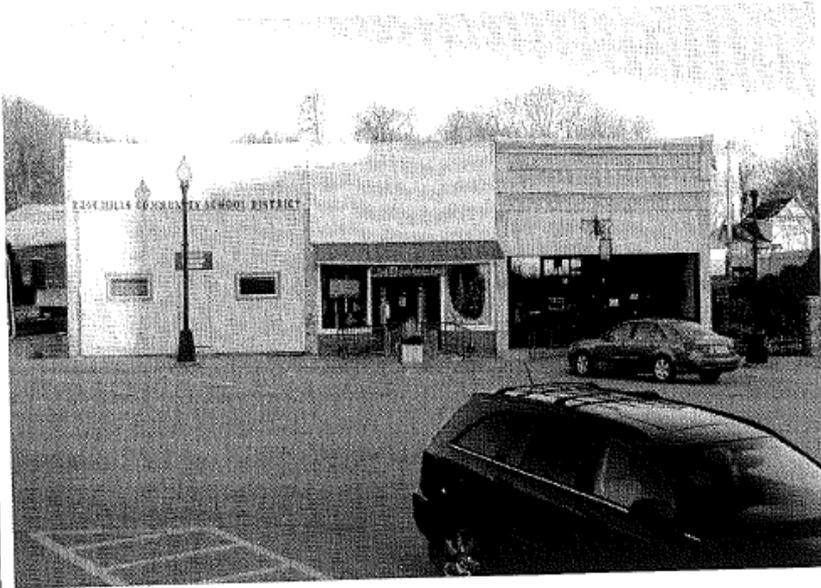


# Inadequate S & B Evidence Photos (1)



# Inadequate S & B Evidence Photos (2)

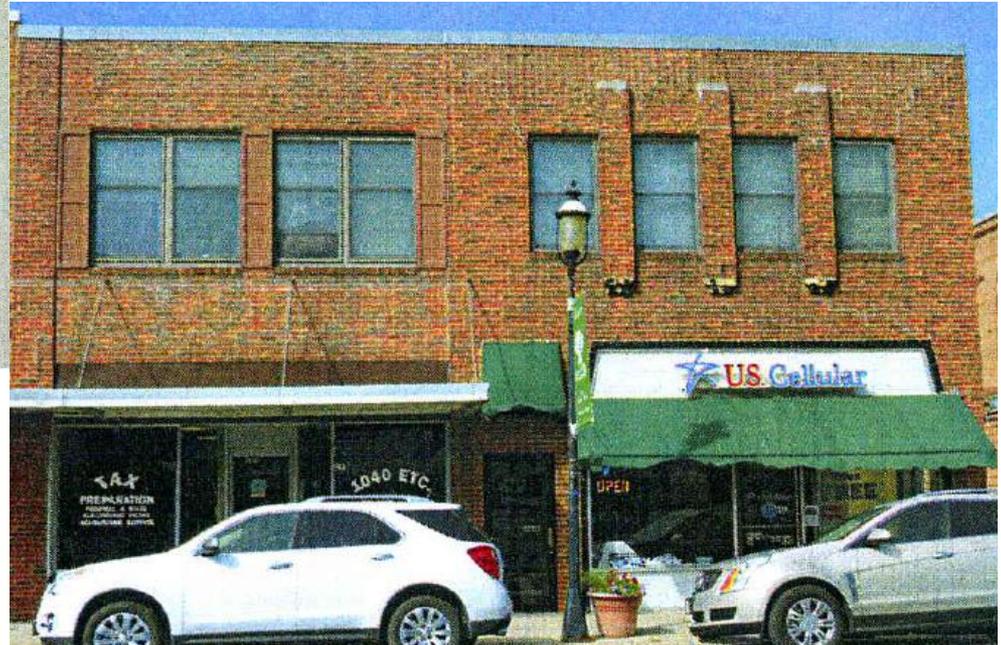
Middle façade in picture



# Inadequate S & B Evidence Photos (3)



# Inadequate S & B Evidence Photos (4)



# Photograph Differences

## » **Good**

- Primarily taken from close up (sidewalk)
- Focused on blighting condition
- Taken in favorable lighting and full color
- Illustrates just enough to show proper perspective

## » **Inadequate**

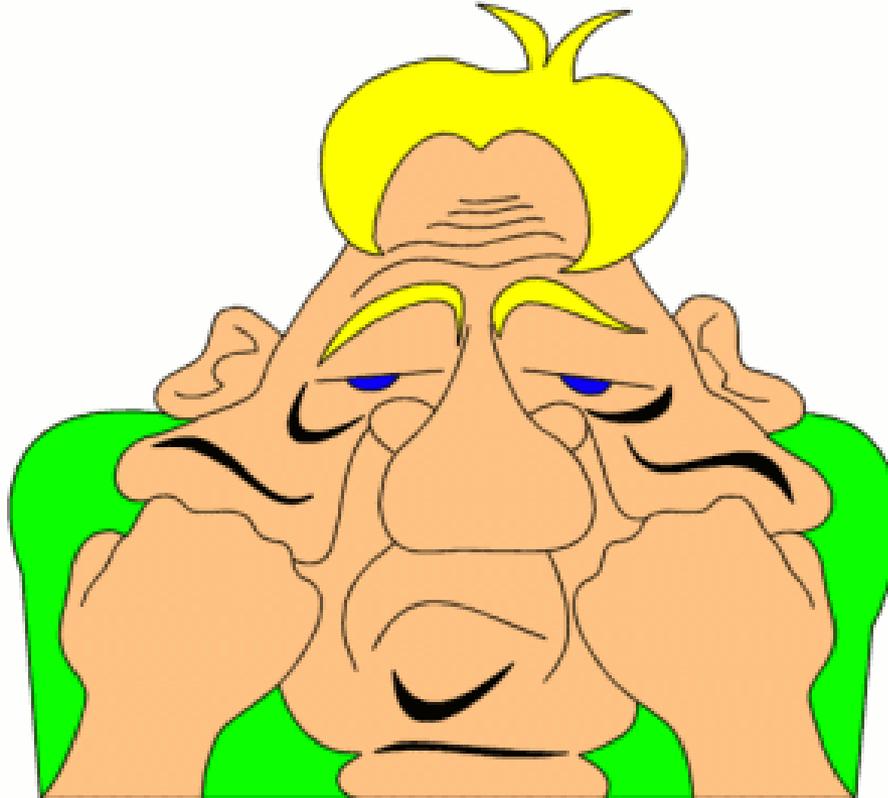
- Taken from too far away
- Photographs too dark, un-descriptive
- General view of buildings rather than focused on blight
- Taken in black & white or of several buildings in one photo

**QUESTIONS ?**

**BORED?**

**TIRED?**

**HUNGRY?**



# FINALIZING DESIGNS

# Design Considerations & Section 106



## Section 106 Process

Section 106 is part of the environmental review process that any HUD funded project must complete. This process ensures that federal undertakings do not harm historical resources.

### Four Point Approach:

#### 1. Initiate the Section 106 Review Process

Ask "Do I have the type of project that has the potential to affect historic resources (changes to existing buildings, ground disturbance, etc.)?" If yes, proceed to Step 2.

#### 2. Identification and Evaluation of Historic Properties

Identify your Area of Potential Effects (APE).

Do this by drawing a border around the entire area that will be affected by the project (both federal funds and other funds). This border should include resources that will be directly affected (modified by construction) and indirectly affected (within the view shed of the project).

Check to see if there are resources (buildings, districts, objects, structures and sites), within the APE that are over 50 years old or are listed in or eligible for listing in the National Register of Historic Places (NRHP).

Do this by checking the NRHP database at the National Park Service website or checking the State of Iowa inventory of historic sites by contacting the inventory coordinator Berry Bennett at 515-281-8742 or [berry.bennett@iowa.gov](mailto:berry.bennett@iowa.gov)

For any properties over 50 years old that have never been evaluated or were evaluated more than 5 years from the date of the project, the CDBG Responsible Entity must determine if they are eligible for listing in the NRHP by completing an Iowa Site Inventory Form (see guidance at <http://www.iowahistory.org/historic-preservation/statewide-inventory-and-collections/iowa-site-inventory-form.html>). The specific criteria of listing in the NRHP must be used to make this determination.

#### 3. Assessing Effects

Once you have evaluated the resources, look at the proposed project to determine if your project will result in either:

- No Historic Properties Affected
- No Adverse Effect to Historic Properties
- Adverse Effect to Historic Properties

Consult with the State Historic Preservation Office and provide sufficient documentation to support your finding.

#### 4. Resolving Adverse Effects

If your project will result in an adverse effect that cannot be avoided, work closely with the SHPO, IEDA, the public and all interested parties to resolve Adverse Effects through the development of a Memorandum of Agreement (MOA). Typically IEDA strives to ensure that projects are planned and designed to avoid adverse effects.

Contact:  
Ann Schmid  
Iowa Economic Development Authority  
Historic Preservation Specialist  
515.725.3078  
[ann.schmid@iowa.gov](mailto:ann.schmid@iowa.gov)

Updated 8/14/2014

### Section 106 for CDBG Downtown Revitalization Program

1. A community chooses to apply to Iowa Economic Development Authority (IEDA) for a Community Development Block Grant (CDBG) for Downtown Revitalization such as facade improvements. By electing to apply to this program, the community becomes the Responsible Entity (RE) for compliance with federal regulations, and therefore takes on the responsibility of completing the Section 106 Process. From the moment a community applies to IEDA, the Section 106 Process, along with other federal regulations, apply to the project.

2. IEDA reviews applications and makes awards based on the specified grant criteria and available federal funds.

3. Once awarded, the RE identifies the Area of Potential Effects (APE) for the project and checks to see if resources within the APE are eligible for listing in the National Register of Historic Places (NRHP). **At this time it is also a good idea to set up a meeting with IEDA and SHPO staff to discuss the project.**

- If all resources are listed in the NRHP the RE can proceed to step 4.
- If all resources are not listed in the NRHP but have been evaluated by a qualified historic preservation professional within the past 5 years the RE can proceed to step 4.
- Any resources that are not listed in the NRHP and have not been recently evaluated for listing in the NRHP, the RE working with their architect or their qualified historic preservation consultant must determine if the resource(s) is eligible for listing in the NRHP by completing an Iowa Site Inventory Form (See Step 2. on reverse side).

4. The RE must contract with a qualified architect to develop the design plans for the DTR project. As most DTR projects affect buildings that are typically over 50-years old and often determined eligible for listing in the NRHP, the architect should be experienced in working with historic properties and should be very familiar with the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties. The architect should develop facade designs to satisfy the requirements of the grant, meet the goals of the original application and ensure that the SOI Standards are applied to properties listed in or determined eligible for listing in the NRHP. These standards must be followed for historic properties to ensure that no DTR project results in a finding of "Adverse Effects." All DTR projects should result in a finding of either "No Historic Properties Affected" or "No Adverse Effect to Historic Properties"

5. During the architect's plan development, the RE should work with property owners to ensure that all work, both facade improvements and any other improvements planned during the facade project are included in the Section 106 review.

6. Once the architect's plans and a full scope of work are specified for each property participating in the DTR grant the RE (or their Grant Administrator) will initiate consultation with the State Historic Preservation Office (SHPO). Consultation shall include:

- A cover letter for the overall project stating the number of buildings participating and a brief description of the resources and the area of potential effects. This cover letter may also include general project plans and specifications that apply to all properties in the project.
- A cover letter for each individual property participating in the project with a brief description of that resource and a brief description of the proposed work for that building
- A "Request for SHPO Comment on a HUD Project" for each specific property
- An Iowa Site Inventory Form for each specific property including current condition photographs, maps and any historic images available
- Architects plans, specifications and renderings for each specific property

\* IEDA highly encourages the RE to contact the CDBG historic preservation specialist before submitting to SHPO.

7. The SHPO has 30-days to review each submittal. Assuming the properties were designed in accordance with the SOI standards as applicable, the buildings were correctly evaluated for NRHP eligibility and sufficient documentation was provided to the SHPO, the RE should anticipate SHPO concurrence within 30-days. If the submittal was insufficient, additional reviews may be required until SHPO concurs with the proposed project. Upon SHPO concurrence the Section 106 process is concluded. **NOTE: Any changes in scope of work or discoveries made during construction that change the project would require reopening consultation with the SHPO.**

# National Historic Preservation Act, 1966

- » State Historic Preservation Offices
- » Tribal Historic Preservation Offices
- » Advisory Council on Historic Preservation
- » National Register of Historic Places
- » National Historic Landmarks
- » Certification of Local Governments
- » Section 106 of the National Historic Preservation Act and Title 36 CFR Part 800

“The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, **prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register.**”

# Section 106 Process

## » Four Point Approach

- » 1. Initiate Section 106 Review Process
  - Identify projects that have the potential to affect cultural resources
- » 2. Identification and Evaluation of Historic Properties
  - Identify the Area of Potential Effects (APE) including sites within, adjacent to and directly or indirectly related to the undertaking which may be affected by the project
  - Evaluate resources within the APE that are listed on or eligible for listing on the National Register of Historic Places (NRHP)
- » 3. Assessing Effects
  - Consult with the State Historic Preservation Office (SHPO), interested and consulting parties and the public
- » 4. Resolve Adverse Effects
  - Memorandum of Agreement, which outlines agreed upon measures that IEDA will take to avoid, minimize or mitigate the adverse effect resulting from the undertaking

# Section 106 Process

## » 1. Initiate Section 106 Review Process

- » Is this the type of project that has the potential to effect cultural resources?
  - Construction activities on a building more than 50 years old, activities that include ground disturbance, activities within the visual view shed of buildings, sites, districts or objects that are more than 50 years old, etc. – YES
  - Planning activities with no construction components – NO
  - Activities outlined as Categorically Excluded **not** Subject to 58.5 - NO
  
- » Using a Programmatic Agreement that is in place between the RE or IEDA and the SHPO to expedite or streamline the Section 106 Process?
  - Your project may fall under an “Allowance” or “Exempt Activity” meaning you don’t have to consult with the SHPO on a project that without a PA in place you would otherwise have to. **Please note that PA’s must be current, up to date and can not be used by any other agency than that specified in the agreement.**

# Section 106 Process

- » 2. Identification and Evaluation of Historic Properties
- » What is a Historic Property?
  - Resources that are listed on or eligible for listing on the National Register of Historic Places (NRHP) including:
    - Buildings, Districts, Structures, Objects, Sites (including archaeological sites)
- » How do we identify historic properties?
  - Check the National Register of Historic Places Database:  
<http://nrhp.focus.nps.gov/natreghome.do?searchtype+natreghome>
  - Check the State of Iowa Inventory by contacting the inventory coordinator Berry Bennett at 515.281.8742 or [berry.bennett@iowa.gov](mailto:berry.bennett@iowa.gov) or Don Hirt 515.281.7803 or [Don.Hirt@iowa.gov](mailto:Don.Hirt@iowa.gov)
  - I Sites Public: <http://archaeology.uiowa.edu/i-sites>

# Section 106 Process

- » How do we evaluate previously unevaluated historic properties?
  - Apply the National Register Criteria for Evaluation to determine if the building is eligible for listing in the NRHP – note evaluation is not always limited to the exterior
    - **Age** – is the building over 50 years old or of exceptional significance?
    - **Criterion A** – is the resource associated with an event that made a significant contribution to our history?
    - **Criterion B** – is the resource associated with the lives of significant persons?
    - **Criterion C** – does the resource embody the distinctive characteristics of a significant type, period, style, or method of construction/architecture?
    - **Criterion D** – does the resource yield or is likely to yield important information about our nation's history or pre-historic times? (Archaeology)
  - Complete an Iowa Site Inventory Form to document your evaluation

# Section 106 Process

- » How do we evaluate previously unevaluated historic properties?
  - Provide existing condition photographs.
  - Describe in detail any changes or alterations made to the building over time.
  - Document any damage or deterioration that has occurred or is visible.
  - Include a good map of the property location.
  - Include any historic images or maps to help document the age of the structure and the integrity of the building.



# Section 106 Process

## » Completing an Iowa Site Inventory Form

**Site Inventory Form**  
 State Historical Society of Iowa  
 (November 2005)

State Inventory No. \_\_\_\_\_  New  Supplemental  
 Part of a district with known boundaries (enter inventory no.) \_\_\_\_\_  
 Relationship:  Contributing  Noncontributing  
 Contributes to a potential district with yet unknown boundaries  
 National Register Status: (any that apply)  Listed  De-listed  NHL  DOE  
 9-Digit SHPO Review & Compliance (R&C) Number \_\_\_\_\_  
 Non-Extant (enter year) \_\_\_\_\_

**1. Name of Property**

historic name \_\_\_\_\_  
 other names/site number \_\_\_\_\_

**2. Location**

street & number \_\_\_\_\_  
 city or town \_\_\_\_\_  vicinity, county \_\_\_\_\_  
 Legal Description: (If Rural) Township Name \_\_\_\_\_ Township No. \_\_\_\_\_ Range No. \_\_\_\_\_ Section \_\_\_\_\_ Quarter of Quarter \_\_\_\_\_  
 (If Urban) Subdivision \_\_\_\_\_ Block(s) \_\_\_\_\_ Lot(s) \_\_\_\_\_

**3. State/Federal Agency Certification [Skip this Section]**  
**4. National Park Service Certification [Skip this Section]**

**5. Classification**

Category of Property (Check only one box)

<input type="checkbox"/> building(s)	<b>Number of Resources within Property</b>	
<input type="checkbox"/> district	<i>If Non-Eligible Property</i>	<i>If Eligible Property, enter number of:</i>
<input type="checkbox"/> site	Enter number of:	Contributing Noncontributing
<input type="checkbox"/> structure	— buildings	— buildings
<input type="checkbox"/> object	— sites	— sites
	— structures	— structures
	— objects	— objects
	— Total	— Total

Name of related project report or multiple property study (Enter "NA" if the property is not part of a multiple property examination).  
 Title \_\_\_\_\_ Historical Architectural Data Base Number \_\_\_\_\_

**6. Function or Use**

Historic Functions (Enter categories from instructions) \_\_\_\_\_  
 Current Functions (Enter categories from instructions) \_\_\_\_\_

**7. Description**

Architectural Classification (Enter categories from instructions) \_\_\_\_\_  
 Materials (Enter categories from instructions)

foundation \_\_\_\_\_  
 walls (visible material) \_\_\_\_\_  
 roof \_\_\_\_\_  
 other \_\_\_\_\_

**Narrative Description** SEE CONTINUATION SHEETS, WHICH MUST BE COMPLETED)  
**8. Statement of Significance**

Appropriate National Register Criteria (Mark "X" representing your opinion of eligibility after applying relevant National Register criteria)	A	Property is associated with significant events.
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> More Research Recommended	B	Property is associated with the lives of significant persons.
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> More Research Recommended	C	Property has distinctive architectural characteristics.
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> More Research Recommended	D	Property yields significant information in archaeology or history.

County \_\_\_\_\_ Address \_\_\_\_\_ Site Number \_\_\_\_\_  
 City \_\_\_\_\_ District Number \_\_\_\_\_

**Criteria Considerations**

<input type="checkbox"/> A Owned by a religious institution or used for religious purposes.	<input type="checkbox"/> E A reconstructed building, object, or structure.
<input type="checkbox"/> B Removed from its original location.	<input type="checkbox"/> F A commemorative property.
<input type="checkbox"/> C A birthplace or grave.	<input type="checkbox"/> G Less than 50 years of age or achieved significance within the past 50 years.
<input type="checkbox"/> D A cemetery	

**Areas of Significance** (Enter categories from instructions) \_\_\_\_\_  
**Significant Dates**  
 Construction date \_\_\_\_\_  
 check if circa or estimated date  
 Other dates, including renovation \_\_\_\_\_

**Significant Person**  
 (Complete if National Register Criterion B is marked above) \_\_\_\_\_  
**Architect/Builder**  
 Architect \_\_\_\_\_  
 Builder \_\_\_\_\_

**Narrative Statement of Significance** SEE CONTINUATION SHEETS, WHICH MUST BE COMPLETED)

**9. Major Bibliographical References**  
 Bibliography  See continuation sheet for citations of the books, articles, and other sources used in preparing this form

**10. Geographic Data**

UTM References (OPTIONAL)

Zone	Easting	Northing	Zone	Easting	Northing
1	_____	_____	2	_____	_____
3	_____	_____	4	_____	_____

See continuation sheet for additional UTM references or comments

**11. Form Prepared By**

name/title \_\_\_\_\_ date \_\_\_\_\_  
 organization \_\_\_\_\_  
 street & number \_\_\_\_\_ telephone \_\_\_\_\_  
 city or town \_\_\_\_\_ state \_\_\_\_\_ zip code \_\_\_\_\_

**ADDITIONAL DOCUMENTATION** (Submit the following items with the completed form)  
**FOR ALL PROPERTIES**

- Map:** showing the property's location in a town/city or township.
- Site plan:** showing position of buildings and structures on the site in relation to public road(s).
- Photographs:** representative black and white photos. If the photos are taken as part of a survey for which the Society is to be curator of the negatives or color slides, a photo/catalog sheet needs to be included with the negatives/slides and the following needs to be provided below on this particular inventory site:

Roll/slide sheet # _____	Frame/slot # _____	Date Taken _____
Roll/slide sheet # _____	Frame/slot # _____	Date Taken _____
Roll/slide sheet # _____	Frame/slot # _____	Date Taken _____

- See continuation sheet or attached photo & slide catalog sheet for list of photo roll or slide entries.  
 Photos/illustrations without negatives are also in this site inventory file.

- FOR CERTAIN KINDS OF PROPERTIES, INCLUDE THE FOLLOWING AS WELL**
- Farmstead & District:** (List of structures and buildings, known or estimated year built, and contributing or noncontributing status)
  - Barn:**
    - A sketch of the frame/truss configuration in the form of drawing a typical middle bent of the barn.
    - A photograph of the loft showing the frame configuration along one side.
    - A sketch floor plan of the interior space arrangements along with the barn's exterior dimensions in feet.

**State Historic Preservation Office (SHPO) Use Only Below This Line**  
 Concur with above survey opinion on National Register eligibility:  Yes  No  More Research Recommended  
 This is a locally designated property or part of a locally designated district.

Comments: \_\_\_\_\_  
 Evaluated by (name/title): \_\_\_\_\_ Date: \_\_\_\_\_

# Section 106 Process

## » Completing an Iowa Site Inventory Form

Iowa Department of Cultural Affairs  
State Historical Society of Iowa  
**Iowa Site Inventory Form**  
**Continuation Sheet**

Site Number  
Related District Number

Page 1

Name of Property

County

Address

City

### 7. Description

Include a narrative description of the property describing the size and form of the resource, how many stories it is, what the exterior materials are, what the roof form is, distinct details or characterizes and visible changes or alterations made to the building. If the resource is located within a neighborhood or collection of similar resources, briefly describe the setting as well.

### 8. Statement of Significance

Describe why the property is or is not eligible for listing in the National Register of Historic Places. Make sure this section matches the boxes you filled out on page 1 of the form and explains your “yes” or “no” determination for each of the NRHP criteria. Talk about any integrity issues and make your definitive statement about NRHP eligibility.

Continuation Pages can also be used for:

- Current Photographs
- Historic Images
- Maps
- Floor Plans
- Renderings
- Drawings
- Archival materials such as newspaper articles, pamphlets, brochures, etc.

# Section 106 Process

## » Completing an Iowa Site Inventory Form

Iowa Department of Cultural Affairs  
State Historical Society of Iowa  
**Iowa Site Inventory Form  
Continuation Sheet**

Site Number  
Related District Number

Page 2

Name of Property	Scott
1310 Eastern Avenue	County
Address	Davenport
	City



Front of 1310 Eastern, facing west

Continuation Sheets can also be used for:

- Current Photographs
- Historic Images
- Maps
- Floor Plans
- Renderings
- Drawings
- Archival materials such as newspaper articles, pamphlets, brochures, etc.



# Section 106 Process

## » 2. Identification and Evaluation of Historic Properties

Emmetsburg Commercial Historic District Map



- Contributes to the Emmetsburg Downtown Historic District
- Within the Boundaries of the Emmetsburg Downtown Historic District but Non-Contributing
- Within the Boundaries of the Emmetsburg Downtown Historic District but Not Evaluated – Need More Information
- Demolished in 2012

City of Conrad



- APE
- Potential Historic District
- Contributing
- Non-contributing

# Section 106 Process

## » 2. Identification and Evaluation of Historic Properties



# Section 106 Process

## » 3. Assessing Effects

» How will my project effect Cultural Resources:

» No Potential To Cause Effects – No SHPO Consultation Required

» No Historic Properties Effected – Consult with SHPO

» No Adverse Effect to Historic Properties – Consult with SHPO

» Adverse Effect to Historic Properties – Consult with SHPO

» Consult with SHPO and other consulting parties after selecting a Finding

# Section 106 Process

- » When should I consult with the State Historic Preservation Office (SHPO)?
  - » When you know the full scope of work for the project, including project plans, specifications, access areas, borrow sites, utilities, etc.
  - » After you've defined your Area of Potential Effects (APE)
  - » When you've completed your identification and evaluation of cultural resources within your APE
  - » When you've determined your effects assessment
  - » Approximately 3 months prior to an estimated construction start date, or earlier

# Section 106 Process

- » Preparing a comprehensive SHPO Submittal
  - » Cover letter from the RE (City or Grant Administrator) to SHPO requesting review and comment on a CDBG funded undertaking
  - » *Request for SHPO Comment on a HUD Project* form – with a finding selected and an authorized signature
  - » Inventory Form for the individual building or district including current condition photographs and any available historic images. Even if the building or district is listed on the NRHP, current condition photographs are required with submittal. Or if new construction, archaeological figures to show previous use of the land and the potential for the site to contain archaeological resources.
  - » Print out of the assessor's webpage for the property/parcel.
  - » Architects renderings including as much detail is possible in order to convey that the proposed project meets SOI standards, or will not result in an Adverse Effect to any Historic Properties

# Consultation

- » Consultation should be an open process, where both the RE and the SHPO can discuss options, make suggestions and ultimately agree on a finding.
- » The SHPO may be able to provide technical assistance or conditions related to a specific project, such as conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties or review of Archaeological Survey work.
- » Consultation with the SHPO does not replace the potential need to consult with federally recognized Native American Tribes and Tribal Preservation Officers. Use the CDBG Management Guide and HUD database for the consultation process and Federal Tribal contacts. Note consultation with the Tribe MUST be on City letterhead from the Chief Elected Official.
- » CDBG projects are often designed to avoid adverse effects, however when such effects can't be avoided, IEDA works with the RE and SHPO to resolve issues.

# Section 106 Process

## » 4. Resolving Adverse Effects

- » An Adverse Effect is caused when “An undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register.” (36CFR800.5)
- » Memorandum of Agreement outlines measures that IEDA and the RE will take to avoid, minimize or mitigate the adverse effect resulting from the undertaking, developed in consultation with the SHPO, interested parties and the public.
  - » Consult with the SHPO on a finding of “Adverse Effects” (30 days)
  - » SHPO concurs with finding of “Adverse Effects”
  - » Notify the Advisory Council on Historic Preservation of the Adverse Effects and invite them to participate in resolution (15 days)
  - » Notify the public and interested parties of the Adverse Effect and solicit ideas for ways to avoid, minimize and mitigate the effects
  - » Through consultation with the SHPO and all identified interested parties select mitigation measures that are commensurate with the adverse effect
  - » Draft the MOA to outline those mitigation measures and the roles and responsibilities of who will implement them
  - » Distribute the draft MOA to all signatories and invited signatories for review and comment
  - » Once agreed upon, execute MOA
  - » Complete all stipulations of the MOA

# 10 Minute Break?



# Design Considerations & Section 106



## Section 106 Process

Section 106 is part of the environmental review process that any HUD funded project must complete. This process ensures that federal undertakings do not harm historical resources.

### Four Point Approach:

#### 1. Initiate the Section 106 Review Process

Ask "Do I have the type of project that has the potential to affect historic resources (changes to existing buildings, ground disturbance, etc.)?" If yes, proceed to Step 2.

#### 2. Identification and Evaluation of Historic Properties

Identify your Area of Potential Effects (APE).

Do this by drawing a border around the entire area that will be affected by the project (both federal funds and other funds). This border should include resources that will be directly affected (modified by construction) and indirectly affected (within the view shed of the project).

Check to see if there are resources (buildings, districts, objects, structures and sites), within the APE that are over 50 years old or are listed in or eligible for listing in the National Register of Historic Places (NRHP).

Do this by checking the NRHP database at the National Park Service website or checking the State of Iowa inventory of historic sites by contacting the inventory coordinator Berry Bennett at 515-281-8742 or [berry.bennett@iowa.gov](mailto:berry.bennett@iowa.gov)

For any properties over 50 years old that have never been evaluated or were evaluated more than 5 years from the date of the project, the CDBG Responsible Entity must determine if they are eligible for listing in the NRHP by completing an Iowa Site Inventory Form (see guidance at <http://www.iowahistory.org/historic-preservation/statewide-inventory-and-collections/iowa-site-inventory-form.html>). The specific criteria of listing in the NRHP must be used to make this determination.

#### 3. Assessing Effects

Once you have evaluated the resources, look at the proposed project to determine if your project will result in either:

- No Historic Properties Affected
- No Adverse Effect to Historic Properties
- Adverse Effect to Historic Properties

Consult with the State Historic Preservation Office and provide sufficient documentation to support your finding.

#### 4. Resolving Adverse Effects

If your project will result in an adverse effect that cannot be avoided, work closely with the SHPO, IEDA, the public and all interested parties to resolve Adverse Effects through the development of a Memorandum of Agreement (MOA). Typically IEDA strives to ensure that projects are planned and designed to avoid adverse effects.

Contact:  
Ann Schmid  
Iowa Economic Development Authority  
Historic Preservation Specialist  
515.725.3078  
[ann.schmid@iowa.gov](mailto:ann.schmid@iowa.gov)

Updated 8/14/2014

### Section 106 for CDBG Downtown Revitalization Program

1. A community chooses to apply to Iowa Economic Development Authority (IEDA) for a Community Development Block Grant (CDBG) for Downtown Revitalization such as facade improvements. By electing to apply to this program, the community becomes the Responsible Entity (RE) for compliance with federal regulations, and therefore takes on the responsibility of completing the Section 106 Process. From the moment a community applies to IEDA, the Section 106 Process, along with other federal regulations, apply to the project.

2. IEDA reviews applications and makes awards based on the specified grant criteria and available federal funds.

3. Once awarded, the RE identifies the Area of Potential Effects (APE) for the project and checks to see if resources within the APE are eligible for listing in the National Register of Historic Places (NRHP). **At this time it is also a good idea to set up a meeting with IEDA and SHPO staff to discuss the project.**

- If all resources are listed in the NRHP the RE can proceed to step 4.
- If all resources are not listed in the NRHP but have been evaluated by a qualified historic preservation professional within the past 5 years the RE can proceed to step 4.
- Any resources that are not listed in the NRHP and have not been recently evaluated for listing in the NRHP, the RE working with their architect or their qualified historic preservation consultant must determine if the resource(s) is eligible for listing in the NRHP by completing an Iowa Site Inventory Form (See Step 2. on reverse side).

4. The RE must contract with a qualified architect to develop the design plans for the DTR project. As most DTR projects affect buildings that are typically over 50-years old and often determined eligible for listing in the NRHP, the architect should be experienced in working with historic properties and should be very familiar with the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties. The architect should develop facade designs to satisfy the requirements of the grant, meet the goals of the original application and ensure that the SOI Standards are applied to properties listed in or determined eligible for listing in the NRHP. These standards must be followed for historic properties to ensure that no DTR project results in a finding of "Adverse Effects." All DTR projects should result in a finding of either "No Historic Properties Affected" or "No Adverse Effect to Historic Properties"

5. During the architect's plan development, the RE should work with property owners to ensure that all work, both facade improvements and any other improvements planned during the facade project are included in the Section 106 review.

6. Once the architect's plans and a full scope of work are specified for each property participating in the DTR grant the RE (or their Grant Administrator) will initiate consultation with the State Historic Preservation Office (SHPO). Consultation shall include:

- A cover letter for the overall project stating the number of buildings participating and a brief description of the resources and the area of potential effects. This cover letter may also include general project plans and specifications that apply to all properties in the project.
- A cover letter for each individual property participating in the project with a brief description of that resource and a brief description of the proposed work for that building
- A "Request for SHPO Comment on a HUD Project" for each specific property
- An Iowa Site Inventory Form for each specific property including current condition photographs, maps and any historic images available
- Architects plans, specifications and renderings for each specific property

\* IEDA highly encourages the RE to contact the CDBG historic preservation specialist before submitting to SHPO.

7. The SHPO has 30-days to review each submittal. Assuming the properties were designed in accordance with the SOI standards as applicable, the buildings were correctly evaluated for NRHP eligibility and sufficient documentation was provided to the SHPO, the RE should anticipate SHPO concurrence within 30-days. If the submittal was insufficient, additional reviews may be required until SHPO concurs with the proposed project. Upon SHPO concurrence the Section 106 process is concluded. **NOTE: Any changes in scope of work or discoveries made during construction that change the project would require reopening consultation with the SHPO.**

# Section 106 for CDBG DTR

## » Steps 1 & 2 of 7

1. A community chooses to apply to Iowa Economic Development Authority (IEDA) for a Community Development Block Grant (CDBG) for Downtown Revitalization such as facade improvements. By electing to apply to this program, the community becomes the Responsible Entity (RE) for compliance with federal regulations, and therefore takes on the responsibility of completing the Section 106 Process. From the moment a community applies to IEDA, the Section 106 Process, along with other federal regulations, apply to the project.
2. IEDA reviews applications and makes awards based on the specified grant criteria and available federal funds.

# Section 106 for CDBG DTR

## » Step 3 of 7

3. Once awarded, the RE identifies the Area of Potential Effects (APE) for the project and checks to see if resources within the APE are eligible for listing in the National Register of Historic Places (NRHP). **At this time it is also a good idea to set up a meeting with IEDA and SHPO staff to discuss the project.**

- If all resources are listed in the NRHP and have current (less than 5 years) Iowa Site Inventory Forms, the RE can proceed to step 4.
- If all resources are not listed in the NRHP but have been evaluated by a qualified historic preservation professional within the past 5 years and have completed Iowa Site Inventory Forms the RE can proceed to step 4.
- Any resources that are not listed in the NRHP and have not been recently evaluated for listing in the NRHP, and do not have current Iowa Site Inventory Forms, the RE working with their architect and/or their qualified historic preservation consultant must determine if the resources are eligible for listing in the NRHP by completing a survey and Iowa Site Inventory Forms.

# Section 106 for CDBG DTR

## » Step 3 of 7

### 3. Area of Potential Effects (APE) – Determining level of investigation

- If all resources are listed in the NRHP or have been recently evaluated and determined NRHP eligible, but there are no current Iowa Site Inventory Forms, the RE must produce either in house or by contracting with a qualified architectural historian current Iowa Site Inventory Forms for each of buildings participating in the façade project. These forms must provide a current written description of the building, current photographs and a statement of the character defining features of the building.
- If the APE is neither listed in the NRHP nor has it been recently evaluated for listing in the NRHP, the RE must ensure that a survey of the entire APE, including buildings not participating in the façade project, but may have contributed to the overall development of a potential historic district, is completed. This level of investigation falls in between a standard Reconnaissance Survey and an Intensive Level Survey, as the RE will also need to ensure that after the area survey is completed Iowa Site Inventory Forms for each building participating in the project are also completed.

Once the APE survey is completed – this needs to be submitted to the SHPO for concurrence on NRHP eligibility of the area before architects finalize designs. This adds an extra step and additional time to the process.

# Section 106 for CDBG DTR

Emmetsburg Commercial Historic District Map



- Contributes to the Emmetsburg Downtown Historic District
- Within the Boundaries of the Emmetsburg Downtown Historic District but Non-Contributing
- Within the Boundaries of the Emmetsburg Downtown Historic District but Not Evaluated – Need More Information
- Demolished in 2012

City of Conrad



- APE
- Potential Historic District
- Contributing
- Non-contributing

# Section 106 for CDBG DTR

## » Step 4 of 7

### 4. Design

The RE must contract with a qualified architect to develop the design plans for the DTR project. As most DTR projects affect buildings that are typically over 50-years old and often determined eligible for listing in the NRHP, the architect should be experienced in working with historic properties and should be very familiar with the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties. The architect should develop facade designs to satisfy the requirements of the grant, meet the goals of the original application and ensure that the SOI Standards are applied to properties listed in or determined eligible for listing in the NRHP. These standards must be followed for historic properties to ensure that no DTR project results in a finding of "Adverse Effects." All DTR projects should result in a finding of either "No Historic Properties Affected" or "No Adverse Effect to Historic Properties"

# Section 106 for CDBG DTR

## » Step 4 of 7

### 4. Design – Secretary of the Interior’s Standards for Rehabilitation

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. **The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. **Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.**
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. **Deteriorated historic features shall be repaired rather than replaced.** Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. **Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used.** The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.



# Section 106 for CDBG DTR

## » Step 4 of 7

### 4. Design – why it's important that design and NRHP eligibility are compatible

Accompanying Iowa Site Inventory Form states:

“The slip cover and storefront alteration completed at this time (1960) were constructed over all three bays. This façade alteration was well designed and executed with materials and workmanship that evoke the feeling and association of many mid-century international designs. Its’ wholesale treatment of the building makes a strong statement and it should be considered contributing under Criterion C for its ability to represent a vernacular example of this style.”

# Section 106 for CDBG DTR

## » Step 4 of 7

### 4. Design – why it's important that design and NRHP eligibility are compatible



#### GENERAL NOTES

1. SEE SHEET G1.00 FOR GENERAL DEMOLITION AND IMPROVEMENT NOTES

#### DEMO KEYED NOTES

- (D1) REMOVE EXISTING WALL
- (D2) REMOVE EXISTING STOREFRONT SYSTEM AND GLAZING
- (D3) REMOVE EXISTING DOOR AND FRAME
- (D4) REMOVE EXISTING WINDOWS
- (D5) REMOVE METAL RAIN SCREEN & SUPPORTS
- (D6) REMOVE EXISTING AWNING
- (D7) REMOVE AND SAVE WALL PLAQUE
- (D8) REMOVE EXISTING INFILL FRAMING / SHEATHING

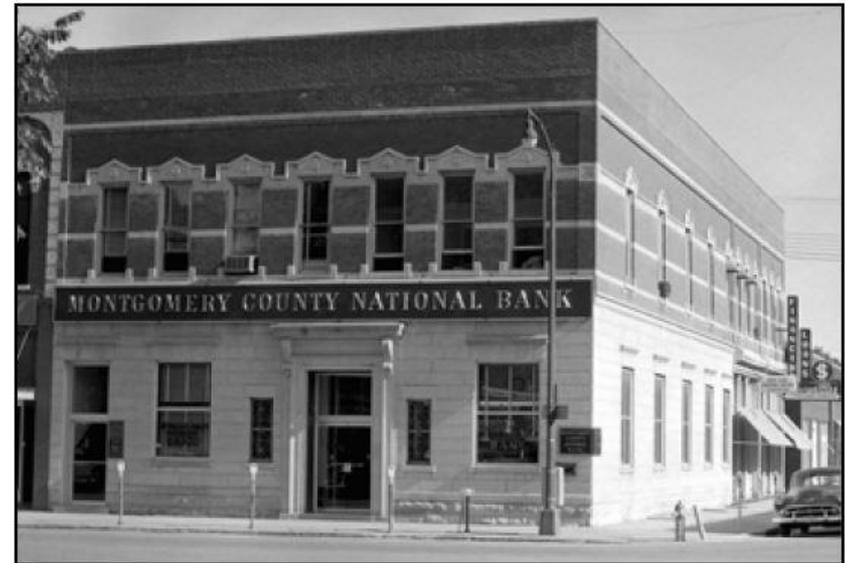
# Section 106 for CDBG DTR

## » Step 4 of 7

### 4. Design – why it's important that design and NRHP eligibility are compatible



SOUTHEAST FACADE, C. 1880



SOUTHEAST FACADE, 1955

You can't base NRHP eligibility on something you can't see. It's either eligible as it stands today, or not eligible. There is no speculation in this process for what it could look like after improvements. For the purposes of Section 106, our determinations are made at a single point in time (before the project is commenced) and have no impact on future evaluations.

# Section 106 for CDBG DTR

## » Steps 5 & 6 of 7

5. During the architect's plan development, the RE should work with property owners to ensure that all work, both facade improvements and any other improvements planned during the facade project are included in the Section 106 review.

6. Once the architect's plans and a full scope of work are specified for each property participating in the DTR grant the RE (or their Grant Administrator) will initiate consultation with the State Historic Preservation Office (SHPO). Consultation shall include:

- A cover letter for the overall project stating the number of buildings participating and a brief description of the resources and the area of potential effects. This letter should be accompanied by general project information such as maps, specifications, window survey, etc.
- A cover letter for each individual property participating in the project with a brief description of that resource and a brief description of the proposed work for that building
- A "Request for SHPO Comment on a HUD Project" for each specific property
- An Iowa Site Inventory Form for each specific property including current condition photographs, maps and any historic images available
- Architects plans, specifications and renderings for each specific property

# Section 106 for CDBG DTR

## » Steps 6 of 7

### SECTION 106 REVIEW INFORMATION

- THIS PROPERTY HAS BEEN IDENTIFIED AS A CONTRIBUTING RESOURCE WITHIN A NEIGHBORHOOD DESIGNATED AS A HISTORIC DISTRICT.
- THE PROPOSED FACADE REHABILITATION IS CONSISTENT WITH THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES.
- EXISTING CHARACTER-DEFINING FABRIC THAT IS CONFIRMED OR SUSPECTED TO BE PRESENT INCLUDE THE FOLLOWING: STOREFRONT LINTEL, GROUND LEVEL PIERS, UPPER STORY EXTERIOR BRICK, UPPER STORY WINDOWS, PARAPET, WINDOW SILLS, WINDOW LINTELS/HOODS.
- MATERIALS THAT APPEAR NOT TO BE ORIGINAL TO THE BUILDING AND HAVE NOT ACHIEVED SIGNIFICANCE: STOREFRONT SYSTEM, EXTERIOR SIGNAGE, OPAQUE MATERIAL @ TRANSOM AREA.

### SCOPE OF WORK/ OUTLINE SPECIFICATIONS:

- MASONRY REPAIR/RESTORATION: TUCK POINT EXPOSED BRICK WITH APPROPRIATE RESTORATION MATERIAL AS DETERMINED BY MATERIAL ANALYSIS. COLOR, TEXTURE, AND CHEMICAL COMPOSITION TO BE INFORMED BY ANALYSIS AND ARCHITECT APPROVED.
- UPPER STORY WINDOWS: EXISTING WINDOWS TO REMAIN; SEAL & CAULK EXISTING WINDOWS AND WOOD INFILL; PAINT EXISTING EXTERIOR INFILL SOFT GRAY.
- PAINT: PREP AND PAINT EXISTING EXTERIOR MATERIAL WITH PANELIZE MULTI-COLOR SCHEME. PAINT HISTORIC WOOD DOOR TO SECOND LEVEL ENTRY.

### DEMOLITION KEY NOTES

- ① REMOVE EXISTING WINDOW
- ② PREP OPENING FOR NEW WINDOW
- ③ REMOVE DOOR AND FRAME
- ④ REMOVE PORTION OF WOOD-FRAMED FACADE
- ⑤ PREP FOR NEW ALUMINUM STOREFRONT
- ⑥ REMOVE CANOPY AND ALL ASSOCIATED COMPONENTS
- ⑦ REMOVE GLAZING EXISTING HISTORIC WINDOW
- ⑧ FRAMEWOOD FRAME TO REMAIN
- ⑨ REMOVE NON-HISTORIC METAL INFILL
- ⑩ REMOVE PLYWOOD PAINTED BRICK
- ⑪ REMOVE NON-HISTORIC BRICK & BUILT UP TO LINTEL
- ⑫ PREP OPENING FOR NEW STOREFRONT SYSTEM
- ⑬ REMOVE EXISTING GLAZING/HISTORIC INFILL AND ALL ASSOCIATED COMPONENTS
- ⑭ REMOVE EXISTING EXTERIOR FINISH FRAME TO REMAIN
- ⑮ REMOVE DOOR, EXISTING FRAME TO REMAIN

### NEW CONSTRUCTION KEY NOTES

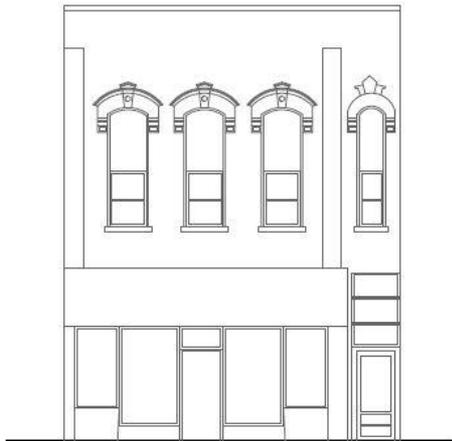
- ① ALUMINUM STOREFRONT SYSTEM LEVEL WINDOW
- ② ALUMINUM STOREFRONT TRANSOM WINDOW
- ③ METAL DOOR
- ④ REPAIR & RESTORE EXISTING WOOD STOREFRONT DOOR AS NECESSARY; REPLACE ALL GLAZING/INFILL WITH REBUILT/RESTORED GLAZING
- ⑤ REPAIR & RESTORE EXISTING STOREFRONT FRAME AS NECESSARY; METAL NEW REBUILT/RESTORED GLAZING
- ⑥ NEW BRICK - SETTING EXTERIOR WOOD INFILL WITH 1" BRICK TO MATCH EXISTING FRAME
- ⑦ REMOVE AND RESTORE EXISTING WOOD INFILL; WOOD INFILL WILL HAVE BRICK INFILL FOR EXTERIOR BRICK; BRICK INFILL TO BE DONE BY WORKSHOP AND PAINT EXTERIOR FRAME
- ⑧ REMOVE & BELL CANOPY @ 2ND LEVEL
- ⑨ PREP OPENING FOR ALL COMPONENTS SURFACE OF 2ND FLOOR STOREFRONT EXTERIOR PER BRICK, TUCK POINT
- ⑩ REMOVE ALL LOCAL MATERIAL FROM EXTERIOR AT FACADE, NUMBER AND NUMBER IN PLACE; SEE SECTION 106 FOR ADDITIONAL INFORMATION ON SCOPE OF WORK.
- ⑪ CLIP BRICK FROM EXTERIOR AND REPAIR TO EXPOSED BRICK; BRICK NUMBER ONLY - SEE BRICKLAY, SEE SECTION 106 FOR ADDITIONAL INFORMATION ON SCOPE OF WORK.
- ⑫ NEW EXTERIOR WINDOW
- ⑬ PREP & PAINT EXISTING EXTERIOR MATERIAL
- ⑭ REMOVE EXISTING DOOR, CLIP BRICK FROM EXTERIOR FRAME; SEE SECTION 106 FOR ADDITIONAL INFORMATION ON SCOPE OF WORK
- ⑮ METAL DOOR CANOPY @ 2ND LEVEL ENTRY WITH 1" REBUILT/RESTORED FRAME
- ⑯ BRICK INFILL @ 2ND LEVEL ENTRY; PREP AND PAINT EXTERIOR FRAME TO MATCH EXISTING FRAME
- ⑰ PREP & PAINT EXTERIOR WITH PANELIZED MULTI-COLOR SCHEME



CURRENT ELEVATION

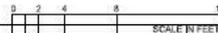
### PAINT MATCH LEGEND

- ① LIGHT TONE PAINT COLOR
- ② MEDIUM TONE PAINT COLOR
- ③ DARK TONE PAINT COLOR
- ④ VERY DARK TONE PAINT COLOR
- ⑤ WOOD GRAY TONE PAINT COLOR
- ⑥ WOOD GRAY TONE PAINT COLOR



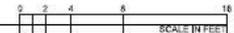
① SHOWING SELECTIVE DEMOLITION

1/8" = 1'-0"



② SHOWING PROPOSED REHABILITATION

1/8" = 1'-0"



# Section 106 for CDBG DTR

## » Steps 6 of 7

### SECTION 106 REVIEW INFORMATION

- THIS PROPERTY HAS BEEN IDENTIFIED AS A CONTRIBUTING RESOURCE WITHIN A NRHP DOWNTOWN LE MARS HISTORIC DISTRICT.
- THE PROPOSED FACADE REHABILITATION IS CONSISTENT WITH THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES.
- EXISTING CHARACTER DEFINING FABRIC THAT IS CONFIRMED OR SUSPECTED TO BE PRESENT INCLUDE THE FOLLOWING: STOREFRONT LINTEL, GROUND LEVEL PIERS, UPPER STORY EXTERIOR BRICK, UPPER STORY WINDOWS, PARAPET, WINDOW SILLS, WINDOW LINTELS/HOODS
- MATERIALS THAT APPEAR NOT TO BE ORIGINAL TO THE BUILDING AND HAVE NOT ACHIEVED SIGNIFICANCE: STOREFRONT SYSTEM, EXTERIOR SIGN MATERIAL @ TRANSOM AREA.

### SCOPE OF WORK/ OUTLINE SPECIFICATIONS:

- MASONRY REPAIR/RESTORATION: TUCK POINT EXPOSED BRICK WITH APPROPRIATE RESTORATION MORTAR AS DETERMINED BY MORTAR ANALYSIS. COLOR, TEXTURE, AND CHEMICAL COMPOSITION TO BE INFORMED BY ANALYSIS AND ARCHITECT APPROVED.
- UPPER STORY WINDOWS: EXISTING WINDOWS TO REMAIN; SEAL & CAULK EXISTING WINDOWS AND WOOD INFILL; PAINT EXISTING EXTERIOR INFILL 50% GRAY
- PAINT: PREP AND PAINT EXISTING EXTERIOR MATERIAL WITH PANELIZED MULTI-COLOR SCHEME. PAINT HISTORIC WOOD DOOR TO SECOND LEVEL ENTRY



### SECTION 106 REVIEW INFORMATION

- THIS PROPERTY HAS BEEN IDENTIFIED AS A CONTRIBUTING RESOURCE WITHIN A NRHP DOWNTOWN LE MARS HISTORIC DISTRICT.
- THE PROPOSED FACADE REHABILITATION IS CONSISTENT WITH THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES.
- EXISTING CHARACTER DEFINING FABRIC THAT IS CONFIRMED OR SUSPECTED TO BE PRESENT INCLUDE THE FOLLOWING: STOREFRONT LINTEL, GROUND LEVEL PIERS, UPPER STORY EXTERIOR BRICK, UPPER STORY WINDOWS, PARAPET, WINDOW SILLS, WINDOW LINTELS/HOODS
- MATERIALS THAT APPEAR NOT TO BE ORIGINAL TO THE BUILDING AND HAVE NOT ACHIEVED SIGNIFICANCE: STOREFRONT SYSTEM, EXTERIOR SIGNAGE, OPAQUE MATERIAL @ TRANSOM AREA.

### SCOPE OF WORK/ OUTLINE SPECIFICATIONS:

- MASONRY REPAIR/RESTORATION: TUCK POINT EXPOSED BRICK WITH APPROPRIATE RESTORATION MORTAR AS DETERMINED BY MORTAR ANALYSIS. COLOR, TEXTURE, AND CHEMICAL COMPOSITION TO BE INFORMED BY ANALYSIS AND ARCHITECT APPROVED.
- UPPER STORY WINDOWS: EXISTING WINDOWS TO REMAIN; SEAL & CAULK EXISTING WINDOWS AND WOOD INFILL; PAINT EXISTING EXTERIOR INFILL 50% GRAY
- PAINT: PREP AND PAINT EXISTING EXTERIOR MATERIAL WITH PANELIZED MULTI-COLOR SCHEME. PAINT HISTORIC WOOD DOOR TO SECOND LEVEL ENTRY



# Section 106 for CDBG DTR

## » Steps 7 of 7

### 7. Review:

- All SHPO Submittals must be sent to IEDA Historic Preservation Specialist (HPS) for initial review. IEDA HPS will ensure that SHPO submittal documents are complete and sufficient for submittal. IEDA HPS will also share architectural plan with IEDA Project Manager for IEDA design review, to compare SHPO submittal to the original iowagrants.gov application (this review will occur either in advance of or simultaneously with SHPO review).
- Once IEDA review is Complete, IEDA will deliver the SHPO submittals to SHPO.
- The SHPO has 30-days to review each submittal. Assuming the properties were designed in accordance with the SOI standards as applicable, the buildings were correctly evaluated for NRHP eligibility and sufficient documentation was provided to the SHPO, the RE should anticipate SHPO concurrence within 30-days. If the submittal was insufficient, additional reviews may be required until SHPO concurs with the proposed project. Upon SHPO concurrence the Section 106 process is concluded. NOTE: Any changes in scope of work or discoveries made during construction that change the project would require reopening consultation with the SHPO.

# Tips for a Successful Project

# Cost Estimate Preparation

- » Accuracy is vital to a successful project that will meet its original scope and impact goals
- » Average building, with share of design, now expected to be about \$50,000 +
- » Err on the high side, but stay within reason
- » CDBG funds can only be used for buildings properly classified in fair or poor condition so costs should very rarely be “minimal”
- » Historic preservation standards may increase costs somewhat
- » Final estimated costs should be close to those originally set forth in the application / If they are not, we will want to know why
- » Make sure that the property owner is “on board” with final cost estimates
- » **Provide us with base estimates for project budget section purposes WITHOUT design fees or any alternates – list those separate**

# Design Priorities

- » Build in flexibility (deductible alternatives – non slum & blight items)
- » Encouraged to build in contingencies based on individual building case by case (rather see it here than a large general contingency – generally, 15-20% for overall project should be adequate)
- » Primary concern is elimination of slum and blight, not necessarily appearance / design must reflect visual elimination of blight
- » Preserve individual building integrity (not necessarily looking for “cookie cutter” store fronts)
- » Make sure that property owner is on board with all aspects
- » Keep overall design fee a reasonable percentage of total budget
- » Do not contradict any historic preservation elements or understandings

# Bid Specifications

- » Project must be bid within one year of grant contract date
- » Important to be clear, concise and uniform
- » Bid specifications must mirror the agreed upon design & meet project goals
- » Include historic compliant materials as necessary
- » Be cognizant of minimizing business disruption
- » Include deducts & add-ons as options in case of cost overruns or “surplus”
- » Be cognizant of the need to minimize change orders
- » Assure that specs first directly address any identified blighting factors
- » Incorporate all recommendations agreed to with SHPO
- » Must include all federally required provisions in bid spec packet (i.e.) EEO, Section 3, Section 504, Labor Standards and Davis-Bacon Wage Rates
- » Must follow all federal competitive bidding standards

# Contract Language

- » Provisions apply not only in construction contracts, but also in architect/engineer/administration agreements
- » Cost plus a percentage of cost not allowed by HUD CDBG regulations / want actual cost and can add actual expenses
- » Wording of standard federal provisions such as: EEO; Fair Housing; Section 3; Section 504; Labor Standards & Wage Rates; ADA, age discrimination, etc. cannot be altered and must be included in all contracts.
- » Provision certifications pertain only to the contractor's funds and activities not to those of other contractors or to the grant recipient, (local unit of government)

# Program Photo Documentation

- » Photography not only important for purposes of application
- » Before and after photos are also very important – is best way to justify program and document success of public/private investment
- » Need to be in color to be able to ascertain detail and readily downloadable
- » Get some photos from in close, (as necessary), to be sure to include evidence of work items being addressed as described on S & B forms
- » Also provide photos showing full façade – preferably from same point of view the before photos were taken from
- » Do not take photos at any time where visibility of building façade is obscured

# Impactful Photo Examples (1)



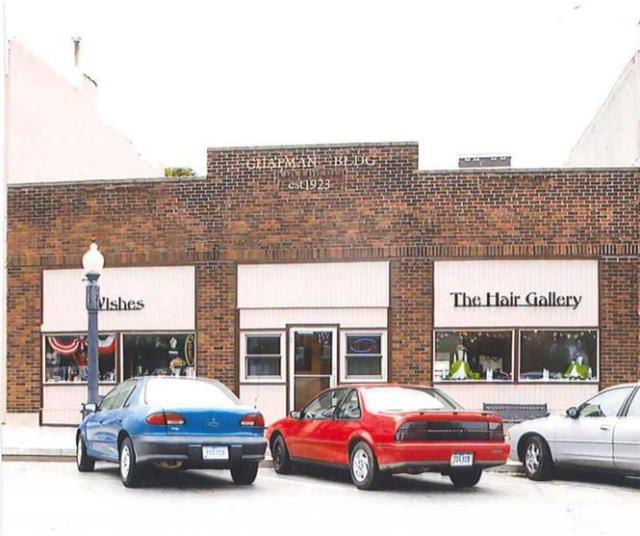
# Impactful Photo Examples (2)



# Impactful Photo Examples (3)



# Impactful Photo Examples (4)



# Non-Impactful Photo Examples (1)



# Non-Impactful Photo Examples (2)



# Non-Impactful Photo Examples (3)



# Non-Impactful Photo Examples (4)



# Project Communications

- » Always keep in mind that city is ultimately responsible to IEDA and to HUD and should make final decisions on vital items
- » Only those directly authorized by the city can speak on their behalf
- » The administrative plan should clearly spell out roles and responsibilities; project manager reports to the city
- » Important that manager/architect/ contractor/ property owner all have same understandings and expectations
- » Project administrator, project manager and/or city officials should always be point of contact with IEDA staff
- » Project manager should mediate any day to day disputes
- » Highlight program successes to all stakeholders but also to the general public to build momentum

# Updated Application Evaluation Factors

- » Appropriateness for funding – need, activities, reasonableness
- » Extent of financing with leveraged funds; commitment of same
- » Project's impact on indentified slum & blight conditions
- » Project management plan
- » Consistent budget figures
- » Completion in a timely fashion
- » Level of city & community support
- » Meeting or exceeding building criteria (Iowa Green Streets)
- » Level of planning completed for comprehensive downtown revitalization before and after
- » Readiness to proceed

# Tips To Be Competitive

## The most competitive applications will have:

- » First Tier Environmental Review Complete
- » Signed agreement with business owners with some monies down in a project escrow account
- » Bid estimates including deductible alternatives
- » Early architect involvement
- » Agreement on all program costs totals between: cost estimates prepared by architect; overall budget line item figures; costs as reported on signed property owner agreements and costs as listed per building in the application forms
- » A sample administrative plan in place outlining all management responsibilities
- » Clear evidence of pervasive slum and blight in project area
- » Cost estimates and design demonstrating how slum and blighting conditions will be directly addressed
- » Consistent and reasonable budget figures



# Question & Answer

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