



NATIONAL ALLIANCE *of* PRESERVATION COMMISSIONS
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June 26, 2009

Mr. Thomas L. Thomson, Executive Director
Metropolitan Planning Commission
P.O. Box 8246
Savannah, GA 31412-8246

Dear Mr. Thomson:

The Historic Savannah Foundation requested that the National Alliance of Preservation Commissions review and comment on proposed revisions to Savannah's historic district ordinance, and we are pleased to do so by way of this letter.

The National Alliance of Preservation Commissions (NAPC) is the only organization devoted solely to representing the nation's preservation design review commissions. NAPC provides technical support and manages an information network to help local commissions accomplish their preservation objectives. We also serve as an advocate at federal, state and local levels of government to promote policies and programs that support preservation commission efforts.

Savannah's landmark district is a national treasure and, as such, deserves the maximum protection to ensure its protection while still allowing for sensitive and respectful growth.

On behalf of NAPC, I read the ordinance and am generally impressed with the proposed changes. It is my view that most of the proposed revisions will contribute positively to stronger protections of Savannah's historic character. Specifically, I believe that the addition of large-scale development standards is a significant improvement.

There are, however, a few areas that warrant further scrutiny and improvement:

1) clearly defining what constitutes "small-scale development (which is simply equal treatment since large-scale development was so clearly defined and treated), 2) addressing height with respect to visual compatibility standards for small-scale development rather than relying on it being adequately addressed by height regulation alone, and 3) using the same definition for "affordable housing" as the US Department of Housing and Urban Development (HUD).

Clarity in definition is crucial for an ordinance to be consistently administered and upheld. By defining what constitutes small-scale development in the ordinance, the City of Savannah would significantly reduce the possibility of inappropriate interpretation of the ordinance which could, in turn lead to challenges to its validity. If the ordinance relies only on height standards for new development that are keyed to the height of surrounding structures, the board may be hindered in its ability to deviate from the standards and work with property owners to develop projects that best serve their, and the City's, needs. Finally, using a different

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definition of affordable housing than is used by HUD can lead to unnecessary confusion and weaken the City's and developers' ability to receive Federal funding for affordable housing projects.

While these points may seem minor and the possibility of incompatible new development remote under the proposed changes to the ordinance, every potential outcome should be considered and addressed when making revisions to an ordinance. If NAPC can assist the MPC or the City in revising the draft to accommodate these suggested improvements, please do not hesitate to contact me in Athens.

Finally, and of particular note, as the process moves forward and the revisions are adopted, I urge you to make use of NAPC's educational programs to train your Historic District Board of Review members about how to implement the new standards and guidelines. We are the leader in providing continuing education to the more than 2300 preservation commissions around the country, and our training programs are tailored to meet the needs of each commission or review board. To have a new ordinance without the tools and training to properly manage it would be both risky and short-sighted. Please let me know if you have questions about how we might help train your review board.

Again, I congratulate you on the progress made to date and thank you for the opportunity to review the proposed revisions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Drane Wilkinson".

Drane Wilkinson
Executive Director

CC: Mr. Michael Brown, City of Savannah
Ms. Beth Reiter, Metropolitan Planning Commission
Mr. Daniel Carey, Historic Savannah Foundation