

**FORSYTH COUNTY  
BOARD OF COMMISSIONERS**

MEETING DATE: JULY 25, 2019

AGENDA ITEM NUMBER: 4

**SUBJECT: RESOLUTION AUTHORIZING EXECUTION OF AN AGREEMENT BETWEEN FORSYTH COUNTY, THE CITY OF WINSTON-SALEM AND THE NORTH CAROLINA STATE HISTORIC PRESERVATION OFFICE FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT AND HOME PROGRAMS**

**COUNTY MANAGER'S RECOMMENDATION OR COMMENTS:** Recommend Approval

**SUMMARY OF INFORMATION:** See Attached

ATTACHMENTS:  YES  NO

SIGNATURE: f. Dudley Watts, Jr. /AMS  
COUNTY MANAGER

DATE: July 25, 2019

**RESOLUTION AUTHORIZING EXECUTION OF AN AGREEMENT BETWEEN FORSYTH COUNTY, THE CITY OF WINSTON-SALEM AND THE NORTH CAROLINA STATE HISTORIC PRESERVATION OFFICE FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT AND HOME PROGRAMS**

**WHEREAS** in accordance with the provisions of the Housing and Community Development Act of 1974, as amended Community Development Block Grant (CDBG), and the HOME Investment Partnership Program Act (HOME), the City of Winston-Salem, North Carolina (City) and Forsyth County (County) (collectively "City/County") propose to administer projects for acquisition, rehabilitation, demolition, new construction, and infrastructure improvements throughout the City's and County's jurisdiction for the 2019-2020 through 2023-2024 fiscal years;

**WHEREAS** the City/County has been designated a Certified Local Government pursuant to the National Historic Preservation Act of 1980 (PL 96-515; 54 U.S.C.300101 et seq;) and the corresponding regulations (36 CFR Part 61);

**WHEREAS** the City/County has determined that the implementation of the individual undertakings of these programs may have an effect upon properties and districts that are listed, or may be eligible for listing, in the National Register of Historic Places (National Register) as defined in 36 CFR 800, the regulations of the Advisory Council on Historic Preservation (Council) for implementing Section 106 of the National Historic Preservation Act, as amended (54 U.S.C. § 306108);

**WHEREAS** the City/County, in consultation with the North Carolina State Historic Preservation Office (SHPO), and the National Trust for Historic Preservation, has developed the Winston-Salem Historic Design Guidelines which reflect the *Secretary of the Interior's Standards and Guidelines for Rehabilitation of Historic Buildings* (Standards) and the Council's *Policy Statement on Affordable Housing and Historic Preservation and Principles for Implementation*;

**WHEREAS** the City/County maintains a comprehensive inventory of historic properties;

**WHEREAS** the City/County and SHPO, pursuant to 36 CFR 800.13, have consulted in the development of this Programmatic Agreement. The City/County and the SHPO are each a "Signatory" to this Programmatic Agreement, hereafter, "Signatories;"

**WHEREAS** the City/County, pursuant to 36 CFR 800.6, notified the Advisory Council on Historic Preservation on December 20, 2018, via its Electronic Section 106 Documentation Submittal System regarding its intent to prepare a Programmatic Agreement and invited Council to participate in consultation, and Council has declined to participate;

**WHEREAS** the City/County consulted the Catawba Indian Nation on January 9, 2019. Tribal consultation included an invitation to be a concurring party to this agreement. A response letter was received on January 22, 2019, but the Catawba Indian Nation declined to participate further in the agreement process; and

**WHEREAS** the City/County provided public notice of intent to enter into this Programmatic Agreement for the CDBG and HOME programs and public hearings were held at the City Council meeting on June 17, 2019, and at the Forsyth County Commissioners meeting on July 25, 2019;

**NOW, THEREFORE, BE IT RESOLVED**, the City/County and SHPO agree that, effective July 1, 2019, the City/County shall administer and implement the CDGB and HOME programs for fiscal years 2019-2020 through 2023-2024, in accordance with the following stipulations, which will provide measures adequate to avoid or satisfactorily mitigate any adverse effect on historic properties.

Adopted this 25<sup>th</sup> day of July 2019.

## STIPULATIONS

The City/County will ensure that the following measures are implemented:

### I. Qualifications of City/County Staff

- A. The City/County shall ensure that it employs a Historic Preservation Planner (HPP) who, at a minimum, meets the *Secretary of Interior's Professional Qualifications Standards* (48 CFR Part 738.9) for Architectural History or Historic Architecture.
- B. The current HPPs are Michelle M. McCullough and Heather Bratland.
- C. If there is a change of staff in the HPP positions, the City/County shall notify the SHPO in writing that the position is vacant. Until a qualified candidate is employed to fill the HPP position, all CDBG and HOME program activities shall be individually reviewed by the SHPO.

### II. Identification of Historic Properties

To determine if a property is historic, the City/County's HPP will:

- A. Maintain a comprehensive inventory of historic properties within the City of Winston-Salem and Forsyth County.
- B. Consult the SHPO's most recent roster of properties that are listed in or have been determined eligible for listing in the National Register or are on the North Carolina State Study List for potential nomination to the National Register. This includes the SHPO's most recent list of properties identified in the Forsyth County Architectural Inventory. Use of SHPO provided, online digital resources, such as HPOWEB, is acceptable. A property is considered historic, if it is on the roster or shown on the maps as National Register (NR), State Study-listed (SL), or determined eligible (DOE).
- C. If the property is not on the roster or study list and is over fifty (50) years old and appears to be eligible to the HPP, or if a property is less than fifty years old, but appears to meet the exception criteria for listing in the National Register, the HPP will submit a map, photographs, and brief history of the property (if known) to the SHPO for a Determination of Eligibility, unless the property has been previously surveyed for eligibility.
- D. If the City/County does not concur with the SHPO's eligibility finding, the property will be submitted to the Keeper of the National Register for a formal Determination of Eligibility in accordance with the Council's regulations at 36 CFR Part 800.4(c)(2).

### III. Exempt Activities

The following CDBG and Home Program undertakings, involving historic properties, have limited potential to affect historic properties and are exempt from the terms of this agreement when approved by the City/County's HPP.

- A. Site Improvements, including but not limited to:
  - 1. Reconstruction of roads where no change in width, surface materials, surface treatments, or vertical alignments of drainage is to occur.
  - 2. Repair/replacement of existing curbs and sidewalks.
  - 3. Repair or in-kind replacement of existing streetlights, signs, traffic lights, or existing utility lines.
  - 4. Repair/replacement of water, gas, storm, and/or sewer lines if it occurs within the dimensions of the original trench and permanent impacts upon surface treatments or landscape features which contribute to the historic or architectural significance of the resource are avoided.

5. Tree planting and removal.
6. Resurfacing and/or repainting parking spaces or streets.
7. Items that require immediate attention to correct a threat to health or safety.
8. Installation of required public improvements under the American with Disabilities Act (ADA), if the design was previously approved by the SHPO.

**B. Rehabilitation**

1. Exterior (Review of effects in historic districts should focus on exterior features, unless the property is a Local Historic Landmark.)
  - a. Caulking, weather-stripping, and/or reglazing of window glass with glass of the same surface qualities (color, texture, and reflectivity).
  - b. Installation or replacement of gutters and downspouts.
  - c. New storm windows provided they conform to the shape size of the historic windows and the meeting rail coincides with that of existing sash. Color shall match trim; mill finish aluminum is not acceptable.
  - d. Repair or repainting of existing storm windows.
  - e. In-kind replacement – this is understood to mean that the new features/items will duplicate the material, dimension, configuration, and detailing of the original of the following:
    - 1) Porches, including railings, posts/columns, brackets, cornices, steps, and flooring
    - 2) Roofs
    - 3) Siding
    - 4) Exterior architectural details and features
    - 5) Windows, including the frame, panes, and sash
    - 6) Doors
    - 7) Cellar/bulkhead doors
  - f. Painting previously painted surfaces (does not include unpainted masonry).
  - g. Repair or replacement of existing wheelchair ramps and the installation of detachable temporary handicap ramp.
  - h. Repair or replacement of chimneys with the same material, dimensions, and design.
  - i. Clean and seal treatments.
2. Interior (Review of the interior will include only significant features or changes that will damage the integrity.)
  - a. All plumbing rehabilitation/replacement, including pipes and fixtures in either the bathroom or kitchen.
  - b. Heating system rehabilitation, replacement, or cleaning including water heaters, furnaces, pipes, radiators, or other heating units. This includes ductwork and piping.
  - c. Electrical wiring, switches, and receptacles.
  - d. Restroom improvements for handicapped access, provided work is contained within the existing restroom.
  - e. Interior surfaces treatments (floors, walls, ceilings, and woodwork) provided the work is restricted to repainting, refinishing, repapering, or laying carpet or linoleum and the feature is not significant to the integrity of the property.
  - f. Installation of insulation provided it is restricted to ceilings, attics, crawl spaces, and proper vapor barriers are used.
  - g. Repair or replacement of concrete basement floors and interior basement walls.

- h. Installation of new kitchen and bath appliances, cabinets, counters, tubs, sinks and toilets.
- i. Installation of smoke or carbon monoxide alarms.
- j. Replacement of door locks.

IV. Treatment of Historic Properties

The City/County shall ensure that all properties listed in the National Register of Historic Places, eligible for listing in the National Register of Historic Places or determined eligible for listing in the National Register of Historic Places, are treated in accordance with the following stipulations. All work items not listed in the above exempt categories will be reviewed by City/County's HPP to ensure that the rehabilitation guidelines are followed.

A. Property Acquisitions

- 1. Upon the acquisition of a historic property using Program funds, the City/County shall secure, stabilize, and protect the historic property pending its future use. The methods used to secure and stabilize properties shall adhere to 36 CFR Part 800. Securing the properties should, at a minimum, take into consideration the recommendations of the National Park Service contained in *Preservation of Briefs #31, Mothballing Historic Buildings*. Specific stabilization steps to be followed are outlined in Appendix A.

B. Rehabilitation

- 1. The HPP shall ensure that all residential and commercial rehabilitation projects involving historic properties are carried out in accordance with the *City of Winston-Salem Design Guidelines*. These Guidelines are based on the *Secretary of the Interior's Standards and Guidelines for Rehabilitation of Historic buildings* (Standards) and the Council's *Policy Statement on Affordable Housing and Historic Preservation and Principles for Implementation*. The HPP shall review and approve all plans and specification or work write-ups provided by the Rehabilitation Inspector prior to the initiation of project activities.
- 2. The HPP will review additions for conformance with the National Park Service's *Preservation Brief #14: New Exterior Additions to Historic Buildings: Preservation Concerns*, and the *City of Winston-Salem Design Guidelines*.
- 3. Exterior alteration or addition projects (if applicable), for which the City/County's Historic Preservation Commission issues a Certificate of Appropriateness, will have no adverse effect upon a historic property or district, and no further review is required.
- 4. To determine if a project meets the *Guidelines* and/or *Standards*, the City/County's Community Development Departments staff will submit the following documentation to the HPP for review and comment prior to commencement of the project:
  - a. Brief project description
  - b. Location map
  - d. Work write-up
  - e. Architectural plans (if available)
  - f. Elevation drawings (if available)
- 5. The HPP will respond within ten (10) working days of receipt of adequate information. Using the HPP's comments and recommendations the City/County's Community Development Departments staff will revise the plans to meet the *Guidelines* and/or *Standards* and after reviewing the final scope of work documentation, the HPP will certify in writing to the Community Development Departments staff that the project will have no adverse effect.
- 6. If, during the project, changes are required, the HPP is to be notified immediately. The HPP will determine if the change will cause an adverse effect. All work must stop until it is determined that the new work will not cause an adverse effect. If an adverse effect cannot

be avoided, the HPP shall consult with the North Carolina SHPO and initiate the procedures set forth at 36 CFR 800.6. If the SHPO determines the undertaking will result in an adverse effect, the City/County will comply with Stipulation V below.

7. If the HPP discovers that the agreed upon scope of work is not being followed and an adverse effect is taking place by the City or County's Community Development Department staff, the HPP will contact the Community Development Department's staff and request an immediate stop work order. The HPP shall then consult with the North Carolina SHPO immediately. If the SHPO determines the undertaking is an adverse effect, the City/County will discuss with the North Carolina SHPO mitigation measures. If an agreement cannot be reached the City/County will comply with Stipulations VIII below.
8. The documentation of each project will be retained by the HPP as part of the permanent project files and may be reviewed by the North Carolina SHPO upon request, or as part of an annual report.
9. If the *Guidelines* and/or *Standards* cannot be met, the proposed treatment of the property is not rehabilitation, or if the contemplated action could otherwise have an adverse effect on such property, the HPP shall consult with the North Carolina SHPO and initiate the procedures set forth at 36 CFR 800.6. If the SHPO determines the undertaking will result in an adverse effect, the City/County will comply with Stipulation V below.

C. New Construction

1. New construction projects within or immediately adjacent to historic districts or individual historic properties will be designed to conform with the prevailing historic character of the area in terms of height, scale, massing, setbacks, materials, detailing, and site features.
2. The HPP will review all new construction plans for properties in or immediately adjacent to historic districts and individual historic properties and certify in writing that the project will have no adverse effect by virtue of meeting the *Standards*. If the HPP has any question to the effect determination or if the plans will have an adverse effect, the HPP will write to the North Carolina SHPO. The North Carolina SHPO shall provide written recommendations and comments within (30) thirty days. If no comments are received, it shall be assumed that the plans are acceptable to the North Carolina SHPO.

D. Relocation of historic properties

1. A historic building may be moved to a new site within a historic district when redevelopment activities require the removal of the building.
2. The structure and site shall be documented so that a permanent record of the structure is made prior to its relocation. Photographs and written documentation which portrays the structure on its original site should be made a part of the files of the HPP.
3. A new location should be chosen considering architectural compatibility. In addition, the impact which the relocation will have on nearby buildings should be considered. For relocation into or within a historic district, special attention should be given to the orientation, lot coverage, spacing, setback, and site planning, so that the new location will be consistent with the district and the integrity of the district is maintained.
4. The new site must be approved by the North Carolina SHPO. If the SHPO objects to the new site, the City/County will request the Council's comments in accordance with 36 CFR 800.6.
5. Within ninety (90) days after the move, the City/County in consultation with the North Carolina SHPO will reevaluate the eligibility of the property for the National Register.

E. Handicapped Accessibility

1. The City/County should explore alternative methods for providing handicapped accessibility to historic buildings in accordance with the Americans with Disabilities Act (ADA) regulations and other local, State, and Federal requirements for accessibility. To the extent feasible, handicapped access shall be placed on secondary elevations for historic buildings and shall not result in the removal of the historic building's significant architectural features. The design of handicap accessible features shall be consistent with the *Standards*, National Park Service Preservation Brief No. 32: *Making Historic Properties Accessible* and the Department of the Interior pamphlet entitled *Preserving the Past and Making it Accessible for People with Disabilities*.

V. Adverse Effects

- A. If the *Guidelines* or *Standards* cannot be met and the proposed undertaking will result in an adverse effect upon a historic property, prior to taking any action, the City/County will notify and consult with the SHPO in accordance with 36 CFR Part 800.5 and .6 of the Council's regulations.

B. Demolition

1. The City/County may proceed with the demolition of properties that are not included in the City/County's inventory list or are listed as noncontributing to a historical district, provide there will be no adverse effect on other adjacent historic properties and/or districts.
2. Where demolition of a property that is individually listed or which is classified as a contributing building with a historic district is needed to eliminate a significant public safety hazard, the regulations outlined in 36 CFR 800.12 will be followed. Whether a demolition is needed to eliminate a significant public safety hazard shall be pursuant to any applicable building codes or local ordinances.
3. Prior to the demolition of any properties that are individually listed or which are classified as contributing buildings located within historical districts that are listed or which have been determined eligible for listing on the National Register, the proposed demolition will be reviewed on a case-by-case basis with the North Carolina SHPO. The City or County's Community Development Department's staff or HPP shall forward the following documentation to the SHPO for review and comment:



- a. Location (including a map) and description of the property proposed for demolition;
- b. Reasons for the demolition, including documentation of any code violations and structural damage and deterioration, and an explanation of why rehabilitation is neither prudent nor feasible.
- c. Photographic evidence and written description of the deteriorated condition of the building to be demolished.
- d. Analysis of the demolition on the related historic district (if any).

The North Carolina SHPO will review the documentation submitted and, within thirty (30) days of receipt of adequate documentation, concur or object in writing to the proposed demolition, and forward an informational copy to the Advisory Council. If the North Carolina SHPO finds that demolition will have an adverse effect, the City/County will proceed in accordance with 36 CFR Part 800.5 and .6

VI. Archaeology

- A. Prior to any new ground-disturbing activities as part of new construction projects, the City/County shall notify the North Carolina SHPO and request its opinion of the potential existence of any significant archaeological resources. The City/County will send the SHPO the following information in initiate the consultation process:
  1. A map locating the proposed activity.
  2. Information regarding the nature, depth, and date of the disturbance.
- B. If the North Carolina SHPO determines that the potential for significant archaeological resources exists, the City/County will carry out an archaeological survey of the affected area in consultation with the SHPO. If archaeological resources are found that meet the National Register criteria, they will be avoided or preserved in place whenever feasible. When it is not feasible, the SHPO will be consulted and treatment consistent with the Council's handbook on archaeology and approved by the SHPO will be developed and implemented.

VII. Project Documentation and Recordkeeping

- A. To provide monitoring and oversight, the City/County will:
  1. Maintain, in individual project files, copies of all case documentation, including, before and after photographs, work write-ups, and the HPP's comments for nonexempt undertakings.
  2. Maintain copies of Certificate of Appropriateness for which a determination of no adverse effect was made pursuant to stipulation IV.B.3 above.
  3. Provide information to the North Carolina SHPO on elements of the CDBG and HOME programs which will not be implemented within the project years covered by this Programmatic Agreement, but which may affect historic properties in future years. At the end of each program year, provide a summary report to the SHPO and the City/County of Winston-Salem Historic Preservation Commission and Planning Division summarizing actions taken to comply with the terms of this Agreement.
  4. Upon written request provide the SHPO and the Council with specific case documents.
- B. The SHPO may monitor any activities carried out pursuant to this Programmatic Agreement, and the Council will review such activities if so requested. The City/County will cooperate with the Council and the North Carolina SHPO in carrying out their monitoring and review responsibilities.

VIII. Dispute Resolution

Should the SHPO object within thirty (30) days to any proposed undertakings pursuant to this Programmatic Agreement; the City/County shall consult with the SHPO to resolve the objection. If the City/County or SHPO determines that the objection cannot be resolved, the City/County shall request the further comments of the Council pursuant to 36 CFR Part 800.7 (c). Any Council comment provided in response to such a request will be taken into account by the City/County. The City/County's responsibility to carry out all actions under this Programmatic Agreement that are not the subjects of the dispute will remain unchanged.

IX. Agreement Modification and Termination

- A. This Programmatic Agreement will continue in full force and effect until June 30, 2024. At any time in the six-month period prior to the date, the City/County may request in writing that the North Carolina SHPO review the City/County's program and consider an extension or modification to this Programmatic Agreement. No extension or modification will be effective unless all parties to the Programmatic Agreement have agreed to it in writing.
- B. Any party to this Programmatic Agreement may request that it be amended, whereupon the parties will consult in accordance with 36 CFR Part 800.6 (c) (7) to consider such amendment.
- C. Any party to this Programmatic Agreement may terminate it by providing thirty (30) days' notice to the other parties, provided that the parties will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the City/County will comply with 36 CFR Parts 800.4 through 800.6 with regard to individual undertakings covered by this Programmatic Agreement.

Execution and implementation of this Programmatic Agreement evidences that the City/County has afforded the Council a reasonable opportunity to comment on the administration of CDBG and HOME Programs for fiscal years 2019-2020 through 2023-2024 and that the City/County has taken into account effects of the Programs on historic properties, as per their Section 106 responsibilities.

**AGREED:**

**ATTEST:**

**CITY OF WINSTON-SALEM:**

\_\_\_\_\_  
(seal)  
Sandra Keeney, City Secretary

\_\_\_\_\_  
(seal)  
Lee Garrity, City Manager

Date: \_\_\_\_\_

Approved as to form and legality.

This is the \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
Angela Carmon, City Attorney

**ATTEST:**

**COUNTY OF FORSYTH:**

\_\_\_\_\_  
(seal)

\_\_\_\_\_  
(seal)

Ashleigh Sloop, County Clerk

J. Dudley Watts, Jr., County Manager

Date: \_\_\_\_\_

Approved as to form and legality.

This is the \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_

Gordon Watkins, County Attorney

**State Historic Preservation Officer**

\_\_\_\_\_  
Dr. Kevin Cherry, PhD., SHPO Date

**Filed By:**

**Advisory Council on Historic Preservation**

\_\_\_\_\_  
Execution Director Date

## APPENDIX A STABILIZATION PLAN

The following steps will be taken to "mothball" certified historic structures acquired with CDBG or HOME funds while they are awaiting disposition. The purpose is to ensure that vacant structures do not continue to deteriorate and that they are maintained in a manner that impacts the surrounding neighborhood as little as possible. Stabilization work will be undertaken as soon as possible after acquisition.

- A. Utilities
  - 1. Turn off gas, water, etc.
  - 2. Disconnect electrical service
  
- B. Yard cleanup
  - 1. Debris pickup
  - 2. Mowing, and trimming shrubbery, and removal of dead or diseased trees
  - 3. Removal of fuel tanks (above and below ground)
  - 4. Well closure
  
- C. Interior Cleanup
  - 1. Removal of trash and debris including appliances, loose bathroom and kitchen fixtures and cabinets, rugs, loose floor and wall coverings, curtains, blinds, etc.
  
- D. Post "No Trespassing" Sign
  
- E. Windows
  - 1. Remove storm windows and store if in good condition
  - 2. Cut ½" OSB panels to fit inside window frame (basement, first and second floors)
    - 1. Secure OSB panels with star or hex head screws
    - 2. Leave 4" open space at top for light and ventilation
    - 3. Install (2) 2X4 cross braces lag bolted into center of window casing (first floor and basement)
    - 4. Paint OSB panels and braces white
    - 5. Open window sash at top ventilation
  
- F. Doors
  - 1. Remove original front door and store if in good condition
  - 2. Construct ¾" plywood door with 2X4 bracing
  - 3. Use (3) strap hinges with star or hex screws
  - 4. Install (2) hasp and turnbuckles with padlocks
  - 5. Paint plywood and braces white
  - 6. Other entrance doors to have OSB panels cut to fit inside door frame and secured with hex or star screws. Install (3) braces to center of door casings.
  
- G. Foundation Access
  - 1. Install treated lumber jams at crawl space access door
  - 2. Construct ¾" plywood door with (2) hinges, hasp and turnbuckle with padlock
  
- H. Foundation
  - 1. Close all other openings in foundation wall
  
- I. Roof
  - 1. Inspect for leakage and repair any minor defects to make watertight
  - 2. If deteriorated, replace roof shingles, sheathing, flashing, etc. as needed with Permanent new materials
  
- J. Siding and Trim

1. Replace any missing or rotted siding, soffit, fascia, molding or other trimwork as necessary to stop water penetration matching the existing as closely as possible
2. Paint any new wood to match existing

**K. Safety**

1. Secure any unsafe floors and ceilings with plywood
2. Secure existing and/or replace missing railings and steps at porches and stairs
3. Remove hanging or falling gutters, antennas, metal awnings, etc.

**STAFF REPORT**  
**Consideration of the Programmatic Agreement for Housing Rehabilitation  
Programs for FY2019-2020 to FY 2023-2024.**

**July 25, 2019**

As part of the County's effort to meet its requirement for implementing Section 106 of the National Historic Preservation Act, staff has worked with the North Carolina State Historic Preservation Office (SHPO) to draft the enclosed Programmatic Agreement among the City for Winston-Salem/Forsyth County for the Community and North Carolina State Historic Preservation Officer for the Development Block Grant and HOME programs. Section 106 requires that any site, district, building, structure or object that is included in or eligible for inclusion in the National Register of Historic Places be forwarded to the SHPO and the Advisory Council on Historic Preservation for review and comment prior to the expenditure of federal funds for said projects.

The Advisory Council has allowed the SHPO to create agreements that allow staff at the local level to administer review for federally funded projects such as the CDBG and HOME Programs. The City of Winston-Salem has had a Programmatic Agreement with the SHPO since 2003, however, this would be the first year for Forsyth County to be included in Programmatic Agreement. Staff has received comments from the Advisory Council on Historic Preservation and all other required organizations.