



OFFICE OF PLANNING & DESIGN SERVICES
DEVELOP LOUISVILLE
LOUISVILLE, KENTUCKY

GREG FISCHER
MAYOR

YU "EMILY" LIU, AICP
DIRECTOR

April 25, 2018

Dear Signatories and Consulting Parties:

The Louisville Jefferson County Metro Government (LJCMG) has revised the Programmatic Agreement (PA) for the Beecher Terrace Redevelopment Project. To access the final draft please visit this link to the Vision Russell website: <http://visionrussell.org/historic-preservation/section106>.

Summary of Modifications to Programmatic Agreement

Comments on the PA were received from the Advisory Council on Historic Preservation (ACHP) and the Kentucky State History Preservation Office (KY SHPO). A summary of the changes to the PA is provided here. Minor edits or typographical changes are not mentioned, nor are areas where wording was added to simply or clarify the text.

1-Clarification of the Lead Agency

LJCMG is the Lead Agency for the project and is listed as such throughout. Louisville Metro Housing Authority (LMHA) is a partner agency and an Invited Signatory.

2-Future Offsite Housing Units

LJCMG as Responsible Entity has determined that the offsite units associated with future phases of the project are not part of this Undertaking. While other CNI projects often include off site units in PA's addressing multi-stage compliance projects, the development of the offsite units associated with this CNI project area are not included in the CNI development budget; there are no CNI funds or CDBG funds projected for these offsite housing units. These units will be the subject of a specific developer request for proposal process through which project-based Section 8 vouchers will be awarded by LMHA. This phase is unique because the offsite locations have not yet been identified. The environmental review process for the to-be-selected offsite housing properties will be addressed on a case-by-case basis.

3-Units associated with Relocated Beecher Terrace residents

The relocation phase is not part of this Undertaking. Units associated with the relocation of current Beecher Terrace residents are also not considered as part of this Undertaking. Generally, residents are moving into existing public housing or they are receiving housing vouchers. The relocation vouchers are considered Tenant Based Rental Assistance. These relocation vouchers are not subject to Section 106 review as they are classified as Categorical Excluded Not Subject to Review under Part 58 per 24CFR 58.35 (b)(1).

4-Categorization of Consulting Parties

All Consulting Parties have been categorized as Signatories, Invited Signatories, or Concurring Parties.

LOUISVILLE FORWARD

www.louisvilleky.gov

METRO DEVELOPMENT CENTER 444 S. FIFTH STREET, STE 300, LOUISVILLE, KENTUCKY 40202 502.574.6230 FAX 502. 574.8129

5-Project Communications

All formal project communications will occur via email. The protocol for communications has been clarified. The Vision Russell website will be used as the primary tool for receiving information and redistributing it to the Consulting parties. Hard copies of materials will be provided to KY SHPO and ACHP as requested.

6-Ongoing Meetings

Two separate sets of meetings have been added as part of the PA. Quarterly meetings have been added for all Consulting Parties to facilitate the exchange of ideas and information. It is anticipated that the Quarterly Meetings would overlap with any resident design meetings that are required during the predevelopment process. In addition, a representative of the KY SHPO will be invited to participate in additional design review meetings to identify possible adverse effects early in the design process and to facilitate early consideration of strategies to avoid or minimize adverse effect.

7-Review Time Line for Future Phases

The time line and process for reviewing documents has been clarified and compressed. The new time line, as described in the PA is as follows:

Action	Timeline
LJCMG Shares Concept Design and Issues Determination of Effect	Day 1
Consulting Parties Meeting-Face to Face and conference call. If applicable, LJCMG Shares Mitigation Strategies and Requests Comments on Mitigation.	Day 15
End of Comment Period for Effects and Concept Design	Day 30
End of Comment Period for Mitigation Strategies	Day 45
Letter of Resolution Issued by LJCMG	After Day 46

8-Emergency Action

The Stipulation regarding Emergency Action has been removed.

9-Signatures

All signatures will be in counterpart. This draft includes signature pages for all Concurring Parties.

10-Baxter Square Park Maintenance

The Stipulation and references to the appendix for Baxter Square Park have been removed. A Whereas clause exempting basic maintenance has been added.

11-Future Phases

The difference between phases and stages has been clarified.

12-Substantial Changes

The section on Substantial Changes that could occur in Stage I has been deleted.

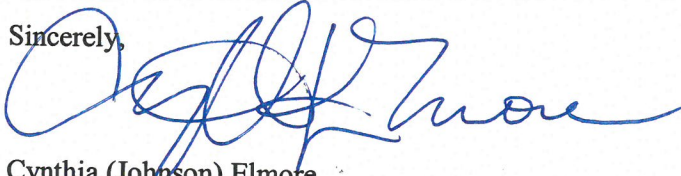
13-Dispute Resolution

The language in the Stipulation has been modified to comply with current ACHP guidance.

Timeline for Comments

We ask you submit your **formal comments** on this draft of the Programmatic Agreement are due no later than **Monday April 30, 2018** (36CFR800.6). You may send your comments on the Vision Russell comment page located at: <http://visionrussell.org/historic-preservation/consulting-party-feedback/>. *Please note that other information related to this undertaking and to the Section 106 process pursuant to 36CFR800.4 is also provided on the Vision Russell website.*

Sincerely,



Cynthia (Johnson) Elmore
Metro Historic Preservation Officer
Louisville Metro Planning and Design Services/Develop Louisville
444 S. 5th St., Ste. 300 Louisville KY 40202
Cynthia.johnson@louisvilleky.gov

