

Historic Preservation Assessment Regulatory Background

Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, requires the lead federal agency with jurisdiction over an undertaking to consider impacts to historic properties, before the undertaking occurs. Undertakings in this sense include activities, projects, or programs that are directly or indirectly funded by a federal agency, such as the CDBG funding source from Housing and Urban Development for this application's improvements. The implementing regulation of Section 106 is 36 CFR Part 800, overseen by the Department of Interior's Advisory Council on Historic Preservation (ACHP).

The NHPA defines a historic property as any archeological site, district, building, structure, or object that is listed in, or eligible for inclusion in, the National Register of Historic Places (NRHP). Under this definition, other cultural resources may be present within a project's Area of Potential Effects but are not historic properties if they do not meet the eligibility requirements for listing in the NRHP. To be eligible for the NRHP, a property generally must be historically significant and greater than 50 years of age, although there are provisions for listing recent cultural resources if they are of exceptional federal, state or local importance.

36 CFR 800 establishes the three-step processes for: (1) identifying whether historic properties will be affected by the proposed undertaking; (2) assessing the undertaking's effects on identified historic properties, and (3) engaging in consultation with stakeholders to avoid, reduce, or mitigate any adverse effect from the undertaking. Adverse effects include, but are not limited to (per 36 CFR 800.5): destruction or alteration of all or part of a property; isolation from or alteration of its surrounding environment; introduction of visual, audible, or atmospheric elements that are out of character with the property or that alter its setting; transfer or sale of a federally owned property without adequate conditions or restrictions regarding preservation, maintenance, or use; and neglect of a property resulting in its deterioration or destruction.

36 CFR Part 800 specifies that certain parties must be consulted during the process. These parties include: the State Historic Preservation Officer (SHPO) who is appointed by each state to protect the interests of its cultural heritage; and federally-recognized Native American Tribes that have stated a claim to the area. Sections 101(b)(3) and 101(d)(6)(B) of the NHPA provides each SHPO and Tribe, respectively, a prominent role in advising the responsible federal agencies and ACHP in their efforts to carry out Section 106 requirements. Federal agencies usually consult with the SHPO and Tribes when developing methodologies related to cultural resource investigations and are required to notify SHPO and Tribes when making findings related to the establishment of an undertaking, findings of NRHP-eligibility of identified cultural resources, project effects to historic properties, and resolution of adverse effects. That process has been formalized for this New Jersey Hurricane Sandy disaster recovery program through the execution of a Programmatic Agreement signed in 2013. For projects located within municipal boundaries, the assessment and resolution of adverse effects must also be comply with local building codes and ordinances, and any local historic district requirements that are mandated by a Certified Local Government or local Historic Preservation Commission.

The Programmatic Agreement stipulations state that each SHPO and Tribe generally are required to respond within 15 days of receiving a request to review a proposed action, or a request to make a finding or determination regarding historic properties located within the project's Area of Potential Effect. In the event that the SHPO/Tribe does not respond within this time frame, 36 CFR 800.3(c)(4) states that the lead agency (DCA) can decide to (1) proceed to the next step in the application process based on any earlier findings or determinations that have been made up to that point; or (2) consult directly with the ACHP in lieu of the SHPO/Tribe. If, after this step is followed, the SHPO or Tribe decides to re-enter the Section 106 process, 36 CFR 800.3(c)(4) further states that the lead agency may continue the consultation proceeding without being required to reconsider previous findings or determinations.

Assessment of Historic Preservation Compliance for SRP0038251

The proposed project complies with NHPA Section 106 requirements. Consultation with the New Jersey Historic Preservation Office (NJHPO, also SHPO) was initiated by URS on behalf of the program in an email dated February 26, 2014. The email included the form developed by NJHPO for Section 106 disaster recovery evaluations, specifically the "Form 2" which indicated that the existing multi-family residential building was a historic resource eligible for listing in the NRHP as a contributing resource to a potential historic district. This determination was based on a FEMA / SHPO joint windshield survey that indicated the property lay within the NRHP-eligible South Atlantic City Historic District. Based on the fact that the undertaking would involve the demolition of the existing building, built ca. 1933 according to historic aerial imagery, URS determined that this would negatively impact the historic character of the South Atlantic City Historic District and result in an adverse effect (see URS submitted Form 2, below).

The NJHPO replied in an email dated February 27, 2014 that they did not concur with the assessment made by URS. The agency stated their finding that the particular location in which the project was located was not within the potential area of concern for the South Atlantic City Historic District. The NJHPO finding was that the reconstruction undertaking would have no adverse effect on historic properties (see NJHPO response, below). New Jersey DEP and DCA have agreed to accept the SHPO finding of no historic properties affected and the project may proceed.

The Programmatic Agreement also states that an archaeological investigation of the project area is not required when it is a reconstruction project, if it is located on a barrier island. That allowance is stated under Appendix B, Tier II Stipulation I, which states:

Tier II Allowances

I. BARRIER ISLANDS ONLY - GROUND DISTURBING ACTIVITIES AND SITE WORK:

Any projects located on a barrier island will be exempt from archaeological review by the New Jersey State Historic Preservation Office except when any of the following conditions applies:

- A. There is a known shipwreck site on or adjacent to the project site; or
- B. There is a known archaeological site on or adjacent to the project site;
- C. Local officials or members of the public identify to the federal agency archaeological resources, or strong potential, within the project site; or
- D. Footprint of ground disturbance exceeds 5 acres; or
- E. FEMA personnel meeting or exceeding the Secretary's Professional Standards for archaeology assesses the project site as possessing a high potential for the presence of significant archaeological deposits, as guided by archaeological site sensitivity models developed for the region.

Atlantic City is located on Absecon Island, one of the southernmost barrier islands of New Jersey. None of the above exceptions apply, therefore the project is exempt from an archaeological review. The application of this allowance was made by Jeremy Lazelle of URS, an archaeologist who meets the Secretary of Interior's professional standards for archaeology. This information was also included on the Form 2 submitted by URS to NJHPO.

The proposed project is not situated within a local historic district and so consultation with the municipal government regarding potential historic preservation concerns was not required. Furthermore, as the proposed program action is limited to activities that meet the Programmatic Agreement allowances for archaeology, consultation with the Native American Tribe signatories to the document was not needed.

Source: Programmatic Agreement for New Jersey Hurricane Sandy Disaster Recovery. Form 2 Section 106 consultation form submitted to NJHPO and signed letter from NJHPO.

Lackowicz, Rob

From: McLaughlin, Sara
Sent: Wednesday, February 26, 2014 12:24 PM
To: DEP NJHPO
Cc: Lackowicz, Rob; Crowl, Heather; Wolf, Zana
Subject: DEP Form 2, SRP0038251, 307 ATLANTIC AVE, Atlantic City
Attachments: SRP0038251_FORM2.pdf

Good afternoon,

Attached for your review please find a Form - 2: Assessment of Effects for application SRP0038251, 307 ATLANTIC AVE, Atlantic City.

Please forward any questions you may have to me at sara.mclaughlin@urs.com. We look forward to your response.

Thank you,

Sara McLaughlin
Architectural Historian
URS Corporation
437 High Street
Burlington, NJ 08016
(t) 609.386.5444
(f) 609.386.6994
sara.mclaughlin@urs.com

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**New Jersey Department of Environmental Protection
Hurricane Sandy
Community Development Block Grant
Form – 2 : Assessment of Effects (Version 1.0)**



HPO USE ONLY

Application ID #	SRP0038251		
Applicant Name:	MOHAMMAD SHARIF		
Street Address:	307 ATLANTIC AVE		
Municipality:	Atlantic City (Atlantic City)	County:	Atlantic
PAMS PIN:	0102_124_51		
Latitude:	39.36778209	Longitude:	-74.41485632
Undertaking:	<input type="checkbox"/> Rehabilitation:	<input type="checkbox"/> Interior <input type="checkbox"/> Exterior <input type="checkbox"/> Both	<input checked="" type="checkbox"/> Elevation
	<input checked="" type="checkbox"/> Reconstruction:	<input type="checkbox"/> Within Existing Footprint, plus 2 feet	<input checked="" type="checkbox"/> Outside Existing Footprint

Property Description:	<p>This three-story, multiple-family, vernacular residence was built in c.1933 (HistoricAerials.com) in the Italian Renaissance style. Although DCA and the tax record does not lists the date of construction for this residence, URS concurs the actual date of construction to be the 1930s based on the building’s form, materials, and style. The building occupies the entire parcel and has a rectangular-shaped plan. The residence features a flat roof covered with asphalt roll roofing. The walls are exposed brick and concrete block. Decorative wall features include a paneled concrete-block across portions of the facade and concrete quoins. The façade also features pilasters rising from the top of the paneled-block to the top of the second story that border the windows beside the center bay. The residence has double-hung, one-over-one, wood-framed and vinyl-framed window sashes. The windows are arranged symmetrically in singles. Centered on the primary façade is a recessed entry with a heavily elaborated entrance surround. The surround consists of pilasters crowned by an entablature etched with the building’s address. The entry also is curved and has a keystone with florets on both sides. The main entry door is not visible. On both sides of the main entry are windows that are boarded over and have wood panels below and bracketed aprons. Beside these windows are boarded over windows with brick sills. The façade’s second story has a centered, double-hung window crowned with a half-circle window that is accented with a curved stretcher brick crown topped by a keystone and also has a brick sill. On both sides of the centered window are double-hung windows that have wood panels below with balcony accents that have a metal post balustrade. There is a double-hung window with a brick sill near the east bay and the west bay is missing a window and wall cladding. The façade’s third story is missing all fenestration and wall cladding. The slightly extended southwest (side) elevation has two windows with brick sills along each of the three stories. Continuing along the southwest (side) elevation are three fixed windows at the basement story. The first story has nine windows with brick sills, and the second and third stories each have 11 windows with brick sills. The northwest (rear) elevation’s basement level has two fixed windows, and the remaining first, second, and third stories each have three windows that are evenly spaced. Between the center and south bays is a brick chimney. The northeast (side) elevation’s basement level has four fixed windows, and the first, second, and third stories each have eleven windows. URS assesses this residence to be a contributing resource to the historic fabric of the potentially National Register of Historic Places (NRHP)-eligible South Atlantic City Historic District.</p> <p>The property has low archaeological potential because it is located on a Barrier Island. Additionally, the property has low archaeological potential because the project substantially conforms to the original footprint and meets Tier II PA Allowance VII.A.I as listed in Appendix B of the PA.</p>
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Current Property Status	
National Historic Landmark?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
National Register of Historic Places Listed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a National Register of Historic Places Historic District?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	<input type="checkbox"/> Contributing <input type="checkbox"/> Non-Contributing
Does the property have a SHPO Opinion or COE?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a Known Archaeological Site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an Area of High Archaeological Sensitivity?	<input type="checkbox"/> Area of Previous Historic Occupation <input type="checkbox"/> Property Located within HPO’s Archaeological Site Sensitivity Grid <input type="checkbox"/> Area Located on Well-Drained Soils located within 500 feet of waterways, wetland complexes, or relict glacial features.

Preliminary Property Evaluation	
<input type="checkbox"/> Further Survey Necessary:	<input type="checkbox"/> Archaeological <input type="checkbox"/> Historic Architecture
<input checked="" type="checkbox"/> No Further Survey Necessary	
<input checked="" type="checkbox"/> Recommend Eligible:	<input type="checkbox"/> Individual <input checked="" type="checkbox"/> Contributing to: South Atlantic City Historic District
	Criteria: [Check All That Apply] <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D
Reasoning:	The residence appears to meet the criteria to be a contributing property to the National Register of Historic Places (NRHP) eligible South Atlantic City Historic District under Criteria A and C. The proposed boundary for the historic property is the legal parcel. Based on its age, the residence appears to be associated with the settlement and development of South Atlantic City. Based on information supplied by NJ HPO, the South Atlantic City Historic District is primarily considered eligible for listing on the NRHP under Criteria A, for its local significance as an African-American historic neighborhood. The residence appears to retain its integrity of location, setting, feeling, and association; however alterations represent some loss of integrity of design, materials, and workmanship. This property is not individually eligible for listing in the NRHP.

Architecture Reviewer	Lorin Farris, MA (URS Corporation)	Archaeology Reviewer	N/A (cleared under Tier 1 PA allowance)
Date Reviewed	2/25/2014		

Required Documentation: Historic Properties Map Soils Map USGS Quad Property Photos



**New Jersey Department of Environmental Protection
Hurricane Sandy
Community Development Block Grant
Form – 2 : Assessment of Effects (Version 1.0)**



HPO USE ONLY

<input type="checkbox"/> Recommend Ineligible:	<input type="checkbox"/> Lacks Integrity of Materials/Design
	<input type="checkbox"/> Not 48 Years of Age <input type="checkbox"/> Not Within / In View of a National Register of Historic Places Listed / Eligible Historic District <input type="checkbox"/> Not a Building (per FEMA Definition) <input type="checkbox"/> Other – Lacks Distinctive Characteristics That Make It Individually Eligible for Listing on NRHP

Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ

Assessment of Effects	<input type="checkbox"/> No Historic Properties Adversely Affected
	<input type="checkbox"/> No Historic Properties Adversely Affected, provided the following conditions are met:
	<input checked="" type="checkbox"/> Adverse Effect The proposed undertaking of reconstruction with elevation will have an Adverse Effect on the possible historic area identified as the National Register of Historic Places (NRHP) eligible South Atlantic City Historic District. This undertaking will alter the historic area’s integrity of location, setting, feeling, and association, as well design, materials, and workmanship.

National Historic Landmark Consultation Process [If Applicable]	
Undertaking Located Within NHL :	<input type="checkbox"/> National Park Service
Applying Allowances As Defined in Programmatic Agreement:	<input type="checkbox"/> National Park Service <input type="checkbox"/> State Historic Preservation Office
	Tier I: _____
	Tier II: _____
Adverse Effect:	<input type="checkbox"/> National Park Service <input type="checkbox"/> State Historic Preservation Office <input type="checkbox"/> Advisory Council on Historic Preservation

Resolution of Adverse Effects	<input type="checkbox"/> Abbreviated Consultation Process	Treatment Measure:	Means to resolve the Adverse Effect will be negotiated between the New Jersey DCA, DEP and HPO offices prior to the undertaking being funded or proceeding to construction.
	<input type="checkbox"/> Memorandum of Agreement		
	<input type="checkbox"/> Programmatic Agreement		

Public Consultation	Federally Recognized Tribes, Certified Local Governments, Historic Preservation Commissions, etc: Public consultation members and the means of consultation will be decided by New Jersey DCA, DEP and HPO as part of Adverse Effect resolution measures.
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HISTORIC PRESERVATION OFFICE USE ONLY	
<input type="checkbox"/> I concur with this finding,	
<input type="checkbox"/> I do not concur with this finding for the following reason(s):	
Daniel D. Saunders Deputy State Historic Preservation Officer	Date

Architecture Reviewer	Lorin Farris, MA (URS Corporation)	Archaeology Reviewer	N/A (cleared under Tier 1 PA allowance)
Date Reviewed	2/25/2014		

Required Documentation: Historic Properties Map Soils Map USGS Quad Property Photos



New Jersey Department of Environmental Protection
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Community Development Block Grant
Form – 3 (Version 1.0)



Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ



Proposed Action Site	Listed (Indv.)	Eligible (HD)	Listed
HUD Review Parcels	Listed (HD)	Identified (Indv.)	Eligible
Archaeological Site Grid	Eligible (Indv.)	Identified (HD)	Identified

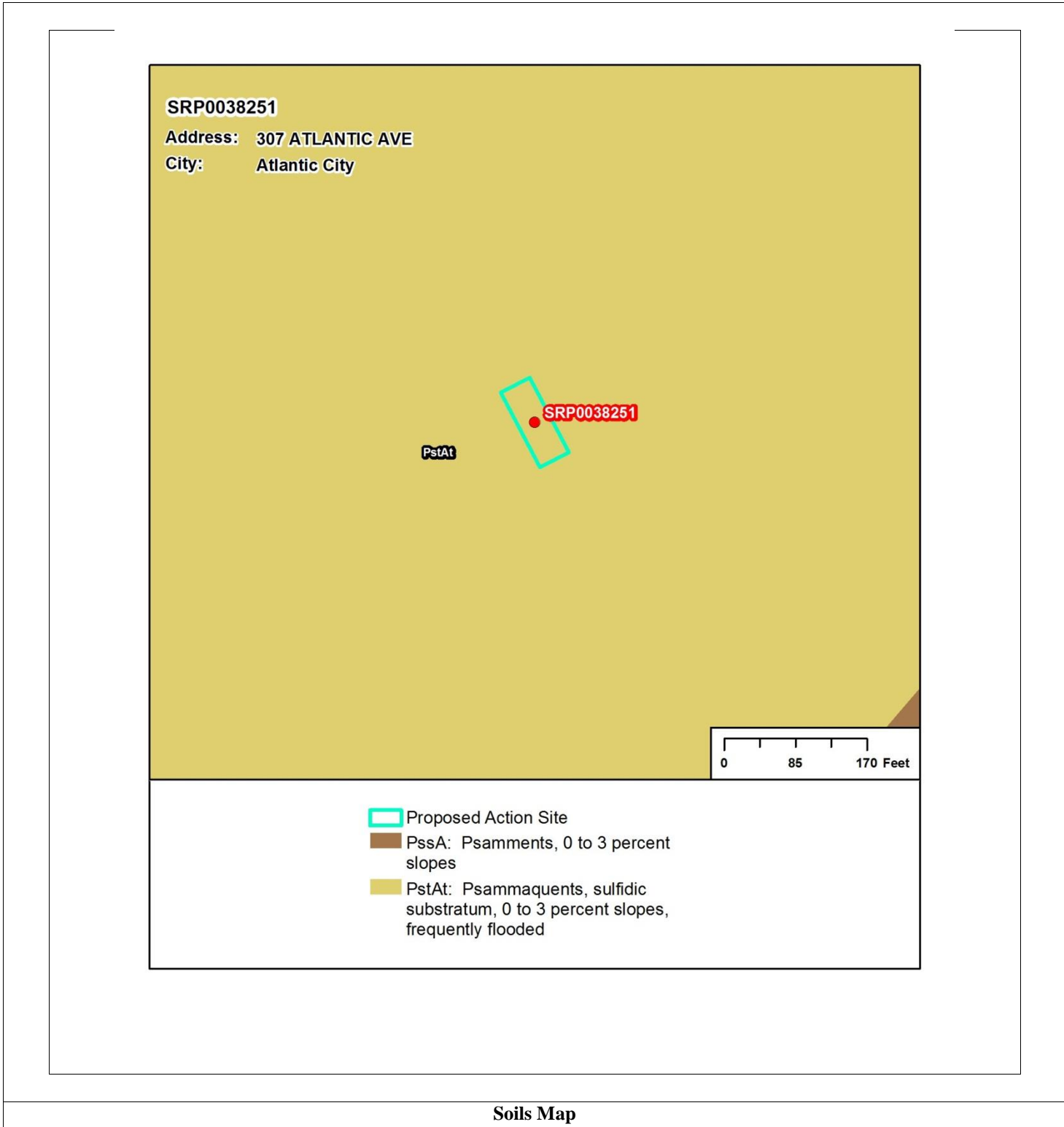
Historic Properties Map



New Jersey Department of Environmental Protection
Hurricane Sandy
Community Development Block Grant
Form – 4 (Version 1.0)



Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ



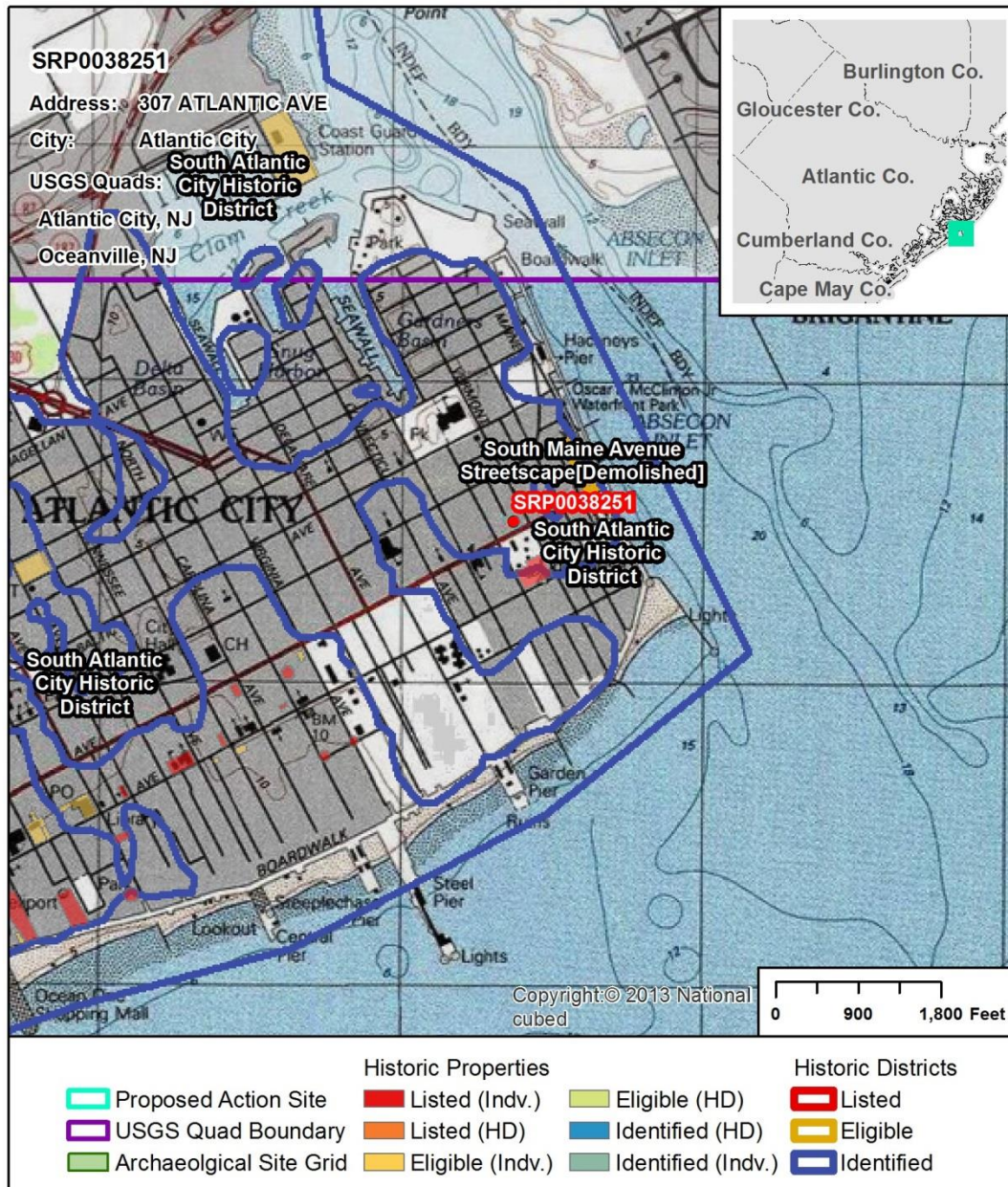
Soils Map



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Hurricane Sandy
Community Development Block Grant
Form – 5 (Version 1.0)



Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ



USGS Quadrangles: Atlantic City and Oceanville, NJ



New Jersey Department of Environmental Protection
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Community Development Block Grant
Form – 5 (Version 1.0)



Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ

Date:	2/5/2013
Direction:	North
Description:	
Front; southeast elevation	



Date:	2/5/2013
Direction:	Northwest
Description:	
Portico detail; 307 Atlantic Avenue, Atlantic City, NJ	





New Jersey Department of Environmental Protection
Hurricane Sandy
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Form – 5 (Version 1.0)



Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ

Date:	2/5/2013
Direction:	Southeast
Description:	
Rear; Northwest elevation	



Date:	2/5/2013
Direction:	Northeast
Description:	
Side; Southwest elevation	





New Jersey Department of Environmental Protection
Hurricane Sandy
Community Development Block Grant
Form – 5 (Version 1.0)



Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ

Date:	2/5/2013
Direction:	Northwest
Description:	Side; Northeast elevation



Date:	2/5/2013
Direction:	Southwest
Description:	Streetview; Atlantic Avenue, Atlantic City, NJ





New Jersey Department of Environmental Protection
Hurricane Sandy
Community Development Block Grant
Form – 5 (Version 1.0)



Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ

Date:	2/5/2013
Direction:	Northeast
Description:	Streetview; Atlantic Avenue, Atlantic City, NJ



Date:	2/5/2013
Direction:	East
Description:	Streetview; Atlantic Avenue, Atlantic City, NJ





New Jersey Department of Environmental Protection
Hurricane Sandy
Community Development Block Grant
Form – 6 (Version 1.0)



Applicant ID #	SRP0038251
Property Address:	307 ATLANTIC AVE, Atlantic City, NJ

Date:	2012
Direction:	East
Description:	Bing Bird's eye view of 307 Atlantic Avenue, Atlantic City, NJ (indicated by arrow) and environs



Date:	2012
Direction:	South
Description:	Bing Bird's eye view of 307 Atlantic Avenue, Atlantic City, NJ (indicated by arrow) and environs



[New Search](#)

Block: 124 Prop Loc: 307 ATLANTIC AVE Owner: MD DAD & SON'S APARTMENT LLC Square Ft: 7626
 Lot: 51 District: 0102 ATLANTIC Street: 101 BRETTWOOD DRIVE Year Built:
 Qual: Class: 4C City State: EGG HARBOR TWP., NJ 08234 Style:

Additional Information

Prior Block: 98 Acct Num: Addl Lots: EPL Code: 0 0 0
 Prior Lot: 74 Mtg Acct: Land Desc: 38.72X100 Statute:
 Prior Qual: W01 Bank Code: 0 Bldg Desc: B3S Initial: 000000 Further: 000000
 Updated: 07/15/13 Tax Codes: Class4Cd: 29 Desc:
 Zone: NEIR Map Page: 023 Acreage: 0.0889 Taxes: 22974.60 / 0.00

Sale Information

Sale Date: 05/16/13 Book: 13599 Page: 32764 Price: 65000 NU#: 26

Sr1a	Date	Book	Page	Price	NU#	Ratio	Grantee
More Info	06/06/07	12649	63220	10	10	0	COHEN INVESTMENTS LLC
More Info	05/16/13	13599	32764	65000	26	0	MD DAD & SON'S APARTMENT LLC

TAX-LIST-HISTORY

Year	Owner Information	Land/Imp/Tot	Exemption	Assessed	Property Class
2014	MD DAD & SON'S APARTMENT LLC 101 BRETTWOOD DRIVE EGG HARBOR TWP., NJ 08234	420000 483800 903800	0	903800	4C
2013	COHEN INVESTMENTS LLC 32 BATTLE FLAGG RD BEDFORD, MASS 01730	420000 483800 903800	0	903800	4C
2012	COHEN INVESTMENTS LLC 32 BATTLE FLAGG RD BEDFORD, MASS 01730	420000 483800 903800	0	903800	4C
2011	COHEN INVESTMENTS LLC 32 BATTLE FLAGG RD BEDFORD, MASS 01730	420000 483800 903800	0	903800	4C

Lackowicz, Rob

From: Armstrong, Atalaya <Atalaya.Armstrong@dep.state.nj.us>
Sent: Thursday, March 06, 2014 2:24 PM
To: McLaughlin, Sara
Cc: Lackowicz, Rob; Crawl, Heather; Wolf, Zana
Subject: Completed Submission 14-1699 NJDEP RE: DEP Form 2, SRP0038251, 307 ATLANTIC AVE, Atlantic City
Attachments: B2014-301.pdf

Ms. McLaughlin:

The 307 Atlantic Avenue documentation has been reviewed, signed, and scanned.
Please find attached HPO-B2014-301
If you have any issues with the attachments or require additional information, please feel free to let us know.

Regards-A. Armstrong

Mail Code 501-04B
Historic Preservation Office
NJ DEP
PO Box 420
Trenton, NJ 08625-0420
www.nj.gov/dep/hpo

From: McLaughlin, Sara [<mailto:sara.mclaughlin@urs.com>]
Sent: Wednesday, February 26, 2014 1:24 PM
To: DEP NJHPO
Cc: Lackowicz, Rob; Crawl, Heather; Wolf, Zana
Subject: DEP Form 2, SRP0038251, 307 ATLANTIC AVE, Atlantic City

Good afternoon,
Attached for your review please find a Form - 2: Assessment of Effects for application SRP0038251, 307 ATLANTIC AVE, Atlantic City.

Please forward any questions you may have to me at sara.mclaughlin@urs.com. We look forward to your response.

Thank you,

Sara McLaughlin
Architectural Historian
URS Corporation
437 High Street
Burlington, NJ 08016
(t) 609.386.5444
(f) 609.386.6994
sara.mclaughlin@urs.com



State of New Jersey

MAIL CODE 501-04B

DEPARTMENT OF ENVIRONMENTAL PROTECTION

NATURAL & HISTORIC RESOURCES

HISTORIC PRESERVATION OFFICE

P.O. Box 420

Trenton, NJ 08625-0420

TEL. (609) 984-0176 FAX (609) 984-0578

CHRIS CHRISTIE
Governor

BOB MARTIN
Commissioner

KIM GUADAGNO
Lt. Governor

February 27, 2014

Sara McLaughlin
Architectural Historian
URS Corporation
437 High Street
Burlington, NJ 08016

Dear Ms. McLaughlin:

As Deputy State Historic Preservation Officer for New Jersey, I am providing **Consultation Comments** in accordance with 36 CFR Part 800: Protection of Historic Properties, as published with amendments in the Federal Register on July 6, 2004 (44 FR 40553-40555) for the following proposed undertaking:

Atlantic County, Atlantic City
307 Atlantic Avenue – Reconstruction & Elevation
Small Rental Properties Program (SRP0038251)
N.J. Department of Community Affairs
U.S. Department of Housing & Urban Development

Identification of Historic Properties

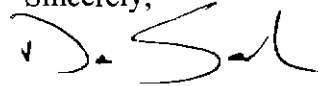
The above referenced submission recommends that the subject property is a contributing property to a potential National Register of Historic Places eligible historic district, under Criteria A and C. However, based upon review of the submitted documentation, the property does not appear to meet the significance criteria for historic district listing on the National Register.

Therefore, there are **no historic properties affected** within the project's area of potential effects. Consequently, pursuant to 36 CFR 800.4(d)(1), no further Section 106 consultation is required unless additional resources are discovered during project implementation pursuant to 36 CFR Part 800.13.

Additional Comments

Thank you for providing the opportunity to review the potential for the above-referenced project to affect historic properties. Please do not hesitate to contact Allyson Mehley of my staff at (609) 292-1913 or Allyson.Mehley@dep.state.nj.us with any questions. If additional consultation with the HPO is needed for this undertaking, please reference the HPO project number 14-1699 in any future calls, emails, or written correspondence in order to expedite our review and response. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Saunders". The signature is fluid and cursive, with a large initial "D" and a long, sweeping "S".

Daniel D. Saunders
Deputy State Historic
Preservation Officer