



Section 106 Effects Case Study Report for the Orange  
Avenue Apartments Redevelopment Project,  
Tallahassee, Leon County, Florida

Submitted to:

Columbia Residential-Orange Avenue Apartments  
1718 Peachtree Road, Suite 684  
Atlanta, GA 30309

PaleoWest Technical Report No. 20-703

November 10, 2020

**SECTION 106 EFFECTS CASE STUDY REPORT FOR  
THE ORANGE AVENUE APARTMENTS  
REDEVELOPMENT PROJECT, TALLAHASSEE, LEON  
COUNTY, FLORIDA**

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**PaleoWest Technical Report No. 20-703**

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**November 10, 2020**

# EXECUTIVE SUMMARY

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In October 2020, PaleoWest Archaeology completed a structure documentation and evaluation survey on behalf of Columbia Residential-Orange Avenue Apartments (CROAA) on four parcels (31-07-20-981-000-0, 31-07-20-982-000-0, 31-07-20-983-000-0, and 31-07-20-984-000-0) located in Tallahassee, Leon County.

The purpose of the structure documentation survey was to identify and document the various types of structures that constitute the Orange Avenue Apartments, to document the Orange Avenue Apartments as a historical resource group, and to provide sufficient historical context for the Florida State Historic Preservation Officer to evaluate the eligibility of the Orange Avenue Apartments according to the National Register of Historic Places (NRHP) criteria in 36 CFR 60, National Historic Preservation Act of 1966, as amended.

As a result of the survey, PaleoWest Archaeology documented five historical structures (8LE06496–8LE06499, LE06583) and one historical resource group (8LE06500). The historical structures are a representative sample of the types of structures found in the Orange Avenue Apartments, and are contributing resources to the Orange Avenue Apartments resource group (8LE06500). The five historical structures were determined by SHPO to be individually ineligible for listing in the NRHP because they lack significant historical associations and architectural distinction.

The Orange Avenue Apartments resource group (8LE06500) was determined by SHPO to be eligible for listing in the NRHP at the local level of significance under Criterion A: Community Planning and Development as the oldest example of Tallahassee Housing Authority (THA) planned and administered public housing in the city. The resource group may also be significant under Criterion C: Architecture as the complex represents a unique developmental pattern in public housing in Tallahassee. The period of significance of Orange Avenue Apartments is 1970-1972, the dates of construction of the complex.

The purpose of this Case Study Report is to document the undertaking's potential effects to 8LE06500, a significant historical resource, and to propose potential measures to mitigate any adverse effects.

The THA has determined that the buildings are functionally obsolete and no longer demonstrate long-term physical and social viability as decent, safe, and affordable housing. Further, significant rehabilitation would be necessary to bring structures into compliance with various state and federal building and environmental codes. As such, redevelopment of the site is necessary, and both rehabilitation and demolition alternatives were evaluated. A Physical Needs Assessment (PNA) of the Orange Avenue Apartments determined that the rehabilitation alternative was neither feasible nor cost-effective. The conclusions presented in the PNA confirm that redevelopment requires the demolition of the existing Orange Avenue Apartment structures. There is no feasible alternative to this demolition that meets the needs of the project, and as such, the proposed undertaking will have an **Adverse Effect** on the resource.

Further coordination and consultation will occur among the SHPO, CROAA, THA, other potential consulting parties, and the public to fulfill the requirements of Section 106. Final mitigation measures will be determined through consultation and will be documented in a Memorandum of Agreement (MOA) to resolve the adverse effect.

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# 1.0 INTRODUCTION

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In October 2020, PaleoWest Archaeology (PaleoWest) completed a structure documentation and evaluation survey on behalf of Columbia Residential-Orange Avenue Apartments (CROAA) on four parcels (31-07-20-981-000-0, 31-07-20-982-000-0, 31-07-20-983-000-0, and 31-07-20-984-000-0) located in Tallahassee, Leon County.

The purpose of the structure documentation survey was to identify and document the various types of structures that constitute the Orange Avenue Apartments, document the Orange Avenue Apartments as a historical resource group, and provide historical context for the development of the Orange Avenue Apartments. The ultimate goal was to provide the Florida State Historic Preservation Office (SHPO) with sufficient information to evaluate the eligibility of the Orange Avenue Apartments according to the National Register of Historic Places (NRHP) criteria in 36 CFR 60, National Historic Preservation Act of 1966, as amended. The structure documentation survey was completed by a Secretary of the Interior (SOI) qualified architectural historian and is in accordance with Section 5-54, Natural Features Inventory, Tallahassee Land Development Code.

As a result of the survey, PaleoWest documented five historical structures (8LE06496–8LE06499, LE06583) and one historical resource group (8LE06500). The historical structures are a representative sample of the types of structures found in the Orange Avenue Apartments, and are contributing resources to the Orange Avenue Apartments resource group (8LE06500). The five historical structures were determined by SHPO to be individually ineligible for listing in the NRHP because they lack significant historical associations and architectural distinction.

The Orange Avenue Apartments resource group (8LE06500) was determined by SHPO to be eligible for listing in the NRHP at the local level of significance under Criterion A: Community Planning and Development as the oldest example of Tallahassee Housing Authority (THA) planned and administered public housing in the city. The resource group may also be significant under Criterion C: Architecture as the complex represents a unique developmental pattern in public housing in Tallahassee. The period of significance of Orange Avenue Apartments is 1970-1972, the dates of construction of the complex.

The purpose of this Case Study Report is to document the undertaking's adverse effect to 8LE06500, a significant historical resource, and to propose potential measures to resolve this adverse effect. For additional information on the project's environmental setting, historic context, previous research, and survey methods and results, refer to *Orange Avenue Apartments Structure Documentation, Tallahassee, Leon County, Florida* (Keethler et al. 2020).

# 2.0 PROJECT DESCRIPTION AND NEED

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The Tallahassee Housing Authority (THA) is proposing to redevelop the Orange Avenue Apartments, a public housing site located at 2710 Country Club Drive in Tallahassee, Leon County, Florida. The site is composed of 34 one-bedroom apartments, 64 two-bedroom apartments, 64 three-bedroom apartments, 34 four-bedroom apartments, and four five-bedroom units on four parcels (31-07-20-981-000-0, 31-07-20-982-000-0, 31-07-20-983-000-0, and 31-07-20-984-000-0), all of which were built between 1971 and 1972. The Area of Potential Effects (APE) for the proposed undertaking is all four parcels that contribute to the Orange Avenue

Apartments (Figure 1). The total area of the project is approximately 29 acres. The project is located in Section 7 of Township 1 South, Range 1 East on the Tallahassee (1977) quadrangle (Figure 2).

The THA has determined that the buildings are functionally obsolete and no longer demonstrate long-term physical and social viability as decent, safe, and affordable housing. Further, significant rehabilitation would be necessary to bring structures into compliance with various state and federal building and environmental codes. As such, redevelopment of the site is necessary (THA 2018). Both rehabilitation and demolition alternatives were evaluated. As further discussed in Section 3, a Physical Needs Assessment (PNA) of the Orange Avenue Apartments determined that the rehabilitation alternative was neither feasible nor cost-effective. The conclusions presented in the PNA confirm that redevelopment requires the demolition of the existing Orange Avenue Apartment structures. There is no feasible alternative to this demolition that meets the needs of the project.

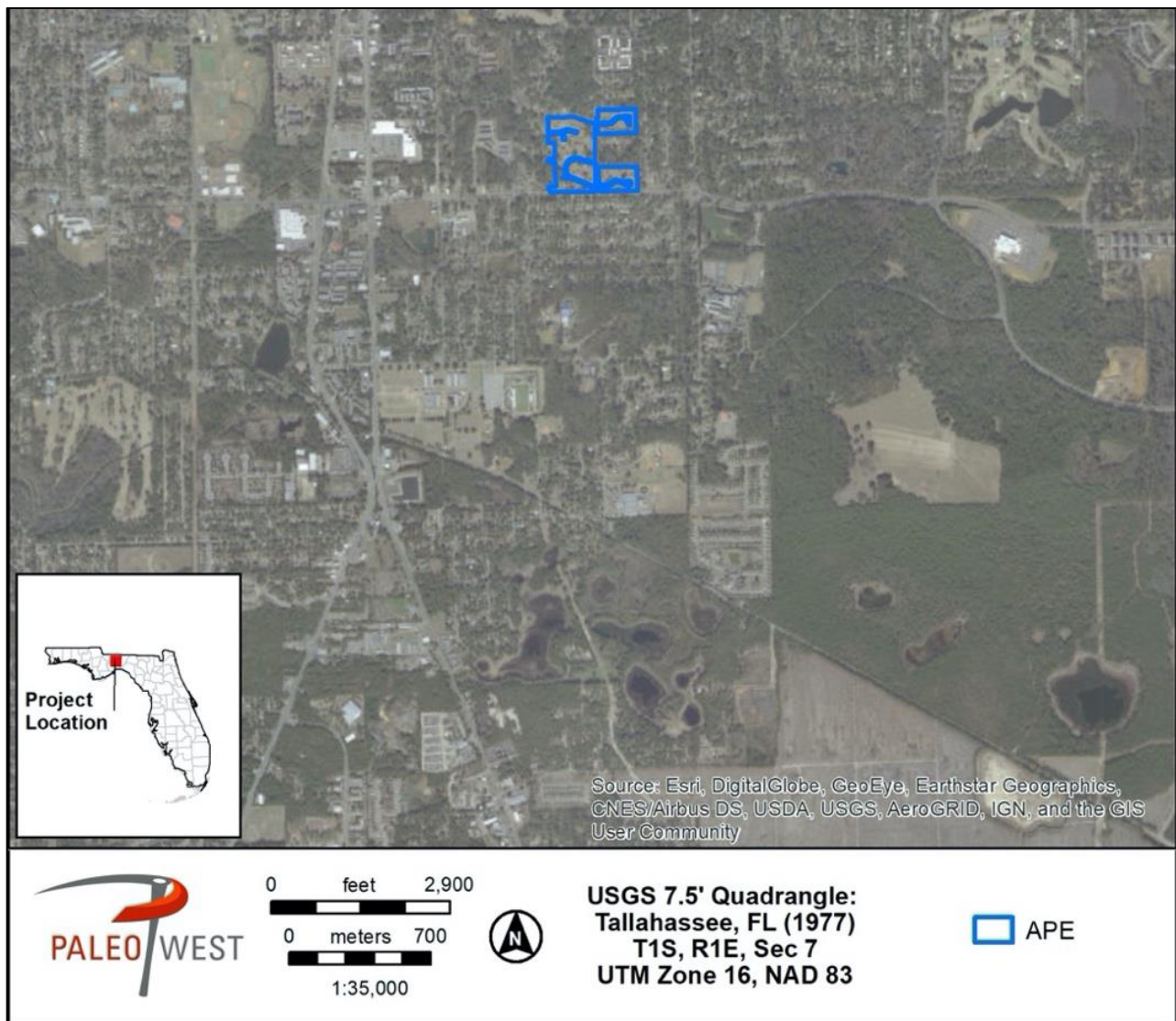


Figure 1. The APE on modern aerial imagery.



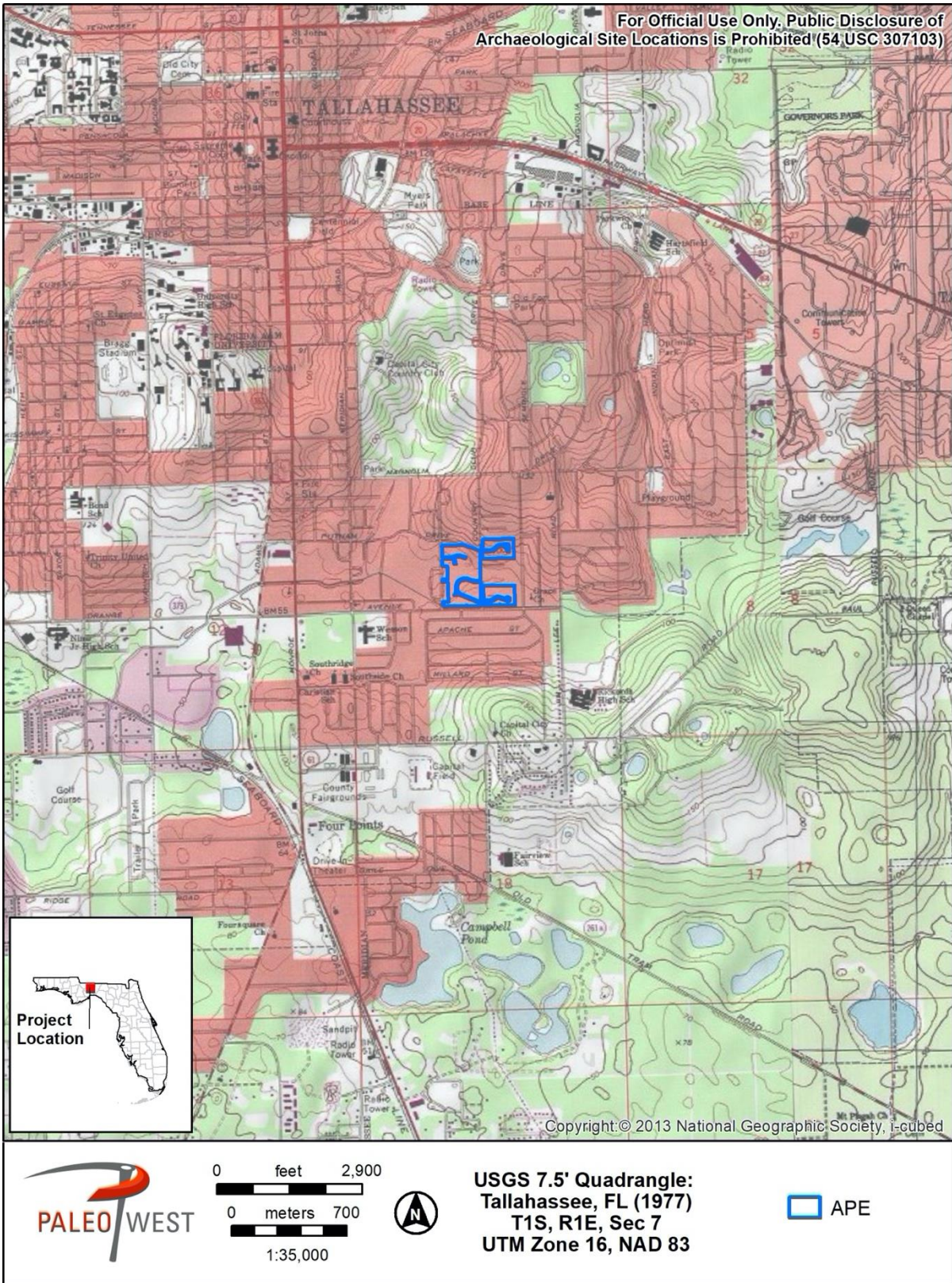


Figure 2. Topographic map with APE.

## 3.0 ANALYSIS OF PROJECT ALTERNATIVES

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The PNA was performed in June 2020 to provide an objective, independent, professional opinion of the potential repair, rehabilitation, and deferred maintenance associated with the Orange Avenue Apartments (DG3 2020). The demolition and disposition of public housing is authorized under Section 18 of the Housing Act of 1937, as amended. For the demolition of an entire development, the development must be determined to be obsolete as to physical condition, location, or other factors, making it unsuitable for housing purposes, and no reasonable program of modifications is cost-effective to return the public housing project or portion of the project to its useful life.

The cost-effectiveness of rehabilitation was determined by comparing rehabilitation costs with the project's total development cost (TDC) in accordance with the United States Department of Housing and Urban Development (HUD) procedures and guidelines. TDC and rehabilitation cost ratios were calculated using HUD form 52860-B. HUD does not consider rehabilitation to be cost-effective if the costs associated with rehabilitation exceed 62.5% of TDC for developments with elevators or 57.14% of TDC for all other types of structures.

The PNA documented the current state of the structures and assessed the feasibility of a rehabilitation alternative. The interiors and exteriors of the residential structures were determined to be in generally poor physical condition and to have exceeded their useful life. The structures require significant rehabilitation and retrofitting to render them viable for on-going safe and sanitary housing.

The structures were also evaluated for compliance with the current State of Florida Building Code (2017), the International Energy Conservation Code (IECC, 2012), the Americans with Disability Act (ADA Code of 1991), the National Fire Protection Association (NFPA) Life Safety Code, the Uniform Federal Accessibility Standards (UFAS), and the Minimum Property Standards (MPS) in HUD Handbook 4910.1.

The structures do not meet current State of Florida Building Codes or NFPA Life Safety Code as they are lacking in fire-rated construction between each unit, sprinklers, and standpipes (DG3 2020:17-18). Further rehabilitation is required to meet compliance standards of the ADA and Section 504 UFAS. Additional work is necessary to address lead-based paint, asbestos-containing material, and mold and mildew concerns (DG3 2020:19-20).

The PNA concluded that a rehabilitation alternative was not feasible due to level of repairs needed and the functional obsolescence observed at the property. Further, the rehabilitation alternative does not meet the cost-effectiveness standards established by HUD. A comparison of the TDC to the estimated construction/rehabilitation cost resulted in a ratio of 76.07% for the residential apartment buildings (DG3 2020:6). Note that this does not incorporate costs associated with elements such as site amenities for increased marketability which would further increase this ratio.

The conclusions presented in the PNA confirm that redevelopment requires the demolition of the existing Orange Avenue Apartment structures. There is no feasible alternative to this demolition that meets the needs of the project.



## 4.0 SURVEY RESULTS

PaleoWest conducted an architectural survey within the APE of the Orange Avenue Apartments and documented five historical structures (8LE06496–8LE06499, 8LE06583) and one historical resource group (8LE06500) (Table 1, Figure 3). These structures are a representative sample of the types of structures found in the Orange Avenue Apartments; 8LE06583 is the complex’s administration office. These newly recorded structures were recommended as not individually eligible for the NRHP because they lack significant historical associations and architectural distinction. These five historical structures are contributing to Orange Avenue Apartments resource group (8LE06500). Refer to *Orange Avenue Apartments Structure Documentation, Tallahassee, Leon County, Florida* (Keethler et al. 2020) for additional information on these resources and their NRHP eligibility evaluations.

On October 23, 2020, SHPO determined that the Orange Avenue Apartments resource group (8LE06500) is eligible for listing in the NRHP at the local level of significance under Criterion A: Community Planning and Development as the first successful public housing development by the THA under the Turnkey I program. While the individual structures are not architecturally significant, the complex as a whole represents a departure from the large barracks style apartments and the tower-style housing project—a unique developmental pattern in public housing in Tallahassee. For this reason, the resource group may also be significant under Criterion C: Architecture. The period of significance of Orange Avenue Apartments is 1970-1972, the dates of construction of the complex.

**Table 1. Historical structures recorded within the APE.**

FMSF No.	Parcel No.	Street Address/Name	Date	SHPO Determination
8LE06496	31-07-20-983-000-0	36 & 37 Priscila Ln	1972	Individually Ineligible
8LE06497	31-07-20-984-000-0	22-25 Bates Dr	1972	Individually Ineligible
8LE06498	31-07-20-981-000-0	10 & 11 Sebring Ct	1971	Individually Ineligible
8LE06499	31-07-20-982-000-0	21 Canton Cr	1971	Individually Ineligible
8LE06583	31-07-20-982-000-0	2710 Country Club Drive/Leasing Office	1971	Individually Ineligible
8LE06500	31-07-20-981-000-0 31-07-20-982-000-0 31-07-20-983-000-0 31-07-20-984-000-0	Orange Avenue Apartments	1970-72	Eligible

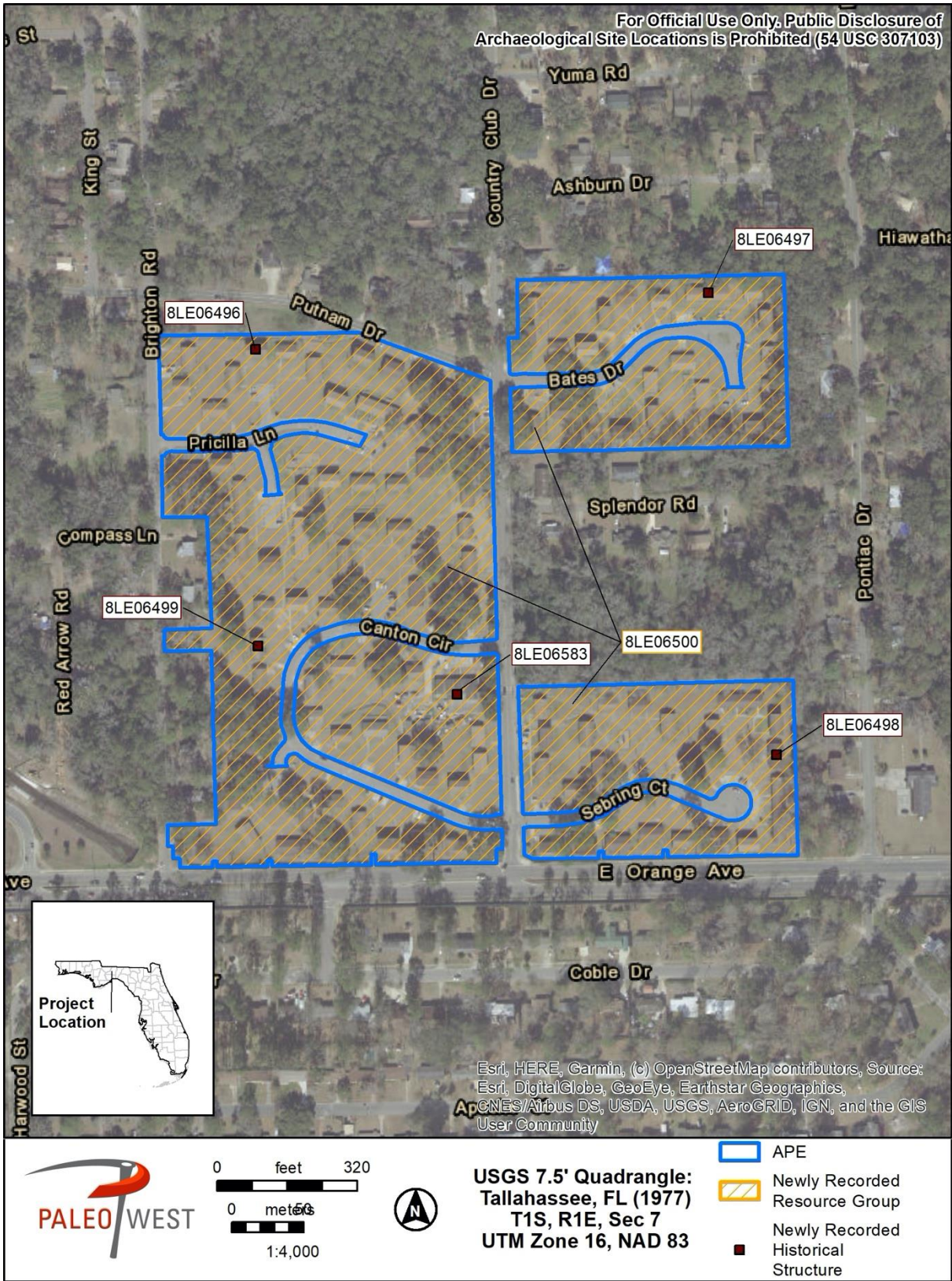


Figure 3. Results of the survey.



## 4.1 8LE06500: ORANGE AVENUE APARTMENTS (8LE06496–8LE06499, 8LE06583)

**Site Type:** Resource Group

**Build Date:** c. 1971 & c. 1972

**Contributing Resources:** 8LE06496–8LE06499, 8LE06583

**District Eligibility Status:** Eligible

**Resource Group Description:** 8LE06500 is a housing development on four parcels (31-07-20-981-000-0, 31-07-20-982-000-0, 31-07-20-983-000-0, and 31-07-20-984-000-0) of property consisting of single and multi-family homes with Minimal Traditional Influence but lacking any formal architectural style. The development was built in 1971 and 1972 with numerous, detached buildings that have rectangular-shaped plans. In total, there are 34 one-bedroom apartments, 64 two-bedroom apartments, 64 three-bedroom apartments, 34 four-bedroom apartments and 4 five-bedroom units. The parcels and development itself are bordered to the south by Orange Avenue, to the east by Brighton Rd, to the west by Pontiac Dr, and to the north by Putnam Dr. All structures within these four parcels follow the same style influence (Minimal Traditional) and form variations – including single-unit, one-story duplexes, two-story duplexes, three-unit apartments, and four-unit apartments.



Figure 4. Photograph of Parcel 31-07-20-981-000-0, Sebring Ct, facing north.



Figure 5. Photograph of Parcel 31-07-20-981-000-0, Sebring Ct, facing west.



Figure 6. Photograph of Parcel 31-07-20-982-000-0, Canton Cr, facing north.





Figure 7. Photograph of Parcel 31-07-20-982-000-0, Canton Cr, facing south.



Figure 8. Photograph of Parcel 31-07-20-983-000-0, Priscila Ln, facing northeast.





Figure 9. Photograph of Parcel 31-07-20-983-000-0, Priscila Ln, facing south.



Figure 10. Photograph of Parcel 31-07-20-984-000-0, Bates Dr, facing south.



Figure 11. Photograph of Parcel 31-07-20-984-000-0, Bates Dr, facing west.

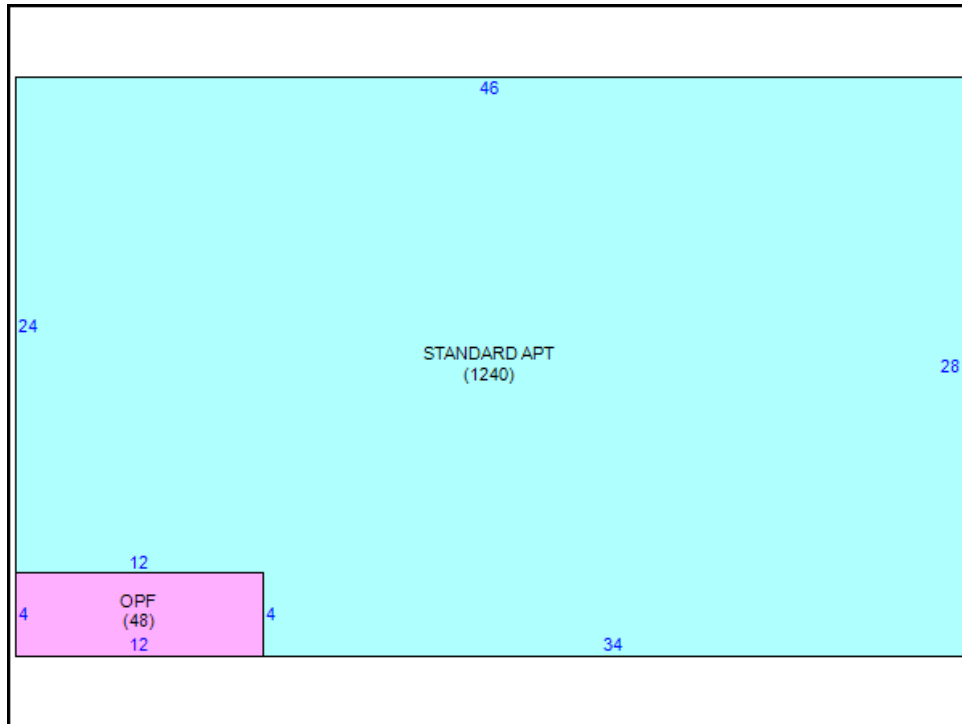


Figure 12. Standard single-unit apartment plan (Leon County Property Appraiser 2020).

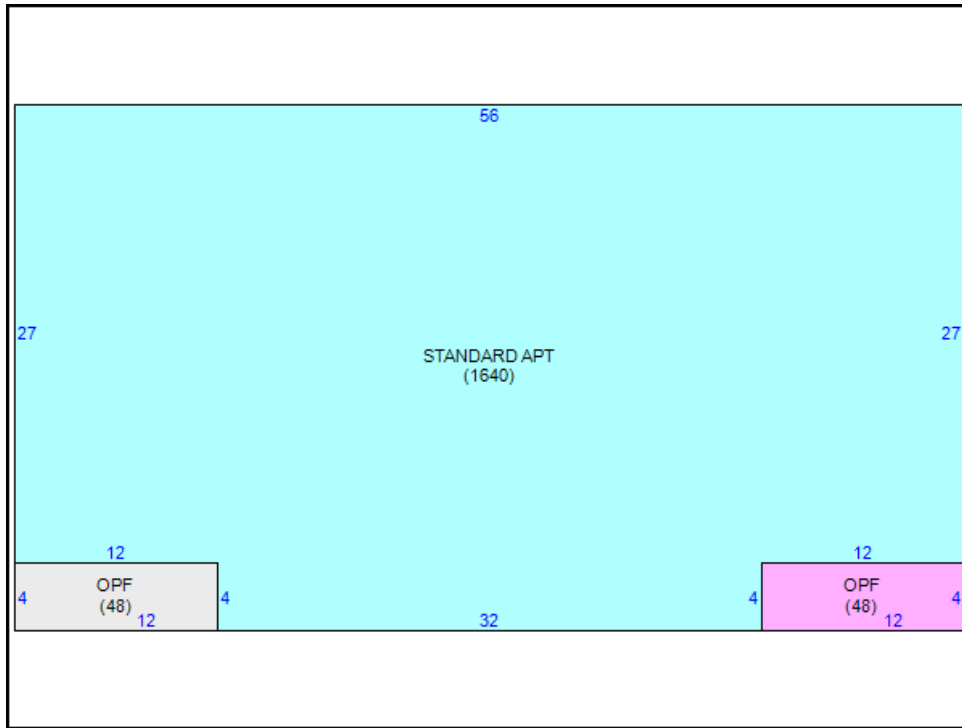


Figure 13. Standard duplex apartment plan (Leon County Property Appraiser 2020).

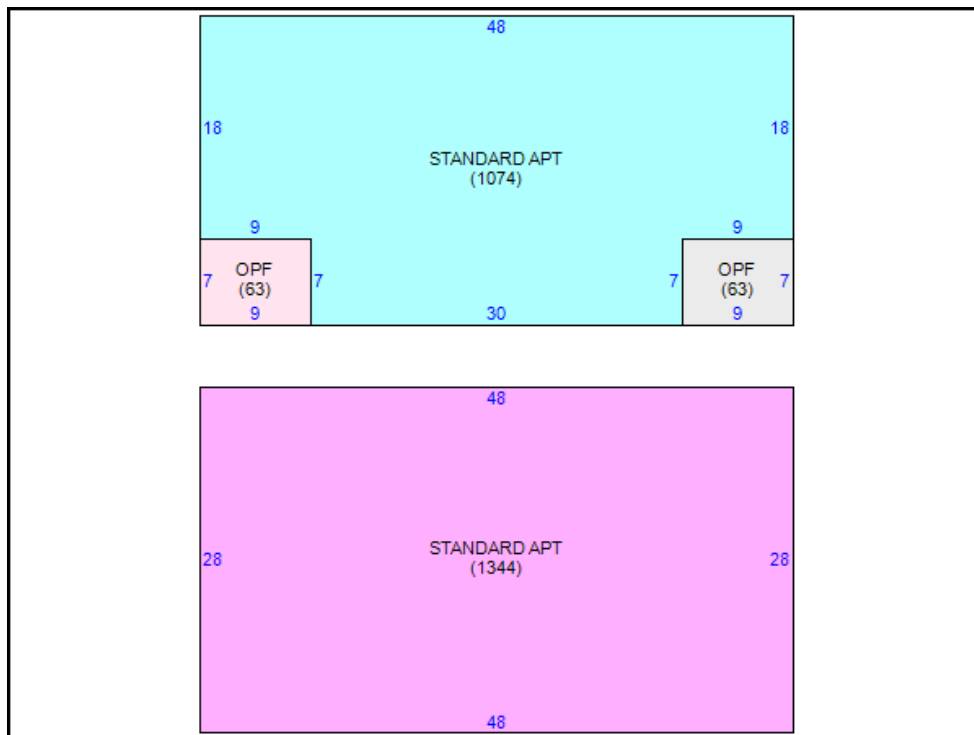


Figure 14. Standard two-story duplex apartment plan (Leon County Property Appraiser 2020).



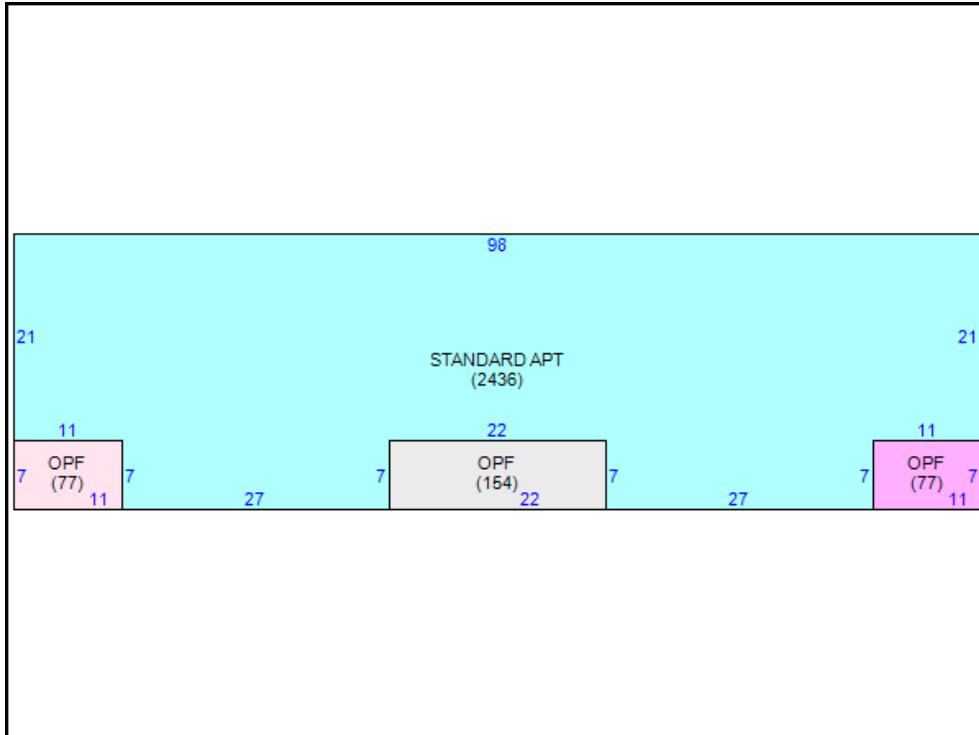


Figure 15. Standard triplex apartment plan (Leon County Property Appraiser 2020).

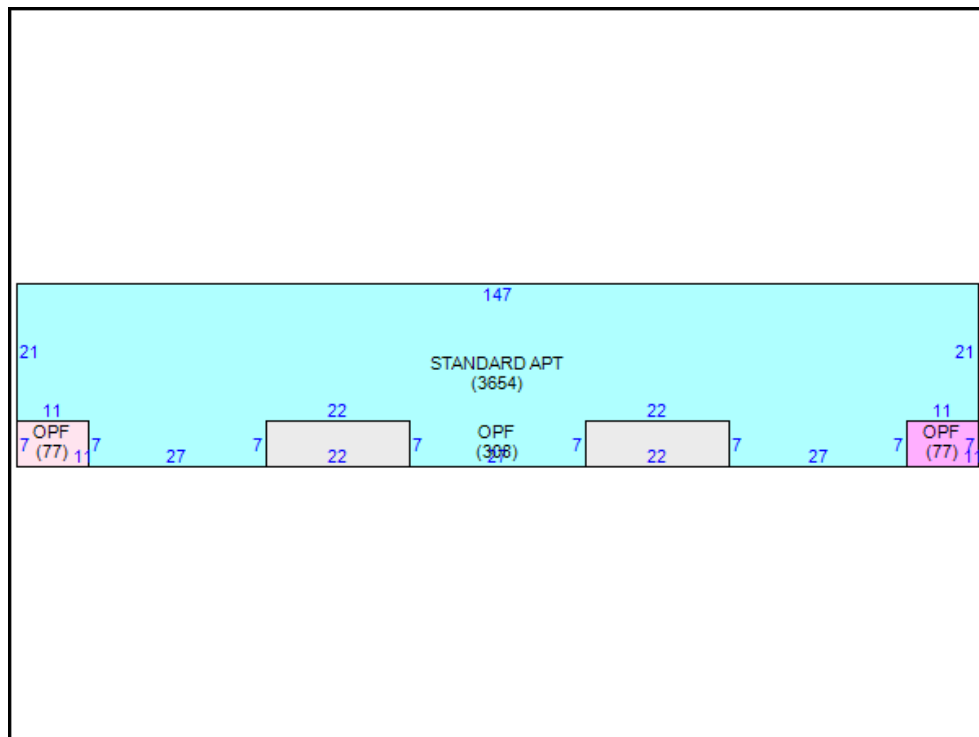


Figure 16. Standard four-unit apartment plan (Leon County Property Appraiser 2020).

All structures among these parcels share masonry frame structure clad in brick and vinyl, as well as side-gable composite shingle roofs and replacement 1/1 vinyl windows and vinyl entry-doors. All window bays within the structures across all four parcels are either single or paired 1/1 vinyl windows, many of which on the front elevations feature shutters. Each individual parcel contains a playground area for children, a set of grouped mailboxes for residence, and the entire development shares a single office building for housing administration built in the same style of Minimal Traditional Influence as the surrounding structures. The foundations of all structures are continuous brick and all patio areas are concrete slab with brick column supports. Parking around the development is provided at designated areas along the streets in front of the structures.

8LE06500 is a federally subsidized public housing development arranged with the specific intention of invoking a suburban aesthetic. This is in contrast to earlier and many contemporary public housing properties, which concentrated high numbers of units in buildings with comparatively less open space.

According to Leon County Property Appraiser records the property is owned by the Tallahassee Housing Authority, which has been the sole property owner since c. 1972 when it was purchased from Housing Associates, Inc (an Ohio Corporation) (Leon County Property Appraiser 2020).

As addressed in greater detail in the local history section, 8LE06500 was constructed as one of several public housing developments within Tallahassee by the THA. The demand for public housing in Tallahassee was fueled in the late 1960s by a comprehensive urban renewal plan. 8LE06500 is a federally-subsidized public housing development arranged with the specific intention of invoking a suburban aesthetic. This is in contrast to earlier and contemporary public housing properties in Tallahassee, which concentrated high numbers of units in buildings with comparatively less open space.

**SHPO Eligibility Determination:** Eligible for listing in the NRHP at the local level under Criterion A: Community Planning and Development as the first successful public housing development by the THA under the Turnkey I program. The resource group may also be significant under Criterion C: Architecture as it expresses a unique developmental pattern in public housing in Tallahassee. The period of significance of Orange Avenue Apartments is 1970-1972, the dates of construction of the complex.

## 5.0 EVALUATION OF EFFECTS

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This Section 106 Effects Case Study Report documents the potential effects the Orange Avenue Apartments Redevelopment Project will have on the Orange Avenue Apartments resource group (LE06500), which has been determined by SHPO to be eligible for listing in the NRHP. The Criteria of Adverse Effect, as defined in 36 CFR § 800.5(a)(1), were applied to this resource. An adverse effect is defined as follows:

An adverse effect is found 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 in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the

National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Examples of adverse effects on historic properties, found in 36 CFR § 800.5(a)(2), include but are not limited to:

- i) Physical destruction of or damage to all or part of the property;
- ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
- iii) Removal of the property from its historic location;
- iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The preferred alternative for the Orange Avenue Apartments Redevelopment Project includes the demolition of the Orange Avenue Apartments resource group (LE06500). As detailed in 36 CFR § 800.5(a)(2)(i), physical destruction or damage to all or part of the property constitutes an adverse effect.

## 6.0 MITIGATION MEASURES

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As detailed in Section 3, the avoidance (rehabilitation) alternative is neither a feasible nor cost-effective means of meeting the needs of the proposed project. Further, the significant level of rehabilitation and retrofitting that would be required to bring the structures into compliance with applicable state and federal building and environmental codes while also providing safe, decent, and affordable housing for residents may diminish the integrity of the resource to an extent that also constitutes an adverse effect.

The following are potential measures to mitigate the adverse effect to the Orange Avenue Apartments resource group (LE06500). These measures are neither exhaustive nor final; additional measures can be arrived at through consultation with SHPO, CROAA, THA, other potential consulting parties, and the public.

- Preparation of a historical narrative for a Florida Historical Marker and completion of a Florida Historical Marker Program Application for the Orange Avenue Apartments development to be installed following the redevelopment of the site.
- Funding of an oral history or documentary project about the experience of Tallahassee's African American community and relationship to THA public housing during this period, highlighting the work of organizations such as the Lincoln Neighborhood Association and THA's Urban Renewal Citizens Advisory Committee.

- Development of a story map as a web-based tool to present the public with historical information about the Orange Avenue Apartments. The story map will include a historical narrative about the Orange Avenue Apartments that will be derived from informant interviews and other sources. This information will be conveyed through a variety of media, including photographs, audio, and video.

## 7.0 PUBLIC INVOLVEMENT

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THA has directed a robust public involvement program throughout planning and development of the proposed undertaking. Community engagement in the form of meetings, workshops, social media outreach, mapping exercises, and stakeholder interviews began in 2017 during development of the Orange Avenue Corridor and Apartments Transformation Plan (THA 2018), with at least one workshop per month held at the Oliver Hill Community Center at the Orange Avenue Apartments site. THA continues to hold regular resident meetings with limited attendance in accordance with current public health guidelines.

Pursuant to 36 CFR §800.6(a)(4), THA shall make the information presented in this Case Study Report available to the public, and shall provide an opportunity for members of the public to express their views on resolving adverse effects of the undertaking. The Case Study Report will be uploaded to the [project website](#), and the project effects will be discussed at an upcoming resident meeting. In addition to informing the public of the adverse effect determination, THA will solicit public input on the resolution of the adverse effect. This meeting, or a separate webinar, may be recorded and uploaded to the project website. Further public outreach and notification can be conducted through social media, such as the [project Facebook page](#).

## 8.0 CONCLUSIONS

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This Section 106 Effects Case Study Report documents the potential effects that will result from the Orange Avenue Apartments Redevelopment Project. The preferred alternative requires demolition of the Orange Avenue Apartments resource group (LE06500), an NRHP-eligible resource. As such, the proposed undertaking will have an **Adverse Effect** on this resource.

Further coordination and consultation will occur among the SHPO, CROAA, THA, other potential consulting parties, and the public to fulfill the requirements of Section 106. Final mitigation measures will be arrived at through consultation and will be documented in an MOA to resolve the adverse effect.



## 9.0 REFERENCES

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### Dominion Due Diligence Group (DG3)

- 2020 Section 18 Demolition Disposition Physical Needs Assessment (PNA), Orange Avenue Apartments – Tallahassee Housing Authority. June 22, 2020.

### Keethler, Emma, Shannon Bruffett, Steve Karacic, and Julie Duggins

- 2020 Orange Avenue Apartments Structure Documentation, Tallahassee, Leon County, Florida. PaleoWest Technical Report No. 20-541.

### Leon County Property Appraiser

- 2020 Leon County Property Appraiser. Accessed online August 2020: <https://leonpa.org>.

### Tallahassee Housing Authority (THA)

- 2018 Orange Avenue Corridor and Orange Ave. Apartments Transformation Plan. April 27, 2018.

# **Appendix A. Determination of Eligibility Cover Letter, October 7, 2020**



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info@paleowest.com

TALLAHASSEE, FLORIDA  
916 East Park Avenue  
Tallahassee, FL 32301

October 7, 2020

Corey Lentz  
Compliance Review  
Division of Historical Resources  
Florida Department of State  
500 South Bronough St.  
Tallahassee, Florida 32301

RE: Historical Structure Documentation  
Project: *Orange Avenue Apartments, Tallahassee, Florida*  
DHR Project Number: 2020-2679  
County: Leon

Dear Corey Lentz:

PaleoWest completed a structure documentation survey for the Orange Avenue Apartments for Columbia Residential-Orange Avenue Apartments. A professional architectural historian completed the work in August 2020 according to the Division of Historical Resources guidelines. Please find enclosed a report detailing the results and conclusions of our survey. It was performed in compliance with Section 5-54, Natural Features Inventory, Tallahassee Land Developmental Code.

The survey resulted in the documentation of five historical structures (8LE06496–8LE06499, 8LE06583) and one historical resource group (8LE06500). The historical structures are a representative sample of the types of structures found in the Orange Avenue Apartments. PaleoWest recommends that the structures are not eligible for the NRHP because they lack significant historical associations and architectural distinction. These historical structures contribute to the historical resource group 8LE06500, Orange Avenue Apartments. PaleoWest recommends that 8LE06500 is not eligible for the NRHP. 8LE06500 does not meet criteria A or B, as no significant historical associations are known. 8LE06500 is not the earliest example of a public housing developed by THA, which was instrumental in the formation of the Cherry Hill apartments, later called Ebony Gardens. It is not eligible under criterion C because 8LE06500 is one of several examples of large-scale housing developments constructed in the late 1960s and early 1970s as part of an urban renewal plan in Tallahassee. In particular, 8LE06500 is similar to Springfield Apartments in its spatial organization, which was designed to provide the residents with access to open spaces. Springfield Apartments was also developed through THA, remains in use, and is a second example of public housing embracing a suburban aesthetic. 8LE06500 is not eligible under criterion D, as it does not possess the potential to provide further information of historical importance.

PaleoWest's structure documentation survey established that the undertaking should have no effects on historical structures eligible for or listed in the NRHP. PaleoWest recommends no additional investigations into the structures within the APE.

We seek your office's concurrence.



Ray Kuniansky (RKuniansky@columbiare.com) at Columbia Residential-Orange Avenue Apartments is the primary contact for the project. While Mr. Kuniansky is the contact, if you have any questions or concerns please contact me directly at [jduggins@paleowest.com](mailto:jduggins@paleowest.com) or 678-360-6243.

Best,

PALEOWEST

A handwritten signature in cursive script that reads "Julie B. Duggins".

**JULIE DUGGINS** | Office Principal





## **Appendix B. SHPO Letter, October 23, 2020**



## FLORIDA DEPARTMENT *of* STATE

**RON DESANTIS**  
Governor

**LAUREL M. LEE**  
Secretary of State

Julie Duggins  
Office Principal  
PaleoWest  
916 East Park Avenue  
Tallahassee, FL 32301

October 23, 2020

RE: DHR Project File No.: 2020-2679-D, Received by DHR: October 7, 2020  
Project: *Revised Cultural Resource Assessment Survey Report:*  
*Orange Avenue Apartments, Tallahassee, Florida*  
County: Leon

Ms. Duggins:

The Florida State Historic Preservation Officer reviewed the referenced project for possible effects on historic properties listed, or eligible for listing, in the *National Register of Historic Places*. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in *36 CFR Part 800: Protection of Historic Properties* in accordance with *Section 5-54, Natural features inventory, Tallahassee Land Development Code* to determine if significant archaeological or historical resources are present or are likely to be present within the project area and to provide recommendations for the treatment of significant resources.

In October 2020, PaleoWest conducted revisions to the above referenced Phase I cultural resource assessment survey (CRAS) on behalf of Columbia Residential-Orange Avenue Apartments (CROAA). As a result of the structure documentation survey, PaleoWest documented five historical structures (8LE06496–8LE06499, 8LE06583) and one historical resource group (8LE06500). The historical structures are a representative sample of the types of structures found in the Orange Avenue Apartments 8LE06496–8LE06499. 8LE06583 is the complex's administration office. PaleoWest recommended that these individual structures are not eligible for the *National Register of Historic Places* (NRHP) because they lack significant historical associations and architectural distinction. These historical structures contribute to the historical resource group 8LE06500, Orange Avenue Apartments. PaleoWest recommended that 8LE06500 is not eligible for the NRHP because the resource group does not meet criteria A or B, as no significant historical associations are known, and does not meet criterion C because 8LE06500 is one of several examples of large-scale housing developments constructed in the late 1960s and early 1970s as part of an urban renewal plan in Tallahassee.

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Based on the information provided, our office does not concur with PaleoWest's recommendations that the historical structures 8LE06496-8LE06499, 8LE06583 and the resource group, Orange Avenue Apartments are ineligible for listing in the NRHP.

It is our opinion that the Orange Avenue Apartments is eligible for listing in the NRHP at the local level of significance under Criterion A: Community Planning and Development as the first successful public housing development by the Tallahassee Housing Authority (THA) under the Turnkey I program. Though the THA public housing development Ebony Gardens was developed prior to Orange Avenue Apartments, that project was never fully finished and the structures that were constructed are no longer extant, making Orange Avenue Apartments the oldest example of THA planned and administered public housing in the city. Additionally, Orange Avenue Apartments represents a third developmental pattern in public housing in Tallahassee, with the other two being the large, barracks style apartments found in the Griffin Heights apartments, Leon Arms Apartments, and Suakoko Villa apartments, and the tower-style housing project as seen in the Dickinson Apartments. The period of significance of Orange Avenue Apartments would be 1970-1972, the dates of construction of the complex.

The property may also be significant under Criterion C: Architecture for its suburban approach to public housing planning, which contrasts with both the tower-in-the-park approach of the multi-story housing projects and the regimented rows of apartment blocks found in barracks style housing. It also contrasts with earlier modes of public housing found in other parts of the state. The individual buildings by themselves are not architecturally significant, but as a whole they speak to an identifiable pattern and type.

As our office has determined the Orange Avenue Apartments to be eligible listing in the NRHP, the demolition of the complex would result in an adverse effect to this resource group. Therefore, CROAA is directed to follow the process described in 36 CFR Part 800.6, *Resolution of Adverse Effects* to complete the Section 106 process. To complete this process, the CROAA should undertake the following actions:

- 1) According to 36 CFR 800.6(a), the Agency (CROAA) shall continue consultation with the SHPO and other consulting parties to develop and evaluate alternatives or modifications to the undertakings that could avoid, minimize, or mitigate adverse effects on historic properties. The Agency shall submit a case study\* outlining these efforts for review by the SHPO.

\* A case study is a document that outlines the agency's efforts to develop and evaluate alternatives or modifications to a project that could avoid or minimize adverse effects to cultural resources. The case study provides a record of an agency's due diligence to carefully consider the impacts of its actions upon cultural resources. The document may also reveal previously unidentified but feasible alternatives that will avoid impacts altogether.

- (2) In accordance with 36 CFR 800.6(a)(4), the Agency shall make information regarding this finding available to the public, providing the public with an opportunity to express their views on resolving adverse effects of the undertakings. Pursuant to 36 CFR 800.11(e), copies or summaries of any views provided by consulting parties and the public shall be made available to the SHPO as part of the case study outlined in (1).

- (3) The Agency shall notify the Advisory Council on Historic Preservation (ACHP), 401 F Street NW, Suite 308, Washington, DC 20001-2637, of the adverse effect finding per 36 CFR 800.6 (a)(1). The notification to the ACHP should be similar to the project information submitted to this office and should include the following documentation as outlined in 36 CFR 800.11(e). The ACHP will advise of its decision to participate in consultation within fifteen (15) days of receipt of this notification or other request. If the ACHP chooses not to participate in consultation, the Agency shall resolve the adverse



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effect without ACHP participation and pursuant to 36 CFR 800.6(b)(1). Notification of the ACHP can also be completed digitally; information for digital notification is available at <https://www.achp.gov/e106-email-form>.

(4) If the Agency, the SHPO and, if applicable, the ACHP agree on how the adverse effects will be resolved, they shall execute a Memorandum of Agreement (MOA) pursuant to 36 CFR 800.6(c).

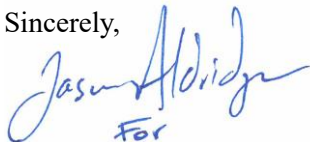
(5) If the Agency and the SHPO fail to agree on the terms of the MOA, the Agency shall request the ACHP to join the consultation. If the ACHP decides to join the consultation, the Agency shall proceed in accordance with 36 CFR 800.6(b)(2). If the ACHP decides not to join the consultation, the ACHP will notify the Agency and proceed to comment in accordance with 36 CFR 800.7.

Our office looks forward to further consultation with CROAA in order to develop appropriate measures to avoid, minimize, or mitigate the adverse effect. At this time our office recommends the following as possible measures to mitigate the adverse effect:

- HABS documentation for the 8LE06583 and 8LE06496–8LE06499.
- The completion of a Florida Historic Marker Program Application for the Orange Avenue Apartments development to be installed following the redevelopment of the site.
- Funding of an oral history or documentary project about the experience of Tallahassee’s African American community and relationship to THA public housing during this period, highlighting the work of organizations such as the Lincoln Neighborhood Association and THA’s Urban Renewal Citizens Advisory Committee.

If you have any questions, please contact Corey Lentz, Historic Sites Specialist, by email at [Corey.Lentz@dos.myflorida.com](mailto:Corey.Lentz@dos.myflorida.com), or by telephone at 850.245.6339.

Sincerely,

A handwritten signature in blue ink that reads "Jason Aldridge". Below the signature, the word "For" is written in a smaller, lighter blue font.

Timothy A Parsons, Ph.D.  
Director, Division of Historical Resources  
& State Historic Preservation Officer