MEMORANDUM OF AGREEMENT AMONG THE UNITED STATES DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERY ADMINISTRATION, ADVISORY COUNCIL ON HISTORIC PRESERVATION AND TEXAS STATE HISTORIC PRESERVATION OFFICER FOR THE PROPOSED PHASE II IMPROVEMENTS TO THE HISTORIC SECTION OF FORT SAM HOUSTON NATIONAL CEMETERY, SAN ANTONIO, TEXAS

WHEREAS, in 2009 Department of Veterans Affairs National Cemetery Administration (NCA) entered into a Programmatic Agreement (PA) with the Texas State Historic Preservation Officer (SHPO) and Advisory Council on Historic Preservation (ACHP) for the purpose of expanding the eastern section of the Fort Sam Houston National Cemetery (Cemetery) and making a series of improvements to the historic (western) section of the Cemetery; and

WHEREAS, the PA resulted in splitting the construction project into two phases of work, Phase I - Expansion of the Cemetery and Phase II – Improvements to Historic Section of Cemetery; and

WHEREAS, the 2009 PA includes several stipulations associated with the construction of Phase II Improvements and this Memorandum of Agreement (MOA) incorporates those applicable stipulations; and

WHEREAS, NCA has initiated action on all these stipulations and will provide a status on the completion of these measures in its annual reports to SHPO, ACHP, and Consulting Parties; and

WHEREAS the 2009 PA required NCA to prepare and submit to SHPO a 30% Design Submittal; and

WHEREAS, in March 2011, NCA submitted the 30% Design Submittal to SHPO and the Consulting Parties for review and comment. As a preliminary design document, the purpose of the 30% design submittal was to conceptually establish the design intent and constraints impacting the design for twenty action items (improvements) to the historic section identified during discussions with SHPO and the Consulting Parties, hereinafter collectively referred to as the "Phase II Improvements;" and described in Appendix 1; and

WHEREAS, SHPO and the Consulting Parties have reviewed and commented on the 30% Design Submittal, and NCA has considered the comments and incorporated as appropriate; and

WHEREAS, in accordance with the 2009 PA, NCA agreed to submit hardcopies of the 90% construction documents to SHPO, ACHP, and Consulting Parties for review and comments. NCA has also agreed to and has submitted hardcopies of the 50% construction documents, an interim progress submittal, as a means of identifying and resolving concerns early in the final design phase of the project; and

WHEREAS, pursuant to 36 CFR § 800.3(a), NCA has determined that these proposed activities collectively constitute an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800); and

WHEREAS, Stipulation II of the 2009 PA specifies that NCA will seek to resolve adverse effects on the Cemetery through consultation with SHPO and other Consulting. Parties; and

WHEREAS, pursuant to 36 CFR § 800.5(d), NCA has determined that this undertaking will have adverse effects on the Cemetery, requiring consultation to explore alternatives that would resolve the adverse effect; and

WHEREAS, NCA has consulted with the SHPO to explore alternatives to various elements of the Phase II Improvements; and

WHEREAS, NCA has notified the ACHP of this consultation, and the ACHP has elected to participate in the consultation; and

WHEREAS, NCA has notified Preservation Fort Sam Houston, the San Antonio Conservation Society, the City of San Antonio's Historic Preservation Officer, and Fort Sam Houston Historic Preservation Office of this consultation, and invited them to comment in this MOA; and

WHEREAS, NCA, SHPO, ACHP, and the Consulting Parties have consulted and commented on all twenty action (20) items and concerns have been addressed to the satisfaction of all Parties for fifteen (15) action items constituting the Phase II Improvements, thus minimizing the adverse effects of these fifteen (15) action items on the historic significance of the Cemetery; and

WHEREAS, NCA, SHPO, ACHP, and the Consulting Parties have reached agreement on how to resolve the adverse effects for the five (5) remaining Phase II Improvements actions items;

Action Item # Description

- 1 Widening the main Cemetery entrance at the intersection of Harry Wurzbach Road and San Antonio Boulevard;
- 2 Rebuilding deteriorated stone walls paralleling Harry Wurzbach Road;

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- 4 Relocation of the existing administration building (Building #1001) fronting San Antonio Boulevard;
- 11 Replacement of selected burial section markers, and
- 14 Construction of an overpass on Nursery Road crossing over San Antonio Boulevard;

WHEREAS, this MOA sets forth measures to address the adverse effects resulting from the implementation of the five action items identified above; and

WHEREAS, this MOA incorporates specific measures concerning public education and outreach, professional qualification standards, and monitoring and reporting; and

WHEREAS, NCA, in consultation with SHPO and ACHP, has terminated the 2009 PA and will replace it with this MOA; and

NOW, THEREFORE, it is mutually agreed that NCA will implement the following stipulations in order to resolve the adverse effects for the Phase II Improvements action items.

STIPULATIONS

NCA shall ensure that the following measures are carried out.

- I. Review of Construction Documents
 - A. NCA will ensure that SHPO, ACHP, and the Consulting Parties are provided with hardcopies of the construction drawings at the 90% progress submission milestone for review and commenting.
 - B. SHPO, ACHP, and Consulting Parties will be afforded at least 30 calendar days to review the construction documents and comment on them via letter or e-mail.
 - C. NCA will consider all comments received and incorporate as appropriate.
- II. Construction Schedule
 - A. NCA anticipates construction will start in mid-2014 and take approximately 12 months to complete.
 - B. Due to circumstances beyond the control of NCA, the construction start and end dates are subject to change.

- C. NCA will notify SHPO, ACHP, and the Consulting Parties when the construction contract is awarded and the anticipated completion date.
- III. Widening the Entrance (Action Item 1)

- A. Widening of the cemetery's main entrance is necessary to address traffic and safety issues. In consultation with the Fort Sam Houston Base Engineer, NCA explored several options for maintaining multiple access points to the cemetery while addressing the Base's need to comply with the Department of Defense's directive for force protection. Options considered included a new cemetery access point off Winans Road, closure of Nursery Road between Winans Road and golf course maintenance yard to base traffic, and traffic control devices at the intersection of Nursery Road and San Antonio Blvd., with each option keeping the current Base access control point east of Nursery Road or moving it just east of the proposed new cemetery access point off Winans Road. In July 2011, the Base Commander announced that Fort Sam Houston will be relocating the Base's secure entry control point on Winans Road to the intersection with Harry Wurzbach Road, a major north/south artery. The Base's control point relocation will eliminate Nursery Road as an alternate access point to the cemetery and force all cemetery ingress/egress traffic through the San Antonio Blvd. access point. The widening of the exit from one lane to two lanes will allow for a clearly defined exit route for both northbound and south bound traffic while minimizing the exit queuing typically experienced without the improvement.
- B. NCA will ensure that the entrance gate is widened in accordance with the specifications set forth in the construction documents (Appendix 2), and specifically that:
 - 1. The overall appearance of the new gate will replicate the materials, profile, and finish of the original gate;
 - 2. The two original gate leaves will be retained at either side, with a new leaf added at the middle as shown in Appendix 2; and
 - The relocated column at the north side of the entrance will be reconstructed using salvaged materials, to the greatest extent feasible.

IV. <u>Rebuilding Stone Walls (Action Item 2)</u>

A. The 30% Design Submittal included a detailed analysis of the perimeter stone walls along the north, west, and south boundary of the cemetery's historic section. In general, the wall segments were found to be in poor condition with large vertical cracks, segments of wall leaning two degrees or greater, deteriorating stonework, and damaged concrete caps. The existing perimeter walls do not meet NCA's maintenance standards for maintaining cemeteries at national shrine levels.

- B. NCA had considered a wholesale demolition and replacement of the perimeter walls with walls of like kind but has agreed with SHPO, ACHP, and the Consulting Parties to address the failures in the walls as follows:
 - 1. In consultation with the SHPO, NCA will identify any segments of the wall along Harry Wurzbach Road that are suitable for repair rather than replacement, and will repair any such segments.
 - 2. NCA will replace those wall segments that cannot be repaired using stone of the same type, size, and shape as that employed in the original construction. NCA will build the replacement walls using mortar joints of the same hardness, profile, and dimension as that featured in the original masonry work. NCA will ensure that the work is completed under the supervision of an experienced stonemason.
 - 3. NCA will not increase the height or width of the wall.
 - 4. NCA may reinforce the wall as necessary, provided such reinforcement is not visible once the wall is finished.
 - 5. In limited areas along the northern boundary of the cemetery where the cemetery wall also serves as the perimeter for Fort Sam Houston, NCA may employ a composite stone base and wrought iron top, if NCA finds it to be desirable. If NCA pursues this option, it will ensure that the reconstructed stone base matches the profile and dimensions of original wall, and that the wrought iron top is designed to be in keeping with the character of other historic wrought iron elements, such as the entrance gate, elsewhere within the cemetery.

V. Relocating Administration Building #1002 (Action Item 4)

- A. In lieu of demolishing the existing Administration Building (Bldg. #1002) which is NCA's preferred alternative, NCA has agreed with SHPO, ACHP, and Consulting Parties to relocate the building and renovate it for use by the Honor Guard.
- B. NCA will employ a professionally qualified mover familiar with moving historic structures to relocate the Administration Building to the location shown in Appendix 3, in a manner consistent with the guidelines set forth in *Moving Historic Buildings* by John Obed Curtis <u>http://www.jasm.org/wpcontent/uploads/2013/12/moving-historic-buildings.pdf.</u>
- C. NCA will demolish the 1980s addition to the Administration Building prior to relocation.

- D. NCA will landscape around the building with plant material that is both appropriate to the period of the building and compatible with the environment.
- VI. Replacing Burial Section Markers (Action Item 11)
 - A. NCA will retain all marble burial section markers that are in good condition, and replace in kind those that are not in good condition as described in the March 2011 30% Design Submittal.
 - B. NCA need not further consult with SHPO or Consulting Parties regarding marker replacement, unless unforeseen circumstances result in design changes.
- VII. Constructing Nursery Road Overpass (Action Item 14)
 - A. In July 2011, the Fort Sam Houston Base Commander announced that Base will be relocating the Base's existing entry control point on Winans Road to the intersection with Harry Wurzbach Road, a major north/south artery. The relocation will eliminate Nursery Road at San Antonio Bivd. as a crossing point to the eastern section of the cemetery dividing the cemetery in two and making the eastern section inaccessible to both visitors and cemetery personnel. The only option acceptable to the Base and NCA is the construction of a San Antonio Blvd. Overpass at the intersection which will physically separate military traffic from civilian traffic.
 - B. NCA will ensure that the San Antonio Blvd Overpass is designed and constructed in substantial conformance with the Design Development drawings dated March 18, 2012, subject to further consultation with the SHPO and Consulting Parties, and that the guardrail on the overcrossing will be horizontal with faux stone pilasters.

VIII. Public Education and Outreach (PA Stipulations)

- A. NCA is committed to fulfilling the public education and outreach measures as required by the 2009 PA. NCA has retained a historic preservation specialist meeting the Secretary of Interior's Professional Qualifications Standards (36 CFR § 61) to prepare final drafts of the following:
 - 1. Application for official Texas Historical Marker, which, if approved, will be installed at the cemetery in an appropriate location to be decided in consultation with the SHPO,
 - 2. Three interpretive signs depicting the unique historic resources at the cemetery, which will be installed at the cemetery,

- Presentation about the history of Fort Sam Houston National Cemetery, which will be delivered to the general public upon request, at a minimum of two times, and
- 4. Three samples of a tri-fold brochure depicting the history of Fort Sam Houston National Cemetery, which, when finalized, will be available via the internet, as well as through the NCA Communications and Outreach Support Division (43A2).
- B. Additionally, NCA's consultant has prepared the final drafts of the Historic American Landscape Survey (HALS) report, the Fort Sam Houston National Cemetery portion of the multi-property National Register of Historic Places (NRHP) nomination, and Fort Sam Houston National Cemetery Operations and Maintenance Guidelines supplementing NCA's National Shrine Commitment Operational Standards and Measures.
- C. NCA shall give the SHPO thirty (30) calendar days to review and comment on the deliverables, as appropriate. All work under this stipulation shall be completed on or before January 31, 2018.

IX. Unanticipated Discoveries

- A. In the course of conducting work on the Project or any other activity on the Property that involves disturbance of the ground, NCA shall not intentionally or knowingly remove or disturb or cause to be removed or disturbed any archaeological, or other cultural artifacts, relics, remains, or objects of antiquity. Any such artifacts, relics, remains, or objects of antiquity constitute federally owned property under the control of the NCA.
- B. In the event that a previously unidentified archaeological resource is discovered during such activities, NCA shall ensure that all work involving subsurface disturbance in the immediate area of the resource is stopped immediately and in the surrounding area where further subsurface resources may reasonably be expected to occur (the "Site"), and shall immediately notify the SHPO. NCA shall then, within ten (10) days of such notice, obtain a Qualified Archaeologist to inspect the Site to determine whether further investigations are warranted. Following the inspection by the Qualified Archaeologist, NCA and SHPO shall consult and determine, within three (3) business days following the completion of such inspection, whether to conduct any archaeological work that may be necessary, and if so, how such archaeological work shall be accomplished. Construction work may continue in the Project area outside the Site.
- C. If, following the inspection by the Qualified Archaeologist, NCA determines that the previously unidentified archaeological resource is eligible for listing

in the NRHP, NCA shall submit to SHPO an assessment of the Site's eligibility and a Treatment Plan prepared by NCA to avoid, minimize, or mitigate any adverse effect on the resource. The Treatment Plan shall be prepared and implemented in accordance with the Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation. SHPO shall provide NCA comments on the eligibility of the resource for listing in the NRHP and the Treatment Plan within 14 calendar days of receipt. NCA shall then take into account SHPO's comments regarding NRHP eligibility and the Treatment Plan, and provide consolidated comments to ACHP. NCA shall carry out appropriate actions in accordance with the Treatment Plan. If it is later determined by SHPO and NCA that the archaeological resource on the Site does not meet the criteria for eligibility in the NRHP (36 CFR § 60.4), NCA shall provide SHPO with a written report on actions taken pursuant to the Treatment Plan within thirty (30) calendar days following the resumption of work on the Site.

- D. If human remains are identified on the Property by any action taken pursuant to this Agreement, NCA shall consult and notify SHPO within 3 business days and shall develop and implement a plan for the appropriate treatment of those remains in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC § 3001 et. seq. as appropriate) and the Archaeological Resources Protection Act (ARPA) (16 § USC 470aa et. seq.) and their respective regulations. The plan shall include provisions for in-place preservation, excavation, and analysis, in accordance with a data recovery plan approved pursuant to this Agreement, and disposition of the remains as appropriate. NCA shall, in good faith, consult with the relevant Parties in accordance with applicable law. The NCA shall then submit the plan to the SHPO for review and comment prior to its implementation.
- E. If any discoveries under this Paragraph will permanently impact the proposed development by NCA under the Phase II Improvement Plans, the Parties agree to work to modify the Phase II Improvement Plans as expeditiously as possible so as to allow NCA to resume the action.

X. <u>Resolving Objections</u>

- A. Should any signatory to this MOA object in writing to the NCA regarding any action carried out or proposed with respect to any aspect of the Undertakings, or to implementation of this MOA, the NCA will consult with the objecting signatory to resolve the objection.
- B. If after initiating such consultation the NCA determines that the objection cannot be resolved through consultation, the NCA will forward all

documentation relevant to the objection to the ACHP, including the NCA's proposed response to the objection.

- C. Within 30 days after receipt of all pertinent documentation, the ACHP will exercise one of the following options:
 - 1. Advise the NCA that the ACHP concurs in the NCA's proposed response to the objection, whereupon the NCA will respond to the objection accordingly; or
 - 2. Provide the NCA with recommendations, which the NCA will take into account in reaching a final decision regarding its response to the objection; or
 - 3. Notify the NCA that the objection will be referred for comment pursuant to 36 CFR § 800.7(a)(4), and proceed to refer the objection and comment. The NCA will take the resulting comment into account in accordance with 36 CFR § 800.7(c)(4) and Section 110(l) of NHPA.
- D. Should the ACHP not exercise one of the above options within 30 days after receipt of all pertinent documentation, the NCA may assume the ACHP's concurrence in its proposed response to the objection.
- E. The NCA will take into account any ACHP recommendation or comment provided in accordance with this stipulation with reference only to the subject of the objection; the NCA's responsibility to carry out all actions under this MOA that are not the subjects of the objection will remain unchanged.
- F. At any time during implementation of the measures stipulated in this MOA, should an objection pertaining to this MOA or the effect of the Undertakings on historic properties be raised by a member of the public, the NCA will notify the signatories to this MOA and take the objection into account, consulting with the objector and, should the objector so request, with any of the signatories to this MOA to resolve the objection.

XI. Professional Qualification Standards

A. All preservation-related work carried out in accordance with this MOA shall be overseen by a person or persons meeting the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) for the appropriate discipline.

XII. Annual Report and Review

- A. On or before September 30 of each year until the NCA and SHPO agree in writing that the terms of this MOA have been fulfilled, NCA's Deputy Under Secretary for Management will prepare and provide an annual report via email to the signatories to this MOA:
 - 1. Progress in planning and constructing the main cemetery entrance;
 - 2. Progress in planning and reconstructing the stone walls;
 - 3. Progress in planning and carrying out the Administration Building #1002 relocation;
 - 4. Progress in planning and carrying out the replacement of burial section markers
 - 5. Progress in planning and constructing the Nursery Road overcrossing;
 - 6. Progress on the Public Education and Outreach requirements.
 - 7. Any problems or unexpected issues encountered during the year; and
 - 8. Any changes that the NCA believes should be made in implementation of this MOA.
- B. The NCA will ensure that its annual report is made available for public inspection both at the Cemetery and at NCA's public documents web site, <u>http://www.cem.va.gov/cem/EA.asp.</u> that potentially interested members of the public are made aware of its availability through press releases and other means, and that interested members of the public are invited to provide comments to the SHPO and ACHP as well as to the NCA.
- C. The signatories to this MOA will review the annual report and provide comments to the NCA. Non-signatory signatories to this MOA may review and comment on the annual report at their discretion.
- D. At the request of any signatory to this MOA, the NCA will ensure that a meeting or meetings, either in person or via teleconference, are held to facilitate review and comment, to resolve questions, or to resolve adverse comments.
- E. Based on this review, the signatories to this MOA will determine whether this MOA will continue in force, be amended, or be terminated.

XIII. Amendment and Termination

A. If the terms of this MOA have not been implemented by January 31, 2018, this MOA will be considered null and void. In such event the NCA will so

notify the signatories to this MOA, and if it chooses to continue with the Phase II Improvements, will re-initiate review of the uncompleted Improvements in accordance with 36 CFR Part 800.

- B. Any signatory to this MOA may propose to the NCA that the MOA be amended, whereupon the NCA will consult with the other signatories to this MOA to consider such an amendment. 36 CFR § 800.6(c)(1) will govern the execution of any such amendment.
- C. If the NCA determines that it cannot implement the terms of this MOA, or if the SHPO or ACHP determines that the MOA is not being properly implemented, such signatory may propose to the other signatories to this MOA that it be terminated.
- D. The signatory proposing to terminate this MOA will notify all signatories to this MOA, explaining in writing the reasons for termination and affording them at least 30 days to consult and seek alternatives to termination. The signatories will then consult.
- E. Should such consultation fail, the NCA or other signatory may terminate the MOA by notifying all signatories in writing.
- F. Should this MOA be terminated, the NCA will either:
 - 1. Consult in accordance with 36 CFR § 800.6 to develop a new MOA; or
 - 2. Request the comments of the ACHP pursuant to 36 CFR § 800.7.

XIV Availability of Funds

A. This agreement is subject to the Anti-Deficiency Act (31 U.S.C. Section 1341). NCA's responsibilities under this Agreement are contingent upon the availability of appropriated funds from which payment, if any, can be made.

Execution and submission of this MOA, and implementation of its terms, evidence that NCA has afforded the ACHP an opportunity to comment on the Fort Sam Houston National Cemetery Phase II improvements and their effects on historic properties, and that NCA has taken into account the effects of the undertakings on historic properties.

AGREED:

U.S. DEPARTMENT OF VETERANS AFFAIRS, NATIONAL CEMETERY ADMINISTRATION By: Date: Ronald E. Walters, Acting Under Secretary for Memorial Affairs **TEXAS STATE HISTORIC PRESERVATION OFFICER** By: Date: Mark Wolfe, Executive Director, Texas Historic Commission ADVISORY COUNCIL ON HISTORIC PRESERVATION 114 Date: By: John Fowler, Executive Director

Action Items included in Phase II Construction Contract:

1 <u>Entry Gate at Harry Wurzbach Road</u> - Widen Harry Wurzbach Rd. from the southern to the northern boundary of cemetery to allow north and south bound traffic to safely queue and turn onto San Antonio Blvd. Widen San Antonio Blvd. at Harry Wurzbach Rd. to allow for two exiting lanes from the cemetery, one north bound and one south bound, and one entry lane into the cemetery. Reconstruct the stone columns on the north side of San Antonio Blvd. and add an intermediate gate leaf to accommodate the widened San Antonio Blvd. at Harry Wurzbach Rd.

- 2 Perimeter Stone Walls Repair and/or replace perimeter stone wall segments "B", "C", and "D" paralleling Harry Wurzbach Rd, as identified in the 30% Design Submission dated March 2011 using salvaged stone and/or like material. Repairs shall include the replacement of unsalvageable pre-cast concrete caps, existing service drive gate, and installation of approximately 90 LF of new ornamental steel fence on the southwest corner of the cemetery. All restoration and /or repair work shall be accomplished in accordance with the Secretary of Interior's Standards for Rehabilitation of Historic Properties.
- 3 <u>Perimeter Stone Walls</u> Due to funding limitations, repairs and/or replacement of perimeter stone wall segments "A", "E", and "F" is delayed for a future project. Design of wall segments along Winans Rd. needs to be coordinated with the Base so wall meets DOD physical security requirements while blending with the historic character of the cemetery. NCA will consult with THC on the design of the wall segments "E" and "F".
- 4 <u>Administration Building "1002"</u> Remove 1980's addition and relocate building to area adjacent to the existing storage building. The building shall be renovated and adapted for reuse as office space for the honor guard. Land freed up by relocation of Admin Bldg B shall be turfed, irrigated, and reserved for future burial purposes.
- 5 <u>Superintendent's Lodge (Building "1001")</u> Adapt for reuse as a Public Information Center for the western portion of the cemetery. The main floor (street-level) of the building will be renovated to include public restrooms, gravesite locator kiosk, space for interpretive displays, and storage. The lower level will be turned into conditioned storage space and the existing parking lots will be removed and/or reconfigured. The rear of the building will become the primary entrance meeting ADA accessibility requirements via a ramp. The existing steps to the front porch will be left in-place.
- 6 <u>Existing Restroom Building</u> Demolish and the underlying land will be turfed, irrigated, and preserved for future burial purposes.
- 7 <u>Existing Storage Building</u> Renovate existing storage building, repave service area, and provide a CMU screening wall. No new equipment and material storage building included.

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FORT SAM HOUSTON NATIONAL CEMETERY

Phase II - Improvements to Historic Section of Cemetery Project Number 846-036B

- 8/9 <u>Areas surrounding Superintendent's Lodge</u> Remove existing parking areas and reconfigure for new parking; turf and irrigate remainder of site and preserve for future burial purposes.
- 10 <u>Signage</u> Replace all streets, regulatory, and directional signage on west side of cemetery to match signage on east side of the cemetery.
- 11 <u>Burial Section Markers</u> Replace all burial section markers in poor condition on west side of cemetery with new markers matching original material; granite or marble.
- 12 <u>Storm Drain Inlets, Curbs, & Streets</u> Reconstruct only San Antonio Blvd. and underground drainage and water utility systems. To the extent feasible with available funds, construction work will address existing drainage Issues prevalent with the cemetery's roadway system. Balance of roads in western (historic) section will be reconstructed at a later date due to funding limitations.
- 13 <u>Flag Pole Round-About at San Antonio Blvd. and Macdonia St.</u> Improve outside radii of circle and correct drainage issue to improve traffic flow for large vehicles and emergency equipment.
- 14 <u>Cemetery & Post Traffic Separation at Nursery Road</u> Construct Nursery Rd. Bridge over San Antonio Blvd.; depress San Antonio Blvd. approximate 4' below existing grade to lower profile of overpass. The overpass structure shall be constructed of pre-cast concrete units simulating a stone veneer and painted to replicate the limestone material available from local guarries.
- 15 <u>Landscaping/Irrigation</u> Revise/replace damaged landscape and irrigation adjacent to new work.
- 18 **Funeral Directory** Provide new directory.
- 19 <u>Additional Curb & Gutters & Roadway Resurfacing</u> Balance of roads in western (historic) section will be reconstructed at a later date due to funding limitations.

