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An Analysis of the Twenty Percent Federal Rehabilitation Tax Credit Program's Administration in the States of Tennessee and South Carolina from Fiscal Years 2005-2015

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AN ANALYSIS OF THE TWENTY PERCENT FEDERAL REHABILITATION TAX
CREDIT PROGRAM'S ADMINISTRATION IN THE STATES OF
TENNESSEE AND SOUTH CAROLINA FROM FISCAL YEARS 2005-2015

A Thesis
Presented to
the Graduate School of
Clemson University and the College of Charleston

In Partial Fulfillment
of the Requirements for the Degree
Master of Science
Historic Preservation

by
John William Evangelist
December 2017

Accepted by:
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ABSTRACT

The Twenty Percent Federal Rehabilitation Tax Credit is one of the most valuable incentive tools in the field of historic preservation. This thesis analyzes the application and review process of the Twenty Percent Federal Rehabilitation Tax Credit in the states of South Carolina and Tennessee. The thesis explored how the two states' State Historic Preservation Offices (SHPO) and the National Park Service enforce regulations and rehabilitation protocols during the tax credit process. The factors examined are efficacy of the tax credit system in the two states as measured by the rate of projects' successful matriculation through the process, efficiency of the process in the two states as measured by the time line of review and feedback, and the consistency with which SHPOs and the National Park Service interpret the Secretary of the Interior's Standards and apply these standards in the application approval process. To investigate how the two states compare in terms of the constancy, efficacy, and efficiency of the tax credit program, a case study methodology was adopted. Six case studies, three chosen from each state, which utilized the Twenty Percent Credit are explored. Data tracked for the six case studies consisted of: dates of submissions, amendments, determinations, project completion, the content of the comments made on the projects. This data reveals that the National Park Service and each states' SHPO met efficiency measures by the timely return of comments, and interpreted and enforced the Secretary of the Interior's Standards consistently across the two states.

DEDICATION

To my grandmother, B. R. Drake

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CHAPTER ONE

INTRODUCTION

Since its beginnings, the historic preservation movement has sought to prevent the loss of historic buildings. Private organizations and individuals have often been in the vanguard to defend historic buildings and encourage their preservation. The Federal government has also played a major preservation role, providing extensive programs to incentivize and assist in the rehabilitation and protection of historic buildings. Since its creation by Congress in 1976, the Federal Rehabilitation Tax Credit Program (FRTCP) has become one of the nation's most powerful historic preservation tools.¹ From 1976 to 2015, the program certified over 40,000 historic property rehabilitations, leveraging more than \$78 billion in investment. The FRTCP is responsible for creating an estimated 2.36 million jobs and the program plays an essential role in putting historic buildings back into productive use.²

Utilizing the FRTCP to rehabilitate historic buildings generates local and national economic growth, ignites new life and purpose in old buildings, and saves them from demolition. Today, historic textile mills, factories, and other industrial buildings are among the nation's endangered properties. These buildings are often prized for the large acreage they occupy. The FRTCP seeks to help developers see these buildings not as a small obstacles standing on a large tract of developable land, but as a financially viable redevelopment resource. Proponents of new construction frequently argue that historic buildings are inefficient, burdensome to adapt, and economically unprofitable. Proponents for the rehabilitation of historic buildings hold an opposing view. Preservation advocates believe there is inherent value in older buildings.

Numerous studies and analyses have assessed the Federal Rehabilitation Tax Incentive Program over the forty plus years of the program. The literature can be categorized based on the

¹ "Tax Incentives—Technical Preservation Services, National Park Service," accessed August 15, 2015, <http://www.nps.gov/tps/tax-incentives.htm>.

² "Stat Report fy2015.indd - Tax-Incentives-2015statistical.pdf," accessed January 12, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2015statistical.pdf>.

author or institution publishing the literature: preservation, private interest, and government. The National Park Service produces an extensive amount of literature regarding this program. Their studies examine the FRTCP in each state monitoring its operation.³ The National Park Service collaborates with Rutgers University to produce annual input and output reports of the FRTCP for each fiscal year. These reports analyze project data from each state. The data is then computed into charts and graphs that illustrate the different sectors of the program and their fluctuation of operation.

In addition to the National Park Service and Rutgers University publishing statistics on the tax credit program, many firms in the private sector produce studies. Firms such as NGP Capital, LLC., a national firm that specializes in the syndication of preservation tax credits and assists in investment opportunities involving historic properties regularly report on the FRTCP.⁴ Tate & Tryon, an accounting firm in Washington, DC, encourages and promotes the use of preservation tax incentives by providing fact-driven statistics and literature regarding the success of the FRTCP.⁵ Most often, these firms specialize in tax credit services, including assistance in the application process, the syndication of credits, and guidance with purchasing and investing in properties utilizing tax credits to educate investors and attract greater private investment.

One of the findings presented in these reports is that the tax credit program has generated significant revenue for the United States Treasury. A study produced by the National Trust for Historic Preservation and Rutgers University indicated since the program's inception in 1978 to fiscal year 2011, federal tax receipts generated directly from the program have totaled over \$24.4 billion in revenue for the United States Treasury.⁶ This study proves the program has paid for itself by creating direct and multiplier impacts and demonstrates the FRTCP is a vital tool in preservation as well as

³ "Tax Incentives—Technical Preservation Services, National Park Service."

⁴ "<https://www.ngp-capital.com> Accessed September, 2016.

⁵ David M. Duren, Steven L. McClain. The Journal of Financial Planning, June 2003. "Gold at Your Client's Doorstep: Federal Tax Incentives for Historic Properties." Accessed September 2016.

⁶ "Third Annual Report on the Economic Impact of the Federal ..." Accessed February, 2016.
https://www.novoco.com/historic/resource_files/research/rutgers_report_071712.pdf.

economic development. The Advisory Council on Historic Preservation (ACHP) describes the functions and significance of the tax credit program in its publication “Preservation and Rightsizing In America.”⁷ Like the National Park Service, the ACHP promotes the rehabilitation and preservation of historic structures. These organizations have released a multitude of statements and testimonies reinforcing the various benefits of the federal tax credits and their demonstrated role in the rehabilitation of historic properties. The ACHP notably emphasizes how the program attracts revenue and growth to blighted cities and towns and promotes community development and economic success; many of these examples are also listed in the National Park Service’s publications. The FRTCP is directly responsible for saving a vast number of buildings across the country. Annually, the National Park Service and ACHP highlight success stories in reports of rehabilitation projects that have used tax credits, including examples as diverse as row houses in Baltimore, art deco hotels in Miami, office buildings in New York City, and theatres and churches across the country.⁸

This thesis analyzes the administration of the Twenty Percent Federal Rehabilitation Tax Credit by the State Historic Preservations Offices (SHPO) in South Carolina and Tennessee from fiscal years 2005 to 2015. The FRTCP is jointly administered by the United States Department of the Interior and the United States Treasury. Both, the National Park Service and SHPOs act as delegates on behalf of the Department of the Interior and Treasury. Their role is to certify that preservation objectives are met during the rehabilitation project. This is determined based on a rehabilitation project’s compliance with the Secretary of the Interior’s Standards for Rehabilitation. This document, the Standards for Rehabilitation, is a set of principles or conceptual best practices agreed upon by the preservation community. The final player in the administration of the FRTCP is the Internal Revenue Service (IRS), which disperses the credit.

⁷ “RightsizingReport.pdf.”

⁸ “Community Developments, Historic Tax Credits: Bringing New Life to Older Communities.” United States Department of the Treasury accessed September 16, 2016.

The FRTCP requires a multi-part application process. The SHPO and the National Park Service oversee each phase of the process. To evaluate the efficacy, efficiency, and consistency of the administration of the program by these two agencies, each step of the FRTCP is considered in the following analysis. The efficacy of the FRTCP's administration in each state is measured by the number of projects which earn the tax credit relative to the number of projects which begin the FRTCP application process. The term efficacy in this analysis, thus, is the difference between the number of Part 1 applications submitted and Part 3 Certifications awarded. A Part 3 Certification is the formal acknowledgment that a project met all requirements set forth by the Secretary of the Interior's Standards. The Part 3 Certification is awarded by the National Park Service and the SHPO and signals the project's legitimate claim to the Tax Credit benefit.

This thesis also examines the efficiency of each agency in the administration of the FRTCP. Efficiency is measured by examining the response time of the SHPOs and the National Park Service's comments, correspondence, and amendments relative to response times specified in the FRTCP legislation. Tracking the date of receipt of application materials, documents in response to requests for information etc., against the date of a response by the administering bodies created this analysis. Efficiency is thus defined as National Park Service and SHPO compliance with stated timelines in the administrative process of the FRTCP. Responding to an applicant within the specified number of days is considered efficient.

These quantifiable measures of efficacy and efficiency are supplemented by more qualitative data in the form of a review of comments made by the SHPO and the National Park Service. Reviewing the comments made by the administering agencies informed the study of consistency in the FRTCP's administrative process. The content of each National Park Service, South Carolina SHPO or Tennessee SHPO comment sent via official correspondence to the applicant was recorded to look for patterns about inconsistent interpretation or enforcement of the Secretary of the Interior Standards.

Comments were compared among individual projects, the projects occurring in South Carolina verses Tennessee, and were also compared based on which agency made the comment.

The states of Tennessee and South Carolina were selected for this analysis to determine if the FRTCP is administered differently by state. Selecting states for the study began by seeking one state with a state-level rehabilitation tax credit program and one state without such a state-level program. One of the differences between the FRTCP and various state-level tax programs is the type of taxes the credit can be used to offset. The federal tax credit can only be used toward federal income tax owed. State tax credits are structured as a credit on state income tax owed. Tennessee does not have a state income tax, thus a state tax credit program designed to reduce the amount of income tax owed is irrelevant. However, the federal tax credit is still beneficial for Tennessee as it is applied toward federal tax. Two other states are similar to Tennessee in terms of using the FRTCP to incentivize rehabilitation of existing structures with no state income tax, and Texas began a state historic tax credit program in 2015 in which the credits that are accumulated may be used against licensing fees and corporate taxes. As one of fifteen states yet to create a state tax credit program, Tennessee legislators are in the process of creating a tax credit program like Texas which would offset other non-income tax types owed. The active legislation will be covered more thoroughly in Chapter 3. Tennessee has no other major financial incentives for rehabilitation projects. The fact that the only major economic incentive for historic building rehabilitation in Tennessee is the FRTCP, underlies the hypothesis that the administration of the FRTCP in Tennessee may differ from South Carolina.

South Carolina has long been part of the preservation movement. The state's tax credit program mirrors the FRTCP and like most states with a state tax credit program, the incentives are equal to or greater than that of the FRTCP. Certified rehabilitation projects in South Carolina can qualify for a twenty-five percent state tax credit with a project cap of one million in credit. Additionally, other state credits and incentives in South Carolina can be paired with the federal credit

to maximize the return. A summary of South Carolina's numerous incentive programs and further insight about its state tax credit program is outlined in Chapter 4.

There are thirty-five states with state-level tax credit programs. Within the category of state-level tax credit program and not, the two states of South Carolina and Tennessee were selected for analysis because of similar and facile access to information. The amount of data available was based on the ease of physical access. The location of the researcher's academic institution, the graduate program in historic preservation's location in Charleston, South Carolina made the selection of that state conducive to in-person visits to the South Carolina SHPO. The researcher's home state of Tennessee also allowed for ease of in-person visitation of the Tennessee SHPO. Because the selection of the two states was partially made for reasons of convenience, it is important to consider some of the commonalities and differences implicit in the two states.

South Carolina and Tennessee are both mid-sized states falling in the middle third of states by population. Tennessee has a population of 6,601,198, ranking 17th in the nation and South Carolina has a population of 4,896,991, ranking 27th in the nation. The per-capita GDP of the two states differs, but not dramatically. South Carolina's per-capita GDP in 2014 was \$189.3 billion. Tennessee's 2014 GDP was \$297.2 billion.⁹

This basic understanding of the similar character of the South Carolina and Tennessee in terms of population and GDP but contrasting state-level tax credit program comes to bear through the analysis presented in this thesis. Following this introduction, Chapter 2 presents a history of the Federal Historic Tax Incentives Program. It reviews the creation of the program, the purpose and benefits of the tax credits, and how its role in the field of historic preservation has become an integral part of saving and rehabilitating historic buildings. The chapter defines the tax credit, individuals or parties engaged in the process, how the process works, and the criteria that determine a successful

⁹ "Pdf.cfm," accessed April 11, 2016, <https://www.bea.gov/regional/bearfacts/pdf.cfm?fips=47000&areatype=STATE&geotype=3>.

application. The steps involved in applying for the credits are then summarized explaining the difference between the ten and twenty percent rehabilitation tax credits and how they may be utilized.

Chapters 3 and 4 present the case studies. These chapters analyze each case study and its path through the FRTCP process. The six projects all meet the three parameters which are: the building's size, (250,000 square feet or greater), projects with an estimated qualified rehabilitation expenditures of greater than \$10 million, and projects receiving Part 3 Certification between fiscal years 2005-2015. The projects from Tennessee are the Dortch Stove Works factory, Cummins Station, and The Trolley Barns. The projects in South Carolina are the Granby Cotton mill, Monaghan Mill, and Oakland Mill. These chapters also present an analysis of the FRTCP of each state. Applications and correspondence from each project, in conjunction with national data, provide the information for an analysis of efficacy, efficiency and consistency of the FRTCP's administration in the two states. Information about these case study buildings was gathered via in-person conversation, collection from archives, and telephone, or electronic mail communications during visits to each states' SHPO offices.

Chapter 5, the final chapter, examines the data outlined in chapters 3 and 4 to draw conclusions about the efficacy, efficiency and consistency of the FRTCP's administration in South Carolina and Tennessee by both of the organizations involved – the National Park Service and the SHPOs. The chapter provides charts, graphs, and other data to help visualize the data and and substantiate author's final conclusions.

CHAPTER TWO

HISTORY OF THE FEDERAL TAX INCENTIVE PROGRAM

A tax credit is a dollar-for-dollar reduction of taxes owed by a taxpayer. By reducing the overall amount of federal income tax owed, tax credits are significant incentives for certain companies and individuals. Tax credits differ from tax deductions. Tax deductions lower the amount of income that is subject to taxation. Of these two tax abatement mechanisms, the tax credit is more beneficial. By reducing the amount of federal income tax owed by a taxpayer, the tax credits provide a way for the property owner to offset some of their dollars invested in rehabilitating a qualifying building. The amount of the tax credit generated by a historic rehabilitation is calculated by taking a percentage of the qualified rehabilitation expenses. For example, a project valued at \$800,000 in expenses could qualify for a tax credit valued at \$160,000. Whether the owner or an investor uses the credit, the value of the credits can be treated as equity for the project and incentivize further rehabilitation work.

Senator Glenn Beall of Maryland spearheaded the passage of the first Federal tax incentives program through the Tax Reform Act of 1976. Before the Act, the United State's tax code offered tax deductions for the demolition of older buildings.¹⁰ The Act realigned the legal stance on historical buildings in favor of their protection by merging preservation policy and tax law. For the first time, tax law encouraged both voluntary and private sector investment to protect and preserve historic buildings. By aligning federal tax policy with historic preservation policies, the Tax Reform Act of 1976 promoted the rehabilitation of income-producing historic buildings directly.¹¹ The Act consisted of four parts regarding the rehabilitations of historic buildings:

1. A provision to allow a five-year amortization of rehabilitation expenditures. (Total project costs except land and original shell.)
2. An alternative provision allowed for an accelerated method of depreciation to be used on both the shell and rehabilitation costs.

¹⁰ "Rehabilitation ATG 2002.PDF - Rehab.pdf."

¹¹ "35th AR Final 041613 Pdf.indd - Tax-Incentives-35anniversary.pdf." 5.

3. A third provision allowed only a straight-line method of depreciation for any new building constructed where an older building had been demolished.
4. A prohibition against any deduction or recognition for tax purposes of any costs for demolition or site clearing, and no deduction of the purchase price of the property (building before demolition).¹²

These four provisions utilized different methods to provide a tax advantage for the rehabilitation of historic buildings. The first provision allowed the owner of any income-producing building to write off rehabilitation expenditures over a five-year period rather than over the lifespan of improvements. Under the second provision, owners could depreciate the building at an accelerated rate or the same rate as new construction. The third provision may dissuade the developer or investor to take on a complex new building project if there are extensive upfront costs such as site prep and cleanup including demolition. Provision four prohibits any deductions of cost for preparation work in regards to building before demolition. These four provisions did not trigger significant increases in the pace of rehabilitations. They became, however, the building blocks of later legislation.

In 1978, the United States Congress again recognized the preservation of historic buildings as a vital, national need. Passage of new legislation sought to preserve American architectural heritage while drawing attention to the plight of deteriorating buildings. The Federal Tax Incentive Program produced the first Rehabilitation Tax Credit program in the Revenue Act of 1978 and created the rehabilitation tax credit, which acted as an additional incentive to developers. This Act asserted that historic buildings were assets, holding economic value and encouraged the modernization and rehabilitation of historic buildings. A tax credit, at a rate of ten percent, replaced the five-year amortization incentive in the 1976 Tax Reform Act.¹³

In 1981, the Historic Tax Credit Program (HTCP) experienced another restructuring under the Economic Recovery Tax Act (ERTA).¹⁴ Perhaps one of the most significant steps forward, the Act

¹² "Rehabilitation ATG 2002.PDF - Rehab.pdf."

¹³ Ibid.

¹⁴ Ibid.

expanded the credit to Twenty-Five percent for certified rehabilitation costs. This modification of the program resulted in a dramatic surge of certified rehabilitation projects across the country; Part-Two approvals soared, with 3,214 projects approved in 1984.¹⁵ The Act developed into three tiers:

1. Buildings at least thirty years old were allowed a fifteen percent credit for qualifying rehabilitation expenditures.
2. Buildings at least forty years old were allowed a twenty percent credit for qualifying rehabilitation expenditures.
3. Qualifying rehabilitation expenditures for “Certified Historic Rehabilitation” were allowed a twenty-five percent credit.¹⁶

ERTA substantially improved the HTCP from a preservation perspective. The Act increased the tax credit to twenty-five percent, eradicated most of the depreciation incentives, and allowed thirty-year-old buildings to qualify for the credit. ERTA also introduced the concept of a “certified historic building.” While ERTA ignited rehabilitation projects across the country, the Act focused more on principal economic benefits derived from recycling historic buildings. The HTCP received special recognition in 1984 when President Ronald Reagan stated, “Our historic tax credits have made the preservation of our older buildings not only a matter of respect for beauty and history, but of course for economic good sense.”¹⁷

In 1986 federal tax laws underwent further modification with the passage of the Tax Reform Act, perhaps the most drastic change in regard to preservation tax law and one of the most extensive changes in the nation’s economic history.¹⁸ President Ronald Reagan collaborated with Representative Dan Rostenkowski, who at the time was Chairman of the House Ways and Means Committee, to pass this Act. This reform curtailed many real estate tax benefits such as the rate of capital gains, increased corporate tax rates, and closed many tax loopholes meaning that tax credits of all types were more

¹⁵ "Third Annual Report on the Economic Impact of the Federal ..." Accessed February, 2016. https://www.novoco.com/historic/resource_files/research/rutgers_report_071712.pdf.

¹⁶ Rehabilitation ATG 2002.PDF - Rehab.pdf.”

¹⁷ “35th AR Final 041613 Pdf.indd - Tax-Incentives-35anniversary.pdf.” 5

¹⁸ “Rehabilitation ATG 2002.PDF - Rehab.pdf.”

valuable to corporations and other investors. The Act also protected the majority of the historic preservation tax incentives, setting the new credit at twenty percent and retaining the ten percent credit.¹⁹ Passage of the Tax Reform Act of 1986 restructured the tax credit program and implemented a two-tier tax credit system. The revised law provided:

1. A ten percent credit available for the rehabilitation of non-historic buildings with an additional requirement that the building must have been or originally constructed before 1936; *or*
2. A twenty percent credit available for the rehabilitation of a Certified Historic building, (one listed on the National Register of Historic Places or located in a Registered Historic District and determined to be of significance in the Historic District).²⁰

These changes reduced the previous twenty-five percent rehabilitation investment tax credit to twenty percent while the non-rehabilitation tax remained at ten percent. Although one credit was lowered, the provisions characterizing income as active or passive significantly outweighed the reductions. Passive income can be defined as income earned regularly such as capital gains, self-charged interest, or stocks. Active income can be defined as income that has been earned; this can be from salaries, wages, or tips. The changes made in the 1986 legislation no longer allowed the tax credits to be taken against passive income, which limited who could utilize the credits.

The tax reform ultimately led to a striking decline in historic rehabilitation investment between the fiscal years 1989 and 1993.²¹ The most recent change to the program was the Revenue Reconciliation Act of 1990, which moved the written law from Internal Revenue Code IRC Section 48(g) to IRC section 47.²² The change was made due to the IRS altering code content in prior tax provisions – this was a technical change that did not alter the tax credit policy or process. Investment leveraged through the Tax Credit program increased in 1994 and continued to grow, expanding until fiscal year 2008. The recession of 2008 severely crippled the real estate market across the nation and

¹⁹ “35th AR Final 041613 Pdf.indd - Tax-Incentives-35anniversary.pdf.” 5

²⁰ “Rehabilitation ATG 2002.PDF - Rehab.pdf.”

²¹ “Stat Report fy2014.indd - Tax-Incentives-2014statistical.pdf” 5

²² Ibid.

had a profound impact upon the program. In the fiscal year 2014 alone, the estimated investment in proposed rehabilitation projects equaled \$6 billion, a record for this program. Table 2.2 constructed from the National Park Service’s yearly statistical analysis of the program breaks down different phases. From the fiscal years 2010 through 2014, the data shows the tax credit program growth.

	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014
Approved Part 2s	951	937	1,020	1,155	1,156
Rehabilitation Expenses (in millions)	\$3.42	\$4.1	\$5.33	\$6.73	\$5.98
Average Expense/Project (in millions)	\$3.59	\$4.29	\$5.23	\$5.82	\$5.17
Maximum Amount of Credit to be Claimed (in millions)	\$684	\$805	\$1.66	\$1.4	\$1.2
Average Credit/Project (approx.)	\$718,885	\$858,767	\$1,045,255	\$1,164,648	\$1,035,005

Table 2.1 Projects & Expenses (Part 2 applications): FY 2010-2014²³

The FRTCP has proven to be a durable, robust tool for historic preservation. Yielding two-fold results, the program has revitalized economies while also preserving and revitalizing historic buildings. A stimulant for economic growth, the rehabilitation tax credit has been a critical redevelopment tool for revitalizing buildings, cities, towns and rural communities across the country. Since the program’s inception, it has leveraged \$109 billion leveraged in private investment and produced a margin of revenue greater than the program’s original cost.²⁴ Due to its success, many

²³ “Annual Report 10 Final.indd - Tax-Incentives-2010annual.pdf,” accessed January, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2010annual.pdf>, “Annual Report 11 Final.indd - Tax-Incentives-2011annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2011annual.pdf>, “Annual Report fy2012 Bg.indd - Tax-Incentives-2012annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2012annual.pdf>, “Annual Report fy2013.indd - Tax-Incentives-2013annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2013annual.pdf>, “Stat Report fy2014.indd - Tax-Incentives-2014statistical.pdf,” accessed January 10, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2014statistical.pdf>, “Annual Report fy2015.indd - Tax-Incentives-2015annual.pdf,” accessed January 23, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2015annual.pdf>.

²⁴ Prosperity through Preservation, Saves the Historic Tax Credit NTHP

states have mirrored the federal program through legislation, creating state tax incentives and programs, some even offering higher percentages of credits than the federal program.²⁵ To date, thirty-four states have passed legislation creating state tax credits for the rehabilitation of historic buildings. These states are: Alabama, Arkansas, Colorado, Connecticut, Delaware, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Missouri, Montana, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Vermont, Virginia, West Virginia, and Wisconsin.²⁶ Despite this compelling evidence, ACHP states, “In many instances, local officials contend that the rehabilitation process presents too many hurdles in the rehabilitation process among them being lead abatement, code compliance and other technical challenges.”²⁷ These challenges can be overcome with historic preservation tools. Financial incentives, historic rehabilitation techniques, and knowledgeable developers can solve the challenges presented by historic buildings and accomplish successful rehabilitations.²⁸

Major risks are involved for all parties during the rehabilitation process. Most buildings undergoing rehabilitation are historical and these properties may be in poor structural condition without any visual evidence of underlying and unknown issues. Key rehabilitation risks are:

Construction risks – Developers cannot account for existing conditions of the building until rehabilitation is underway. This can result in cost overruns and exponentially raise these expenses.

Developer risks – Smaller or mid-size developers often complete rehabilitations. Large developers tend to avoid these projects because they are small and there is much uncertainty about the success rate. Since small developers achieve the majority, their financial stability and lack of experience are vital factors that can affect the project’s completion.

Location risks – Most properties rehabilitated are a bit of a gamble for investors unless revitalization has begun. The rehabilitation of historic buildings in these areas will either prosper or fail.

²⁵ “35th AR Final 041613 Pdf.indd - Tax-Incentives-35anniversary.pdf” 6.

²⁶ “State Historic Tax Credits - National Trust for Historic Preservation.” Preservationnation.org. Accessed February 04, 2016. <http://www.preservationnation.org/take-action/advocacy-center/additional-resources/historic-tax-credit-maps/state-rehabilitation-tax.html>.

²⁷ “RightsizingReport.pdf” 17.

²⁸ Ibid.

Leased or rented space – Originally built for a particular purpose, these historic buildings have to accommodate a lessee for modern purposes. Often it is vital to have an effective marketing team for leasing these sometimes irregular and small spaces to firms and other professional groups.

Financing risks – The financing process of these buildings is often intricate, having a floating rate with little or no loan option. Most lenders may also require the space be leased before permanent financing.

Tax risks – The tax law provisions is a complex process. This combined with the certification of the building can be a daunting process.²⁹

Administered by the United States Department of the Interior and the Department of the Treasury, the program requires various reviews and approvals from governmental departments before the credit may be claimed. The National Park Service, Secretary of the Interior, and the SHPO act in conjunction with one another to facilitate and assist in fulfilling the appropriate requirements for obtaining the tax credits. The IRS is also involved in the process, acting on behalf of the Secretary of the Treasury and issuing the credit after the project's completion and verification of appropriate measures.³⁰

An application for the Historic Rehabilitation Tax Credit is obtainable at any SHPO or directly online through the National Park Service.³¹ The application consists of three formal parts, with all instructions and guidelines included. Part 1 requires the applicant to submit documentation evaluating the significance of the building, fulfilling the requirements on how the building contributes to a National Register property or a registered district. Part 2 includes detailed statements, photographs and architectural drawings depicting the current state of the building, with explanation and illustration of any proposed renovation. It also documents and describes all character defining elements affected during the process to be listed and how they will be treated, along with the assurance that all work and adaptations comply with the Secretary of the Interior's Standards for Rehabilitation. This section is perhaps the most important and most scrutinized by the SHPO and the National Park Service,

²⁹ Alvin L. Arnold, *Real Estate Investments after the Tax Reform Act of 1986 : Special Report*.78-79.

³⁰ Ibid 4.

³¹ <https://www.nps.gov/tps/tax-incentives/application.htm>

ensuring the rehabilitation does not harm or destroy the existing historic fabric of the building. Part 3 evaluates and measures the finished work against the work proposed in Part 2, approving that all work was completed accurately as described.

The Rehabilitation Tax Credit Program offers two separate tax credit tiers for certified rehabilitations: A ten percent credit is only applicable for rehabilitations to buildings older than 1936 that are not listed on the National Register. The twenty percent credit for rehabilitations is available for historic properties. Both tiers are only available for income-producing properties. Each credit offers a percentage of return for any substantial and completed rehabilitation project on a depreciable historic building. Tax credit applications must meet three tests: first, the building must be depreciable, meaning it is used in trade or business and therefore income producing; second, it cannot serve exclusively as the owner's private residence, but it can be used for rental housing, offices, commercial industrial space or agricultural enterprises; third, the rehabilitation must be considered a "substantial rehabilitation," thus having expenditures exceeding \$5,000 or the adjusted basis of the building and its structural components. All of these stipulations must be met within a 24-month period by the taxpayer. After the substantial rehabilitation criteria are met, the credit can be claimed for all of the expenditures, which occurred before, during and after the measuring periods, through the end of the taxable year when the building is put into operation. If the rehabilitation takes place in phases, the measuring period is 60 months rather than 24 months. If a phased rehabilitation is necessary, there must be a set of architectural plans describing each phase in detail.

Federal rehabilitation tax credits are limited to only substantial rehabilitations. The "adjusted basis" is the purchase price of the property minus its depreciation, with the land cost not included in the adjusted basis value. For example, a property purchased for \$2.5 million, with \$1 million accounting for the building and \$1.5 million for the land, and the owner having taken \$100,000 in depreciation deductions, the total adjusted basis of the property qualifying for the substantial rehab is \$900,000. (\$1 million building cost less \$100,000 in depreciation).

Applicants for the tax credit must be owners of the property. An owner is defined in Title 36 67.2 of the National Park Service's Code of Federal Regulations as "a person, partnership, corporation or public agency holding a fee-simple interest in a property or any other person or entity recognized by the Internal Revenue Code for purposes of the applicable tax benefits."³² Limited exceptions are available if the applicant is not the simple-fee owner. A long-term lessee may also apply but only if the remaining lease period is 27.5 years for a residential property or 39 years for a nonresidential property. An applicant with a written statement from the fee-simple owner consenting to the knowledge of the application, and who has no objection to the property being certified, may also suffice to fulfill and submit an application.³³

The SHPO is one of the first contact points owners consult in the application process. In general, the SHPO office assists owners by providing necessary forms, regulations, site visits, and guidance during the application process and other aspects of obtaining the credit. The SHPO also maintains records of buildings and districts on the National Register of Historic Places. If the property or building is not registered or certified, the SHPO can assist in listing the building or district declaring it eligible on the National Register. If the building is located within a registered historic district, the owner must complete Part 1 of the Historic Preservation Certification Application – Evaluation of Significance. The owner completes this application and submits it to the SHPO for review. It is then forwarded to the National Park Service with a recommendation for approval or denial by the SHPO. The National Park Service follows the same process as the SHPO to determine if the building does, in fact, contribute to the overall historic district. If the building is already listed on the National Register of Historic Places, it is eligible for tax credits. Owners of these buildings need not complete Part 1 of the application unless there is more than one building on the property.³⁴ If there is any doubt

³² *E-CFR*. Title 36 Chapter 1 Part 67 §67.2

³³ "Hpca-Instructions.pdf."

³⁴ *Ibid.* 5

regarding a property being certified as eligible for federal tax credits the owner may contact their SHPO.

After eligibility is confirmed, the central role of the SHPO is to review the federal tax application by applying the Secretary of the Interior's Standards to the proposed rehabilitation work. The SHPO and the National Park Service require intricate plans of the proposed phases of rehabilitation, detailing the scope of work and an appropriate period of time for its completion. In the Part 2 of the Historic Preservation Certification Application documents the developer must list all proposed rehabilitation interventions; these must be approved by the SHPO and the National Park Service before any work can commence. The National Park Service recommends that the developer and other parties involved consult with one another before any work commences and that the SHPO should be notified before any construction or modification is undertaken in order to save much time and expense navigating the application process. Any work performed before Part 2 approval by the National Park Service may result in certification delay.

The SHPO and the National Park Service review the proposed rehabilitation work, as presented in the Part 2 documents, ensuring it is compliant with the Secretary of the Interior's Standards for Rehabilitation. These Standards apply to all types and styles of buildings in order to protect historical features and ensure that the building and its architectural elements will not be damaged, removed, or altered beyond a state drastically changing the historic fabric. The Standards apply to both the exterior and interior of the building, while also extending to protect related landscape features and attached or related adjacent buildings. Any changes made should be reversible and the least invasive as possible. The early consultation of these guidelines by the developer improves the chances for a successful project.

If any of the proposed work does not meet the Standards, an amendment must be filed and reviewed until the proposed work is approved by both agencies. The SHPO processes all certification requests first of the two agencies and then passes their recommendation on to the National Park

Service. The SHPO review of the Part 2 application results in a recommendation for either approval, approval with conditions, or in denial by the SHPO. If it is approved, the application, along with notations attached, is then forwarded to the National Park Service for further review. Issues encountered during the SHPO review of Part 2 applications can delay submission of the documents to the National Park Service.

The National Park Service receives the tax application after it has been reviewed by the SHPO in the state where the building is located. From the day the National Park Service receives the application the organization has thirty days to review the recommendation by the SHPO, ensuring the scope and work of the project conforms to the Secretary of the Interior's Standards for Rehabilitation. After the review, the National Park Service issues an approval or denial of certification in writing. The decision is forwarded to the owner, the IRS, and the SHPO. Should the application result in a denial, the applicant may re-submit a revised plan through an amendment that follows the same review process beginning with the SHPO.³⁵ In the event of any inconsistency or uncertainty with the application, the Department of the Interior regulation (36 CFG Part 67) takes precedence.³⁶ Potential applicants for the rehabilitation tax credit are encouraged to consult tax professionals or advisors with experience in rehabilitation credits. This ensures the credit is applicable and a beneficial avenue for the investor or owner's investment.

There are many requirements to qualify and claim the credit, as discussed through this chapter, but the chief concern for the owner or developer is what expenses does the credit cover? Project expenditures vary, with the credit based on primary costs. The credit covers costs of work on the historic building, taxes, insurance premiums, legal and architectural fees, capitalized construction period interest, and surveys. These expenditures only qualify if they exceed \$5,000 of the total

³⁵ "Tax Incentives—Technical Preservation Services, National Park Service" 15.

³⁶ "Tax Incentives—Technical Preservation Services, National Park Service."

rehabilitation cost or the adjusted basis value of the building.³⁷ Also, they must be incurred within a 24-month period of the rehabilitation or sixty months for larger phased projects.

Recapture of the rehabilitation tax credit is possible on the building if, at any point after the rehabilitation is completed, the owner relinquishes the building, makes changes that are not consistent with the Standards, or it ceases to be business-use property within the five-year compliance period.³⁸ The Internal Revenue Code Section 50(a) provides the recapture provisions and compliance guidelines.³⁹ Recapture of the credit is not a regular occurrence but it does occur, presenting a substantial risk to the financing institution(s) involved. Factors primarily resulting in credit recapture may include, but are not limited to, any disposition of the property. Transfers, sales, foreclosures or losses of more than one-third ownership of the building are factors that may result in recapture by the IRS of the rehabilitation tax credit. If credit recapture occurs, the National Park Service revokes the buildings certification and the owner repays the credit amount.

Table 2.1 below references the IRS Section 50(a) illustrating the recapture percentage rates over the five-year compliance period. When the end of the five-year compliance period is over, the bank withdraws its involvement exiting the Limited Partnership (LP) or Limited Liability Company (LLC), and the IRS, on any condition, cannot recapture the credit.

RECAPTURE RATES

If the building is disposed of:	Recapture Rate (%):
Less than one year from placement into service	100
After year one but prior to end of year two from placement into service	80
After year two but prior to end of year three from placement into service	60

³⁷ “Defending the Historic Preservation Tax Credit - Viewcontent.cgi” 208.

³⁸ “Recapture Brief- 3C48732D-52BD-050C.doc - Tax_credit_recapture_brief.pdf.”

³⁹ “USCODE-2011-title26-subtitleA-chap1-subchapA-partIV-subpartE-sec50.pdf.”

After year three but prior to end of year four from placement into service	40
After year four but prior to end of year five from placement into service	20
After year five	0

Table 2.2 Recapture Rates ⁴⁰

A qualified rehabilitation project may sometimes monetize tax credits. When this occurs, tax credits are syndicated by the owner into funds, which can be directly applied towards construction loans or syndicated to an LLC. Some see this as the “selling” of tax credits for cash, which is not accurate. Credits cannot be "sold", the owner must use the credits; however, the owner can create a “pass-through entity”, such as an LLC or a firm that technically owns or partially owns the building in which a tax credit has been claimed. If the owner creates an LLC or similar type of entity, then the developer or owner would be the general partner and the LLC would be the tax-credit investor. The LLC yields 99 percent of interest, receiving an allocated amount of tax credits.

⁴⁰IRC Section 50(a).

CHAPTER THREE

TENNESSEE CASE STUDIES

Most states have enacted historic rehabilitation investment incentives that parallel the federal program to revitalize historic buildings, stimulate commerce, and create new job opportunities. Tennessee is one of fifteen states yet to enact a state income tax credit program for historic building rehabilitations. Every state contiguous to Tennessee has rehabilitation incentives or a state tax credit program. Tennessee is also one of the few states that has no state income tax, but does have the “Hall” income tax, a six percent tax on interest and dividends, which is specifically allowed by the state constitution. The Tennessee legislature recently introduced House Bill 1474 and Senate Bill 1723 (an Act to amend Tennessee Code Annotated, Title 4, Chapter 11, Part 1; Title 56, Chapter 4 and Title 67, relative to tax credits for the rehabilitation of historic structures). If passed, Tennessee would become the thirty-sixth state to offer a state tax credit for the rehabilitation of historic buildings. House Bill 1474 and Senate Bill 1723 would introduce a twenty-five percent tax credit for any certified rehabilitation. This program would mirror the federal program’s guidelines and all rehabilitation work would follow the Secretary of the Interior’s Standards to be eligible for tax credit benefits. Distribution of the credits would follow completion of all expenditures and the project’s certification. Credits would then be disbursed in equal installments over a three-year period to the owner.⁴²

Tennessee’s economy and communities have benefited from the FRTCP. Even in the absence of a state tax credit program, the Twenty Percent Federal Credit is frequently utilized. Since the inception of the federal program in 1976, Tennessee has completed 397 certified rehabilitation projects.⁴³ These projects represent a total of \$852 million in certified expenses. In 2011, the state

⁴² “Final Report - Cover New - Tennessee-Historic-Rehabilitation-Investment-Incentive-Economic- and-Fiscal-Impacts-Full-Report.pdf,” accessed January 18, 2016, <http://www.preservationnation.org/take-action/advocacy-center/additional-resources/Tennessee-Historic-Rehabilitation-Investment-Incentive-Economic-and-Fiscal-Impacts-Full-Report.pdf>.

reported nearly \$16 million in certified expenses.⁴⁴

Constructed with data collected from the National Park Service annual statistical reports for Tennessee, Table 3.1 below shows the distribution of applications and expenditures from each fiscal year beginning in 2005 through 2015, details the number of application Part 2s and Part 3s received and approved, and lists the estimated Qualified Rehabilitation Expenditures (QRE) during Part 2 of the application process and at the completion of the project. Part 1 of the tax applications are also used when filing National Register Nominations. Due to their multipurpose-use, Part 1 applications are omitted from the table because no differentiation could be made between the National Register nominations applications and the applications continuing through the Tax Credit application process. The estimated QRE at Part 2 is the anticipated expenditure (in dollars) for the project. Actual expenditures, or the QRE listed in the Part 3 of the application materials, may differ from the QRE listed in the Part 2 materials. Table 3.1 shows the QRE upon completion, thus providing the actual cost of expenditures as opposed to the estimated cost. The varying discrepancies of the estimated and actual expenditures can occur due to unforeseen rehabilitation complications, the stability or lack thereof in the current economy, and many other factors.

⁴³ “A Future for the Past—A Comprehensive Plan for Historic Preservation in Tennessee – The historic-Preservation-Plan.pdf,” accessed January 13, 2016, https://www.tn.gov/assets/entities/environment/attachments/thc_historic-preservation-plan.pdf. 11

⁴⁴ Ibid.

Fiscal Year	Applications Received		Applications Approved		Qualified Rehabilitation Expenditures	
	Part 2	Part 3	Part 2	Part 3	EST QRE at Part 2	EST QRE at Project Completion
2005	24	20	20	16	\$ 89,064,424.00	\$ 5,566,526.50
2006	13	13	15	11	\$ 21,344,356.00	\$ 1,940,396.00
2007	4	7	3	4	\$ 16,109,456.00	\$ 4,027,364.00
2008	N/A	N/A	N/A	N/A	N/A	N/A
2009	13	8	9	5	\$ 41,319,697.00	\$ 8,263,939.00
2010	6	9	7	10	\$ 87,949,779.00	\$ 8,794,977.00
2011	5	4	7	3	\$ 15,925,000.00	\$ 5,308,333.33
2012	15	4	8	4	\$ 14,430,756.00	\$ 11,829,153.00
2013	18	10	16	7	\$ 227,572,535.00	\$ 15,503,515.00
2014	10	14	15	18	\$ 25,375,000.00	\$ 30,914,517.00
2015	15	8	5	8	\$ 50,554,225.00	\$ 30,935,838.00
Total	123	97	105	86	\$ 589,645,228.00	\$ 123,084,558.83

Table 3.1 Tennessee Statistical Report 2005-2015

*2008 Data not released

To examine Tennessee's administration of the FRTCP, three key considerations were taken into account: the consistency of how the National Park Service and the SHPO applied the Secretary of the Interior's Standards, the efficiency of agency response to applicant materials, and the efficacy of the program to move projects from initial application to earning the tax credit. To answer these questions, an analysis was made on data and other information retrieved from project files at the Tennessee SHPO for three case study buildings. The case studies from Tennessee are: Cummins Station and the Trolley Barns, two buildings situated in Nashville's Metropolitan district and Dortch Stove Works, located in Franklin, Tennessee, twenty miles south of Nashville. The selection of these buildings met the sampling parameters based on: the building's size, 250,000 square feet or greater, the project's estimated qualified rehabilitation expenditures exceeding \$10 million, and receipt of Part 3 Certification between fiscal years 2005-2015.

DORTCH STOVE WORKS

Address: 230 North Franklin Road
Franklin, Tennessee 37064
Building Type: Industrial
Type of Construction: Concrete & brick masonry
Historic Use: Manufacturing facility for stove parts
Current Use: Mixed Use
Gross Building Area: 310,000 SF
Net Rentable Area: 310,000 SF
Year Built: 1929-30
Year Rehabilitated: 1997

OWNERSHIP STRUCTURE

Calvin LeHew
P.O. Box 864
Franklin, Tennessee 37065

PROJECT CONTACT

Rod L. Pewit
P.O. Box 864
Franklin, Tennessee 37065

DEVELOPMENT SCHEDULE

Project Initiated: August 12, 1996
Part 1
- Received: September 13, 1996
- Approved: September 16, 1996
Part 2
- Received: September 29, 1997
- Approved: September 10, 1998 (Conditional)
Part 3
- Received: November 22, 2004
- Approved: January 28, 2005
Construction Date: September 1998
Completion Date: November 15, 2004
Estimated Rehabilitation: \$17,603,000.00
Estimated New Construction: \$ 400,000.00
Total (QRE plus non-QRE): \$18,003,000.00

*Figure 3.2 Summary of Rehabilitation of Dortch Stove Works*⁴⁵

⁴⁵ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 1- Evaluation of Significance. Dortch Stove Works. Accessed, Tennessee Historical Commission. December 2015



Figure 3.3 Dortch Stove Works North Façade

Photo taken by John W. Evangelist



Figure 3.4 Dortch Stove Works North Façade

Photo taken by John W. Evangelist

Located in Franklin, Tennessee, the Dortch Stove Works plant opened in 1930. Renamed as The Factory, it is situated one-half mile north of downtown Franklin, a town rich in Civil War history and recognized for its Main Street. Strategically located, The Factory is situated between the

Louisville and Nashville (L&N) Railroad and US Route 31, two major transportation routes leading directly into Nashville. Sprawling over more than thirty acres, the complex of nine buildings totals more than 310,000 square feet.⁴⁶ The Atlanta architectural firm Robert and Company designed the complex of buildings along with many other mills and factories in the south during this period. Originally housing the Dortch Stove Works, Inc. from 1933 until 1955, the complex eventually sold to Magic Chef, Inc.. In 1962, Jamison Bedding Company purchased the plant and continued their operations there until 1991.⁴⁷ Calvin LeHew, a local businessman purchased the entire complex in 1991 and Mr. Rod Pewitt, LeHew's developer, spearheaded the building's rehabilitation.

Building (1), the main factory building is from circa 1930. It is 210,000 square feet originally U-shaped in plan. The original factory and foundry includes three circa 1935-1940 additions. These additions are described in Section Seven of the National Register of Historic Places application as: building (2) the original boiler room, with one 1960s addition, enclosing approximately 5,500 square feet; building (3) a 1935 building enclosing approximately 33,000 square feet; building (4) a circa 1935-1940 shed without exterior walls of approximately 12,000 square feet; building (5) a 1935 masonry building of approximately 650 square feet; building (6) a 1960 shed without exterior walls of approximately 2,000 square feet (non-contributing); building (7) the original water storage tank; building (8) modern water storage tank (non- contributing); and building (9) a 1950 office building with an addition, enclosing approximately 12,000 square feet (non-contributing).⁴⁸ Except where noted, all of the resources are contributing." The two-story brick masonry building has factory-style casement windows on both levels. Several loading bays are along the north façade of the building, allowing stove products to be shipped by trucks. In addition, the loading bays located on the east

⁴⁶ "National Register Nomination," "97001438.PDF," accessed January 11, 2016, <http://focus.nps.gov/pdfhost/docs/nrhp/text/97001438.PDF>.

⁴⁷ "Williamson County | Entries | Tennessee Encyclopedia," accessed January 18, 2016, <https://tennesseeencyclopedia.net/entry.php?rec=1516>

façade are adjacent to the rail line, also allowing for easy access to ship goods by rail.⁴⁹

REHABILITATION

The Dortch Stove Works rehabilitation project encountered complications from the lack of organization and management skills of the applicant; multiple application submissions, filled with errors, delayed the application process. This generated continuous requests, comments, and concerns from both agencies insisting the applicant must follow precise directions and provide the requested documentation. Discovered in the Dortch Stove Works' file, retrieved at the Tennessee SHPO, is correspondence from the Tennessee SHPO addressing the National Park Service in which it notates the application's "disorganization." However, in the same correspondence the SHPO relays that the owner is devoted to performing an appropriate and sensitive rehabilitation project.⁵⁰ Inadequate response time between the property owner and developer with both agencies is seen based on the dates of correspondence. There are lapses of weeks, months, and even years between the request for information and receipt of the information by the National Park Service and the SHPO. Furthermore the project ran into issues because work was undertaken prior to approval by the National Park Service or the SHPO. This issue was recorded in the correspondence between the applicant and the administering agencies and it is the subject of multiple amendments and comments made by the National Park Service and the SHPO. This was a problematic sequence because for the

⁴⁸ "National Register Nomination," "97001438.PDF," accessed January 11, 2016, <http://focus.nps.gov/pdfhost/docs/nrhp/text/97001438.PDF>.

⁴⁹ Ibid.

⁵⁰ Louis Jackson to Guy Lapsley, Date Missing, Letter in *Federal Tax Credit Application file*. Accessed at Tennessee Historical Commission. December 2015

tax credit to be issued, all rehabilitation work and preservation procedures must be reviewed first, during Part 2 of the application, before work is to be completed. This review process seeks to ensure that techniques and construction procedures meet the Secretary of the Interior's Standards for Rehabilitation before work can commence. Fortunately, in the case of Dortch Stove Works, the majority of work which occurred before approval was obtained did not adversely affect the existing historic building fabric. However, the work did not meet the Secretary of the Interior's Standards. This case study illustrates the importance of gaining the SHPO's and the National Park Service' approval before the commencement of any rehabilitation work. Rehabilitation work completed without prior to approval results in copious amounts of paperwork for all parties, prolongs the rehabilitation process, and ultimately leads to higher project costs.

The Dortch Stove Works property contains 10 buildings contributing and non-contributing to the National Register Nomination. The project initiated with the majority of buildings incorporating the same materials with little variance in the rehabilitation process. Dortch Stove Works received preliminary determination at the beginning of the rehabilitation project for individual listing on the National Register of Historic Places. Further evaluation was needed to meet all National Register criteria. The National Park Service extended the scope of contributing buildings eligible for listing on the National Register of Historic Places in November 1994 and deemed the contributing buildings significant under National Register standards as Criterion C, *"A property associated with events that have made a significant contribution to the broad patterns of our history, in regards to commerce and industry,"* period of significance determined to be 1933-1946.⁵¹ This was the height of The Factory's manufacturing of stoves and stove parts. During this period Dortch Stove Works produced stove

⁵¹ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 1- Evaluation of Significance. Accessed, Tennessee Historical Commission. December 2015

parts for wood, gas, and coal heaters, ranges, cook stoves, parlor furnaces, and other stove products.⁵² The applicant for the project proposed redeveloping the vacant Dortch Stove Works building a multi-use commercial space featuring restaurants, office and retail space. The initial estimate of rehabilitation costs ranged between \$6 and \$8 million.⁵⁶ The rehabilitation work was carried out in spaces totaling more than 300,000 square feet. The estimated construction period involved four to six phases and a timeline for completion of four to five years.⁵⁷

The SHPO received the National Register application on August 12, 1996 with the property previously inspected by the SHPO on July 16, 1996.⁵⁴ On September 3, 1996, the Tennessee SHPO approved that the application was adequate, and in the SHPO's opinion meet the National Register requirements for rehabilitation. The SHPO then transmitted the nomination to the National Park Service and made the statement, on September 4, 1996, "the property appears to meet the National Register Criteria for Evaluation and will likely be nominated."⁵³ Part 1 the "*evaluation of significance*" was approved on September 16, 1996.⁵⁵

Part 1 of the tax credit application described the existing roof system as in poor condition testing high in asbestos as well as the roof decking disintegrating due to water damage from leakage. Following the plan laid out and approved in the Part 2 process, workers completed asbestos abatement on all buildings as required by building codes. A new roof system was constructed and tied into the existing brick walls. Plans called for the salvage of the original wood trusses and other structural beams to be reused if found to be structurally sound. The buildings originally had sloped roofs with center gables and a corrugated tin covering. Roofers replaced the

⁵² Ibid.

⁵³ Ibid.

⁵⁴ Ibid.

⁵⁵ Ibid.

⁵⁶ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 2 – Description of Rehabilitation. Accessed, Tennessee Historical Commission. December 2015.

⁵⁷ Ibid.

existing roofs with a standoff roof over the corrugated tin, followed by R-20 insulation, and topped with a new corrugated metal roof. Designs called for the underside system of the roof to be left exposed displaying the historic beams and girders.⁵⁸

Interior walls underwent pressure washing and sandblasting to remove lead-based paint. With the exception of minor repairs, the exterior brick remained untouched. Drywall encapsulated interior walls in some of the buildings. The under decking of the ceiling was pressure washed and all steel was prepped for paint, thus encapsulating the existing lead paint. Flooring throughout consisted of poured concrete and was left untouched during the rehabilitation, with the final covering to be determined by future tenants.⁵⁹

This multi-phase project commenced September 1996 only to receive Part 3 Certification in January 2005, ten years later. After the project received Part 2 certification on September 10, 1998, the rehabilitation appeared to go dormant. No evidence could be found explaining the resulting two-year gap. Traceable in the documentation available, the project encountered schedule conflicts and other setbacks due to inadequate communication and response from the developer to the SHPO and the National Park Service. The SHPO and the National Park Service's correspondence directly references the application's overall lack of detailed information, neglect of certain application line items, and missing documentation such as drawings and photographs. These missing or disorganized components of the application resulted in delays in its progress through the application process.

Retrieved from the Tennessee SHPO, the Dortch Stove Work file contents appear in complete disarray. The file was out of order with multiple pages of the application and other accompanying documents missing. After days of sorting the file's contents, the researcher extracted a minimal amount of correspondence from both the National Park Service and the Tennessee

⁵⁸ Ibid.

⁵⁹ Ibid.

SHPO. One letter addressed to the National Park Service from the SHPO describes the “mess” of the submitted application by the applicant. Notably, the majority of correspondence was missing. By deciphering time and date stamps on the available correspondence, letters of response could be matched with letters posing questions. The correspondence between the parties dealt with a variety of issues and concerns. Items such as missing photographs, the need for additional architectural drawings, concerns of proposed window plans, and identifying inadequate or inappropriate preservation treatments in the application were referenced in correspondence by both agencies.

On September 10, 1996, the Tennessee SHPO issued a letter to the developer in response to the Part 2 application submission. This letter addressed a variety of issues found by the SHPO, explaining further requirements that were to be met before Part 2 of the application could undergo further review. Louis Jackson, the Tennessee SHPO representative who authored the letter, indicated that the Part 2 of the application was incomplete and lacked extensive detailed information regarding the rehabilitation plan and proposed procedures.

The SHPO addressed concerns regarding Part 2 of the application in the September 10th letter, along with the admonishment about the lack of detail and incomplete information. A major issue involved the proposed treatment for the floor after the removal of asbestos tiles. The description of work listed on the application calls for the existing floors to remain and the covering be determined by the future tenant. Detailed plans of new interior configurations also need to be provided. The application lists the broken glass in the windows to be replaced and the metal grid work to be scraped and painted. The SHPO inquired if the windows were to remain and if so, what was their condition?

The September 10th letter stated that the submission of information for Part 2 Certification for buildings 1, 2, and 13 was being proposed as a four to six phase project. However, the project manager’s submission of Part 2 did not list all phases of the rehabilitation, a requirement that must be provided before the office can grant approval. The letter also made reference to the requests of any

changes to the floor plan; stating that these must be made and include the demolition or relocation of interior partition walls and updated floor plans. When submitting Part 2, photographs of all areas undergoing rehabilitation work must be provided and keyed into a floor or site plan. This submission contained very few photographs which were not labeled. The floor plans and the submission of all construction phases were incomplete or missing. In the letter's closing, the SHPO expressed their concern for such an extensive and large rehabilitation previewed through an incomplete and disorganized application.

On January 23, 1998, the National Park Service issued a letter to Mr. Calvin Lehew, regarding the submission of Part 2. The letter read that after review the National Park Service determined that the application is still incomplete and the review is on hold until additional information is received. The National Park Service provided a detailed list of information needed for the application to proceed. First, the agency noted that good overall photographs of the site and its environment in its pre-rehabilitation condition were still lacking. Photos showing views of the overall site, including the complex itself as well as views out from the complex needed to be provided on a keyed map to give a good idea of how the factory looks in its setting. Additionally, the National Park Service commented on the proposed rehabilitation work for each building and that information is sometimes vague regarding specific replacement materials and treatments. The agency emphasized that proposed areas of work, both interior and exterior, need adequate photographs illustrating the space and its features in addition to clear and comprehensive plans for the proposed design.

A problematic issue both agencies expressed concern over, and chose to formalize their position on via amendments created for building 4/7, is the treatment of a building in an advanced state of disrepair. After inspection, workers concluded that over ninety percent of the building would be new construction, thus it was removed from the application and rehabilitation process. The SHPO and National Park Service feared the demolition of this building might affect the properties National Register listing; both agencies concluded that demolition was permissible and allowed it.

The correspondence from the file allowed for a measured of efficiency by analyzing the response rate of each the National Park Service and the SHPO. As stated earlier, it is apparent that some correspondence is missing; therefore gaps of time and dates cannot be accounted for. After an examination of the available materials, it appears that both agencies processed correspondence in an efficient manner. From the date of authorship to receivership, the time elapsed for correspondence ranged six to eight days. However, the response time from the property owner and project manager to the agencies occurred in longer gap ranging from six to nineteen days to reply.

In the Dortch Stove rehabilitation, each agency enforced the Secretary of the Interior's Standards consistently, but with different application methodologies. The SHPO initiated a macro approach to enforce the Standards. Throughout correspondence the SHPO identified large-concept problems and focused less on specific details. The National Park Service honed in on more specific details such as repair techniques, specific product brands of materials used for repair, and proposed designs, defining features such as doors, windows, and exterior elevations. Both the National Park Service and the SHPO warranted similar and justifiable concerns for the Dortch Stove Project by applying the Standards accurately and appropriately.

The SHPO identified a number of items not conforming to the appropriate practices set forth by the Secretary of the Interior's Standards. These included proposed landscape designs disrupting the historic context and grounds of the property, extensive conversions of interior floor configurations such as the addition and removal of walls, cleaning techniques which may be harmful to the existing historic fabric, and proposed window replacements and treatments. The National Park Service expressed similar concerns, however, their comments drew upon the more detail-oriented items that the SHPO had already formalized as comments in the correspondence. The National Park Service identified complex issues which included inappropriate treatments, repair techniques, and possible harmful materials specified to be used during the rehabilitation. Initially, a main concern of the National Park Service entailed work items already completed significantly

impacting the historic integrity of the complex; namely the demolition of Building 4/7. The loss of this building magnified the importance of reducing the loss of historic fabric through the remaining buildings of the project. The National Park Service advised that the majority of work completed on Building 4/7 did not meet the Secretary's Standards and would need modification in order for Part 3 approval. Particularly the new elevator tower and the addition of an extensive porch system constructed across the front façade significantly impacted the historic building's integrity in a highly visible location. The National Park Service determined the elevator tower needed to be painted a more compatible color to blend in with the brick of the building, and the porch had to be removed to conform with the Secretary of the Interior's Standards. The National Park Service also noted concerns with the proposal for trees plantings inside the building. The National Park Service advised that there should be fewer in number and that all trees were to be located in above-ground, built-in or movable planters. The National Park Service also noted the coverings over exterior benches along the front façade of the building disrupted the historic visual and recommended the coverings be removed.

SUMMARY

After careful review of correspondence from the Dortch Stove Work's file, findings show the response time of both the National Park Service and the SHPO to be efficient, under the specified thirty day response timeline in every instance. The primary delays of the project resulted from the timeline driven by the applicant, not the National Park Service or the SHPO. Documents and other correspondence sent from both agencies had minimal lead times, reaching the intended recipient within acceptable courier times between geographical locations. Casual correspondence between the agencies was sent by facsimile and expedited parts of the process. This case study revealed a slower response rate from the property owner and project manager to the government agencies. Although the applicant was not measured for efficiency, there exists a noticeable delay in the response time of the

applicant to correspondence from the administrating agencies. Comparing time stamps of documentation sent from the agencies to the applicant and the applicant's response revealed the delay in some instances weeks passed before the applicant responded. However, considering the amount of requested information by each agency in their correspondence most likely resulted in the lengthier response rate of the project manager or property owner.

Throughout the process of the Dortch Stove Work project application, the Secretary of the Interior's Standards were interpreted consistently by the National Park Service and the SHPO. The only difference between the agencies is how they applied the Standards. The National Park Service focused more on the specific details of the rehabilitation. These included concerns for the proposed replacement materials, proposed techniques for restoration, and floor plan reconfigurations. The SHPO covered a broader base of concerns. These dealt with keeping the historical context of the property's landscape accurate and the impact of work already completed before approval. Both agencies commented on similar issues and expressed common concerns throughout the process. The two predominant issues the agencies addressed during this rehabilitation concerned the windows and the work completed prior to approval.

The general application process completed by the property owner and developer received scrutiny from both the SHPO and the National Park Service due to the multiple incomplete submittals and incorrect application fields. This project encountered numerous roadblocks throughout the project causing many delays and difficulties for all parties involved. Financial issues, application amendments and corrections, and the overall affects of a disorganized applicant created a time-consuming and costly project. Though a drawn-out process, rehabilitation work at The Factory was ultimately found to meet the Secretary of the Interior Standards as an appropriate preservation treatment of the historic property and earned a successful Part 3 Certification.

The Factory today continues to be a full-time operating multi-use space. It is home to almost thirty stores ranging from artisan guitars, antiques, record shops, art galleries, and several

other retailers. Many companies have located their main office or extension offices within The Factory. Business space consists of law offices, film and design firms, record labels, and other prominent Nashville companies. The complex also houses seven distinct venues for entertainment available for private use, concerts, plays, and other social events throughout the year, also including fashion shows, fundraisers, video shoots, film screenings, and much more. ⁶⁰ It offers a unique and distinctive environment for shopping, eating, and socializing, thus ensuring guests leave with a lasting impression of these historic buildings and their new use.

⁶⁰ “The Factory at Franklin | Shops, Restaurants, and Events in Historic Franklin, TN,” accessed January 11, 2016, <http://factoryatfranklin.com/>.

TROLLEY BARNS (WPA GARAGES)

Address: 33 Peabody Street
Nashville, Tennessee 37210

Building Type: Industrial

Type of Construction: Concrete, stone, brick, asphalt roof

Historic Use: Trolley Storage Barn

Current Use: Mixed Use

Gross Building Area: 90,000 SF

Net Rentable Area: 90,000 SF

Year Built: 1930

Year Rehabilitated: 2011

OWNERSHIP STRUCTURE

Phil Ryan
701 South Sixth Street
Nashville, Tennessee 37206

DEVELOPER

The Matthews Company
300 Broadway
Nashville, Tennessee 37210

PROJECT CONTACT

Robert C. H. Matthews, III
300 Broadway
Nashville, Tennessee 37210

REHABILITATION ARCHITECT

Centric Architecture
2207 Crestmoor Road, Suite 200
Nashville, Tennessee 37215

DEVELOPMENT SCHEDULE

Project Initiated: September 29, 2009

Initial contact with SHPO: October 1, 2009

Part 1

- Received: March 12, 2010
- Approved: March 17, 2010

Part 2

- Received: January 3, 2010
- Approved: February 11, 2011

Part 3

- Received: November 24, 2014
- Approved: March 13, 2015

Construction Date: February 2011

Completion Date: September 2011

Estimated Rehabilitation: \$ 9,494,624.00

Estimated New Construction: \$ 5,245,437.00

Total (QRE plus non-QRE): \$14,740,060.00

Figure 3.5 Summary of Rehabilitation of Trolley Barn Data ⁶¹

⁶¹ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 1- Evaluation of Significance. WPA Garages, Trolley Barns, Accessed, Tennessee Historical Commission. December 2015



Figure 3.6 Trolley Barns looking north

Photo taken by John W. Evangelist



Figure 3.7 The Trolley Barns

Photo taken by John W. Evangelist

Constructed in 1930, the Trolley Barns, a municipal garage complex, is located in the Rolling Mill Hill area of downtown Nashville, Tennessee. The Trolley Barns are one-story brick masonry buildings retaining a high degree of physical integrity. The complex of seven brick buildings designed in an orthogonal grid reflects the investment Nashville made in its city infrastructure and public works

during this time. The Works Progress Administration (WPA) was a federal Great Depression-era program with its primary initiative designed to “put people to work.” Thousands of Tennesseans, both skilled and unskilled, were employed by the WPA to construct roads, sewer systems, bridges, dams, and buildings, including the Trolley Barns complex. The garages were specifically constructed for the City Sanitation Department. Six of the seven original barns remain today. In 1943, the WPA was terminated with expenditures exceeding \$11 billion having employed approximately eight million workers.⁶² Although coined the “Trolley Barns”, the buildings never actually housed trolley cars. By the time of their construction, city buses had completely replaced Nashville’s trolley system. Their name came about possibly because the barns are situated on the lot that previously housed the original mule-powered trolleys, including the “barns” for the mules.

REHABILITATION

The Matthews Company lead by Bert Matthews, based in Nashville, developed the Trolley Barns. On March 12, 2010, the project met preliminary determination for individual listing on the National Register by the Tennessee SHPO; however, the application noted, “further evaluation needed to be conducted to meet all criteria.”⁶³ After thorough review, the SHPO deemed that, “The property appears to meet the National Register Criteria for Evaluation and will likely be nominated individually” on February 26, 2010, and forwarded Part 1 to the National Park Service. Concurring with the SHPO, the National Park Service determined the buildings should be listed separately since each possessed historic significance. Therefore, the National Park Service deemed all of the building to be “certified historic buildings” when the property was listed.⁶⁴

The Matthews Company soon noted the buildings’ problematic issues. The application’s property description presents the buildings as, “A group of city maintenance buildings in relatively

⁶² “Works Progress Administration | Entries | Tennessee Encyclopedia,” accessed February 6, 2016, <https://tennesseeencyclopedia.net/entry.php?rec=1534>.

⁶³ Ibid.

poor condition - physical appearance: six buildings that retain a high degree of physical integrity, including bowed steel truss roof systems, original metal frame windows, stepped parapet rooflines and decorative brick detailing.” Little information is available regarding the buildings since the general public did not use them. Developers scheduled the project to be completed in six phases with major renovations including the removal of concrete masonry units (CMUs) used as infill for existing doors and windows; replacement of missing or damaged brick on all façades; new garage doors and entrance doors; and windows.⁶⁵

Workers installed new tenant entryways in former window openings while preserving existing windows - repairing, repainting, and re-glazing with clear glass; installing new operable interior wood and glass storm sashes; rebuilding muntins that were missing; and repaired damaged brick sills. Some existing windows were too far deteriorated and required full replacement. The application called for the original wooden garage doors to be retained and repainted. Workers removed and disposed of existing non-original metal garage doors, replacing them with a storefront system. Previous alterations of the building(s) consisted of many non-original openings cut into the brick façade for doors or other mechanical equipment. Workers removed all non-original door openings and filled them with appropriate brick, along with removing existing cables and wires attached to the brick exterior. Interior brick partitions were kept and repaired, existing CMU’s and gypsum board layers were removed.

Masons patched openings and repaired brick on the interior face of the exterior walls. Electricians installed industrial light fixtures to match existing ones or ones that dated to the building’s time period. The plans called for an extensive renovation of the roof system, with roofers repairing and replacing roof decking and the removal of deteriorated insulation held in place by octagonal metal wire,

⁶⁴ Louis Jackson to Sam Lingo, 13 March 2010, Letter in *Federal Tax Credit Application file*. Accessed at Tennessee Historical Commission. December 2015.

⁶⁵ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 3 – Request for Certification of Completed Work. Accessed, Tennessee Historical Commission. December 2015.

otherwise known as chicken wire. Additionally, the workers installed a thermoplastic (TPO) membrane roof system encapsulating new styrofoam insulation on top of the existing wood decking. Carpenters repaired and restored the original bead board ceilings throughout and left the steel trusses-deemed in good condition by the SHPO- exposed as much as possible. The original building consisted of “sloped” concrete floor slabs. The engineers replaced the existing ones with new, “level” concrete floor slabs.

Due to the building’s vacancy and neglect over several years, the proposed plan of extensive repairs and alterations met some opposition due to the nature of their intensity. Moderate resistance occurred from both the SHPO and the National Park Service during the Part 2 review of the application. Filed amendments and concerns from the agencies dealt primarily with proposed alterations and the removal or coverings of exterior finishes and features.

Two major concerns the agencies both addressed dealt with the landscape plantings and the new roof color. These items produced the majority of the comments from both the National Park Service and the SHPO. The proposed landscaping, specifically the trees to be planted between the buildings, did not meet the Secretary of the Interior’s Standards.⁶⁷ Though not administrating authorities for the application of the Tax Credit Program, the Tennessee Historical Commission stated their reasoning for opposing the tree plantings: “You respect the current unobstructed site lines of the laneways between the trolley barns by altering the current plan to concentrate proposed plantings and street furniture around existing portals and walkway intersections and reducing the footprint of the plantings thereby minimizing their intervention in the historic character of the laneways, whose site lines from intersection to intersection are unobstructed.”⁶⁸ The Tennessee Historical Commission believed the planting of the trees adversely affected the Trolley Barn’s National Register listing, fearing the original view shed between the buildings would minimize due to the tree plantings not original to the pathway. Further correspondence requested the proposed trees planted along Peabody and Hermitage Avenue be removed too, keeping the historic view unobstructed. The letter also called for softening the current visual effects of proposed sidewalks and crosswalks by choosing less obtrusive

pavers to ensure sidewalks be flush with laneways while complying with the ADA.

From the amendments in the application smaller concerns produced the majority of amendments aforementioned. Regarding the roof color, developer Bert Matthews stated, "the decision for going with a white roof instead of the existing black was for energy efficiency," the National Park Service immediately denied the application for this color.⁶⁶ The National Park Service stated the new roof did not conform to the Secretary of the Interior's Standards which required that the roof to be identical in color to the original. Originally when first constructed the building's had a roll-on application of black tar and paper as the roofing material. Today, black tar is not widely used due to its low energy performance. As in Mr. Matthew's statement the selection of color is based on energy efficiency, enhancing the buildings' overall energy performance to gain LEED certification. In the end, both parties reached an agreement and a gray roof, a color respecting the historical context and energy efficient, was chosen.

The work on this six-phase project commenced February 2011 and finished November 2015, receiving its Part 3 Certification. Work took place over a four-year period; transforming the buildings and grounds into multi-use facilities and recreational spaces. Similar to other files retrieved at the Tennessee SHPO, the disarrangement of the Trolley Barn's file hindered the research process. The project's application documents, correspondence between each agency and developer, among other components had to be evaluated and dissected diligently to ensure an accurate narrative of the process.

Compared to the Dortch Stove Works and Cummins Station project files, the Trolley Barn file is the most intact. The project is also the most recently completed of the three. An interesting finding is that the three files can be dated by technology and format. The Dortch Stove application field blanks are filled in by hand, the Cummins Station file by typewriter, and the Trolley Barn file by modern computer.

After careful evaluation of the application, amendments filed, and correspondence of all parties, it can be concluded the SHPO and the National Park Service all performed their roles

efficiently throughout the process. Throughout the communication process, the property owner, project manager, and architect all demonstrated excellent communication skills with the National Park Service and the SHPO. Throughout each amendment and letters of concern received, the developer and his associates replied swiftly with definitive answers and solutions to the agency's concerns. However, multiple amendments were filed during this project's span resulting in a later deadline than anticipated.

The meticulous application of the Secretary of the Interior's Standards by the SHPO and National Park Service is demonstrated by the detailed amendments filed and comments produced and demonstrates consistency between the two agencies in their interpretation of the Secretary of the Interior Standards. The National Park Service issued the majority of the amendments, eleven total, while the SHPO issued eight amendments. A small difference between the two agencies, the amendments related to items such as: cleaning techniques, plantings, HVAC screening, roof color, and signage. The National Park Service issued the majority of their amendments and concerns surrounding the alteration, removal, or covering of exterior finishes and features. Comments from the National Park Service suggested a lack of information from the developer to accurately evaluate the impact of changes. These consisted of new door openings, installation of ramps, stairs, and window replacements on major elevations not matching historic configurations, materials, or profiles. The SHPO filed four fewer amendments than the National Park Service regarding the proposed alterations, removal, and coverings of the Exterior finishes and features. In other categories both agencies filed an equal amount amendments stating similar concerns.

⁶⁶ Burt Matthews III. Telephone Interview. January 22, 2016

⁶⁷ Burt Matthews III. Telephone Interview. January 22, 2016

⁶⁸ Patrick McIntyre to Mr. Joe Cain RE: HUD ROLLING MILL TROLLEY BARN PHASE II DEVELOPMENT, INFRASTRUCTURE, GREENWAY, AND PEDESTRIAN CONNECTION, NASHVILLE, DAVIDSON COUNTY. June 11, 2010., Letter in *Federal Tax Credit Application file*. Accessed Tennessee Historical Commission. December 2015

SUMMARY

In conclusion, the Trolley Barn rehabilitation project succeeded, earning Part 3 Certification and receiving the FRTC. Throughout the process both agencies demonstrated efficient response times and consistency in applying the Secretary of the Interior's Standards. The estimated completion date for the rehabilitation was September of 2011. Part 3 Certification was received in March of 2015, four years after the expected finish date, but the site opened for business in 2011. The delay in certification is primarily due to the amendments and period of a six-phase project.

The rehabilitation of the Trolley Barns created one of the most popular mixed-use spaces in Nashville, immediately spurring revitalization to an area which had been ridden with crime and abandoned for public use. The National Park Service and the Tennessee Historical Commission congratulated the owner and developer on a successful rehabilitation and the retention of historic fabric throughout the buildings.⁶⁹ The Trolley Barns contain some of the most sought-after businesses, restaurants, and office space in Nashville. Their rehabilitation not only revitalized these buildings but also the Rolling Hill Community. After initial investments, this community experienced growth it had not seen in over forty years. Today, new developments, business relocation, and restaurants have multiplied causing this community to thrive once again.

⁶⁹ Louis Jackson to Sam Lingo, 21 August 2012, Letter in *Federal Tax Credit Application file*. Accessed Tennessee Historical Commission. December 2015.

CUMMINS STATION

Address:	209 10 th Avenue South, Nashville, Tennessee 37203
Building Type:	Warehouse
Type of Construction:	Reinforced concrete & masonry
Historic Use:	Wholesale Warehouse
Current Use:	Mixed Use
Gross Building Area:	400,000 SF
Net Rentable Area:	400,000 SF
Year Built:	1906
Year Rehabilitated:	1993

OWNERSHIP STRUCTURE

Henry Sender
Cummins Station, LLC.
209 10th Avenue South #325
Nashville, Tennessee 37203

PROJECT CONTACT

Henry Sender
Cumming Station, LLC.
209 10th Avenue South #325
Nashville, Tennessee 37203

DEVELOPMENT SCHEDULE

Project Initiated:	October 1993
Initial contact with SHPO:	October 1993
Part 1	
- Received:	N/A
- Approved:	N/A
Part 2	
-Received:	N/A
-Approved:	N/A
Part 3	
- Received:	May 15, 1997
- Approved:	July 31, 1997
Estimated Rehabilitation:	\$12,062,950.00
Estimated New Construction:	\$ 322,220.00
Total (QRE plus non-QRE):	\$12,385,170.00

Figure 3.8 Summary of Rehabilitation of Cummins Station⁷⁰

*Part 1 & 2 Dates were not listed on the National Park Service project status database

⁷⁰ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 1- Evaluation of Significance. Accessed, Cummins Station. Tennessee Historical Commission. December 2015



Figure 3.9 Cummins Station

Photo taken by John W. Evangelist

Constructed as the longest concrete terminal building in the world, Cummins Station formerly housed some of Nashville's leading businesses including the Cheek-Neal Coffee Company. Noteworthy for its size and materials, Cummins Station was the largest wholesale warehouse in Middle Tennessee at the time of its construction reflecting architectural aspects of the early 20th century Colonial Revival style. The large, four-story concrete and masonry building measures 132 feet in width and 500 feet in length, totaling almost one-half million square feet. It also includes a basement level which opens onto railroad tracks on the west elevation. The exterior is brick veneer, currently painted "brick red," encapsulates the reinforced concrete building and does not carry any of the building's weight. Decorative elements such as flared arching can be found on the exterior storefronts and east and west facades. Other prominent decorative features include jack arches above the windows, prominent keystones, and a double transom window arrangement of the storefronts. The east main façade faces Tenth Avenue South. The building is thirty-six bays in length, with each bay separated by brick piers running the height of the building. Above the storefront level each pier is decorated with a concrete band. Storefronts located along Tenth Avenue South are mostly original with only a few having been altered. Each storefront has a framed entrance door for its business. Three main entrances are located on the east façade, each with double-doors leading to the interior halls of the building. The west elevation of Cummins Station is similar to the east façade. Decorative elements continue and there are fifteen light casement windows at each floor level. The north and south elevations contain the building's typical industrial casement, one-over-one sash windows, but lack the jack arching and keystones of the east and west elevations. At the roofline is a continuous concrete parapet running the length

of the building.

Cummins Station interior is an open floor plan with concrete partition walls. Concrete columns are found on each floor level serving as a visual and structural element of the building's interior. The finishes found throughout the building are primarily concrete with the exception of some partition walls in the first and last bays, constructed of wood. Two sets of elevators are in the building, located at the north and south ends, providing access to all five floors.

The early years of operation at Cummins Station proved successful, and tenant vacancies were few. It was the building which marketed itself because it was the first reinforced concrete building in Nashville, meaning it was “fireproof” and thus lowered the insurance rates and stock. The ideal location was another selling point, being situated adjacent to main railroad lines which were used for the import and export of goods. Another major selling point pertained to that fact that it was a place “where rats cannot live,” a critical aspect in the early twentieth century. Throughout the years, Cummins Station housed the most popular companies in Nashville and the south. Gradually as new buildings began to be constructed during the mid-twentieth century, many tenants moved to other, more modern locations. It was during the 1980s when the building bid farewell to its last major occupant, the Manufacturers Warehouse Company, a distributor of furniture and clothing.

REHABILITATION

Cummins Station consisted of a warehouse conversion into office and mixed-use space which took place in two phases. The first phase involved the exterior and floors one,

two and three; the second phase involved floors four and five. All proposed work for the exterior focused on three key areas. First, the brick was stained to hide where brickwork had been patched or was mismatched around several windows. Second, new bay doors were installed to replace metal garage type doors, which were not original. Third, the loading dock was re-constructed due to its intense deteriorated state. The windows were retained, although new insulated storm windows were installed on the interior. This resulted in the original appearance being retained from the exterior view of the building. The interior was divided into office and commercial space.

Of the three files retrieved from the Tennessee SHPO, the Cummins Station project file is the least complete, missing significant content. The file contains Part 1 of the tax application, a partial Part 2 application, and two letters of correspondence from the Tennessee SHPO. No correspondence from the National Park Service survived. During a visit to the Tennessee SHPO the researcher questioned a representative as to how the contents of the file became misplaced. A clear explanation could not be given. One theory is that the age of file, improper handling and the lack of organization led to the missing components. Due to the notable absence of information, measuring efficiency, consistency, and the overall dynamics of the project proved challenging.

SUMMARY

The two-phase project completed over four years, earned Part 3 Certification in July of 1997. Since the majority of the file is missing, dates and other details from Part 1 and Part 2 of the application provided circumstantial evidence contributing to this study and the project's conclusion. Exhausting resources via internet searches and public forum, no

information revealed how the roles of each party contributed to the project or any problems which arose during the rehabilitation process.

Because the project earned Part 3 Certification the administering agencies and the applicants must have met at least minimal threshold of efficacy throughout the process. The file contained no amendments and the duration of the rehabilitation process from Part 2 until the project received the credit lasted four years. Compared to other projects in this study it can be speculated that minor issues occurred throughout both phases of rehabilitation and the process completed within a standard time frame. The only concern noted in the file is a comment in correspondence by the SHPO regarding the application of masonry stain. However, the SHPO concluded it did not warrant denial of the project and allowed the stain to be used hiding mismatched brick campaigns.

Successfully earning Part 3 Certification, the rehabilitation of Cummins Station most likely experienced setbacks similar to other projects. Following its peers, there is the possibility of amendments, the response rates of parties involved, and applicant-side hurdles slowing the rehabilitation process, although these speculations cannot be accounted for by documentation or other evidence.

Cummins Station continues to be a spotlight of success for community revitalization in Nashville and a precedence having influenced other similar projects. As one of Nashville's most premier addresses, Cummins Station offers unique office, retail, restaurant, and recreational space. The revitalization of this building directly attracted more than 140 diverse businesses to a "business community" at Cummins Station. The building boasts a professional atmosphere for public companies and an artistic and creative space for photographers and designers. Cummins Station has also received LEED-ND Gold

Certification by the United States Green Building Council.

CHAPTER SUMMARY

Tennessee has limited incentives for the rehabilitation of historic properties. The Tennessee Historical Commission offers a grant to qualified applicants, with the selection process based on project type. Priorities for these grants are measured on the plan A Future for the Past: A Comprehensive Plan for Historic Preservation in Tennessee.⁷¹³ This plan identifies areas experiencing rapid growth and development possibly threatening cultural and historically significant sites and buildings throughout Nashville. Ideal projects identify and document historic districts, structures, buildings, sites, and other historical objects significant to the history of Tennessee, prior to 1965. Also included in the plan are surveys recording geographical locations signifying major historical events. The grant is a matching grant, reimbursing up to sixty percent of the approved project costs; however, the remaining forty percent is not covered and must be matched by the grantee. Until Congress passes the federal budget, the exact amount of the grant is unavailable.

The three case studies presented in this chapter offer only a glimpse into the administrative process of the Federal Rehabilitation Tax Credit Program in Tennessee. Although the three case studies were selected for commonality based on several parameters, the rehabilitation process for each was found to be subjective and inherently different. A multitude of rehabilitation projects utilizing the FRTC has been completed across the state. The overall goal of this study is to determine the efficacy, efficiency, and

⁷¹ "Federal Preservation Grants - TN.Gov," accessed February 19, 2016, <https://www.tn.gov/environment/article/thc-federal-preservation-grants>.

consistency demonstrated by the National Park Service and the SHPO during the rehabilitation process. The two factors analyzed for each case study, efficiency and consistency, describes the administration of the application process and how each agency enforces the Secretary of Interior's Standards. This study found that the National Park Service and the Tennessee SHPO demonstrated exceptional response time relaying their comments, in addition to filings amendments and addendums within the appropriated thirty-day period. The only case to experience an inefficient process was the Dortch Stove Works project. However, this project's inefficiency is a direct result of the applicant. The project manager's untimely responses, insufficient or inaccurate information provided on the application, and other negligence's led to the project's inefficiency, not either administrating agency's response rate.

This chapter also examined the consistency in which each agency applied the Secretary of the Interior's Standards. By comparing amendments and comments from each project, issued by both agencies, a pattern is observable. A chart in Chapter Five represents the comments and amendments produced most often and by which agency. These case studies illustrate that the National Park Service and the Tennessee SHPO enforced the Secretary of the Interior's Standards consistently throughout each of the three case studies' proposed rehabilitation work. The agencies addressed similar concerns. Issues producing frequent comments by the agencies related to paint colors, inadequate site photographs, the lack of detailed drawings, improper cleaning techniques, compromising landscape additions, and window treatments.

The National Park Service and the Tennessee SHPO diligently communicated with project managers and property owners to encourage and establish appropriate measures

ensuring a successful and appropriate rehabilitation. The dialogue produced by the National Park Service and Tennessee SHPO with the property owners and developers appears to have established a relationship. This encouraged a healthy line of communication and respect during the application process for all parties. Overall, the National Park Service and the Tennessee SHPO was consistent when enforcing the Secretary of the Interior's Standards in Tennessee. Additionally, these agencies are efficient in their responsiveness.

The success of these projects along with others has indirectly led to an increased volume of tax credit projects in Tennessee. According to the National Park Service analysis and statistical report, Tennessee's approval of Part 3 applications have grown in each fiscal year. Developers have stated that the Tennessee SHPO provides tremendous assistance throughout the tax credit application process as well as the National Park Service reviewers. These projects represent Tennessee's architectural heritage and it is because of their rehabilitation that Tennesseans can preserve more of Tennessee's historic architectural fabric.

CHAPTER FOUR

SOUTH CAROLINA

Unlike their counterparts in Tennessee, South Carolina legislators have embraced incentive programs and tax credits for the rehabilitation of historic buildings. In 1976, the South Carolina legislature amended the tax code to include a state income tax credit for historic rehabilitations. This tax credit would incentivize the rehabilitation of historic properties rather than favor demolition.¹¹⁴ The act created a twenty-five percent and a ten percent state tax credit for the rehabilitation of any certified historic structure, with the twenty percent credit applied specifically to residential buildings and the ten percent credit for any income producing property. These tax credits can be joined with the Federal Twenty Percent Tax Credit, allowing an owner or developer to maximize their reduction of taxes owed. In 2002, South Carolina adopted a state Historic Rehabilitation Incentives Act. Lawmakers inferred that direct spending on materials and construction labor recycled within the state generates income for companies and individuals which supply these goods and services throughout the rehabilitation.¹¹⁵ In 2013, South Carolina's General Assembly secured passage of the *South Carolina Abandoned Buildings Revitalization Act*.¹¹⁶ A new tool in South Carolina's preservation initiative and economic development efforts, the Abandoned Buildings Revitalization Act incentivizes private investment of abandoned or vacant

⁷³“Act No. 229 - south_carolina_act_229_073014.pdf,” accessed April 12, 2016, http://www.novoco.com/historic/resource_files/related_state_htc_docs/south_carolina/Income%20Producing%20Tax%20Credit/south_carolina_act_229_073014.pdf.

⁷⁴“hpEconomicsbooklet.pdf,” accessed February 11, 2016, <http://shpo.sc.gov/pubs/Documents/hpEconomicsbooklet.pdf>.

⁷⁵ “2013-2014 Bill 3093: Abandoned Buildings Revitalization Act - South Carolina Legislature Online,” accessed March 13, 2016, http://www.scstatehouse.gov/sess120_2013-2014/bills/3093.htm.

buildings in downtown areas.

The *South Carolina Abandoned Buildings Revitalization Act* encourages the rehabilitation, renovation, and redevelopment of empty storefronts, returning the building back to use for the community.¹¹⁷ The legislation defines an abandoned building into the following criteria:

1. The building cannot be used as a single-family residence.
2. The building must be at least sixty-six percent vacant for a minimum of five years.
3. The building must be non-operational for income-producing purposes.
4. The investor using the tax credit may not be the owner at the time of abandonment.
5. If the building has been listed on the National Register for Historic Places and used solely for storage or warehousing, it can be deemed abandoned.¹¹⁸

To qualify for the South Carolina Abandoned Building tax credit, the investment threshold must meet the following tiered stipulations:

1. \$250,000 of investment in communities with a population greater than 25,000
2. \$150,000 in investment if the population is between 25,000 and 1,000
3. \$75,000 in investment if the local population is less than 1,000

South Carolina has thus provided a considerable array of incentives for the rehabilitation of historic buildings. Two options of tax credits are available, each invoking specific parameters for tax credit qualification. The investor(s) can opt for either an income tax credit or a property tax credit.¹¹⁹ If choosing the income tax credit, the Department of Revenue must be alerted, this is done by filing a Notice of Intent to Rehabilitate. The income tax credit is capped at \$500,000 and cannot exceed twenty-five percent of rehabilitation expenditures. This credit is disbursed over five years beginning with the tax

¹¹⁷ “SC Abandoned Buildings Revitalization Act,” accessed August 15, 2015, <http://www.masc.sc/pages/legislative/sc-abandoned-buildings-revitalization-act.aspx>.

¹¹⁸ Ibid.

¹¹⁹ Ibid.

year the building is placed into service. The taxpayer cannot claim any other income tax credit incentive programs South Carolina offers, such as the Textile Communities Revitalization Act or Retail Facilities Revitalization Act credits, if the credit is claimed.¹²⁰

Figure 4.1 below summarizes the National Park Service’s statistical analysis reports, recording Part 2 and Part 3 application submissions and the estimated qualified rehabilitation expenditures of all projects in South Carolina from 2005 to 2015 utilizing the federal tax credit.

	Applications Received			Applications Approved			Qualified Rehabilitation Expenditures	
	Part 1	Part 2	Part 3	Part 1	Part 2	Part 3	EST QRE at Part 2	EST QRE at Project Completion
2005	21	7	8	20	5	9	\$ 18,202,492.00	\$ 2,022,499.11
2006	30	13	5	29	15	4	\$ 3,578,352.00	\$ 894,588.00
2007	17	14	9	16	9	6	\$ 46,554,927.00	\$ 7,759,154.50
2008	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2009	13	7	9	9	3	8	\$ 66,214,918.00	\$ 8,276,864.00
2010	11	7	4	11	10	6	\$ 12,068,461.00	\$ 2,011,410.00
2011	3	2	6	2	2	5	\$ 12,536,733.00	\$ 2,507,346.60
2012	13	6	3	13	4	3	\$ 5,989,955.00	\$ 928,015.00
2013	17	14	1	15	9	0	\$ 72,477,010.00	\$ -
2014	26	15	10	25	16	7	\$ 101,296,190.00	\$ 33,689,897.00
2015	23	17	11	19	15	13	\$ 113,637,358.00	\$ 26,605,134.00
Total	174	102	66	159	88	61	\$ 452,556,396.00	\$ 84,694,908.21

*Table 4.1 South Carolina Statistical Report 2005-2015*¹²¹

¹²⁰ Ibid.

¹²¹“Annual Report for Pdf.indd - Tax-Incentives-2005annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2005annual.pdf>,” “Annual Report.indd - Tax-Incentives-2006annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2006annual.pdf>,” “Annual report07.indd - Tax-Incentives-2007annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2007annual.pdf>,” “Annual report08.indd - Tax-Incentives-2008annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2008annual.pdf>,” Ibid., “Tax-Incentives-2009annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2009annual.pdf>,” “Annual Report 10 Final.indd - Tax-Incentives-2010annual.pdf,” accessed January, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2010annual.pdf>,” “Annual Report 11 Final.indd - Tax-Incentives-2011annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2011annual.pdf>,” “Annual Report fy2012 Bg.indd - Tax-Incentives-2012annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2012annual.pdf>,” “Annual Report fy2013.indd -

If investors choose the property tax credit, the city or county must be alerted by filing a Notice of Intent to Rehabilitate. The city or county council must then determine by a vote if the project is eligible. Following their decision, the council then holds a public hearing and approves the project for the credit by ordinance. All affected taxing entities must be notified forty-five days prior to the public hearing. If there are no objections filed by the hearing date, the local taxing entity automatically consents to the tax credit. The Property Tax Credit equals twenty five percent of the actual expenditures, but it is capped so that the credit cannot exceed seventy five percent of the real property taxes of the building. Credit is disbursed over an eight-year period commencing the first year the building is in service. The South Carolina *Abandoned Buildings Revitalization Act* does have a sunset clause. Unless new legislation is passed, the program will terminate in 2019.¹²²

To examine South Carolina's success rate with the FRTCP, the three same key considerations were taken into account. The consistency of how the National Park Service and the SHPO applied the Secretary of the Interior's Standards, the efficiency of their response time. To answer these questions, data and other information retrieved from project files at the South Carolina SHPO was collected for analysis.

The three case studies from South Carolina are Monaghan Mill, Granby Mill, and Oakland Mill. These buildings met the studies selection parameters: the building's size, 250,000 square feet or greater and the project's estimated qualified rehabilitation

Tax-Incentives-2013annual.pdf,” accessed January 11, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2013annual.pdf>,” “Stat Report fy2014.indd - Tax-Incentives-2014statistical.pdf,” “Annual Report fy2015.indd - Tax-Incentives-2015annual.pdf,” accessed January 23, 2016, <http://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2015annual.pdf>.

¹²² Ibid.

expenditures exceeding \$10 million.

<u>MONAGHAN MILL</u>					
Address:	201 Smythe Street Greenville, South Carolina 29611				
Building Type:	Industrial				
Type of Construction:	Brick masonry				
Historic Use:	Textile mill				
Current Use:	Multi-family residential				
Gross Building Area:	479,000 SF				
Net Rentable Area:	479,000 SF				
Year Built:	1900				
Year Rehabilitated:	2005				
<table> <tr> <td><u>OWNERSHIP STRUCTURE</u></td><td><u>PROJECT CONTACT</u></td></tr> <tr> <td>H. Pace Burt Jr. 201 Smythe Street Greenville, South Carolina 29611</td><td>Mark Harris <i>or</i> Amanda Randall 201 Smythe Street Greenville, South Carolina 29611</td></tr> </table>		<u>OWNERSHIP STRUCTURE</u>	<u>PROJECT CONTACT</u>	H. Pace Burt Jr. 201 Smythe Street Greenville, South Carolina 29611	Mark Harris <i>or</i> Amanda Randall 201 Smythe Street Greenville, South Carolina 29611
<u>OWNERSHIP STRUCTURE</u>	<u>PROJECT CONTACT</u>				
H. Pace Burt Jr. 201 Smythe Street Greenville, South Carolina 29611	Mark Harris <i>or</i> Amanda Randall 201 Smythe Street Greenville, South Carolina 29611				
<u>DEVELOPMENT SCHEDULE</u>					
Project Initiated:	June 2005				
Part 1					
- Received:	January 27, 2005				
- Approved:	April 6, 2005				
Part 2					
- Received:	December 5, 2005				
- Approved:	December 22, 2005 (Conditional)				
Part 3					
- Received:	February 9, 2009				
- Approved:	February 27, 2009				
Construction Date:	August 2005				
Completion Date:	May 2006				
Estimated Rehabilitation:	\$18,296,374.00				
Estimated New Construction:	\$1,349,731.00				
Total (QRE plus non-QRE):	\$19,646,105.00				

Figure 4.2 Summary of Rehabilitation of Monaghan Mill Data ¹²³

¹²³ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 1- Evaluation of Significance. Monaghan Mill. Accessed, South Carolina State Historic Preservation Office. February 2015



Figure 4.3 Monaghan Mill, Greenville, South Carolina

Photo taken by John W. Evangelist

Established in 1900, Monaghan Mill is located in Greenville, South Carolina. First cousins Lewis Wardlaw Parker (1865-1916) and Thomas Fleming Parker (1860-1926) developed the mill. Their grandfather, Thomas Fleming, provided financial support for the construction of the mill, leading the cousins to name it after his native Irish county, Monaghan.

The Parker cousins envisioned a grand mill complex, including a mill village. The village they created is referred to as a model of “enlightened paternalism.” Monaghan Mill became not only a place to work but also a community for workers to live in and raise a family; most needs were met within the village. A school, church, medical clinic, and the first YMCA made the village an model community, thus giving great incentive to the mill

employees.¹²⁴ Unlike other mills, Monaghan only employed workers over the age of twelve. At this time, child labor was prevalent and a major issue.¹²⁵

Situated on 325 acres, the mill is located just west of downtown Greenville along the Reedy River. The mill is designed by Lockwood, Greene and Company, one of the largest twentieth century architecture firms in the United States designing textile mills. Monaghan is one of eleven South Carolina textile mills designed by the highly reputed firm. The doors opened in 1901 with 25,000 spindles and \$450,000 in capital.¹²⁶ It grew successfully within a short period of time. In 1903, the mill expanded its production, incorporating 35,000 more spindles and increasing its capital to \$700,000 while primarily producing print cloth and other dress goods such as shirting and shade cloth. The mill employed over 700 workers, while the mill village numbered 1,800, mostly consisting of the workers' families.¹²⁷

Over time, Monaghan Mill experienced many difficulties, primarily consisting of economic hardships and the increase of imported foreign cloth. Although the mill endured many hardships throughout the twentieth century, it always rebounded with vitality; however, by the 1970s American textile companies became more modernized, reducing the number of employees needed to fulfill the operations of the mill.¹²⁸ The lack of positions forced individuals seeking employment to leave Greenville and move elsewhere for work. Soon the village fell into poor condition due to the lack of employees in need of housing.

¹²⁴ August Kohn. *The Cotton Mills of South Carolina*. Spartanburg, SC: Reprint, 1975, pp. 130

¹²⁵ Ibid. pp. 181-83

¹²⁶ James McDowell Richardson. *History of Greenville County, South Carolina: Narrative and Biographical*. Spartanburg, SC: Reprint, 1980, pp. 99-100, 249-53.

¹²⁷ August Kohn. *The Cotton Mills of South Carolina*. Spartanburg, SC: Reprint, 1975, pp. 181-83

¹²⁸ Archie Vernon Huff Jr. *Greenville: The History of the City and County in the South Carolina Piedmont*. Columbia: University of South Carolina Press, 1995. Pp. 350-54

Monaghan continued production of cloth until 2001 when it closed its doors. The mill demonstrated great vitality until its closure, outlasting the majority of textile mills in the area and most mills of this era.

Rectangular in plan, Monaghan Mill is a four-story brick masonry building. A six-story tower is located on the north façade, which contains the main entrance. This building consists of steel frame windows set in segmental openings indicative of the factory-style. Decorative elements include segmental arches above the windows and stringcourses on the tower cornice. The interior is an open floor plan. Cast iron columns support the weight of the floor above which once contained the textile machinery.

Monaghan Mill is a prime example of early, twentieth century, southern mill architecture. The multi-story linear brick building incorporates multiple window bays and other large openings for entrances and exits. At the time of renovation, many of the original windows still existed, although a large majority of the openings had been filled with brick. In spite of the window infill and other “substantial alterations over time,” the SHPO deemed the mill eligible for the National Register of Historic Places under “Criterion A” because of the role Monaghan Mill played in the economic development and the textile industry in Greenville County. The SHPO stated that the mill retains much of its character and is a prime example of a twentieth-century textile mill.

The landscape of Monaghan Mill features many unique aspects which the rehabilitation design retained and improved, including the existing mature dogwood trees surrounding the front lawn. A new entrance and parking area was proposed which worked around the dogwoods and wrapped around the building while also joining an existing parking lot on the south side of the property. The new parking lot consists of seventy-two

parking spaces, necessary to meet applicable zoning codes. The design also retained, refurbished, and replaced sections of the original wrought iron fence surrounding the north and west sides of the property.

REHABILITATION

On January 27, 2005, the South Carolina SHPO received Part 1 of the application for Monaghan Mill. Following the approval of Part 1, the developer submitted Part 2, December 5, 2005. The SHPO issued conditional approval on December 22, 2005. The proposed rehabilitation for the building's exterior included updates to the existing architectural elements and the overall building envelope. Part 2 of the application proposed extensive work on the mill's interior. These alterations in addition to new construction elements allowed for the conversion of the mill into 182 living units. The new design features and proposed rehabilitation work laid out in the Part 2 application were sensitive to the existing interior and exterior historic elements.

The interior brick is described to be in good condition although having previously been sandblasted; the brick in the stairwells however was encapsulated by lead-based paint. The rehabilitation work specified for the brick to be left exposed issuing no plans for any interior masonry repairs. The application describes the loading docks as in good condition and suggests it was to be retained as utility docks for future household and building maintenance use. The application states the building's cornice is in a state of deterioration with paint chipping and staining. The plans proposed to clean the cornice using Sure Klean, a restoration cleaner, then it is to be caulked, primed, and repainted.

The mill's exterior brick is listed in good overall condition and was to be cleaned and repointed, as needed, using an appropriate and compatible mortar matching the original in texture and color. The brick located on the outbuildings was also listed in good condition, but rehabilitation plans propose removing sections of brick for new window openings.

The first floor entrance to the mill is described as in relatively good condition with the exception of the original front door, which is recorded as missing. Using historical photographs of the mill, Part 2 proposed a new door to be constructed replicating the original and to match the new windows in framing and material. All of the original windows in the main building were removed in 1940. Aluminum framed thermal-pane windows were proposed for these existing openings. The design implements double hung sashes with nine over nine light configurations to match the original historic windows. The windows at the southwest and southeast bathroom towers are also described to be in either a deteriorated condition or completely missing. These openings were also to receive new windows to match the historic configuration and aesthetics. Any existing windows with frames still present were to be repaired if needed, cleaned, and re-glazed with a clear thermal-pane glass. An additional exterior fire stair was proposed, fulfilling a required to meet current fire codes. The existing fire stair was noted to be in good condition so no work was proposed. The roof was asserted to be in good condition, having a slight pitch, and internal scupper boxes. No work was needed or proposed.

Three original elevators are located in the mill and were documented in poor condition and furthermore did not meet modern codes. The design proposal implemented new elevators replacing the old ones but utilizing the original shafts and door openings. The new design proposed an eight-foot wide corridor down the center, with entryways for each

living space off of the corridor, and the corridor partition walls finished with painted sheet rock. The corridor walls were to rise from the floor to the ceiling, allowing the historic elements of the ceiling to be exposed. Interior stairways are listed in good condition with the exception of the walls being covered in lead-based paint. Treatment of the stairways listed on the Part 2 application include: the walls to be scraped and then encapsulated with latex paint, newel posts and handrails to be hand scraped and sealed, landings to be filled with concrete and carpeted over, and the stair treads cleaned and repainted. Several original fire doors exist throughout the mill, although covered in lead based paint and chipping, they were in relatively good condition. These were to be cleaned and repainted, matching the original finish. The original heart pine columns were all in good condition with the exception again of the peeling, lead-based paint. These were to be lightly sandblasted removing any paint and raised grain to re-create a finish resembling the original. The plans proposed a new HVAC and plumbing system, with HVAC ductwork exposed in all living units and corridors thus reducing damage to the historic fabric. The the existing heart pine and maple floors were to be capped with a 2.5" layer of concrete meeting local code, and then carpeted for reduced noise transmission.

The submission of Part 2 outlined the proposed rehabilitation work and treatments, including many comments and concerns from the South Carolina SHPO. In the application, "Vague description," "landscape important," "site plan shows changes," and other statements of concern are noted by the SHPO. Eventually the SHPO determined all rehabilitation work and procedures proposed did meet the Standards for Rehabilitation. The SHPO provided positive feedback for design features and rehabilitation techniques issuing statements such, "The new aluminum windows are very good representations of the historic

wood sash that were missing at the time the project started” and “The unfortunate sandblasting of wood features that was accomplished prior to SHPO and NPS involvement has been mitigated in a manner that returns a smoother finish to the “blasted” features.”¹²⁹

Compliments of the remarkable openness and layout of the building, especially considering the building’s end use also were acknowledged. The SHPO did deny the location of the swimming pool because it did not meet the Standard’s number(s) 1, 2, and 5. The original plan, proposed the construction of the pool to be in the front lawn of the building. The SHPO stated this potentially might alter the public perception of the building originally being a historic industrial property. Historically, no pool would be found at the front of the main mill or even at the site. The development team and the SHPO both reached an agreement to relocate the pool at the rear of the building, hidden from view. The SHPO commented on the final amendment regarding the pool, “We believe the pool is located in a compatible location and of a compatible design and materials.” The SHPO forwarded the application to the National Park Service recommending certification of the project, commending the development team for an outstanding and well-executed project.

The SHPO did appear to be more involved than the National Park Service during the project, citing many discrepancies in Part 2 of the application. However, the SHPO’s role, by default, is to be the first point of contact for review of the application. Then the SHPO forwards the application to the National Park Service for additional review. The SHPO’s early comments and requests for amendments for proposed rehabilitation work reduces the issues and discrepancies that the National Park Service must address. This

¹²⁹ Ibid.

allows the National Park Service to audit the SHPO's review ensuring they are performing their duties correctly, and allows the National Park Service to issue additional comments or concerns the SHPO may have overlooked.

During the course of the rehabilitation process, the applicant filed two amendments generating concern from the SHPO and the National Park Service. The first amendment filed May 26, 2006, proposed three additional items: a new pool on the site, changes to the ceiling at exit corridors, and revisions to the design detail of the historic structural columns. The SHPO believed that the details for the partitions and exit corridors met the Standards, however the pool did not, citing that it alters the historic approach of the mill complex. The SHPO recommended denial of the proposed amendment. A second amendment filed two years later, July 11, 2008, revised the pool's location on the landscape plan, positioning it on the backside of the property out of sight from the main entrance. After careful consideration the SHPO approved the revisions by the developer and complimented the redesign. The agency awarded accolades to many aspects of the proposed work such as the new aluminum windows and their excellent representation of historic windows, the interior layout and its openness, and the mitigation techniques which returned a smoother finish to the "sandblasted" features.

After the review of Part 2, the National Park Service issued preliminary determination for the project on December 22, 2005. Preliminary determination indicates that the project meets the Secretary of the Interior's Standards for Rehabilitation, with the stipulation that certain conditions are met. The National Park Service requested that all interior masonry and wood features be retained. It was also required that these features that existed in any public spaces or corridors between apartments be repainted to create a finish

compatible with the historic character of the building's interior. Upon completion, photographs must be provided along with a Request of Certification of Completed Work. The National Park Service made clear this preliminary determination does not extend to site improvements and landscape work, details yet to be submitted by the developer for review to either agency. Correspondence from the National Park Service attached to the application explained how federal regulations require all projects to be evaluated in their entirety. Since the landscape and site work was not included, a future review by the National Park Service and SHPO was required to approve any proposed work or work completed up to that point. If it were to be discovered the rehabilitation work had not meet the Secretary's Standards, the approval could have been overruled. Upon the project's completion, the National Park Service and SHPO congratulated the developer on the overall rehabilitation work. The SHPO, surprisingly, had many compliments for the applicant, especially in regards to the windows.

Monaghan Mill's file retrieved at the South Carolina SHPO contained little correspondence. Only two letters of correspondence existed, both addressed from the National Park Service to the developer. One letter confirmed that the property meets the National Register Criteria for the evaluation and is to receive Part 1 approval. The second letter relates to the work in Part 2 and issues preliminary determination for the proposed work upon which certain conditions must be met to receive Part 3 Certification.

Correspondence between the South Carolina SHPO, the National Park Service, and the developer proved to be an efficient process with few gaps in communication. The SHPO received a partial Part 1 November 1, 2004 with the remaining information received December 12, 2004. After their review the SHPO transmitted Part 1 to the National Park

Service two months later on January 26, 2015. No evidence or documentation suggested as to why it took the SHPO two months to review Part 1 and forward it to the National Park Service. Other projects in this study had much shorter review periods for Part 1 review. The SHPO received Part 2 of the application in June 2005 from the developer. However, the SHPO requested additional information before a complete review and approval could take place of Part 2. The developer submitted Part 2 three times to the SHPO for the additional information requested to complete Part 2; the SHPO received its final requested information November 28, 2005, five months later. The additional information requested by the SHPO consists of detailed descriptions of proposed work, rehabilitation techniques, basis for designs, and additional questions involving intricate details, likely took adequate time to answer.

This file contained a unique document among the case study project files investigated: a copy of the first submission of the Part 2 application with handwritten notes by the SHPO reviewer. The notes record the reviewer's suggestions and concerns for each proposed work item. Extremely insightful, the notes produced a narrative detailing specific work items or designs proposed during the rehabilitation. The reviewer commented on almost all work items, leaving notes such as "vague description" or "type of cleaning techniques." The notes elaborated on details such as demolition work, cleaning methods, paint treatments, and new designs, which the reviewer requested the basis for each design. These notes helped to fill the gaps of missing correspondence from the SHPO. Perhaps this reviewer deemed it more efficient to send the developer a marked-up copy of the Part 2 submission detailing each line item rather than a letter.

The rehabilitation work at Monaghan Mill finished in 2006, however the project did not receive Part 3 Certification until February 2009, three years later. No correspondence referenced this three-year lag. A better documented delay in the progress occurred with then Part 2 of the application had to be submitted three times, which resulted in many set backs and delays. These delays were due to waiting periods on information requested by the SHPO and two amendments filed by the applicant regarding design changes. These factors most likely contributed to the delay in receiving Part 3 Certification, as the changes presented in the amendments triggered additional review from both agencies and required changes to work items by the developer.

Considered a successful rehabilitation for earning Part 3 Certification, Monaghan Mill experienced delays similar to other projects. In this case, the developer drove the extended timeline. However, it took the SHPO two months to submit Part 1 to the National Park Service. Overall, the National Park Service and the SHPO demonstrated efficient communication amongst themselves and the developer.

Today the Lofts of Greenville in the former Monaghan Mill create a unique “historic apartment” community atmosphere. The apartments are at one hundred percent occupancy. The Lofts offer many features while also being a catalyst of local development surrounding the mill. The developer, Pace Burt, donated six adjacent acres to the city of Greenville of which now has been incorporated into a park. The park consists of an event venue, green space, and walking trails. The mill also helped to expand local businesses in Greenville during and after construction. Situated in an area that had become stagnant in growth and development, the mill has revitalized the surrounding area with another close-by mill being rehabilitated which is scheduled to open in the Summer of 2016.

<u>GRANBY COTTON MILL</u>									
Address:	340 Heyward Street Columbia, South Carolina 29201								
Building Type:	Industrial								
Type of Construction:	Brick masonry								
Historic Use:	Textile mill								
Current Use:	Residential								
Gross Building Area:	252,000 SF								
Net Rentable Area:	330,000 SF								
Year Built:	1897								
Year Rehabilitated:	2005								
<table> <tr> <td><u>OWNERSHIP STRUCTURE</u></td><td><u>PROJECT CONTACT</u></td></tr> <tr> <td>Greg Webster</td><td>Patrick Hauck, Powers & Co., Inc.</td></tr> <tr> <td>1411 Walnut Street</td><td>211 N. 13th Street. Suite 500</td></tr> <tr> <td>Philadelphia, Pennsylvania 19107</td><td>Philadelphia, Pennsylvania 19107</td></tr> </table>		<u>OWNERSHIP STRUCTURE</u>	<u>PROJECT CONTACT</u>	Greg Webster	Patrick Hauck, Powers & Co., Inc.	1411 Walnut Street	211 N. 13 th Street. Suite 500	Philadelphia, Pennsylvania 19107	Philadelphia, Pennsylvania 19107
<u>OWNERSHIP STRUCTURE</u>	<u>PROJECT CONTACT</u>								
Greg Webster	Patrick Hauck, Powers & Co., Inc.								
1411 Walnut Street	211 N. 13 th Street. Suite 500								
Philadelphia, Pennsylvania 19107	Philadelphia, Pennsylvania 19107								
<u>DEVELOPMENT SCHEDULE</u>									
Project Initiated:	June 2004								
Part 1									
- Received:	September 13, 1999								
- Approved:	October 13, 1999								
Part 2									
- Received:	February 3, 2005								
- Approved:	March 17, 2005 (Conditional Approval)								
Part 3									
- Received:	March 1, 2007								
- Approved:	April 3, 2007								
Construction Date:	March 2005								
Completion Date:	March 2007								
Estimated Rehabilitation:	\$22,000,000.00								
Estimated New Construction:	\$1,000,000.00								
Total (QRE plus non-QRE):	\$23,000,000.00								

Figure 4.4 Summary of Rehabilitation of Granby Cotton Mill Data ¹³⁰

¹³⁰ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 1- Evaluation of Significance. Granby Cotton Mill. Accessed, South Carolina State Historic Preservation Office. February 2015



Figure 4.5 Granby Mill Front Facade

Photo taken by John W. Evangelist



Figure 4.6 Granby Mill

Photo taken by John W. Evangelist

The Granby Cotton Mill and Village located in Columbia, South Carolina, is located one-mile south of the South Carolina State House. Construction of the mill, situated on a hill overlooking the banks of the Congaree River, commenced in 1897. Designed by W.B. Smith Whaley, Granby Mill consists of over one hundred structures. One of the first technologically advanced mills in Columbia, South Carolina, Granby Mill became the first cotton mill in South Carolina powered by hydroelectricity produced off-site. Similar to other mills of its time, the design of Granby Mill included a self-sustaining village overseen by the mill management. Organized in a standard grid pattern, the village provided housing for the workers and their families. The village, although similar to other mill villages, developed its own identity due to the absence of pre-determined village boundaries. Whaley's inclusion of unique aspects in this mill design reflected his in-depth study of the cotton industry during his time in the Fall River Valley of Massachusetts.

Granby mill prospered, increasing both its output of goods and considerable employee base through its early years. The mill offered multiple employee incentive programs. Whaley recognized the need for more housing for workers who had no families. Whaley's new endeavor in housing was a boarding house equipped with modern conveniences that housed women on the second floor and men on the first. Mill owners developed similar ideas like this to encourage workers without families to remain loyal to the mill. Ownership of Granby Mill changed frequently. Different owners sold off the operative houses to investors or individuals. Mill workers had first pick to buy these houses at a fair price, making the mill into a mortgage holding institution as well.

Granby Mill is a four-story monochrome brick masonry building constructed in the Romanesque Revival style. Architectural elements consist of buttresses and exterior

fenestration features at regular intervals, including belt courses, corbeling, and round headed segmental arches. The front façade features two elaborate five-story towers, similar to other Whaley designs having arched windows and entrances. A cornice separates the fourth and fifth tower levels. The interior of the mill consists of an open floor plan which accommodated the vast rows of textile machinery.

THE REHABILITATION

Submitted September 13, 1999, Granby Mill's Part 1 application came many years before any planned rehabilitation. The Part 1 application submitted in 1999 placed the mill on the National Register. On February 3, 2005, the South Carolina SHPO received Part 2 of the FRTC application. A month and a half later on March 17, 2005, the SHPO issued conditional approval for Part 2 with stipulations and forwarded the application to the National Park Service stating, *"This application is being forwarded without recommendation."* This statement is often used by the SHPO when they cannot support approval of the work. The SHPO requested that the National Park Service conduct an in-depth review of the proposed rehabilitation project – a conversion of the mill into apartments, with a design plan retaining the entirety of the mill, its historic additions, the existing trees, and other historic landscaping elements original to the site.

The plans proposed the removal of modern additions, such as a one-story addition and an attached loading dock projecting from the front façade of the mill. Incorporated into the design, the site plan includes a 288-space parking lot, a one-story outdoor recreation facility with tennis and basketball courts, and a swimming pool. The plan proposed the new facility and additional features, illustrated on the site plan, situated on terrain just below the

backside of the mill. This location minimizes the impact of the new construction, ensuring sensitivity to the mill's historic context and surrounding landscape.

The team documented interior and exterior masonry elements of the main mill recording them in good condition, documenting little deterioration and few structural cracks. Part 2 proposed the masonry work to be cleaned, removing any soot, deposits, and staining on the brick. The cleaning method proposed was a cold pressure washing not to exceed 600psi administered with a fan tip nozzle. This is a mild technique to ensure no damage to the historic materials.

In 1958 the original wood windows were removed and the openings blocked up using CMUs and insulation with a brick veneer masonry on the exterior. Prior to the rehabilitation work, the development team discovered one original wooden window inside the building. Documenting the window, architects replicated a design for replacement windows to match the originals. The plan proposed to remove the cement block infill, repairing or replacing in kind the jambs and sills, and implement new windows throughout the building to reflect the historic design. The original doors at all elevations had previously been replaced with modern, double-leaf and single-light aluminum doors; the plan replaced these with historically accurate paneled wood doors with divided light transoms. The plan proposed a new main entrance at the south elevation thus providing access to the new lobby through three sets of, wooden, double doors with transoms.

The design team stated that the roof needed to be repaired and replaced as necessary, ensuring all materials match the existing finishes. Previously, rooftop additions housed large enclosed HVAC ducts and air filtrations systems. The new plan removed these with no plans to re-implement any large cooling towers or additions to the roof. However, the plan

proposed other small-scale equipment for the roof that was to be set back from the roof's edge as much as possible to minimize visibility.

Granby Mill's interior is an open floor plan with exposed longleaf pine posts and beams for the structural support. The floors are tongue-and-groove rock maple, with the exception of the basement which is poured concrete. Plans for the proposed rehabilitation retained all of the wood floors, leaving them exposed in all public and private spaces. Also, the plan called for any floor damage to be repaired or replaced in kind and afterwards all floors were to be refinished.

The SHPO received the first submission of Part 2 on August 26, 2004. However, the SHPO sent three requests to the applicant for additional information; on September 24th, December 7th, and December 22nd, 2004. On January 13, 2005, almost five months from the first submission, the SHPO received their complete request of information. Eighteen days later on January 31, 2005 the SHPO transmitted the application to the National Park Service indicating the project meets preliminary approval and attaching conditions to be met. With the transmission the SHPO requested an in-depth National Park Service review. The National Park Service received the application for review February 3, 2005. After a month and a half of review, the National Park Service determined the project to meet the Secretary of the Interior Standards for Rehabilitation if certain conditions were met, signed March 17, 2005. This first review by the SHPO service is deemed efficient with an eighteen day response time. The SHPO did have a shorter review process than the National Park Service, but the National Park Service did a more in-depth review, requested by the SHPO. The National Park Service was inefficient in their timeline, exceeding the thirty day specified timeline by two weeks. Both agencies reviewed the application and responded in an

appropriate amount of time, perhaps given the volume of work, but only one agency met their charge, in each instance of correspondence and response with a one month review timeline. The other inefficiency in this submission is the multiple requests for additional details and information requested by the SHPO – which the applicant is responsible for producing.

The SHPO received the second submission of Part 2 February 24, 2006. Once more, on April 5, 2006, to which the SHPO requested additional information. The SHPO did not transmit this application to the National Park Service until one year later, on February 27, 2007. It was during this time that the applicant filed two project amendments, resetting the clock for review for the SHPO with each new submission. The evolving information in the form of revised Part 2 applications and project amendments are most likely the cause for the one-year gap. The developer filed an amendment on June 20, 2006 and again on October 5, 2006. After review of these amendments, on October 27, 2006, the SHPO forwarded both application amendments to the National Park Service for an additional in-depth review determining they met the Standards only if the outlined conditions are met. The National Park Service received the applications October 31, 2006. After a one-month review, the National Park Service determined the project amendments met the Secretary's Standards for Rehabilitation if the attached conditions are met, and shared their determination in a document dated November 28, 2006. On February 27, 2007, the SHPO transmitted the second and final submission of Part 2 to the National Park Service. One week later, the National Park Service also received a request for Part 3 Certification. The National Park Service determined that the work met the Standards and

the rehabilitation was consistent with the historic character of the property. On April 11, 2007, the SHPO received the approved Part 3 Certification from the National Park Service.

Overall, the SHPO and the National Park Service communicated efficiently with one another and the applicant throughout the process regarding amendments and concerns. The developer did have issues with Part 2 of the application and getting the additional requested information to the National Park Service and the SHPO. These requests dealt with proposed work items such as windows, bay openings, and designs of interior spaces. However, in a timely manner all parties worked diligently to ensure each work item, design, and techniques used met the Secretary of the Interior's Standards.

The Granby Mill received Part 3 Certification on April 3, 2007. Both agencies interpreted the Secretary of the Interior's Standards consistently. During the review process, the SHPO and the National Park Service issued similar concerns and stipulations, strictly directed to the proposed work and alterations of the historic fabric and character defining features. The SHPO articulated most of the conditions and concerns, resulting in multiple amendments to be filed in order for the project to meet the Secretary of the Interior's Standards for Rehabilitation. Both agencies commented on the lack of details in the application for proposed work items, techniques, and materials. The National Park Service and the SHPO expressed the most concern during this project towards the proposed work at a 1958 rear addition regarding the bay openings. Additional concerns included adjacent new construction, extensive site work, and the demolition of secondary structures.

Part 2 of the application received much scrutiny from the SHPO and the National Park Service undergoing several addendums and amendments before both agencies issued approval. First received by the SHPO on August 26, 2004, their initial evaluation addressed

many concerns. The SHPO believed the proposed window schedule and its designs are not consistent or compatible with the historic nature of the original windows. The applicant provided two windows designs proposing clear glazing, a low-E microscopically thin, transparent coating. The application of this coating reduces infrared rays and helps to reflect heat. A concern of the SHPO's is the low-E coating might produce a visual appearance different than that of the original historic windows. Other requests by the SHPO include additional details of how the new ceilings were to be implemented between the existing beams and other structural elements. In addition, the SHPO notes the site plan for the proposed landscaping were not yet available. After the SHPO's evaluation they recommended preliminary approval of the project if the above requests and concerns were met.

Received by the SHPO on October 5, 2006, a second submission amended work to Part 2. This amendment dealt mostly with the developer proposing to repurpose fifty-eight bays at a 1958 addition located at the rear of the mill. Historically, this addition did not have a full enclosure system, it housed mechanical systems, at the time a modern convenience for the mill. A louvered shutter system implemented at different intervals within the bay openings allowed ventilation for the equipment. At the time of construction in 1958 the remaining bays with no louvered system received a recessed brick infill – to appear as if windows once existed. Upon the start of the rehabilitation, the majority of the in fill had been demolished. The remaining fifty-two bays retained approximately three-and-a-half feet of masonry. Since the rehabilitation converted the building into apartments, the developer proposed removing the remaining masonry and implementing a new louvered shutter system for the openings to allow the entrance of light. However, due to exponential costs of this

system, the developer proposed a new plan, to leave the bays open and convert the area into an outdoor four-story “porch” for the tenants. The SHPO indicated that any new work at the exterior of the rear addition must be compatible with the historic industrial character of the mill. They ruled this proposal incompatible due to its vast difference in architectural characteristics and physical use in comparison to the mill’s historic context and original use. However, the SHPO did believe that the first submission proposing the louvered shutter system retained the historic characteristics of the mill and is appropriate. The SHPO forwarded their review to the National Park Service with conditional approval.

The National Park Service received the application twenty-six days later on October 31, 2006. After reviewing this matter, the National Park Service approved the application provided that certain conditions are met. The National Park Service stated that an “outdoor” space is not a compatible treatment for this area. The National Park Service presented two solutions to the developer: the bays must be fitted with a shutter or louver system as originally planned in the first submission of Part 2 or implement new windows compatible with the historic character of the building. For either option, the National Park Service requested detailed drawings to be submitted for review and approval prior to any work.

The third and final formal Submission of Part 2, is missing from the file. However, a handwritten note titled “Granby Part 2 – Take 3,” records the comments and concerns from the SHPO. The reviewer states there is still no detailed description for the windows. This documents approves the proposed masonry work. Other requests from the SHPO include the site plan for the proposed landscaping, an elevation drawing of the louver system, and a section drawing of the ceiling showing the sheetrock between the beams and partitions.

Rehabilitation work on Granby Mill commenced February of 2005 and the project received Part 3 Certification in April 2007, two years later. Granby Mill now offers living spaces with historic charm and modern amenities. Spacious floor plans retain the wood floors, twenty foot ceilings, and respect the historic character of the once used spaces for cotton production.

OAKLAND MILL

Address:	2802 Fair Avenue Newberry, South Carolina 29108
Building Type:	Industrial
Type of Construction:	Brick masonry
Historic Use:	Industrial textile mill
Current Use:	Multi-Family residential
Gross Building Area:	279,624 SF
Net Rentable Area:	279,624 SF
Year Built:	1912
Year Rehabilitated:	1999

OWNERSHIP STRUCTURE

Misty West
P.O. Box 734
Newberry, South Carolina 29108

PROJECT CONTACT

Misty West.
P.O. Box 734
Newberry, South Carolina 29108

DEVELOPMENT SCHEDULE

Project Initiated:	June 2004
Part 1	
- Received:	December 7, 2009
- Approved:	December 10, 2009
Part 2	
- Received:	February 18, 2010
- Approved:	March 18, 2010 (Denied, but appealed)
Part 3	
- Received:	May 7, 2014
- Approved:	August 8, 2014
Construction Date:	January 2010
Completion Date:	December 2013
Estimated Rehabilitation:	\$25,214,431.00
Estimated New Construction:	\$2,233,879.00
Total (QRE plus non-QRE):	\$27,448,310.00

Figure 4.7 Summary of Rehabilitation of Oakland Mill Data ¹³¹

¹³¹ National Park Service. (Rev. 2014) Form 10-168. Historic Preservation Certification Application Part 1- Evaluation of Significance. Oakland Mill. Accessed, South Carolina State Historic Preservation Office. February 2015



Figure 4.8 Oakland Mill Northeast Façade

Photo taken by John W. Evangelist



Figure 4.9 Oakland Mill southeast façade

Photo taken by John W. Evangelist

Located in Newberry, South Carolina, Oakland Mill became a major player in South Carolina's textile industry during the early twentieth century. Constructed between 1910 and 1912, it is one of over 50 mills Lockwood, Greene, and Company, a prominent Boston engineering firm, designed throughout South Carolina.¹³² The mill was constructed with capital equaling over \$400,000 all funded by local investors.¹³³ Oakland Mill opened its doors August 8, 1910. The Mill was "modernized" under the new ownership of the Kendall Company in 1925. The modernization was the introduction of new factory equipment. Over the years, the mill underwent many expansions as a product of its immense financial success. Expansions took place in 1949-50, 1950-51, 1964-1965, and 1966. High volume production resulted because the mill had the best equipment and could afford to upgrade the equipment when needed. Like many mills in the early twentieth century, Oakland employed hundreds while providing a village of houses for their workers and families, and it became the financial cornerstone of Newberry, South Carolina. Oakland Mill suspended operations and shutdown the facility in the 2000s; it was the last mill to close in Newberry.

The main mill is a four-story brick masonry structure constructed in a rectangular plan in Romanesque Revival style. The linear building is situated in a northwest-southeast direction with the main façade (southwest) facing Fair Avenue. Originally, the building consisted of recessed brick courses which created a uniformed pattern and vertical rhythm. Segmented arched windows are spaced at regular intervals, articulating each bay. Originally the mill was organized into nineteen bays in length and spanning twelve bays in width. The

¹³² Robert E Dalton. and John E. Wells., *The South Carolina Architects, 1885-1935: A Biographical Dictionary*, Richmond, VA: New South Architectural Press, 1992. Pp. 107-112

¹³³ *The Greenville News*, October 2, 1947.

primary entry was located on the main façade, six bays up from the northwest façade. Today two brick towers are located on the southwest façade, which were added in 1964.

REHABILITATION

The project received preliminary certification in November 2009 and construction commenced January 2010 after a short appeal process. Design plans transformed the mill into multi-family residential housing. The application recorded that the majority of the brick was in excellent condition and required minimal repairs. All interior brick was sandblasted in preparation for painting, with appropriate mortar specified for any repointing as needed.

The windows on the northwest elevation of the mill had been filled with brick, so the proposed rehabilitation work included removing the infill brick and adding new aluminum windows to match original configuration. Interior stairwells are described to have peeling paint which was to be treated by scraping the loose paint to prepare the surface and encapsulating the well adhered portions with a latex paint. The ceilings were to receive the same treatment. The floors of the mill were recorded in good condition; recommendations included repair as needed with the floors being sanded and sealed with a matte finish. Some concrete floor areas were cleaned and carpeted. New HVAC, electric, and plumbing systems were installed. Each living unit and corridor was to have exposed HVAC ductwork to minimize damage to the historic fabric. A total of ten amendments were issued during this project dealing with the removal of the loading docks, new window locations, and replacement windows. A concern for the SHPO was the proposal to sand blast the interior brick. An on-site visit by the SHPO confirmed that if completed in a sensitive manner with no noticeable erosion to the historic brick this treatment would be approved. The work did

meet the Secretary's standards, but the SHPO did not encourage additional sandblasting or other abrasive cleaning in the future. The National Park Service did not comment on the SHPO's decision to proceed with this cleaning technique. It is possible the National Park Service agreed with the SHPO, that a mild application of sandblasting to the extensive interior areas could best mitigate the lead paint causing little or no harm to the historic fabric. This usually ill-advised technique to preservation rehabilitation work met approval by the SHPO after deliberation, and received no particular heightened scrutiny recorded by the National Park Service.

Oakland Mill experienced a variety of hurdles, primarily from the South Carolina SHPO through its application process. Part 2 of the tax application, initially denied, resulted in a complicated appeal process due to the proposed work and the installation of new windows. The area of concern was a portion of the building that had been added on early in the history of the mill. This part of the building was originally constructed with no exterior windows, but a series of blind windows mimicking the fenestration pattern of the original mill building. The rehabilitation work proposed adding new windows to match the historic casement windows on the adjacent original mill building where the blind windows were on the addition. However, the SHPO stated this proposal drastically altered the mill's original historic appearance. This proposed alteration did not meet the Secretary of the Interior's Standards and ultimately lead to the denial of Part 2 by the SHPO. The applicant appealed the SHPO's decision based on the argument that apartment units must have windows to provide light. When consulted, the National Park Service reviewer issued concern, but felt the matter should receive additional review. Ultimately, the appealed decision reached the director of appeals at the National Park Service. After much debate, the director himself

approved Part 2 on appeal. The director sided with the applicant and approved the brick infill be removed and allowed the installation of new windows which replicate the mill's original casement windows.

After the appeals process, the SHPO did not comment further on amendment one, the cause of the appeal. They did however provide comments and recommendations for the remaining amendments, two through ten. In an appeal letter by the SHPO dated July 26, 2010, amendments two through four and six through ten received support. These items consisted of: new roofs for the paint and storage buildings, a new roof for the office buildings, sandblasting at the interior, retaining existing ramps, additional spaces in the 1955 apparatus tower, deletion of the proposed wellness center, and painting at exterior surfaces to match adjacent masonry. The SHPO recommended that amendments two through four and six through ten be approved. However, they recommended a condition for amendment five. This condition related to the boiler house ensuring the visible portions of the roof maintain a compatible historic character with the roof of the main mill.

To complete the Phase Advisory request, the SHPO visited the property on June 15, 2012. The SHPO complimented the overall work and its compatibility with the historic character of the mill; applauding the historic design of the new windows. The SHPO stated the exterior work consisting of eave repairs and masonry repairs appeared compatible.

Like the other applications in the study, minimal correspondence existed for the Oakland Mill project, so commentary on the application and amendments made up for the missing record of correspondence. The file contained only two letters, both from the National Park Service. Perhaps the most important letter dated August 8, 2014 came directly from the Chief Appeals Officer, John A. Burns. His review determined all of the

impediments occurring during Part 2, including the subsequent amendments, had been resolved. This letter granted the project Part 3 Certification, reversing the March 18, 2010, decision of the denial in certification of the rehabilitation. In closing, Mr. Burns stated that, by Department of the Interior regulations, his decision is the final administrative decision regarding the certification of the rehabilitation.

The SHPO received Part 1 of the application November 17, 2009. Less than a month later the National Park received it on December 4, 2009. On December 10, 2009 the National Park Service approved the Certification request. The SHPO first received Part 2 on February 18, 2010, however one month later after their review they denied the application. Regarding the ten amendments throughout the two phases of the project; both agencies responded to all amendments within the appropriated thirty-day period. In addition, the developer acted swiftly and efficiently at requests of both agencies to provide additional information. The SHPO received the second submission of Part 2, after the repeals process, four years later on May 6, 2014. After the SHPO received the additional requested information sporadically on May 16th, June 27th, and June 30th, the SHPO reviewed Part 2 then transmitted the application to the National Park Service July 15, 2014. Officially, on July 31, 2014, the National Park reviewer signed off on Part 3 Certification. Throughout the project all parties communicated efficiently. The four-year gap is the time in which the appeals process occurred. The file contained no official documentation of the appeals process, it is only mentioned in the notes and comments on the application.

Considered a successful Tax Credit project for earning Part 3 Certification, Oakland Mill continues to boast its original historic characteristics. The units offer spacious living areas, long leaf pine flooring, exposed beams, and towering ceilings.

CHAPTER SUMMARY

South Carolina is a state which recognizes the need for preservation. This is demonstrated by the state's multiple incentive programs and state legislation introduced for the protection, preservation, and rehabilitation of historic properties. From state income tax credits for historic rehabilitation projects, the *South Carolina Abandoned Buildings Revitalization Act*, and the Historic Rehabilitations Incentives program, these programs and incentives which have catalyzed the rehabilitation of historic buildings and properties across the state, including the ones in this study.

The three case studies presented in this chapter represent only a fraction of South Carolina's historic buildings preserved and rehabilitated having utilized the FRTCP. By leveraging the FRTCP and other state incentive programs, developers, investors, and preservation-minded individuals have rehabilitated endangered buildings, while stimulating the surrounding local and state economy's.

Consistency of the SHPO and the National Park Service's application of the Secretary of the Interior's Standards and the agency's efficiency in response times were analyzed to determine if both agencies are performing their jobs and duties appropriately. Efficiency for each project is measured by the response time from when correspondence is received to when it is answered. By examining time stamps of correspondence from the National Park Service and the South Carolina SHPO, referencing amendments, concerns, or technicalities, the conclusion is drawn that the SHPO and the National Park Service have acted efficiently in nearly all instances.

This study found that the National Park Service and the South Carolina SHPO both fulfilled their roles appropriately enforcing the Secretary's Standards. Throughout each project examined, a multitude of issues and challenges arose for the developers and the agencies. Similar to the case studies in Tennessee, windows, detailed information of proposed work, additional photographs, and landscape elements generated the most comments and concerns from the SHPO and the National Park Service. The only issue that arose in this study affecting the validation that both agencies applied the Standards consistently is the sandblasting technique at Oakland Mill the SHPO approved. It can be speculated that since the did advise the sandblasting to be mild, it could be justified. However, in many other cases sandblasting is not approved and is a known technique that can be highly destructive to the substrate.

These projects represent a fraction of properties in South Carolina which have been rehabilitated and put back into use. The evidence concluding that the program is effectively administered by the SHPO and National Park Service is found in the numbers of applications which begin verses finish the FRTCP application process. South Carolina has seen an increased volume of tax credit projects indirectly form the success of these projects along with others throughout the state. In addition, the National Park Service analysis and statistical reports indicate that South Carolina's approval of Part 3 applications has grown each fiscal year.

CHAPTER FIVE

ANALYSIS & CONCLUSIONS

This thesis assesses the administration of the Twenty Percent Federal Rehabilitation Tax Credit by the State Historic Preservation Offices (SHPO) in South Carolina and Tennessee between 2005 and 2015. Created by Congress in 1976, this program has been one of the nation's most effective historic preservation tools, leveraging more than a \$78 billion investment in historic buildings. Since 1976, this program has certified over 40,000 historic property rehabilitations, created an estimated 2.36 million jobs, and acted as a catalyst in the revitalization of numerous communities across the country. Experience shows that FRTCP projects stimulate economic growth in areas of economic stagnancy. As a result of the success of this federal program, more than thirty states have followed the leadership provided by the FRTCP and enacted their own incentive programs—each of which mirrors FRTCP rules and regulations. Local organizations, property owners, and developers have made the Twenty Percent Federal Rehabilitation Tax Credit as one of the nation's most powerful historic preservation tools. By providing an alternative to demolition, the FRTCP has generated new life in thousands of historic buildings.

Despite the success and popularity of the FRTCP and the financial incentives it provides, detractors maintain that the program is an obstacle to the rehabilitation process. Critics of the program have argued that the FRTCP process is burdensome, charging that the administration and application process is time-consuming and requires extensive, detailed plans and budgets. It is true that each step of the FRTCP application process involves precise planning, attention to best rehabilitation practices, and timely

communication. Thus, if articulation of rehabilitation plans and goals are not clear and issues or concerns are not jointly addressed, delays in processing the application ensue. Central to the assessment of the administration of the FRTCP in South Carolina and Tennessee, this thesis addressed three criticisms leveled at the FRTCP: (1) the FRTCP process extends project timelines, (2) the administration of the FRTCP is inefficient due to the response rates of administering agencies; and (3) the SHPOs along with the National Park Service may not consistently apply the Secretary of the Interior's Standards.

The thesis developed and applied three measures to assess the administration of the FRTCP in South Carolina and Tennessee. The first, efficacy, was a measure of the success rate of tax credit applications that achieved final SHPO and NPS certification. The second, efficiency, measured the administrative process principally by analyzing the pace of approvals and responses to submissions. The third measure, consistency, evaluated the application of the Secretary of the Interior's Standards by SHPO and NPS officials.

To fulfill the objectives of this study, six case studies were conducted for successful tax credit projects, three in Tennessee and three in South Carolina. Two of the Tennessee case studies, Cummins Station and the Trolley Barns, are situated in Nashville's metropolitan core. The third Tennessee project, Dortch Stove Works, is located twenty miles south of Nashville in Franklin, Tennessee. The case studies for South Carolina were Monaghan Mill located in Greenville and Granby Mill in Columbia, projects in large urban centers, and Oakland Mill in Newberry, a project in a smaller city. All six case studies met three criteria: (1) square footage of the building exceeded 250,000 square feet; (2) estimated qualified rehabilitation expenditures were \$10 million or greater; and (3) Part 3 Certification was secured between fiscal years 2005-2015.

This study applied a variety of methodologies for the collection and evaluation of data, most of it compiled from public sources and the files of the SHPO offices in South Carolina and Tennessee. These sources included annual statistical and fiscal reports produced by the National Park Service retrieved from its website. Interviews with and SHPO staff contributed valuable insight to the application of the FRTCP in the two states. Site visits to all six case study projects provided a better understanding of the scope of the projects as well as completed rehabilitation of the buildings, their settings and current use.

This study focuses on the inner workings of the FRTCP to better understand the administrative processes employed in by the SHPOs and the National Park Service. While this study revealed much about the intricacies and complexities of the FRTCP, its primary goal was to measure the overall efficacy of the program, the efficiency of the administrative processes, and consistency in the application of standards promulgated by the National Park Service (the Secretary of Interior's Standards for Rehabilitation) and applied by the SHPO and NPS.

Efficacy in South Carolina and Tennessee was determined by two measures. Success was defined as completion of all three parts of the FRTCP application and final certification for the issuance of credits by the National Park Service. Certification acknowledges the project met the criteria set by the Secretary of the Interior's Standards which are enforced by the National Park Service and the SHPO. The ratio of projects which began the application process and earned Part 3 Certification provided the primary measure of efficacy. Completion rates were also produced for each part of the application.

The assessment of efficacy revealed a high Part 3 Certification success rate in both states. Graphs which summarize data reported in the National Park Service's annual statistical reports from fiscal years 2005 through 2015 support the overall finding of the efficacy of the FRTCP. Figures 5.1 – 5.4 depict the Part 1, 2, and 3 application submissions from fiscal years 2005 to 2015. These graphs compare projects earning Part 3 Certification to the number of projects which began the FRTCP application process. This comparison established an overall rate of FRTCP success and efficacy in each state. In Part 2 of the application process, South Carolina received 102 applications; eighty-eight gained approval. From the eighty-eight projects receiving approval, sixty-six moved on to Part 3. Of the 102 applications, fifty-nine percent or sixty-one applications received Part 3 final project certification. In Tennessee, of 123 Part 2 applications received, 105 gained Part 2 approval. Of these, ninety-seven moved forward to Part 3. Out of ninety-seven applications, eighty-six or sixty-nine percent received Part 3 Certification. By totaling the Part 2's of applications submitted to each state (figure 5.1) and dividing them by Part 3 certified approvals (figure 5.4), a completion rate for each state is produced. For Tennessee, ninety-seven of the 123 Part 2 applications submitted received Part 3 certification, resulting in a certification rate of 78.8 percent. In South Carolina, 61 projects of the 102 submitted received Part 3 Certification, resulting in a 59.8 percent completion rate.

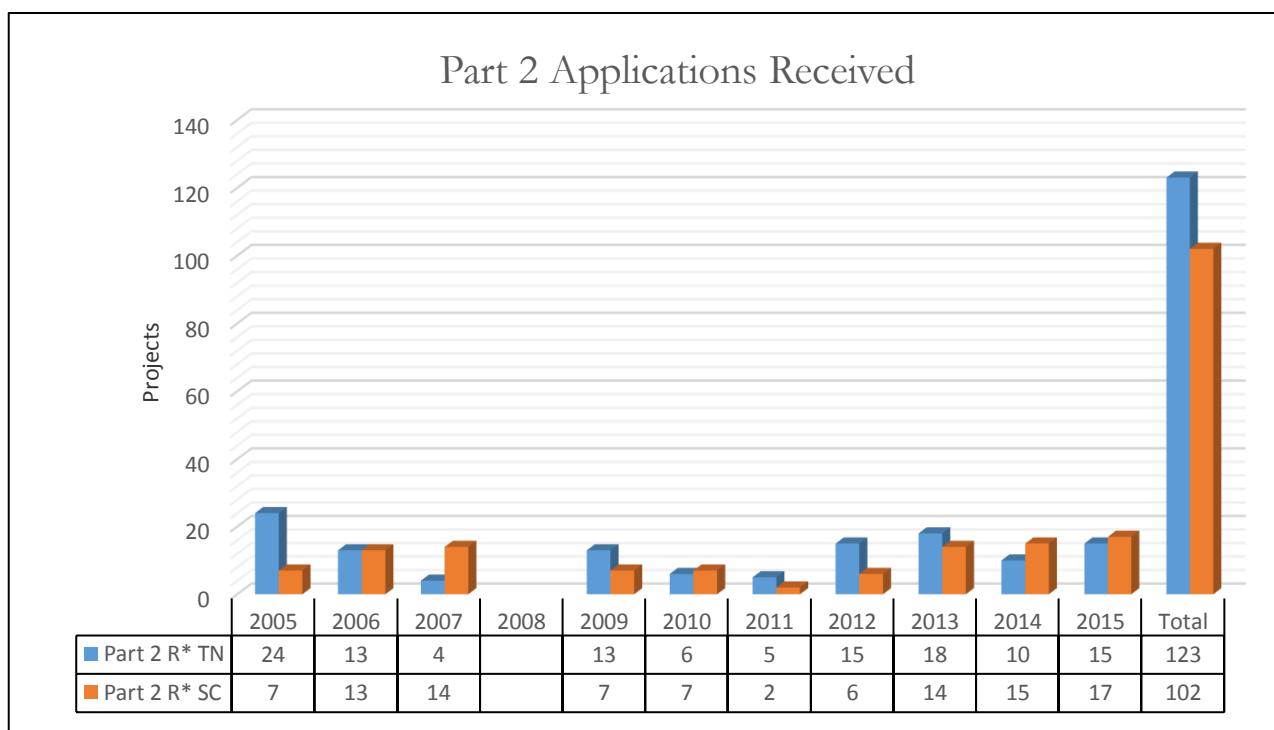


Table 5.1 Part 2 Applications Received

*2008 Data not released

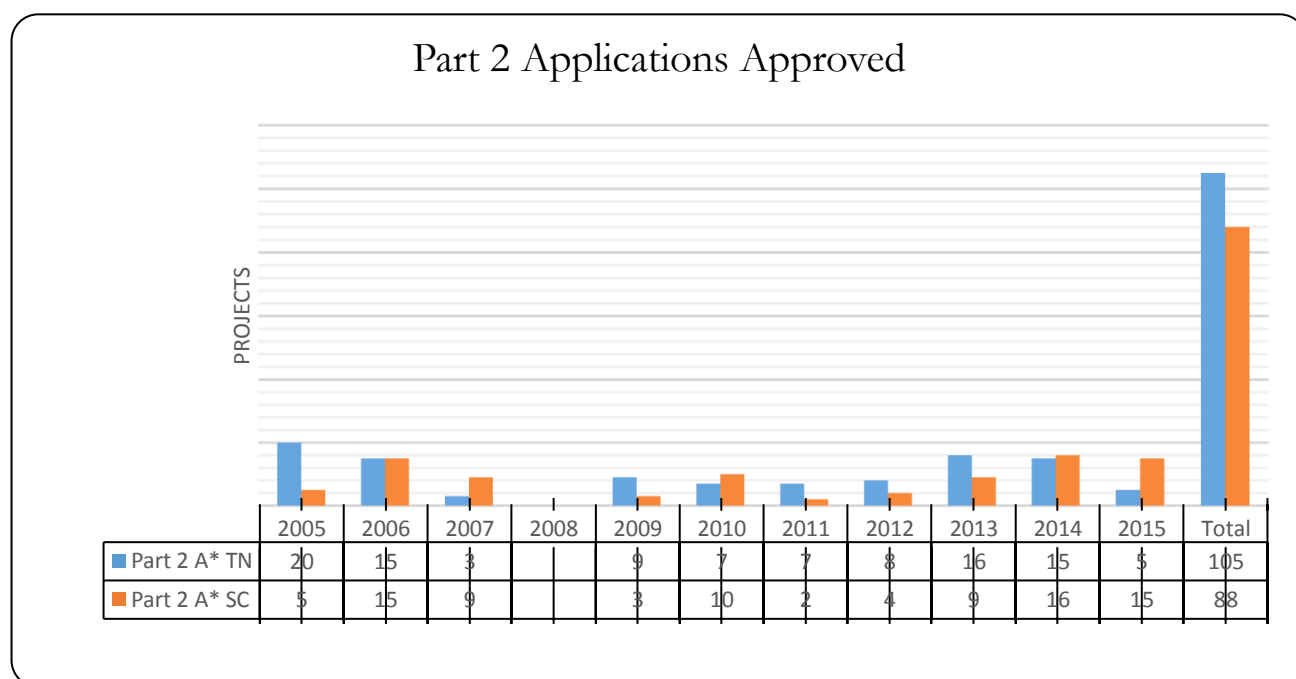


Table 5.2 Part 2 Applications Approved

* 2008 Data not released

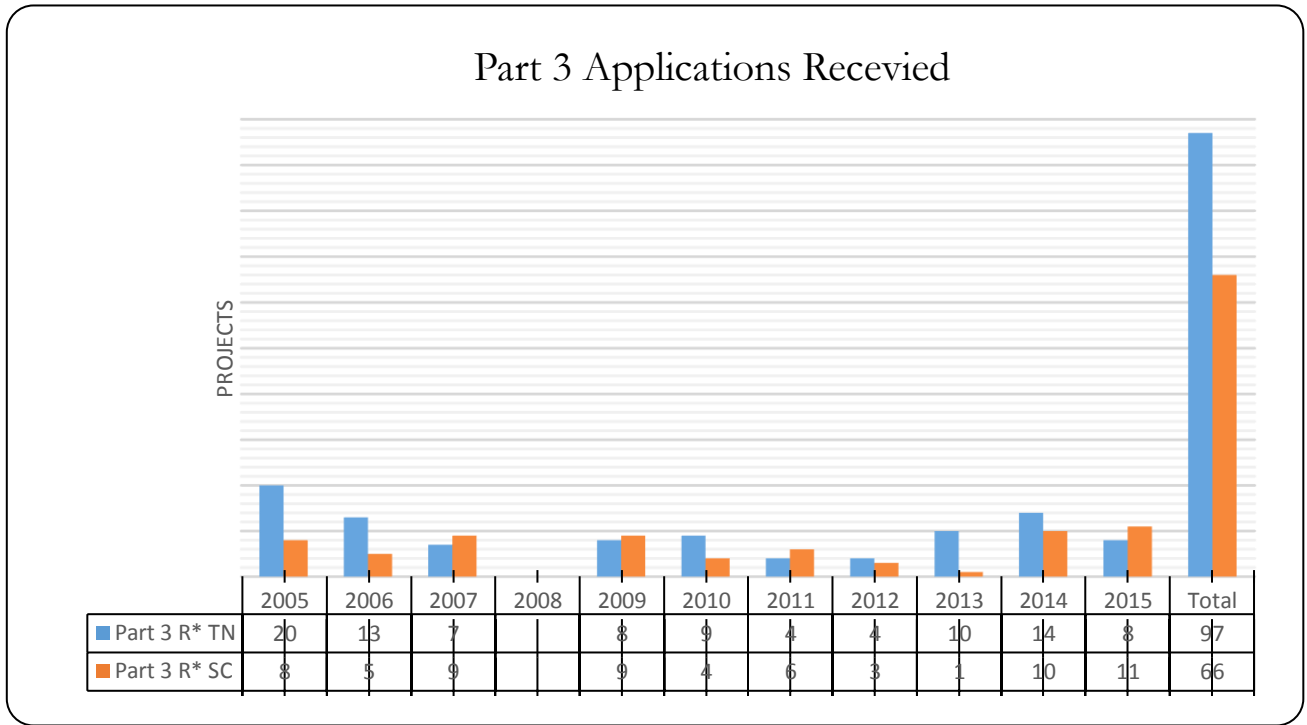


Table 5.3 Part 3 Applications Received

*2008 Data not released

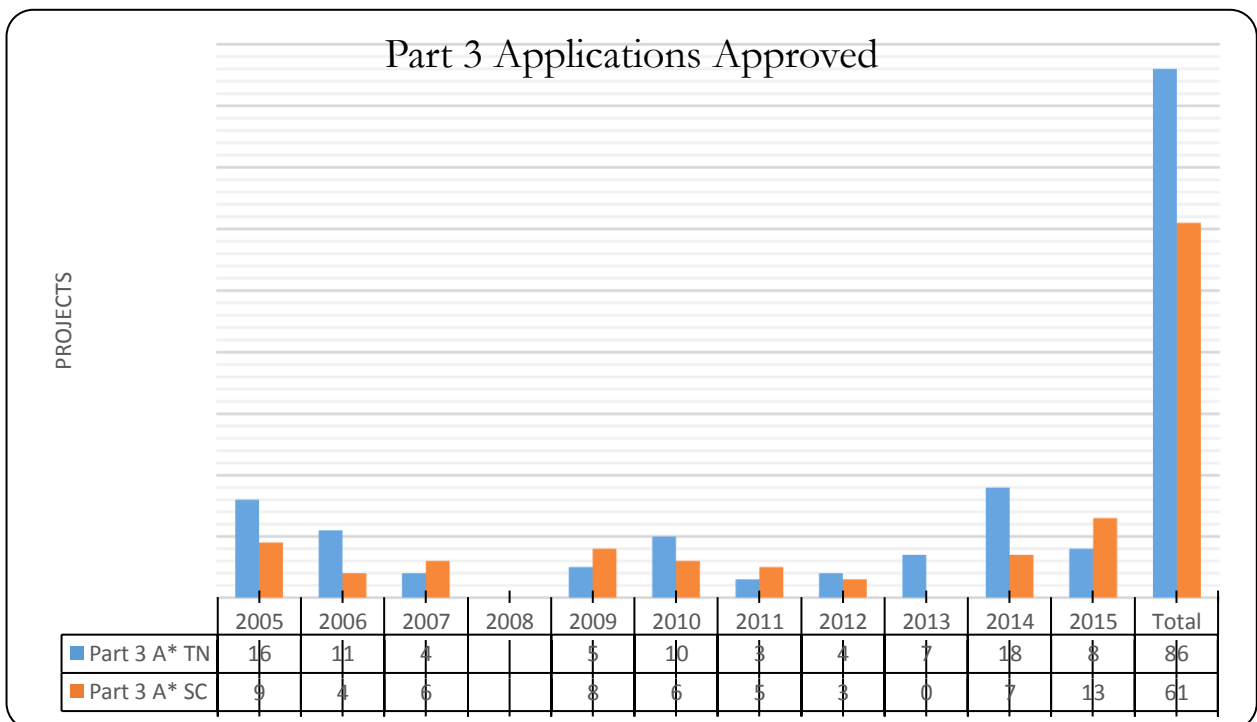


Table 5.4 Part 3 Applications Approved

*2008 Data not released

While it was not the purpose of this study to measure the economic impact of FRTCP projects in South Carolina and Tennessee, tax credit rehabilitation projects in the two states had demonstrable effects. Figure 5.5 summarizes the Qualified Rehabilitation Expenditures (QRE) in South Carolina and Tennessee between 2005 and 2015.

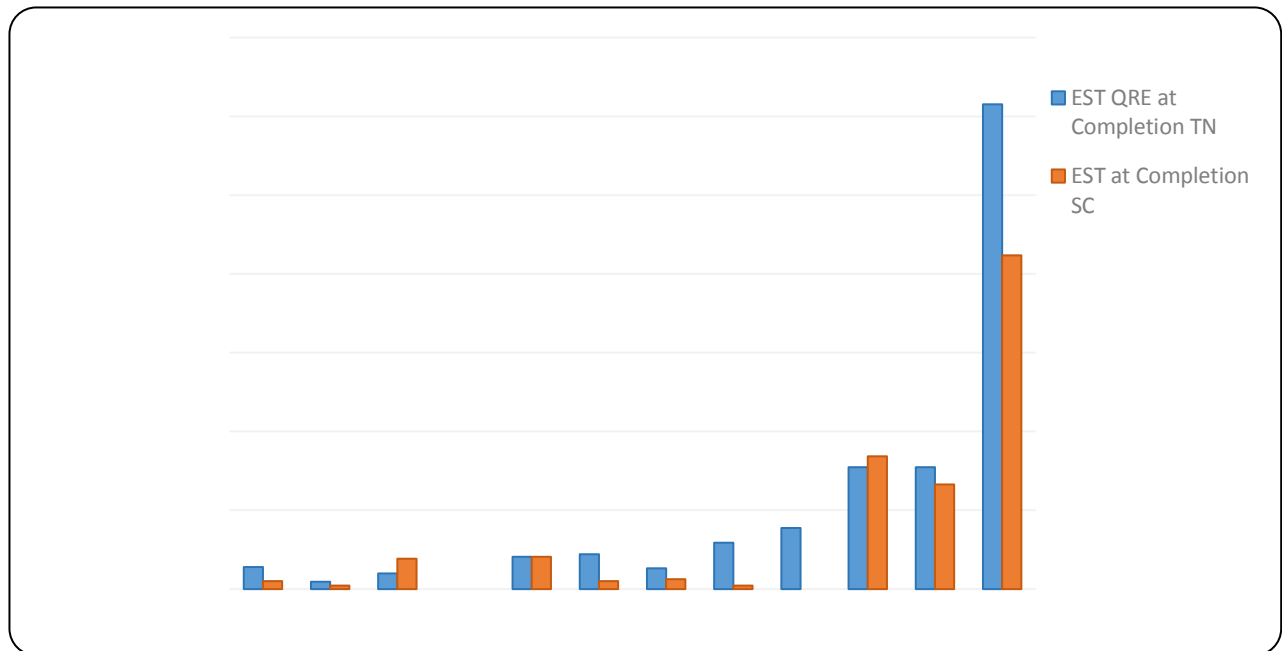


Table 5.5 EST Qualified Rehabilitation Expenditures at Completion

*2008 Data not released

The pace of approvals through the three-part FRTCP process and rate of SHPO and NPS responses to submissions provided measures of the efficiency of the FRTCP process. In addition to the measure of success provided by the ratio of submitted to certified projects, the files for each case study provided additional measures of efficiency. SHPO case files contained information in the form of official responses to FRTCP application forms, the issuance of SHPO and NPS commentary, and notifications of approvals and denials. A critical measure of efficiency was the number of days that passed between SHPO receipt of Part 2 of the application, completion of state-level review, and referral of the

application to the National Park Service for federal review. Analysis of this rate of response with which the SHPO and the National Park Service responded to applicant submission and the issuance of commentary measured whether or not the two SHPO offices maintained mandated schedules. Efficiency in this study was defined as agencies approving or denying application submissions, including their commentary, within the mandated thirty-day period. To determine the efficiency of the agency's review process, each case study submission date, the date the application was received, and any related correspondence, was plotted. Correspondence dates provided a measure of how quickly SHPO officials responded to applicants.

This study found that the FRTCP program and its administration operates efficiently and does not unreasonably delay project timelines. By examining transmission dates from project applications, specifically the date received and the date of response, a measure of efficiency could be generated. Both SHPOs and the National Park Service responded to all correspondence and application documents within the mandated thirty-day period.

Analysis of the pace of correspondence and the recommendations contained in both SHPO and NPS responses concluded that any inefficiencies in the process was the fault of the applicant, not the agencies. A majority of application delays were the result of project denials caused by incomplete or missing information. Other delays arose when the plans for the proposed rehabilitation did not meet the Secretary of the Interior's Standards. If the submission was denied, it is the applicant's responsibility to mitigate the violations in an appropriate and timely manner. Each project in this study experienced delays due to application denials. However, in each denial the National Park Service or SHPO provided positive mediation recommendation to remedying the shortcoming. This study found that

most applicants heeded the agencies' advice and responded to their recommendation. Once completed the application was resubmitted and usually approved without delay. However, one project in this study, Dortch Stove Works, experienced numerous delays which stemmed from denials of submissions. The denials were a result of the developer not following the precise directions issued by the SHPO and the National Park Service. The other case study applicants agreed to SHPO and the National Park Service recommendations promptly.

The success of the FRTCP depends on maintaining an efficient partnership between the SHPOs and NPS reviewers. Evaluated as a process, communication between the the SHPOs in South Carolina and Tennessee and NPS reviewers was efficient and fluid throughout the review and certification of the six case studies.

This study also assessed the consistency with which the federal and state reviewers applied the Secretary of the Interior's Standards for Rehabilitation. The Secretary of the Interior's Standards are the regulatory measures, or best set practices, prescribed for the FRTCP. It is the partnership between the SHPO and the National Park Service that enforces these measures through the two-tier approval process tended by the SHPOs and NPS reviewers. The Secretary of the Interior's Standards for Rehabilitation set forth essential guidance and criterion for the FRTCP projects while the review process creates a shared responsibility to enforce the Standards. Having two parties to interpret and enforce these guidelines thus provides a procedural and regulatory safety net for review of FRTCP rehabilitations.

This study found that the South Carolina and Tennessee SHPOs and the National Park Service apply the Secretary's Standards consistently. The consistency in application of the Standards was found by conducting a cross-comparison study of the states and each project. By evaluating the amendments and commentary from each project's Part 2 review, raw data proved both agencies enforced the Standards consistently. In each state and throughout the cross-comparison study no contradictory statements or disagreements could be found in the case study files between the SHPO and the National Park Service.

Figure 5.6 below summarizes review comments for each case study during review of Part 2 of the application. SHPO and HPS comments fell into five categories: (1) Plans, Drawings, Photos; (2) Additions Removal or Significant Landscape Changes; (3) Alteration, Removal or Covering of Interior Finishes or Features; (4) Alterations, Removal or Covering of Exterior Finishes or Features; and (5) Overall Site or Site Plan. Allocating comments by agency, Figure 5.6 lists the project, the agency which issued comments and amendments, and comment subject matter. Most amendments, correspondence, and comments came from the SHPO (highlighted in yellow) rather than the National Park Service (highlighted in green). Major findings commonly found included: alterations to significant landscape features, alterations to exterior finishes or features; and alterations to interior finishes or features.

Comments issued during review of Part 2 of the six case studies, and summarized in Figure 5.6, drew attention to consistently observed weaknesses in plans, lack of information, and proposals for treatments deemed inappropriate application of the Secretary of Interior's Standards for Rehabilitation. Comments in the category of *Plans, Drawings, and Photos* pointed to the need for additional elevation drawings, missing or incomplete photos, additional

drawings requiring specific details, and other technical issues, for example blueprint elevations too small for review. Comments for the *Additions, Removal, or Significant Landscape Changes* drew attention to Non-compatibility of proposed treatments with the historic character of the building; plans which obstructed historic alleyways and site lines; failure to show parking areas on proposed site plan; vague descriptions of the proposed landscape plan; and selection of pavers and curb details. In the category of *Alteration, Removal, or Covering of Interior Finishes or Features* official comments suggested alternatives to floor leveling which violates the Secretary's Standards; the conversion of a boiler room into a theater; blocking windows; improper remediation of lead-based paint; concern for the cleaning technique of interior wood features; and compatibility of new interior features with the historic character of the building. Commentary in the *Alteration, Removal, or Covering of the Exterior Finishes or Features* focused on the lack of information to evaluate the impact of changes; revisions for door infill and bay openings; installation of new roofing to retain historic visual character; masonry cleaning techniques; cornice cleaning techniques; and window replacements.

<i>Comment Category</i>	<i>Specifics</i>	<i>Trolley Barn</i>	<i>Wiggins Station</i>	<i>Dortch Stove Works</i>	<i>Monaghan Mill</i>	<i>Oakland Mill</i>	<i>Granby Mill</i>
Plans/Drawings/Photos							
	Elevation drawings were not provided as requested and photos do not cover proposed changes	NPS P2		SHPO P2			SHPO P2
	No design of new door and basis for the design				SHPO P2		
	Detailed drawings needed			SHPO P2			SHPO P2
	Elevations too small to review proposed windows				SHPO P2		
Additions, removal, or significant changes to the Landscape							
	Proposed landscaping must be compatible with the historic character of the building			SHPO P2		SHPO P2	SHPO P2
	Respect current unobstructed site lines; reduce plantings in historic laneways	SHPO P2					
	Eliminate planting plots to maintain the open sense of historic alleyways	NPS P2					
	New parking areas, site plan does not show				SHPO P2		
	Vague description of landscape, site plan shows changes				SHPO P2		
	Plantings must be immediately adjacent to buildings and low in height, trees must be confined to perimeter of property	NPS P2					
	Revised proposal describing kinds of plants	NPS P2					
	Alter current plan to demarcate edges of current sidewalks while preserving ADA compliance	SHPO P2					
	The new pool located in the front "yard" has the potential to alter public perception of this building as a historic industrial property				NPS P2		
	Choose larger and less obtrusive pavers to soften the current visual effect of the proposed sidewalks and crosswalks	SHPO P2					
Alteration, removal, or covering features							
	Floor leveling is problematic in terms of Secretary's Standards, but is not clear as to how extensive the proposal is	NPS P2					
	Conversion of boiler room into a theater; a new non visible wall to be build with CMU and painted			SHPO P2			
	Eliminate step and create a greater slope at entrance	SHPO P2					
	Standard #2 not met, the new wall blocks windows which are a primary feature of the interior; windows must have an operable treatment	SHPO P2		SHPO P2			
	What kind of treatment for removing lead based paint				SHPO P2		
	Concern of cleaning interior wood features						SHPO P2
	New interior features must be compatible with the historic character of the building			SHPO P2	SHPO P2		SHPO P2
Alteration, removal, or covering features							
	Lack of information to evaluate the impact of changes regarding new door openings, ramps, stairs, and	NPS P2		SHPO 2			
	Revisement of garage door infill, bay openings, converted windows	NPS P2					SHPO 2
	Doors	NPS P2					
	New roofing must retain the historic visual character of the building	SHPO P2		SHPO P2		SHPO P2	
	Cornice cleaning; techniques need to be described				SHPO P2		SHPO P2
	Masonry cleaning needs to be more specific			SHPO P2	SHPO P2		
	Canopy revision / drawings	NPS P2		SHPO P2			NPS P2
	Window replacements on any major elevation that do match historic configuration, material, and profiles	NPS P2		SHPO P2		SHPO P2	SHPO P2
	Glass Panel revision	NPS P2					
	Use of masonry stain / paint / concrete stain regarding colors		SHPO P2				NPS P2
	Extend the height of exterior HVAC screens to better hide HVAC units	SHPO & NPS P2					
Overall site/siteplan							
	Section 106 Review; the proposed project will not adversely affect any National Register of Historic Places-Listed property	SHPO P2					

Table 5.6 Consistency of SHPO & National Park Service

Analysis of review comments contained in the six case study's files concluded that both agencies performed their duties diligently. Review comments were thorough, providing well-rounded and robust commentary. Official commentary, always professional in tone, outlined their concerns with detailed explanations. The majority of their comments and concerns paralleled one another with the same tone, implementing the best practices to preserve the overall historic content of building and its affected architectural fabric and elements. It can be concluded that both agencies enacted a high-level review and issued very thorough commentary.

Critics of the FRTCP have complained that the Secretary of the Interior's Standards for Rehabilitation may be applied unevenly from state-to-state. Review of each case study file with analysis of comments, correspondence, and the fidelity to the Secretary of the Interior's Standards for Rehabilitation, supported an assessment of each agency's interpretation and consistency in application of the Standards. Analysis concluded that the National Park Service and both SHPOs applied the Secretary of the Interior's Standards consistently. By aligning the same violations from each state, comments and commentary issued could then be cross referenced. This approach revealed commonalities encountered in the two case study states and how reviewers applied the Standards. SHPO and NPS requests for reconsideration, redesign, and resubmittal fell into a narrow range of issues. Additional elevation drawings and photos were required for the Trolley Barns, Dortch Stove Works, and Granby Mill in Tennessee. Further study of proposed landscaping and its compatibility with the historic character of the buildings was solicited for Dortch Stove Works, Oakland Mill, Granby Mill, and the Trolley Barns. Further study of the need to alter of interior features was ordered for Dortch Stove Works, Monaghan Mill, and Granby Mill. Comments and for exterior finishes for roof and windows was required at the Trolley Barns, Dortch Stove Works, Cummins Station, Oakland Mill, and Granby Mill.

The most common issues discovered across the case studies in both states consisted of: cleaning techniques, the alterations of historic fabric such as windows or door openings, and roofing.

Proposed cleaning techniques frequently drew the attention of both state and federal agencies. Both agencies expressed concern about sandblasting, chemical paint stripping, and their application methods. However, every time agencies issued cautions or denied a process they offered an alternative or more appropriate remedy for treating the specific issue.

Changes to historic roofs have the potential to diminish the historic character of rehabilitated buildings. The developer of the Trolley Barns in Nashville, Tennessee proposed a new white metal roof for his project. The original roof, replaced due to extensive damage was originally coated in tar and thus black in color. The SHPO did not approve of the white roof color, while encouraging the developer to retain the historic color. However, the developer argued a black roof would decrease the building's cooling efficiency in the summer months. After further discussion, both parties approved a grey roof which respected the historical color and was deemed energy efficient. Commentary like this and similar issues reveal that the Tennessee South Carolina SHPOs consistently applied the Secretary's Standards.

The examination of the FRTCP applications in South Carolina and Tennessee found that the SHPOs issued more amendments and comments than did the National Park Service. This finding reflects the order of review. Part 2, the most critical and rigorous stage of the review of proposed projects, is first review by the SHPO. During this first phase of the Part 2 review, SHPO staff apply a macro approach. The agencies identify big-picture concerns such as landscape elements, large-scale alterations and procedures, and architectural configurations. The second phase of the Part 2 review, conducted by The National Park Service following SHPO review, tends to focus on finer issues such as cleaning techniques and the types of chemicals used, window details and fenestration, and treatment of character defining features related to significant events of the building's past. Part 2 of the application is by far the most scrutinized by both agencies.

The correspondence and comments associated with each application revealed that the National Park Service and the SHPO in both states provided assistance in the form of critical insights for each

rehabilitation project in this study. Agencies issued amendments and commentary of concern in the form of a letter with references to the exact line item on the Part 2 review not in line with the Standards. The agencies clearly conveyed their concerns about the proposed work, detailing how the procedures or materials do not conform to the Standards. Each time an agency transmitted correspondence, it included an alternative method or solution to resolve the violation, for example, a different cleaning method or a modified design. Frequently the agencies requested additional information to clarify the proposed rehabilitation before a second, more thorough review.

In addition, this study also found that the partnership between the National Park Service and the SHPOs is successful. Findings concluded the National Park Service relies heavily on the SHPOs in both states to officiate a thorough review process prior to the application reaching the National Park Service. Following the SHPOs review it is then the responsibility of the National Park Service to evaluate the application at a finer level of detail, while reviewing the SHPO comments. The number of comments issued between the agencies and a conversation the researcher had with a reviewer substantiated this claim.

This study also concluded the FRTCP process is not burdensome. Neither the Tennessee and South Carolina SHPOs or the National Park Service issue unnecessary paperwork and or impose unreasonable restrictions. Interviews and file correspondence revealed that the developers and applicants had only positive remarks for the National Park Service and the SHPOs. Many of the individuals interviewed applauded their specific agency's expert guidance and assistance throughout their rehabilitation project and experience. Both state and federal agencies were guided by preservation-minded principles summarized in the Secretary of the Interior's Standards.

Generalizations stereotype the SHPOs and the National Park Service as bureaucratic entities which impose "unnecessary" restrictions. This criticism appears to stem from reaction to the process's stringent guidelines. The process, critics say, requires "time-consuming paperwork" and is burdened by unnecessary requirements. Critics complain that the preservation principles embedded in the

FRTCP process are irrelevant, unnecessary, or unimportant. However, for a federal program to be administered efficiently and measures are regulated, certain clearly articulated principles must be followed. In this case, the best-practice guide for the rehabilitation of historic buildings are the principles contained in the Secretary of the Interior's Standards for Rehabilitation.

The success of the Federal Rehabilitation Tax Credit program has inspired more than thirty states to develop state incentives programs that encourage the rehabilitation of historic buildings. Hypothetically the FRTCP and the Twenty Percent Federal Rehabilitation Credit should be most popular and utilized more frequently in states having historic rehabilitation incentive programs. The data collected and analyzed from the National Park Service 2005-2015 fiscal reports and summarized in Figures 51.-5.4 indicate Tennessee produced a slightly greater number of certified rehabilitation projects, utilizing the Twenty Percent Federal Rehabilitation Tax Credit, than South Carolina achieved. This study found that Tennessee exceeded South Carolina in tax act projects despite South Carolina offering greater number of state incentives. The FRTCP posture in the state of South Carolina did not match Tennessee could possibly be the lack of dense, urban cities. South Carolina's capital Columbia, along with Greenville and Charleston are the major populated cities. Cities such as Nashville, Greenville, and Charleston have grown exponentially within the past twenty years. The influx of new citizens and companies has increased the need for commercial and residential space. Often buildings similar to the case studies are trending in the market today because they receive attention for their large spaces, adaptability, and aesthetics.

In conclusion, the FRTCP does move projects through the process effectively and efficiently. The rate of success demonstrates the program achieves its overall purpose of generating a high percentage of Part 3 Certified rehabilitation projects. There are pinch points in the approval process. However, the correspondence that the SHPO's and the National Park Service reveals that both agencies assist developer address issues as they arrive and provide attainable solutions. Windows, roof color or material, and interior or exterior alterations are the most common points of discussion during

the approval process. At times these issues can be nettlesome to resolve and the SHPO must collaborate with the National Park Service for additional advice. Findings concluded that whenever these issues violate the Standards and agencies must issue commentary, this does not affect the efficiency of the FRTCP's administration. However, these issues do affect the project schedule. There is no policy scapegoat for the glitches that emerge during the review process.

The fundamental pursuit of this study was to determine if the FRTCP is successful, is its administration efficient, and if the the federal agencies consistently apply the Secretary of the Interior's Standards. This study concluded the FRTCP process is not burdensome, but effective and efficient, and that the Secretary of the Interior's Standards for Rehabilitation are applied consistently.

From a national perspective, the FRTCP is a crucial and vital tool benefiting the field of preservation. As seen throughout each case study, the program continues to be effective preserving historic buildings around the nation. In addition, the program is also attributed to be a catalyst in spurring economic growth and revitalizing economically stagnated communities. From its inception, the FRTCP is directly responsible for the rehabilitation and re-introduction of over 40,000 buildings – spaces and buildings that otherwise may have been lost to history forever, not to mention the creation of an estimated 2.36 million jobs. These statistics prove the FRTCP is an effective program and continues to be effective in more than just the preservation of buildings.

Presently, the FRTCP is under political scrutiny by the current Administration and the Republican Party. Recently issued (November 2017), the framework for a new tax reform eliminates the federal historic tax credit. It is imperative that this administration and members of Congress recognize and accept the importance of the FRTCP and its long-standing role in the rehabilitation of historic buildings and the communities that draw new energy from them. Advocates in the preservation community must encourage and promote the policies of the FRTCP, reiterating its success over the years and its potential in the future. If this program is eliminated, the preservation community and overall strategic development could feel devastating effects. This program not only

saves the historic buildings. For over forty years the FRTCP has prevented the loss of countless historic buildings while it has also been an economic stimulant. It is imperative the FRTCP continues to be administered diligently with the highest regards to efficiency and the steady application of the Secretary of the Interior's Standards. If these elements were to diminish, the program could be in jeopardy and participation could decline thus resulting in fewer buildings rehabilitated and less communities being revitalized.

APPENDICES

Appendix A:

**United States Department of Interior,
National Park Service
Historic Preservation Certification Application Form**



UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 1 – EVALUATION OF SIGNIFICANCE**

OMB Approved
No. 1024-0009
Form 10-168
Rev. 2014

Instructions: This page must bear the applicant's original signature and must be dated. The National Park Service certification decision is based on the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form takes precedence. A copy of this form will be provided to the Internal Revenue Service.

1. **Property Name** _____

Street _____

City _____ County _____ State _____ Zip _____

Name of Historic District _____

☐ National Register district ☐ certified state or local district ☐ potential district

2. **Nature of request** (check only one box)

- ☐ certification that the building contributes to the significance of the above-named historic district or National Register property for rehabilitation purposes.
☐ certification that the building contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes.
☐ certification that the building does not contribute to the significance of the above-named district.
☐ preliminary determination for individual listing in the National Register.
☐ preliminary determination that a building located within a potential historic district contributes to the significance of the district.
☐ preliminary determination that a building outside the period or area of significance contributes to the significance of the district.

3. **Project Contact** (if different from applicant)

Name _____ Company _____

Street _____ City _____ State _____

Zip _____ Telephone _____ Email Address _____

4. **Applicant**

I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes, as applicable] (1) ☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or (2) ☐ if I am not the fee simple owner of the above-described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 36 CFR § 67.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 8 years.

Name _____ Signature _____ Date _____

Applicant Entity _____ SSN _____ or TIN _____

Street _____ City _____ State _____

Zip _____ Telephone _____ Email Address _____

NPS Official Use Only

The National Park Service has reviewed the Historic Preservation Certification Application – Part 1 for the above-named property and has determined that the property:

- ☐ contributes to the significance of the above-named district or National Register property and is a "certified historic structure" for rehabilitation purposes.
☐ contributes to the significance of the above-named district and is a "certified historic structure" for a charitable contribution for conservation purposes.
☐ does not contribute to the significance of the above-named district.

Preliminary Determinations:

- ☐ appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 CFR Part 60.
☐ does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.
☐ appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer.
☐ appears to contribute to the significance of a registered historic district if the period or area of significance as documented in the National Register nomination or district documentation on file with the NPS is expanded by the State Historic Preservation Officer.
☐ does not appear to qualify as a certified historic structure.

Date _____

National Park Service Authorized Signature

☐

PART 1 – EVALUATION OF SIGNIFICANCE

Property name _____ NPS Project Number _____

Property address _____

5. Description of physical appearance

Date(s) of building(s) _____ Date(s) of alteration(s) _____

Has building been moved? ☐ no ☐ yes, specify date _____

6. Statement of significance

7. Photographs and maps. Send photographs and map with application.



UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009
Form 10-168
Rev. 2014

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 – DESCRIPTION OF REHABILITATION

Instructions: This page must bear the applicant's original signature and must be dated. The National Park Service certification decision is based on the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form takes precedence. A copy of this form will be provided to the Internal Revenue Service.

1. Property Name _____

Street _____

City _____ County _____ State _____ Zip _____

Name of Historic District _____

☐ Listed individually in the National Register of Historic Places; date of listing _____

☐ Located in a Registered Historic District; name of district _____

☐ Part 1 – Evaluation of Significance submitted? Date submitted _____ Date of certification _____

2. Project Data

Date of building _____ Estimated rehabilitation costs (QRE) _____

Number of buildings in project _____ Floor area before / after rehabilitation _____ / _____ sq ft

Start date (estimated) _____ Use(s) before / after rehabilitation _____ / _____

Completion date (estimated) _____ Number of housing units before / after rehabilitation _____ / _____

Number of phases in project _____ Number of low-moderate income housing units before / after rehabilitation _____ / _____

3. Project Contact (if different from applicant)

Name _____ Company _____

Street _____ City _____ State _____

Zip _____ Telephone _____ Email Address _____

4. Applicant

I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes, as applicable] (1) ☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or (2) ☐ if I am not the fee simple owner of the above-described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 36 CFR § 67.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 8 years.

Name _____ Signature _____ Date _____

Applicant Entity _____ SSN _____ or TIN _____

Street _____ City _____ State _____

Zip _____ Telephone _____ Email Address _____

☐ Applicant, SSN, or TIN has changed since previously submitted application.

NPS Official Use Only

The National Park Service has reviewed the Historic Preservation Certification Application – Part 2 for the above-named property and has determined that:

- ☐ the rehabilitation described herein is consistent with the historic character of the property and, where applicable, with the district in which it is located and that the project meets the Secretary of the Interior's Standards for Rehabilitation. This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is complete.
- ☐ the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's Standards for Rehabilitation if the attached conditions are met.
- ☐ the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.

Date National Park Service Authorized Signature

☐ NPS conditions or comments attached

PART 2 – DESCRIPTION OF REHABILITATION

Property name _____ NPS Project Number _____

Property address _____

5. Detailed description of rehabilitation work Use this page to describe all work or create a comparable format with this information.
Number items consecutively to describe all work, including building exterior and interior, additions, site work, landscaping, and new construction.

Number	Feature	Date of Feature
--------	---------	-----------------

Describe existing feature and its condition

Photo numbers _____ Drawing numbers _____

Describe work and impact on feature

Number	Feature	Date of Feature
--------	---------	-----------------

Describe existing feature and its condition

Photo numbers _____ Drawing numbers _____

Describe work and impact on feature

Add Item	Delete Item
----------	-------------



UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009
Form 10-168
Rev. 2014

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 3 – REQUEST FOR CERTIFICATION OF COMPLETED WORK

Instructions: This page must bear the applicant's original signature and must be dated.

1. **Property Name** _____

Street _____

City _____ County _____ State _____ Zip _____

Is property a certified historic structure? ☐ yes ☐ no If yes, date of NPS certification _____ OR date of National Register listing _____

2. **Project Data**

Project start date _____ Project completed and building placed in service date _____

Estimated rehabilitation costs (ORE) _____ Total estimated costs (ORE plus non-ORE) _____

Number of housing units before/after rehabilitation _____ / _____ Number of low-moderate housing units before/after rehabilitation _____ / _____

3. **Project Contact** (if different from applicant)

Name _____ Company _____

Street _____ City _____ State _____

Zip _____ Telephone _____ Email Address _____

4. **Applicant** List all additional owners on next page.

I hereby attest that the information I have provided is, to the best of my knowledge, correct and that I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011). If I am not the fee simple owner of the above-described property, then I have checked the following box: ☐ to attest that the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which statement (a) either is attached to this application form and incorporated herein, or has been previously submitted, and (b) meets the requirements of 36 CFR § 67.3(a) (1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 8 years.

Name _____ Signature _____ Date _____

Applicant Entity _____ SSN _____ or TIN _____

Street _____ City _____ State _____

Zip _____ Telephone _____ Email Address _____

☐ Applicant, SSN, or TIN has changed since previously submitted application.

☐ There are no additional owners within the meaning of "owner" set forth in 36 CFR § 67.2 (2011).

NPS Official Use Only

The National Park Service has reviewed the Historic Preservation Certification Application—Request for Certification of Completed Work (Part 3) for this property and has determined that:

☐ The completed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation and is consistent with the historic character of the property and, where applicable, the district in which it is located. Effective the date indicated below, the rehabilitation of the "certified historic structure" is hereby designated a "certified rehabilitation." This certification is to be used in conjunction with appropriate Internal Revenue Service regulations. Questions concerning specific tax consequences or interpretations of the Internal Revenue Code should be addressed to the Internal Revenue Service. Completed projects may be inspected by an authorized representative of the Secretary to determine if the work meets the Standards for Rehabilitation. The Secretary reserves the right to make inspections at any time up to five years after completion of the rehabilitation and to revoke certification, if it is determined that the rehabilitation project was not undertaken as presented by the owner in the application form and supporting documentation, or the owner, upon obtaining certification, undertook unapproved further alterations as part of the rehabilitation project inconsistent with the Secretary's Standards for Rehabilitation.

☐ The completed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation. However, because this property is not yet a "certified historic structure," the rehabilitation cannot be designated a "certified rehabilitation" eligible for Federal tax credits at this time. It will become a "certified historic structure" on the date it or the historic district in which it is located is listed in the National Register of Historic Places. On that date, the completed rehabilitation will automatically become a "certified rehabilitation." It is the owner's responsibility to obtain such listing through the State Historic Preservation Office. Questions concerning specific tax consequences or interpretations of the Internal Revenue Code should be addressed to the Internal Revenue Service. Completed projects may be inspected by an authorized representative of the Secretary to determine if the work meets the Standards for Rehabilitation. The Secretary reserves the right to make inspections at any time up to five years after completion of the rehabilitation and to revoke certification, if it is determined that the rehabilitation project was not undertaken as presented by the owner in the application form and supporting documentation, or the owner, upon obtaining certification, undertook unapproved further alterations as part of the rehabilitation project inconsistent with the Secretary's Standards for Rehabilitation.

☐ The rehabilitation is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.

A copy of this determination will be provided to the Internal Revenue Service in accordance with Federal law.

Date _____ National Park Service Authorized Signature _____

☐ NPS comments attached

PART 3 – REQUEST FOR CERTIFICATION OF COMPLETED WORK

Property name _____ NPS Project Number _____

Property address _____

Additional Owners Continue on additional sheets as needed to list all owners.

Name _____ SSN _____ or TIN _____

Street Address _____

City _____ State _____ Zip _____

Name _____ SSN _____ or TIN _____

Street Address _____

City _____ State _____ Zip _____

Name _____ SSN _____ or TIN _____

Street Address _____

City _____ State _____ Zip _____

Name _____ SSN _____ or TIN _____

Street Address _____

City _____ State _____ Zip _____

Name _____ SSN _____ or TIN _____

Street Address _____

City _____ State _____ Zip _____

Name _____ SSN _____ or TIN _____

Street Address _____

City _____ State _____ Zip _____

Name _____ SSN _____ or TIN _____

Street Address _____

City _____ State _____ Zip _____



UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
AMENDMENT / ADVISORY DETERMINATION**

OMB Approved
No. 1024-0009
Form 10-168
Rev. 2014

Instructions: This page must bear the applicant's original signature and must be dated.

1. **Property name** _____
Property address _____
2. **This form** ☐ includes additional information requested by NPS for an application currently on hold.
☐ Updates applicant or contact information.
☐ Amends a previously submitted ☐ Part 1 ☐ Part 2 ☐ Part 3 application.
☐ Requests an advisory determination that phase _____ of _____ phases of this rehabilitation project meets the Secretary of the Interior's Standards for Rehabilitation. Phase completion date _____
Estimated rehabilitation costs of phase (QRE) _____

Summarize information here; continue on following page if necessary.

3. **Project Contact** (if different from applicant)

Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

4. **Applicant**

I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes, as applicable] (1) ☐ I am the owner of the above-described property within the meaning of "owner" set forth in 38 CFR § 67.2 (2011), and/or (2) ☐ if I am not the fee simple owner of the above-described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (I) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 38 CFR § 67.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 8 years.

Name _____ Signature _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

☐ Applicant, SSN, or TIN has changed since previously submitted application.

NPS Official Use Only

The National Park Service has reviewed this amendment to the Historic Preservation Certification Application and has determined that the amendment:

- ☐ meets the Secretary of the Interior's Standards for Rehabilitation.
☐ Will meet the Secretary of the Interior's Standard for Rehabilitation if the attached conditions are met. Does not meet the Secretary of the Interior's Standards for Rehabilitation.
☐ Updates the information on file and does not affect the certification.

Advisory Determinations:

- ☐ The National Park Service has determined that the work completed in this phase is consistent with the Secretary of the Interior's Standards for Rehabilitation. This determination is advisory only. A formal certification of rehabilitation can be issued only after all rehabilitation work and any associated site work or new construction have been completed. This approval could be superseded if it is found that the overall rehabilitation does not meet the Secretary's Standards. A copy of this form will be provided to the Internal Revenue Service.

Date _____ National Park Service Authorized Signature _____

☐ NPS conditions or comments attached

Appendix B:

**United States Department of Interior
National Park Service
Secretary of the Interior's Standards for Rehabilitation**

The Secretary of the Interior's Standards for Rehabilitation

The Standards (Department of Interior regulations, 36 CFR 67) pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and the interior, related landscape features and the building's site and environment as well as attached, adjacent, or related new construction.

The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

[3]

Appendix C:

State of Tennessee
House Bill 1474
And
Senate Bill 1723

HOUSE BILL 1474

By McDaniel

AN ACT to amend Tennessee Code Annotated, Title 4, Chapter 11, Part 1; Title 56, Chapter 4 and Title 67, relative to tax credits for the rehabilitation of historic structures.

WHEREAS, this General Assembly recognizes the importance of restoring and preserving the state's historic buildings and structures; and

WHEREAS, the restoration and preservation of the state's historic buildings and structures fosters civic beauty, revitalizes and renews communities, expands the state's economy, creates new employment, retains existing employment, and promotes public education, pleasure and welfare; and

WHEREAS, this General Assembly enacts this Historic Rehabilitation Tax Credit Act to facilitate the restoration and preservation of the state's historic buildings and structures; now, therefore,

BE IT ENACTED BY THE GENERAL ASSEMBLY OF THE STATE OF TENNESSEE:

SECTION 1. Tennessee Code Annotated, Title 56, Chapter 4, is amended by adding Sections 2 through 8 as a new part.

SECTION 2. This part shall be known and may be cited as the "Historic Rehabilitation Tax Credit Act".

SECTION 3. As used in this part:

(1) "Certified historic structure" means a property that is located in this state and is:

(A)

(i) Listed individually on the national register of historic places; or

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(ii) Located in a registered historic district listed on the national register of historic places and is certified by the secretary of the United States department of the interior as contributing to the historic significance of the district; or

(B)

(i) Listed individually on the Tennessee register of historic places, or

(ii) Located in a registered historic district listed on the state register of historic places and is certified by the commission as contributing to the historic significance of the district;

(2) "Commission" means the Tennessee historical commission;

(3) "Owner" means the person who holds legal fee or leasehold title to a certified historic structure, or an identifiable portion of the structure;

(4) "Person" means any natural person, corporation, including any for-profit or nonprofit corporation, general or limited partnership, limited liability company, trust, estate, or other business entity;

(5) "Placed in service" means that sufficient rehabilitation work has been completed which would allow for occupancy of the entire certified historic structure or of some identifiable portion of the structure, or that the owner has commenced depreciation of the qualified rehabilitation expenses, whichever occurs first;

(6) "Qualified rehabilitation expenditures" has the same meaning as defined in Section 47(c)(2)(A) of the Internal Revenue Code of 1986, as amended (26 U.S.C. § 47(c)(2)(A)); and

(7) "State premium tax liability" means any liability incurred by an insurance company for the following taxes, as applicable:

(A) Premium taxes under title 56, chapter 4, part 2; title 50, chapter 6, part 4; § 56-13-114; § 56-14-113; § 56-22-114; and § 56-45-110;

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(B) Retaliatory tax under § 56-4-218; and

(C) Any other premium taxes and retaliatory taxes imposed upon an insurance company by this state under any other law.

SECTION 4. Tax credit; carryforward; allocation.

(a) Any owner that incurs qualified rehabilitation expenditures for the rehabilitation of a certified historic structure shall earn a tax credit against any state premium tax liability in an amount equal to twenty-five percent (25%) of the qualified rehabilitation expenditures; provided, that the rehabilitation shall meet standards consistent with the standards of the secretary of the United States department of the interior for rehabilitation, as certified by the commission, and the qualified rehabilitation expenditures associated with the certified historic structure shall exceed five thousand dollars (\$5,000).

(b) The entire tax credit shall be earned in the year in which the certified historic structure, or portion of the structure, attributable to the qualified rehabilitation expenditures is placed in service; provided, that the tax credit shall be claimed in three (3) equal installments beginning with the year in which the certified historic structure, or portion of the structure, attributable to the qualified rehabilitation expenditures is placed in service. The total tax credit claimed for any taxable year, including the amount of any carryforward tax credit claimed, shall not exceed the claimant's state premium tax liability due. Any unused portion of any installment of the tax credit may be carried forward for the five (5) years following the year in which the installment could be claimed.

(c) The tax credit may be allocated among some or all of the partners, members, shareholders, or other owners of any partnership, limited liability company, S-corporation, or other similar pass-through entity in any manner agreed to by the partners, members, shareholders, or owners without regard to their sharing of other tax

or economic attributes and may be allocated on an annual basis, including an allocation of the entire tax credit, or any installment of the credit, to any partner, member, shareholder, or other owner who was a partner, member, shareholder, or other owner at any time during the year in which the tax credit is allocated.

SECTION 5. Application and Certification.

(a) Requests for designation of a property as a certified historic structure and of a proposed rehabilitation shall be made on the following forms, which shall be promulgated by the commission:

(1) A form used to request designation of a property as a certified historic structure;

(2) A form used to request certification of a proposed rehabilitation as meeting the standards consistent with the standards of the secretary of the United States department of the interior for rehabilitation; and

(3) A form used to request certification of a completed rehabilitation.

(b) If the owner also applies for the federal historic rehabilitation tax credit pursuant to Section 47 of the Internal Revenue Code of 1986 (26 U.S.C. § 47), then in lieu of requesting the tax credit provided in this part on the forms required by subsection (a), the owner may request the tax credit on parts 1, 2 and 3 of the historic preservation certification application used by the national park service, including any additional forms and certifications as may be requested by the commission.

(c) Concurrently with the certificate of a completed rehabilitation, the commission shall issue to the owner a tax credit certificate providing the amount of tax credit generated by the qualified rehabilitation expenditures incurred during the rehabilitation. To issue a tax credit certificate, the owner shall provide the commission with the following:

(1) An audited cost report issued by a public accountant licensed by this state confirming the amount of qualified rehabilitation expenditures incurred during the rehabilitation of the certified historic structure; and

(2) Evidence that the certified historic structure has been placed in service.

SECTION 6. Recapture. If any portion of the tax credit is recaptured or disallowed, then only the owner, and not any allocate of the tax credit or any portion of the credit, shall be liable to repay any amount of recapture or disallowance.

SECTION 7. Retaliatory Tax. A claimant of a tax credit shall not be required to pay any retaliatory tax levied under § 56-4-218 as a result of claiming the tax credit.

SECTION 8. Rules; fees.

(a) Within one hundred eighty (180) days of the effective date of this act, the commission shall promulgate rules in accordance with the Uniform Administrative Procedures Act, compiled in title 4, chapter 5 and adopt the forms necessary or convenient to implement this part.

(b) The commission may adopt a fee, not to exceed five thousand dollars (\$5,000), for the applications and certifications required by this part or by any rules promulgated pursuant to this part. The fees shall be receipts of the commission to be used for performing its duties under this part.

SECTION 9. The headings to sections, chapters, and parts in this act are for reference purposes only and do not constitute part of the law enacted by this act. However, the Tennessee Code Commission is requested to include the headings in any compilation or publication containing this act.

SECTION 10. This act shall take effect upon becoming a law, the public welfare requiring it.

HOUSE BILL 1474
By McDaniel

SENATE BILL 1723

By Johnson

AN ACT to amend Tennessee Code Annotated, Title 4,
Chapter 11, Part 1; Title 56, Chapter 4 and Title
67, relative to tax credits for the rehabilitation of
historic structures.

WHEREAS, this General Assembly recognizes the importance of restoring and
preserving the state's historic buildings and structures; and

WHEREAS, the restoration and preservation of the state's historic buildings and
structures fosters civic beauty, revitalizes and renews communities, expands the state's
economy, creates new employment, retains existing employment, and promotes public
education, pleasure and welfare; and

WHEREAS, this General Assembly enacts this Historic Rehabilitation Tax Credit Act to
facilitate the restoration and preservation of the state's historic buildings and structures; now,
therefore,

BE IT ENACTED BY THE GENERAL ASSEMBLY OF THE STATE OF TENNESSEE:

SECTION 1. Tennessee Code Annotated, Title 56, Chapter 4, is amended by adding
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(A)

(i) Listed individually on the national register of historic places; or

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(ii) Located in a registered historic district listed on the national register of historic places and is certified by the secretary of the United States department of the interior as contributing to the historic significance of the district; or

(B)

(i) Listed individually on the Tennessee register of historic places, or

(ii) Located in a registered historic district listed on the state register of historic places and is certified by the commission as contributing to the historic significance of the district;

(2) "Commission" means the Tennessee historical commission;

(3) "Owner" means the person who holds legal fee or leasehold title to a certified historic structure, or an identifiable portion of the structure;

(4) "Person" means any natural person, corporation, including any for-profit or nonprofit corporation, general or limited partnership, limited liability company, trust, estate, or other business entity;

(5) "Placed in service" means that sufficient rehabilitation work has been completed which would allow for occupancy of the entire certified historic structure or of some identifiable portion of the structure, or that the owner has commenced depreciation of the qualified rehabilitation expenses, whichever occurs first;

(6) "Qualified rehabilitation expenditures" has the same meaning as defined in Section 47(c)(2)(A) of the Internal Revenue Code of 1986, as amended (26 U.S.C. § 47(c)(2)(A)); and

(7) "State premium tax liability" means any liability incurred by an insurance company for the following taxes, as applicable:

(A) Premium taxes under title 56, chapter 4, part 2; title 50, chapter 6, part 4; § 56-13-114; § 56-14-113; § 56-22-114; and § 56-45-110;

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(B) Retaliatory tax under § 56-4-218; and

(C) Any other premium taxes and retaliatory taxes imposed upon an insurance company by this state under any other law.

SECTION 4. Tax credit; carryforward; allocation.

(a) Any owner that incurs qualified rehabilitation expenditures for the rehabilitation of a certified historic structure shall earn a tax credit against any state premium tax liability in an amount equal to twenty-five percent (25%) of the qualified rehabilitation expenditures; provided, that the rehabilitation shall meet standards consistent with the standards of the secretary of the United States department of the interior for rehabilitation, as certified by the commission, and the qualified rehabilitation expenditures associated with the certified historic structure shall exceed five thousand dollars (\$5,000).

(b) The entire tax credit shall be earned in the year in which the certified historic structure, or portion of the structure, attributable to the qualified rehabilitation expenditures is placed in service; provided, that the tax credit shall be claimed in three (3) equal installments beginning with the year in which the certified historic structure, or portion of the structure, attributable to the qualified rehabilitation expenditures is placed in service. The total tax credit claimed for any taxable year, including the amount of any carryforward tax credit claimed, shall not exceed the claimant's state premium tax liability due. Any unused portion of any installment of the tax credit may be carried forward for the five (5) years following the year in which the installment could be claimed.

(c) The tax credit may be allocated among some or all of the partners, members, shareholders, or other owners of any partnership, limited liability company, S-corporation, or other similar pass-through entity in any manner agreed to by the partners, members, shareholders, or owners without regard to their sharing of other tax

or economic attributes and may be allocated on an annual basis, including an allocation of the entire tax credit, or any installment of the credit, to any partner, member, shareholder, or other owner who was a partner, member, shareholder, or other owner at any time during the year in which the tax credit is allocated.

SECTION 5. Application and Certification.

(a) Requests for designation of a property as a certified historic structure and of a proposed rehabilitation shall be made on the following forms, which shall be promulgated by the commission:

(1) A form used to request designation of a property as a certified historic structure;

(2) A form used to request certification of a proposed rehabilitation as meeting the standards consistent with the standards of the secretary of the United States department of the interior for rehabilitation; and

(3) A form used to request certification of a completed rehabilitation.

(b) If the owner also applies for the federal historic rehabilitation tax credit pursuant to Section 47 of the Internal Revenue Code of 1986 (26 U.S.C. § 47), then in lieu of requesting the tax credit provided in this part on the forms required by subsection (a), the owner may request the tax credit on parts 1, 2 and 3 of the historic preservation certification application used by the national park service, including any additional forms and certifications as may be requested by the commission.

(c) Concurrently with the certificate of a completed rehabilitation, the commission shall issue to the owner a tax credit certificate providing the amount of tax credit generated by the qualified rehabilitation expenditures incurred during the rehabilitation. To issue a tax credit certificate, the owner shall provide the commission with the following:

(1) An audited cost report issued by a public accountant licensed by this state confirming the amount of qualified rehabilitation expenditures incurred during the rehabilitation of the certified historic structure; and

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SECTION 6. Recapture. If any portion of the tax credit is recaptured or disallowed, then only the owner, and not any allocate of the tax credit or any portion of the credit, shall be liable to repay any amount of recapture or disallowance.

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SECTION 8. Rules; fees.

(a) Within one hundred eighty (180) days of the effective date of this act, the commission shall promulgate rules in accordance with the Uniform Administrative Procedures Act, compiled in title 4, chapter 5 and adopt the forms necessary or convenient to implement this part.

(b) The commission may adopt a fee, not to exceed five thousand dollars (\$5,000), for the applications and certifications required by this part or by any rules promulgated pursuant to this part. The fees shall be receipts of the commission to be used for performing its duties under this part.

SECTION 9. The headings to sections, chapters, and parts in this act are for reference purposes only and do not constitute part of the law enacted by this act. However, the Tennessee Code Commission is requested to include the headings in any compilation or publication containing this act.

SECTION 10. This act shall take effect upon becoming a law, the public welfare requiring it.

APPENDIX D:
CUMMINS STATION HISTORIC PRESERVATION CERTIFICATION APPLICATION

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 1**

NPS Office Use Only

Cummins Station

Property Name

209 10th Ave. S

Property Address

Project Number:

5. Description of physical appearance:

Cummins Station is a large five story concrete and masonry structure built in 1906. It measures 132 feet in width and 500 feet in length containing a total of almost one-half million square feet. The brick was added to the reinforced concrete structure as a decorative veneer and has been painted brick red.

The east elevation facing Tenth Avenue South is the main facade of the structure and is thirty-six bays in length with each bay separated by a brick pier running the height of the building. Above the storefront level each pier is decorated with a concrete band. The upper facade of the east elevation is recessed between the piers and each bay contains a fifteen light casement window on each floor. On the fifth floor above each bay of windows is a large keystone of concrete inset in the arch. At the roofline is a continuous concrete parapet which runs the length of the building.

Almost all of the storefronts on the facade are similar to the original storefronts. Above the windows and doors on the storefront is a transom bar and a four-light transom containing clear glass. Above this is a second transom bar which displays a three-light
(continued on continuation sheet)

Date of Construction: 1906

Source of Date: Archives

Date(s) of Alteration(s): 1913

Has building been moved? ☐ yes ☒ no. If so, when? _____

6. Statement of significance:

Constructed as the largest wholesale warehouse in middle Tennessee, Cummins Station includes decorative elements both on the storefronts and the upper facade which reflect the aspects of the early 20th Century Colonial Revival movement in the jack arching over the windows and prominent keystones on the fourth floor.

The early 1900s were prosperous years in Nashville and the city grew in wealth and prominence as a center for industry and manufacturing. The opening of Nashville's Union Station in 1900 gave a great boost to the city's role as a rail center, and this surge of economic prosperity enabled many businessmen to erect large factories and warehouses in and around the city. One of the choicest sites was the area adjacent to Union Station and by 1905 this area was examined for development by a group of investors.

When the building was completed in March of 1907 it was promoted with great fanfare by the owners. Two hundred guests including Governor M.R. Patterson and Nashville Mayor T.O. Morris attended a banquet held at Nashville's Maxwell House Hotel to celebrate its opening. Cummins Station was noted as the first building of reinforced concrete in the city and the largest terminal building of concrete in the world. Its first tenants were some of the city's leading businesses such as the Cheek-Neal Coffee Company, Continental Baking Powder Company and several leading wholesale hardware companies.

During its early years the operation of Cummins Station proved successful and vacancies in the building were few. The building's owners made use of various promotional techniques and many publications contained advertisements extolling the virtues of the station. Among the claims for the building was the lowering of insurance rates
(continued on continuation sheet)

7. Photographs and maps.

Attach photographs and maps to application.

Continuation sheets attached: ☐ yes ☐ no

CONTINUATION/AMENDMENT SHEET

Cummins Station
Property Name
209 10th Avenue South
Property Address

Historic Preservation
Certification Application

Instructions. Read the instructions carefully before completing. Type, or print clearly in black ink. Use this sheet to continue sections of the Part 1 and Part 2 application, or to amend an application already submitted. Photocopy additional sheets as needed.


This sheet: ☒ continues Part 1 ☐ continues Part 2 ☐ amends Part 1 ☐ amends Part 2 NPS Project Number: _____

6
stock due to its fireproof construction. Its location on the main railroad lines with access to the Cumberland River was another important selling point. The owners further stated that the building was a place "where rats cannot live" which appears to have been a strong selling point in the early 20th century.

tenants of the building varied from year to year although some notable Nashville businesses operated out of the building for several decades. The most important of these was the Cheek-al Coffee Company which moved into the building in 1907. This company had its beginnings on Second Avenue and distributed coffee throughout the country. In the 1920's the coffee company was sold to General Foods Co. and became known as Maxwell House Coffee.

Another major company located in the station was the H. G. Hill Wholesale Grocery Company which distributed its products to grocery stores throughout the state. By 1930 the company operated over 600 stores in Tennessee after spending many of its years of growth in Cummins Station. Other firms which occupied the building included perfume distributors, wholesale hardware companies, candy companies, and radio and appliance dealers. William Cummins died in 1936 but the company reformed and continued to operate the building. Gradually many of the firms moved into more modern buildings, and until the 1980's the major occupant of Cummins Station was the Manufacturers Warehouse Company which distributed clothing and furniture.

Cummins Station has been a Nashville landmark since its construction in 1906. The building was one of the largest in Middle Tennessee for many years and it has been occupied by major Nashville businesses during its history. The use of reinforced concrete in its construction was an innovative and successful engineering experiment, and upon its completion it was the largest concrete reinforced terminal building in the world.

Name Henry Sender Signature  Date 4/29/97
Street 209 10th Avenue South City Nashville
State Tennessee Zip 37203 Daytime Telephone Number 615 259-0999

NPS Office Use Only

- ☐ The National Park Service has determined that these project amendments meet the Secretary of the Interior's "Standards for Rehabilitation."
☐ The National Park Service has determined that these project amendments will meet the Secretary of the Interior's "Standards for Rehabilitation" if the attached conditions are met.
☐ The National Park Service has determined that these project amendments do not meet the Secretary of the Interior's "Standards for Rehabilitation."

Date _____ National Park Service Authorized Signature _____ National Park Service Office/Telephone No. _____
☐ See Attachments

CONTINUATION/AMENDMENT SHEET

Historic Preservation
Certification Application

Cummins Station

Property Name

209 10th Avenue South

Property Address

Instructions. Read the instructions carefully before completing. Type, or print clearly in black ink. Use this sheet to continue sections of the Part 1 and Part 2 application, or to amend an application already submitted. Photocopy additional sheets as needed.

This sheet: ☒ continues Part 1 ☐ continues Part 2 ☐ amends Part 1 ☐ amends Part 2 NPS Project Number: _____

5

ransom of decorative luxfer glass.

re west elevation is similar to the east elevation. Each floor above the main floor contains fifteen light casement windows with steel frames. On the north and south elevations re both industrial type casement and one-over-one sash. Windows on these facades lack re arching and decoration which characterises the main elevations.

re interior of Cummins Station has been altered extensively from the original intent of re structure as the largest reinforced concrete terminal building in the world in 1906. re exterior has not been altered significantly and retains the integrity of its original sign.

re interior supports many various kinds of business enterprises. Each business has its vn separate designed entrance within the spacious corridors. Unlike many large office complexes, the offices within Cummins Station display glass fronts of interesting designs rich allow vision into the many interesting interiors. The lobbies are expansive and contain signage easy to read and follow. The lobbies and corridors are carpeted and all ailings are exposed to the structure above and are painted flat black above the ten foot ine.

endant lights in the corridors give adequate light to the spaces and relieve the monotony f the normal flourescant lights.

ecause of the multitude of businesses and their individual designs, walking through the orridors on all floors is like visiting a small quaint town yet in one structure.

Name Henry Sender

Signature

Date 4/29/97

Street 209 10th Avenue South

City Nashville

State Tennessee

Zip 37203

Daytime Telephone Number 615 259-0999

NPS Office Use Only

- ☐ The National Park Service has determined that these project amendments meet the Secretary of the Interior's "Standards for Rehabilitation."
- ☐ The National Park Service has determined that these project amendments will meet the Secretary of the Interior's "Standards for Rehabilitation" if the attached conditions are met.
- ☐ The National Park Service has determined that these project amendments do not meet the Secretary of the Interior's "Standards for Rehabilitation."

Date

National Park Service Authorized Signature

National Park Service Office/Telephone No.

☐ See Attachments

CONTINUATION/AMENDMENT SHEET

Cummins Station
Property Name

Historic Preservation
Certification Application

209 10th Avenue South
Property Address

ew alterations have occurred to the building in recent years and it continues to
xhibit its original integrity of materials and design.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 — DESCRIPTION OF REHABILITATION

NPS Office Use Only

NRIS No:

NPS Office Use Only

Project No:

Instructions: Read the instructions carefully before completing application. No certification will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets. A copy of this form may be provided to the Internal Revenue Service. The decision by the National Park Service with respect to certification is made on the basis of the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form shall take precedence.

1. **Name of property:** Cummins Station
Address of property: Street 209 10th Avenue South
City Nashville County Davidson State TN Zip 37203
☒ Listed individually in the National Register of Historic Places; give date of listing: 11/17/83
☐ Located in a Registered Historic District; specify: _____
Has a Part 1 Application (Evaluation of Significance) been submitted for this project? ☒ yes ☐ no
If yes, date Part 1 submitted: _____ Date of certification: _____ NPS Project Number: _____

2. **Data on building and rehabilitation project:**
Date building constructed: 1906 Total number of housing units before rehabilitation: _____
Type of construction: Reinforced concrete & masonry Number that are low-moderate income: _____
Use(s) before rehabilitation: Wholesale Warehouse Total number of housing units after rehabilitation: _____
Proposed use(s) after rehabilitation: Multi-use offices & commercial Number that are low-moderate income: _____
Estimated cost of rehabilitation: \$12,600,000 Floor area before rehabilitation: 400,000 sq. ft.
This application covers phase number 1 of 1 phases Floor area after rehabilitation: 400,000 sq. ft.
Project/phase start date (est.): 10/93 Completion date (est.): _____

3. **Project contact:**
Name Henry Sender
Street 209 10th Avenue South #325 City Nashville
State TN Zip 37203 Daytime Telephone Number 615 259-0999

4. **Owner:**
I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C.1001.
Name Henry Sender Signature _____ Date 4/29/97
Organization Cummins Station, L.L.C.
Social Security or Taxpayer Identification Number _____
Street 209 10th Avenue South, #325 City Nashville
State TN Zip 37203 Daytime Telephone Number 615 259-0999

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application — Part 2" for the above-named property and has determined:

- ☐ that the rehabilitation described herein is consistent with the historic character of the property or the district in which it is located and that the project meets the Secretary of the Interior's "Standards for Rehabilitation." This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is completed.
- ☐ that the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's "Standards for Rehabilitation" if the attached conditions are met.
- ☐ that the rehabilitation or proposed rehabilitation is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's "Standards for Rehabilitation." A copy of this form will be provided to the Internal Revenue Service.

Date

National Park Service Authorized Signature

National Park Service Office/Telephone No.

☐ See Attachments

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2**

NPS Office Use Only

Summins Station
Property Name

209 10th Avenue South
Property Address

Project Number:

DETAILED DESCRIPTION OF REHABILITATION/PRESERVATION WORK—Includes site work, new construction, alterations, etc. Complete blocks below.

<p>NUMBER 1</p> <p>Architectural feature <u>brick veneer</u></p> <p>Approximate date of feature <u>1906</u></p> <p>Describe existing feature and its condition:</p> <p>East Elevations. Window grilles had been talled. Areas of mismatched brick talled. Areas of mismatched brick talled with signage. Electrical wires talled.</p> <p>East Elevation Part I</p> <p>to no. <u>1,2,3</u> Drawing no. <u>7.7,7.8,7.9</u></p>	<p>Describe work and impact on existing feature:</p> <p>Window grilles removed. Lobby entrances constructed. Brick work-brick stained original color Electrical services consolidated. Old canopy removed.</p> <p>(Drawings before & after)</p>
<p>NUMBER 2</p> <p>Architectural feature <u>New canopy</u></p> <p>Approximate date of feature <u>1993</u></p> <p>Describe existing feature and its condition:</p> <p>Central Lobby Entrance</p> <p>to no. <u>4 & 5</u> Drawing no. _____</p>	<p>Describe work and impact on existing feature:</p> <p>New central entrance identified it to be the Main Entrance</p> <p>(Drawings before & after)</p>
<p>NUMBER 3</p> <p>Architectural feature <u>brick pilasters & signs</u></p> <p>Approximate date of feature <u>1995</u></p> <p>Describe existing feature and its condition:</p> <p>East Elevations Entrance platform in disrepair.</p> <p>to no. <u>6</u> Drawing no. _____</p>	<p>Describe work and impact on existing feature:</p> <p>Reconstructed platform with brick pilasters and steel railing to meet codes. Signs installed to identify tenants. Handicapped access ramp incorporated into platform.</p> <p>(Drawing before & after)</p>
<p>NUMBER 4</p> <p>Architectural feature <u>brick pilasters</u></p> <p>Approximate date of feature <u>1995</u></p> <p>Describe existing feature and its condition:</p> <p>East elevations Walkway pilasters</p> <p>to no. <u>7</u> Drawing no. _____</p>	<p>Describe work and impact on existing feature:</p> <p>Pilasters and rails confine walkway</p> <p>(Drawing before & after)</p>

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2**

NPS Office Use Only

Cummins Station
Property Name
209 10th Avenue South
Property Address

Project Number:

NUMBER 5	Architectural feature <u>brickwork & windows</u>	Describe work and impact on existing feature: Similar to Number 1 Stained building, refurbishing windows, adding canopies at entrances, adding pilasters and railing and lights, and adding signs identify the building and curiosity to visit the building. Windows reopened in all areas where grilles were located.
	Approximate date of feature <u>1906</u>	
Describe existing feature and its condition: East elevations at each bay similar to "before" photographs. Some windows had been removed and grilles/ vents installed. Mismatched patches of brick infills. Photo no. <u>8-32</u> Drawing no. _____		

NUMBER 6	Architectural feature <u>brick & windows</u>	Describe work and impact on existing feature: Stained brick and refurbished windows, cleaned up the structure. Windows reopened in all areas where grilles were located.
	Approximate date of feature _____	
Describe existing feature and its condition: West elevation Some windows had been removed and grilles/ vents installed. Mismatched patches of brick infills. Areas of facade painted for signage. Photo no. <u>33</u> Drawing no. _____		

NUMBER 7	Architectural feature <u>brick & windows</u>	Describe work and impact on existing feature: Similar to No. 6 Fire escape removed. Windows cleaned and refurbished. Concrete haunches repaired. Brick stained original red brick color. Windows reopened in all areas where grilles were located.
	Approximate date of feature _____	
Describe existing feature and its condition: South elevation-had been painted green Some windows had been removed and grilles/ vents installed. Mismatched patches of brick infills. Photo no. <u>34</u> Drawing no. _____		

NUMBER 8	Architectural feature <u>Brick & windows</u>	Describe work and impact on existing feature: Similar to No. 6 Windows reopened in all areas where grilles were located.
	Approximate date of feature _____	
Describe existing feature and its condition: North elevation Some windows had been removed and grilles/ vents installed. Mismatched patches of brick infills. Photo no. <u>35,36,37</u> Drawing no. _____		

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

Cummins Station
Property Name
209 10th Avenue South
Property Address

Project Number:

JMBER
9 Architectural feature Entrances & Signage
Approximate date of feature 1995

Describe existing feature and its condition:

Existing interior all open space with some
non-loading bearing partitions.

to no. 38 Drawing no. _____

Describe work and impact on existing feature:

Constructed four lobbies, corridors,
New walls, painted ceilings, new lights,
carpet and entrances to businesses.

JMBER
10 Architectural feature Signage
Approximate date of feature 1996

Describe existing feature and its condition:

to no. 39 Drawing no. _____

Describe work and impact on existing feature:

New interior signage and building
information installed.

JMBER
11 Architectural feature Entrances-interior
Approximate date of feature 1996

Describe existing feature and its condition:

Interior was all open concrete structure
with some non-load bearing partitions.

to no. 40-47 Drawing no. _____

Describe work and impact on existing feature:

Each entrance is different.

All corridors retain exposed concrete
structure with exposed duct work.

JMBER
12 Architectural feature Interiors
Approximate date of feature 1995-1997

Describe existing feature and its condition:

Entrances/Interiors

Open concrete structure with some
non-structural partition walls.

to no. 48-64 Drawing no. _____

Describe work and impact on existing feature:

Concrete structure left exposed. Non-
structural partitions removed. New
tenant spaces constructed which maintain
original structure intact. Each tenant
space has different finishes. Exposed
duct work to retain original warehouse
character.

Cummins Station

Property Name
209 10th Avenue South

Property Address

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

Project Number:

NUMBER 13	Architectural feature <u>Interior Space</u> Approximate date of feature _____	Describe work and impact on existing feature: Exposed ceilings and lights give feeling of spaciousness.
Describe existing feature and its condition: Open space and structure. Photo no. <u>51</u> Drawing no. _____		
NUMBER 14	Architectural feature <u>Interior Space-4th Flr.</u> Approximate date of feature _____	Describe work and impact on existing feature: Portion of 4th Floor converted to Joe Kraft Conference Center. Conference Room is available for all tenants and public. It is unique to Nashville
Describe existing feature and its condition: Photo no. <u>52</u> Drawing no. _____		
NUMBER 15	Architectural feature <u>Floor Plans-each floor</u> Approximate date of feature _____	Describe work and impact on existing feature: Floor plan illustrating lease spaces. No impact on existing columns. Elevators located in original shafts(freight and passenger).
Describe existing feature and its condition: Plan illustrating original column locations and elevator locations. Photo no. _____ Drawing no. <u>1, 2, 3</u>		
NUMBER 16	Architectural feature _____ Approximate date of feature _____	Describe work and impact on existing feature:
Describe existing feature and its condition: Photo no. _____ Drawing no. _____		

NUMBER

4

Summary and Evaluation of Project:

This project involves the conversion of warehouse space to office retail uses. The before photographs were submitted several years ago when this building was proposed to be converted to low-income housing.

This application covers both phases of a two phased rehabilitation project that is now complete. The first phase involved the exterior and floors 1, 2, and 3. The second phase involves floors 4 and 5.

The exterior work focuses on three main areas. First painting the exterior with a masonry stain that matches the color of the brick. This was done to hide where brick work was mis-matched in the past around several windows, the south elevation had been painted green, and to cover barely visible signage from previous tenants.

Second the delivery bays had undergone alterations and several had metal garage type doors. New bays were installed to reflect the original.

Third the loading dock platform was deteriorated. This was rebuilt with the addition of modern railing to meet codes.

Windows were retained and modern insulated windows were installed on the interior. Windows that had in the past been replaced with metal vent grills were, under this project, replaced with a single large pane of glass. The original appearance is very much retained.

The current modern entrance was done several years before this project was begun.

The interior has been divided into commercial and office space. The "storefronts" are modern and of the individual renters design. They are obviously not intended to be historic in feeling but speak of the new use while not detracting from the historic use of the building. In the majority of spaces the warehouses finishes have been left exposed, concrete beams and columns, masonry walls, and exposed duct work. Many of the spaces are large and retain the warehouse feeling. Hallways are wide and retain the original ceiling height as does the majority of the building.

Concerns\Reservations\and Recommendations:

Our only concern was the use of masonry stain but due to the reasons for its use we do not feel that this warrants denial of the project.

We recommend approval.

APPENDIX E:
DORTCH STOVE WORKS HISTORIC PRESERVATION CERTIFICATION APPLICATION

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 1 — EVALUATION OF SIGNIFICANCE

No. 1024-01

NPS Office Use Only

NRIS No: _____

RECEIVED

SEP 13 1996

NPS Office Use Only

Project No: 0573-96-TN62

Instructions: Read the instructions carefully before completing application. No certification will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets.

1. Name of property: DORTCH STOVE WORKS / JAMISON BEDDING

Address of property: Street 230 NORTH FRANKLIN ROAD

City FRANKLIN County WILLIAMSON State TN Zip 37064

Name of historic district: _____

☐ National Register district ☐ certified state or local district ☐ potential historic district
2. Check nature of request:

☐ certification that the building contributes to the significance of the above-named historic district for the purpose of rehabilitation.

☐ certification that the structure or building and, where appropriate, the land area on which such a structure or building is located contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes.

☐ certification that the building does not contribute to the significance of the above-named district.

☒ preliminary determination for individual listing in the National Register.

☐ preliminary determination that a building located within a potential historic district contributes to the significance of the district.

☐ preliminary determination that a building outside the period or area of significance contributes to the significance of the district.
3. Project contact:

Name ROD L. PEWITT

Street P.O. Box 864 City FRANKLIN

State TN Zip 37065 Daytime Telephone Number 615/791-1777
4. Owner:

I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.

Name CALVIN LEHEW Signature Calvin LeHew Date Aug 7 96

Organization LEHEW COMPANY

Social Security or Taxpayer Identification Number _____

Street P.O. Box 864 City FRANKLIN

State TN Zip 37065 Daytime Telephone Number 615/791-1777

NPS Office Use Only

The National Park Service has reviewed the "Historic Preservation Certification Application — Part 1" for the above-named property and hereby determines that the property:

☐ contributes to the significance of the above-named district and is a "certified historic structure" for the purpose of rehabilitation.

☐ contributes to the significance of the above-named district and is a "certified historic structure" for a charitable contribution for conservation purposes in accordance with the Tax Treatment Extension Act of 1980.

☐ does not contribute to the significance of the above-named district.

Preliminary Determinations:

☒ appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 CFR Part 60.

☐ does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.

☐ appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer.

☐ appears to contribute to the significance of a registered historic district but is outside the period or area of significance as documented in the National Register nomination or district documentation on file with the NPS.

☐ does not appear to qualify as a certified historic structure.

Date 9/16/96 National Park Service Authorized Signature Gay M. Lapsley National Park Service Office/Telephone No. 202-343-9533

☐ See Attachment

NPS Office Use Only

operty Name

Property Address

Project Number:

Description of physical appearance:

WILLIAMSON COUNTY REGISTRAR'S OFFICE
THE REVIEW APPEAL (local newspaper)

Source of Date:

Date(s) of Alteration(s): _____

Has building been moved? ☐ yes ☒ no. If so, when? _____

Statement of significance:

³Photographs and maps.

Attach photographs and maps to application.

Continuation sheets attached: ☒ yes ☐ no

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009

REVIEW SHEET

Historic Preservation Certification Application—Significance

Property: DORTCH STOVE WORKS, 230 N FRANKLIN RD., FRANKLIN, TN. Project No.: _____

Historic District: _____
8/12/96 date initial application received by State _____ date(s) additional information requested by State
8/26/96 date complete information received by State _____
9/3/96 date of this transmittal to NPS _____
Inspection of property by State staff? ☐ no ☒ yes date(s): 7/16/96

☒ There is adequate documentation enclosed to evaluate the historic character and integrity of this property.
_____ There is insufficient documentation to evaluate the property adequately. The application is missing the following items:

Reasonable efforts have been made to obtain this information. Copies of the information requests are enclosed.

NUMBER	This property involves:												
1	<table><tbody><tr><td>_____ Extensive loss of historic fabric</td><td>_____ Obscured or covered elevation(s)</td></tr><tr><td>_____ Substantial alterations over time</td><td>_____ Moved property</td></tr><tr><td>_____ Preliminary determination of listing</td><td>_____ State recommendation inconsistent with NR</td></tr><tr><td>_____ for district</td><td>_____ documentation</td></tr><tr><td>_____ for individual property</td><td>_____ Recommendation different from the applicant's</td></tr><tr><td>_____ Significance less than 50 years old</td><td>_____ request</td></tr></tbody></table>	_____ Extensive loss of historic fabric	_____ Obscured or covered elevation(s)	_____ Substantial alterations over time	_____ Moved property	_____ Preliminary determination of listing	_____ State recommendation inconsistent with NR	_____ for district	_____ documentation	_____ for individual property	_____ Recommendation different from the applicant's	_____ Significance less than 50 years old	_____ request
_____ Extensive loss of historic fabric	_____ Obscured or covered elevation(s)												
_____ Substantial alterations over time	_____ Moved property												
_____ Preliminary determination of listing	_____ State recommendation inconsistent with NR												
_____ for district	_____ documentation												
_____ for individual property	_____ Recommendation different from the applicant's												
_____ Significance less than 50 years old	_____ request												

NUMBER	Complete item(s) below as appropriate.
2	<p>(1) The documentation on file with the National Register cites the period(s) of significance of this historic district as _____</p> <p>(2) The property _____ contributes _____ does not contribute to the historic significance of this registered historic district in: _____ location _____ design _____ setting _____ materials _____ workmanship _____ feeling _____ association _____ Property is mentioned in the NR or State or local district documentation in Section _____, page _____.</p> <p>(3) For properties less than 50 years old: _____ the historical merits of the district (the periods and areas of significance) are documented in the National Register form or district documentation on file as less than 50 years old, justifying the certification of this property's contribution. _____ the exceptional historical or architectural significance of this property as described in the National Register form or district documentation on file justifies its certification as contributing. _____ there is insufficient justification to consider this property as contributing to the district for its individual exceptional architectural or historical significance or the significance of the district does not extend to the last 50 years.</p> <p>(4) For preliminary determinations: A. The status of the nomination for the property/historic district: _____ Nomination has already been submitted to State review board, and nomination will be forwarded to the NPS within _____ months. (Draft nomination is enclosed.) _____ Nomination was submitted to the NPS on _____. <input checked="" type="checkbox"/> Nomination will be submitted to the State review board within twelve months. _____ Nomination process likely will be completed within thirty months. _____ Other, explain: _____</p> <p>B. Evaluation of the property: _____ Property is individually eligible and meets National Register Criteria for Evaluation _____ Property is located within a potential registered district that meets National Register Criteria for Evaluation: _____ A _____ B _____ C _____ D Criteria Considerations: _____ A _____ B _____ C _____ D _____ E _____ F _____ G</p> <p>(5) The property is located in a registered district, is outside the period(s) or area(s) of significance as documented in the NR form and appears to contribute to the expanded significance of the district. Enclosed is the revised nomination documentation.</p>

NUMBER
3

Describe and evaluate the physical characteristics of the property, its integrity, and its significance within the context of the historic district (or individually for preliminary determinations of individual listings).

SEE ATTACHED

NUMBER
4

State Official Recommendation:

- This application for the above-named property has been reviewed by L. JACKSON, C. STAGER, R. TUNE, a professionally qualified architect, architectural historian, or historian on my staff.
- ☐ The property is included within the boundaries of a registered historic district, contributes to the significance of the district, and is a "certified historic structure" for the purpose of rehabilitation.
- ☐ The property is included within the boundaries of a registered historic district, contributes to the significance of the district, and is a "certified historic structure" for a charitable contribution for conservation purposes in accordance with the Tax Treatment Extension Act of 1980.
- ☐ The property does not contribute to the significance of the above-named district.
- ☒ The property appears to meet the National Register Criteria for Evaluation and will likely be nominated.
- ☐ The property does not appear to meet the National Register Criteria for Evaluation and will not be nominated.
- ☐ The property appears to contribute to the significance of a:
- ☐ potential historic district which appears to meet the National Register Criteria for Evaluation and will likely be nominated.
- ☐ registered historic district but is outside the period(s) or areas of significance as documented in the National Register nomination or district documentation on file with the NPS. Revised nomination or district documentation is enclosed.
- ☐ The property should be denied a preliminary determination that it could qualify as a certified historic structure.
- ☐ Insufficient documentation has been provided to evaluate the structure.

☐ Detailed NPS review recommended ☐ Precedent-setting case ☐ Forwarded without recommendation

9/4/86
Date

Herbal H. Hays
State Official Signature

☐ See attachments:

NPS Comments:

Date NPS Reviewer

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approval
No. 1024-0001

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 -- DESCRIPTION OF REHABILITATION

NPS Office Use Only

NRIS No.

NPS Office Use Only

Project No.

Instructions: Read the instructions carefully before completing application. No certification will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets. A copy of this form may be provided to the Internal Revenue Service. The decision by the National Park Service with respect to certification is made on the basis of the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form shall take precedence.

1. Name of property: DORTCH STOVE WORKS / JAMISON BEDDING
Address of property: Street 230 NORTH FRANKLIN ROAD
City FRANKLIN County WILLIAMSON State TN Zip 37064
☐ Listed individually in the National Register of Historic Places, give date of listing: _____
☐ Located in a Registered Historic District, specify: _____
Has a Part 1 Application (Evaluation of Significance) been submitted for this project? ☒ yes ☐ no
If yes, date Part 1 submitted: 6/97 Date of certification: 9/16/96 NPS Project Number: 0573-96-TW(CS87)

2. Data on building and rehabilitation project:
Date building constructed: 1929-1932 Total number of housing units before rehabilitation: 0
Type of construction: BRICK-CONCRETE Number that are low-moderate income: _____
Use(s) before rehabilitation: VACANT Total number of housing units after rehabilitation: 3
Proposed use(s) after rehabilitation: MULTI-COMMERCIAL Number that are low-moderate income: _____
Estimated cost of rehabilitation: 6-8 MILLION Floor area before rehabilitation: 300,000
* This application covers phase number 2 of 4-6 phases Floor area after rehabilitation: 300,000
Project/phase start date (est.): SEPT 1996 Completion date (est.): 4-5 YEARS

3. Project contact: ROD L. PEWITT
Name P.O. Box 864 City FRANKLIN
Street TN Zip 37065 Daytime Telephone Number 615/791-1777

4. Owner:

I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.

Name CALVIN LEHEW Signature _____ Date _____
Organization LEHEW COMPANY
Social Security or Taxpayer Identification Number _____
Street P.O. Box 864 City FRANKLIN
State TN Zip 37065 Daytime Telephone Number 615/791-1777

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application - Part 2" for the above-named property and has determined:

- ☐ that the rehabilitation described herein is consistent with the historic character of the property or the district in which it is located and that the project meets the Secretary of the Interior's "Standards for Rehabilitation." This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is completed.
- ☐ that the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's "Standards for Rehabilitation" if the attached conditions are met.
- ☐ that the rehabilitation or proposed rehabilitation is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's "Standards for Rehabilitation." A copy of this form will be provided to the Internal Revenue Service.

Date

National Park Service Authorized Signature

National Park Service Office Telephone No.

DORTCH STOVE WORKS

CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

Property Name

230 N. FRANKLIN ROAD

Property Address

FRANKLIN, TN. 37064

Project Number:

BUILDING 4/7 CIRCA 1927



Architectural feature ROOF

Approximate date of feature _____

Describe existing feature and its condition:

EXISTING ROOF WAS HIGH ASBESTOS.
WE HAD ENVIRONMENTAL FIRM TO
REMOVE. WE WANTED TO KEEP THE
WOOD BEAMS & COLUMNS. NOT ABLE
TO DUE TO LACK OF STRUCTURAL SUPPORT.
ENGINEER'S LETTER ATTACHED.

Photo no. _____

Drawing no. _____

Describe work and impact on existing feature:

NEW ROOF TO BE CONSTRUCTED
AND TIED IN TO EXISTING
BRICK WALLS.



Architectural feature WALLS

Approximate date of feature _____

Describe existing feature and its condition:

INTERIOR & EXTERIOR - BRICK

Photo no. _____

Drawing no. _____

Describe work and impact on existing feature:

INTERIOR - SAND CLEANED
DUE TO SOOT AND STAIN
EXTERIOR - TO REMAIN AS IS



Architectural feature LOADING DOCKS

Approximate date of feature _____

Describe existing feature and its condition:

CONCRETE EXPOSED DOCKS
OFF LARGE DOORS ON NORTH
SIDE.

Photo no. _____

Drawing no. _____

Describe work and impact on existing feature:

TO REMAIN FOR FUTURE
TENANTS TO HAVE ACCESS
TO ALLEY AND PARKING.



Architectural feature _____

Approximate date of feature _____

Describe existing feature and its condition:

Photo no. _____

Drawing no. _____

Describe work and impact on existing feature:

DORTCH STONE WALL HISTORIC PRESERVATION
JAMISON BEDDING CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

Project Number: _____

Property Name

230 N. FRANKLIN ROAD

Property Address

FRANKLIN, TN 37064

BUILDING 3 - circa 1927



Architectural feature

ROOF

Approximate date of feature

Describe work and impact on existing feature:

Describe existing feature and its condition:

Sloped with center saddle

corrugated tin.

new stand-off bars on top
of existing tin, followed by
R-20 insulation and topped
with new corrugated metal
roof.

Photo no. _____

Drawing no. _____



Architectural feature

WALLS

Approximate date of feature

Describe work and impact on existing feature:

Describe existing feature and its condition:

INTERIOR - brick and brecko block

EXTERIOR - " " "

INTERIOR - pressure washed
and sand blasted to removed
lead based paint.

EXTERIOR - brick to remain
as is

Photo no. _____

Drawing no. _____



Architectural feature

INTERIOR CEILING

Approximate date of feature

Describe work and impact on existing feature:

Describe existing feature and its condition:

STEEL BEAMS, TRUSSES, AND
GIRDERS - EXCELLENT STRUCTURAL
CONDITION, ALTHOUGH VERY
DIRTY. (SOOT, BIRD NEST, DROPPINGS)

PRESSURE WASHING UNDERDECKIN
AND ALL STEEL IN PREPARATION
TO PAINT AND ENCAPSULATE
EXISTING LEAD PAINT.

Photo no. _____

Drawing no. _____



Architectural feature

Approximate date of feature

Describe work and impact on existing feature:

Describe existing feature and its condition:

Photo no. _____

Drawing no. _____

DORTCH STOVE WORKS
JAMISON BEDDING
HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

Property Name
230 N. FRANKLIN ROAD
Property Address FRANKLIN, TN 37064
BUILDING 5

NPS Office Use Only
Project Number: **RECEIVED**

AUG 19 1997

TN. HISTORICAL
COMMISSION



Architectural feature FLOORS

Approximate date of feature _____

Describe existing feature and its condition:

POURED CONCRETE

Describe work and impact on existing feature:

EXISTING FLOORS WILL REMAIN
WITH COVERING DETERMINED
BY TENANT

Photo no. _____ Drawing no. _____



Architectural feature WALLS

Approximate date of feature _____

Describe existing feature and its condition:

INTERIOR BRICK & BREEKO BLOCK
EXTERIOR " " " "

Describe work and impact on existing feature:

BRICK TO REMAIN AS IS
BREEKO BLOCK TO BE CLEANED
AND PAINTED OR DRYWALLED

Pressure Wash

Photo no. _____ Drawing no. _____



Architectural feature ROOF

Approximate date of feature _____

Describe existing feature and its condition:

INTERIOR OPEN TO UNDERSIDE
OF ROOF DECK
EXTERIOR DISINTEGRATING &
LEAKING

Describe work and impact on existing feature:

ROOF TO BE EXPOSED SHOWING
GIRDERS & BEAMS
NEW CORRUGATED METAL ROOF

Photo no. _____ Drawing no. _____



Architectural feature LOADING DOCK

Approximate date of feature _____

Describe existing feature and its condition:

POURED CONCRETE

Describe work and impact on existing feature:

POSSIBLE DINING TERRACE

WINDOWS

GLASS & METAL GRIDS

BROKEN GLASS REPLACED.
METAL GRID WORK STRIPPED
AND PAINTED.

DORTCH STONE WORKS
JAMISON PIDDING

Property Name

230 W. FRANKLIN ROAD

Property Address FRANKLIN, TN 37064

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

THIS PAGE PREVIOUSLY
SUBMITTED

NPS Office Use Only

Project Number:

0573-96-TN



Architectural feature FLOORS

Approximate date of feature

Describe existing feature and its condition:

DIRT AND CONCRETE

Describe work and impact on existing feature:

EXISTING FLOORS TO REMAIN
WITH COVERING TO BE
DETERMINED BY TENANT.

Photo no. Drawing no.



Architectural feature WALLS

Approximate date of feature

Describe existing feature and its condition:

INTERIOR - BRICK (WEST
EXTERIOR - BRICK (HALF)
CORRUGATED TIN (EAST
HALF)

Describe work and impact on existing feature:

TO REMAIN AS IS (WITH
CLEANING) - INTERIOR - sandblast
EXTERIOR - pressure wash
as needed

Photo no. Drawing no.



Architectural feature ROOF

Approximate date of feature

Describe existing feature and its condition:

INSIDE TO BE EXPOSED
SHOWING GIRDERS AND
BEAMS.

NEW CORRUGATED METAL
ROOF, TO BE
ADDED

Describe work and impact on existing feature:

OPEN TO ROOF DECK
UNDERSIDE.

DISINTEGRATING + LEAKING.

Photo no. Drawing no.



Architectural feature BOILER

Approximate date of feature

Describe existing feature and its condition:

SAW DUST FIRED BOILER.
(NON-WORKING)

Describe work and impact on existing feature:

PRESSURE WASH AND
USED AS AN ARCHITECTURAL
FOCAL POINT.

GLASS & METAL GRIDS

BROKEN GLASS REPLACED
METAL GRID WORK. SCRAPED
AND PAINTED

JORTCH STONE WORKS
JAMISON BUILDING

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

RECEIVED

Property Name
230 W. FRANKLIN ROAD
Property Address FRANKLIN, TN 37064

Project Number:

AUG 19 1997

TN. HISTORICAL
COMMISSION

BUILDING 6

Architectural feature <u>FLOORS</u>	Describe work and impact on existing feature:
Approximate date of feature _____	
Describe existing feature and its condition: DIRT AND CONCRETE	EXISTING FLOORS TO REMAIN WITH COVERING TO BE DETERMINED BY TENANT.
Photo no. _____ Drawing no. _____	

Architectural feature <u>WALLS</u>	Describe work and impact on existing feature:
Approximate date of feature _____	
Describe existing feature and its condition: INTERIOR - BRICK (WEST) EXTERIOR - BRICK (EAST) CORRUGATED TIN (EAST HALF)	TO REMAIN AS IS (WITH CLEANING) - INTERIOR - sandblast EXTERIOR - pressure wash as needed
Photo no. _____ Drawing no. _____	

Architectural feature <u>ROOF</u>	Describe work and impact on existing feature:
Approximate date of feature _____	
Describe existing feature and its condition: INSIDE TO BE EXPOSED SHOWING GIRDERS AND BEAMS. NEW CORRUGATED METAL ROOF, TO BE ADDED	OPEN TO ROOF DECK UNDERSIDE. DISINTEGRATING + LEAKING.
Photo no. _____ Drawing no. _____	

Architectural feature <u>BOILER</u>	Describe work and impact on existing feature:
Approximate date of feature _____	
Describe existing feature and its condition: SAWDUST FIRED BOILER. (NON-WORKING)	PRESSURE WASH AND USED AS AN ARCHITECTURAL FOCAL POINT.
Architectural feature <u>WINDOWS</u>	Describe work and impact on existing feature:
Approximate date of feature _____	
Describe existing feature and its condition: GLASS & METAL GRIDS	BROKEN GLASS REPLACED METAL GRID WORK SCALED AND PAINTED

JORICH STONE WORKS
JAMISON BIDDING

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

RECEIVED

Project Number:

AUG 19 1997

TN. HISTORICAL
COMMISSION

230 N. FRANKLIN ROAD

PROPERTY ADDRESS: FRANKLIN, TN 37064

BUILDING 8

Architectural feature ROOF

Approximate date of feature _____

Describe existing feature and its condition:

ASBESTOS CONTAINING ROOFING
MATERIAL MOSTLY
DISINTEGRATING & FALLING

Describe work and impact on existing feature:

TO BE REPLACED

Photo no. _____ Drawing no. _____

Architectural feature WALLS

Approximate date of feature _____

Describe existing feature and its condition:

INTERIOR BRICK
EXTERIOR BRICK

Describe work and impact on existing feature:

BRICK TO REMAIN AS IS
PRESSURE WASH AS NEEDED

Photo no. _____ Drawing no. _____

Architectural feature FLOOR

Approximate date of feature _____

Describe existing feature and its condition:

POURED CONCRETE

Describe work and impact on existing feature:

EXISTING FLOORS WILL REMAIN
WITH COVERING DETERMINED
BY TENANT

Photo no. _____ Drawing no. _____

Architectural feature WOOD COLUMNS &

Approximate date of feature BEAMS

Describe existing feature and its condition:

HEAVY USE OF LARGE TIMBERS
FOR SUPPORT

Describe work and impact on existing feature:

TO BE RETAINED AS PART OF
ARCHITECTURAL INTEREST

WINDOWS
GLASS & METAL GRIDS

BROKEN GLASS REPLACED
METAL GRID WORK SCRIPPED
AND PAINTED

CON BEDDING
Name
50 N. FRANKLIN ROAD
Property Address
FRANKLIN, TN 37064

CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

Project Number:

BUILDING II CIRCA 1927



Architectural feature ROOF

Approximate date of feature _____

Describe existing feature and its condition:

SLOPED WITH CENTER
GABLE, TIN (CORRUGATED)

Describe work and impact on existing feature:

NEW STAND-OFF BARS ON TOP
OF EXISTING TIN, FOLLOWED
BY R-20 INSULATION AND
TOPPED WITH NEW CORRUGATED
METAL ROOF

Photo no. _____ Drawing no. _____



Architectural feature WALLS

Approximate date of feature _____

Describe existing feature and its condition:

INTERIOR - BRICK & CREEK BLOCK
EXTERIOR - SAME

Describe work and impact on existing feature:

INTERIOR - PRESSURE WASHED
& SAND BLASTED TO REMOVE
LEAD BASED PAINT
EXTERIOR - BRICK TO REMAIN
AS IS

Photo no. _____ Drawing no. _____



Architectural feature INTERIOR CEILING

Approximate date of feature _____

Describe existing feature and its condition:

STEEL BEAMS, TRUSSES, AND GIRDERS
EXCELLENT STRUCTURAL CONDITION,
ALTHOUGH VERY DIRTY (SOOT, BIRD
NEST, DROPPINGS)

Describe work and impact on existing feature:

PRESSURE WASHING UNDERDECKING
AND ALL STEEL IN PREPARATION
TO PAINT AND ENCAPSULATE
EXISTING LEAD PAINT

Photo no. _____ Drawing no. _____



Architectural feature _____

Approximate date of feature _____

Describe existing feature and its condition:

Describe work and impact on existing feature:

Photo no. _____ Drawing no. _____

JOYCE STONE WORKS
JAMISON BEDDING

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

RECEIVED

Project Number:

AUG 19 1997

TN. HISTORICAL
COMMISSION

230 N. FRANKLIN ROAD

Property Address: FRANKLIN, TN 37064

BUILDING 12

Architectural feature ROOF

Approximate date of feature _____

Describe existing feature and its condition:

Corrugated metal over
steel truss & beam.

Describe work and impact on existing feature:

To be repaired where needed
(to match).
Metal columns, beams, girders
to be pressure washed and painted.

Photo no. _____ Drawing no. _____

Architectural feature WALLS

Approximate date of feature _____

Describe existing feature and its condition:

Brick on interior and
exterior.

Describe work and impact on existing feature:

To be retained and
maintained.
PRESSURE WASH ONLY

Photo no. _____ Drawing no. _____

Architectural feature FLOOR

Approximate date of feature _____

Describe existing feature and its condition:

Poured concrete.

Describe work and impact on existing feature:

To remain with any
covering to be determined.

Photo no. _____ Drawing no. _____

Architectural feature WINDOWS

Approximate date of feature _____

Describe existing feature and its condition:

Glass with metal grids

Describe work and impact on existing feature:

Broken glass replaced.
metal grid work scraped
and painted.

Photo no. _____ Drawing no. _____

YORICH STONE WORKS
JAMISON BEDDING

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

RECEIVED

Property Name

230 W. FRANKLIN ROAD

Property Address FRANKLIN, TN 37064

Project Number:

AUG 19 1997

TN. HISTORICAL
COMMISSION

BUILDING 13 FIRST FLOOR

Architectural feature FLOORS

Approximate date of feature

Describe existing feature and its condition:

POURED CONCRETE

Describe work and impact on existing feature:

EXISTING FLOORS WILL REMAIN
WITH COVERING DETERMINED BY
TENANT

Photo no. Drawing no.

Architectural feature WALLS

Approximate date of feature

Describe existing feature and its condition:

INTERIOR BRICK BLOCK
EXTERIOR BRICK BLOCK

Describe work and impact on existing feature:

INTERIOR BRICK BLOCK TO BE
CLEANED AND PAINTED OR DRYWALL
(pressure washed)
EXTERIOR COMPLEMENTARY
STUCCO TO BE APPLIED

Photo no. Drawing no.

Architectural feature ROOF

Approximate date of feature

Describe existing feature and its condition:

INTERIOR PRE-STRESSED
POURED CONCRETE
EXTERIOR RUBBER ROOF
WITH TARRED FINISH

Describe work and impact on existing feature:

INTERIOR PAINTED AS NEEDED
EXTERIOR NEW RUBBER ROOF

Photo no. Drawing no.

Architectural feature WINDOWS

Approximate date of feature

Describe existing feature and its condition:

GLASS & METAL GRIDS

Describe work and impact on existing feature:

BROKEN GLASS REPLACED
METAL GRID WORK GRAPED AND
PAINTED

Photo no. Drawing no.

DRICH STONE WORKS
AMISON BUILDING

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

NPS Office Use Only

Project Number:

RECEIVED

AUG 19 1997

TN. HISTORICAL
COMMISSION

Property Name

30 W. FRANKLIN ROAD

Property Address: FRANKLIN, TN 37064

BUILDING 14

Architectural feature FLOORS

Approximate date of feature

Describe existing feature and its condition:

POURED CONCRETE

Describe work and impact on existing feature:

EXISTING FLOORS WILL REMAIN
WITH COVERING DETERMINED BY
TENANT

to no. _____ Drawing no. _____

Architectural feature WALLS

Approximate date of feature

Describe existing feature and its condition:

INTERIOR BRICK BLOCK
EXTERIOR BRICK BLOCK

Describe work and impact on existing feature:

INTERIOR BRICK BLOCK TO BE
CLEANED AND PAINTED OR
DRYWALLED (pressure washed)
EXTERIOR COMPLEMENTARY
STUCCO TO BE APPLIED

to no. _____ Drawing no. _____

Architectural feature ROOF

Approximate date of feature

Describe existing feature and its condition:

INTERIOR - WOOD UNDER PICKING
WITH SMALL TIMBERS AS BEAMS

EXTERIOR RUBBER ROOF
WITH TARRED FINKH

to no. _____ Drawing no. _____

Describe work and impact on existing feature:

INTERIOR PAINTED AS NEEDED
EXTERIOR NEW RUBBER ROOF

Architectural feature WINDOWS

Approximate date of feature

Describe existing feature and its condition:

GLASS & METAL GRIDS

Describe work and impact on existing feature:

BROKEN GLASS REPLACED
METAL GRID WORK CORRADED AND
PAINTED

to no. _____ Drawing no. _____

DORCH STOVE WORK
TAMISON BEDDING

HISTORIC PRESERVATION
CERTIFICATION APPLICATION—
PART 2

RECEIVED

AUG 19 1997

230 N. FRANKLIN RD.

Property Name

FRANKLIN, TN. 37064

Property Address

NPS Office Use Only

Project Number:

TN. HISTORICAL
COMMISSION

DETAILED DESCRIPTION OF REHABILITATION/PRESERVATION WORK—Includes site work, new construction, alterations, etc. Complete blocks below

BUILDING IS (PAINT STORAGE)

Architectural feature FLOOR

Approximate date of feature

Describe existing feature and its condition:

DIRT.

Describe work and impact on existing feature:

FINISHED AS NEEDED
FOR USAGE.

Photo no. Drawing no.

Architectural feature ROOF

Approximate date of feature

Describe existing feature and its condition:

WOOD, RUBBER, TAR.

Describe work and impact on existing feature:

REPAIR AS NEEDED.

Photo no. Drawing no.

Architectural feature WALLS

Approximate date of feature

Describe existing feature and its condition:

BRICK INSIDE
AND OUT.

Describe work and impact on existing feature:

TO REMAIN EXPOSED AS
IS. PRESSURE WASH
AS NEEDED

Photo no. Drawing no.

Architectural feature

Approximate date of feature

Describe existing feature and its condition:

Describe work and impact on existing feature:

Photo no. Drawing no.

APPENDIX F:
THE TROLLEY BARNS HISTORIC PRESERVATION CERTIFICATION APPLICATION

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 1 - EVALUATION OF SIGNIFICANCE

NPS Office Use Only
NRIS No:

NPS Office Use Only
Project No:

Instructions: Read the instructions carefully before completing application. No certification will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets.

1. Name of Property: Trolley Barns
Address of Property: Street 33 Peabody Street
City Nashville County Davidson State Tennessee Zip 37210-2125
Name of historic district: _____
☐ National Register district ☐ certified state or local district ☐ potential district

2. Check nature of request:
☐ certification that the building contributes to the significance of the above-named historic district (or National Register property) for the purpose of rehabilitation.
☐ certification that the structure or building, and where appropriate, the land area on which such structure or building is located contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes
☐ certification that the building does not contribute to the significance of the above-named historic district.
☒ preliminary determination for individual listing in the National Register.
☐ preliminary determination that a building located within a potential historic district contributes to the significance of the district.
☐ preliminary determination that a building outside the period or area of significance contributes to the significance of the district.

3. Project contact:
Name Bert Mathews
Street 300 Broadway City Nashville
State Tennessee Zip 37201 Daytime Telephone Number 615-850-2701

4. Owner:
I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.
Name Phil Ryan Signature [Signature] Date 4-29-2009
Organization Metropolitan Development and Housing Agency
Street 701 South Sixth Street City Nashville
State Tennessee Zip 37206 Daytime Telephone Number 615-252-8412

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application - Part 1" for the above-named property and hereby determines that the property:

- ☐ contributes to the significance of the above-named district (or National Register property) and is a "certified historic structure" for the purpose of rehabilitation.
☐ contributes to the significance of the above-named district and is a "certified historic structure" for a charitable contribution for conservation purposes in accordance with the Tax Treatment Extension Act of 1980.
☐ does not contribute to the significance of the above-named district.

Preliminary determinations:

- ☒ appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 CFR Part 60.
☐ does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.
☐ appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer.
☐ appears to contribute to the significance of a registered historic district but is outside the period or area of significance as documented in the National Register nomination or district documentation on file with the NPS.
☐ does not appear to qualify as a certified historic structure.

Date 3/17/10 National Park Service Authorized Signature [Signature] National Park Service Office/Telephone No. 202-354-2278

☐ See Attachments

HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 1

Property Name _____

Trolley Barns _____

Property Address: 33 Peabody Street, Nashville, TN _____

NPS Office Use Only

Project Number: _____

5. **Description of physical appearance:** Six structures that retain a high degree of physical integrity, including bowed steel truss roof systems, original metal frame window, stepped parapet rooflines, and decorative brick detailing. (Designated 11/19/2004; Ordinance No. BL2004-406 National Register eligible.)

Date of Construction: 1930 approximately Source of Date: Metropolitan Development & Housing Agency Feasibility Plan

Date(s) of Alteration(s): _____

Has building been moved? ☐ yes ☒ no If so, when? _____

6. **Statement of significance:** The WPA Municipal Garage complex at Rolling Mill Hill was constructed in the late 1930.s with funds from the Works Progress Administration, a federal Great Depression-era program. The garages, which were used by the City Sanitation Department, consisted of seven one-story brick buildings that were laid out in an orthogonal grid. Only six of the original buildings remain. The buildings reflect the major investment in city structure made by public works building projects in the Depression era.

7. Photographs and maps.

Attach photographs and maps to application

Continuation sheets attached: ☐ yes ☐ no

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

Historic Preservation Certification Application
State Historic Preservation Office Review & Recommendation Sheet
Significance – Part I

Project Number: _____

Number 1	Trolley Barns (Property) 33 Peabody Street, Nashville, Tennessee	_____ Preliminary done
	N/A (Historic District)	
_____ NR District _____ Certified State or Local district		
Date application received by State <u>10/01/09</u>		
Date(s) additional information requested by State <u>10/09</u>		
Date complete information received by State <u>02/26/2010</u>		
Date of transmittal to NPS <u>03/09/2010</u>		
Property visited by State staff? <u>yes</u>		
		SHPO REVIEW SUMMARY <input checked="" type="checkbox"/> Fully reviewed by SHPO <input type="checkbox"/> No outstanding concerns <input type="checkbox"/> Owner informed of SHPO recommendation <input type="checkbox"/> In-depth NPS review requested <input type="checkbox"/> Recommendation different from applicant's request

Number 2	STATE RECOMMENDATION:
	Claudette Stager, Richard Tune, Louis Jackson who meet the Secretary of the Interior's Professional Qualification Standards, have reviewed this application. _____ The property is included within the boundaries of a registered historic district, contributes to the significance of the district, and is a "certified historic structure" for the purpose of rehabilitation. _____ The property is included within the boundaries of a registered historic district, contributes to the significance of the district, and is a "certified historic structure" for a charitable contribution for conservation purposes in accordance with the Internal Revenue Code. _____ The property does not contribute to the significance of the above-named district. _____ Insufficient documentation has been provided to evaluate the structure. _____ This application is being forwarded without recommendation. Preliminary determinations: <input checked="" type="checkbox"/> The property appears to meet National Register Criteria for Evaluation and will be nominated individually. _____ The property does not appear to meet National Register Criteria for Evaluation and will not be nominated. _____ The property appears to contribute to the significance of a: _____ potential historic district that appears to meet the National Register Criteria for Evaluation and will likely be nominated. _____ registered historic district but is outside the period(s) or areas of significance as documented in the National Register nomination or district documentation on file with the NPS and nomination will be amended. _____ The property is located in a proposed historic district and: _____ The property does not appear to contribute to the significance of the proposed historic district. _____ The proposed historic district does not appear to meet the NR Criteria for Evaluation and will not be nominated.

Date

State Official Signature

Deputy SHPO

Number 3	ISSUES:
<input type="checkbox"/> Extensive loss or deterioration of historic fabric	<input type="checkbox"/> Moved property
<input type="checkbox"/> Substantial alterations over time	<input type="checkbox"/> State recommendation inconsistent with NR documentation
<input type="checkbox"/> Significance less than 50 years old	<input type="checkbox"/> Functionally related complex or multiple buildings within an individual nomination.
<input type="checkbox"/> Obscured or covered elevation(s)	<input type="checkbox"/> Other (explain)

Number 4	Complete items below as appropriate:
(1) _____ is the period(s) of significance of the district.	
(2) The property is mentioned in the NR or state or local district documentation, Section _____, Page _____.	
(3) For preliminary determinations, the status of the nomination for the property/historic district:	
_____ Nomination has already been submitted to State Review Board, and will be forwarded to the NPS within _____ months. Draft nomination is enclosed.	
_____ Nomination was submitted to NPS on _____	
<input checked="" type="checkbox"/> Nomination process will likely be completed within thirty months.	
_____ Other, explain:	
(4) _____ The property is located in a registered district, but its current condition is inconsistent with the determination of its contribution to the district as stated in the nomination. Supplemental Listing Record requested.	

Number 5	Describe problematic issues or other concerns.
An intact group of city maintenance structures. Several of the garage doors have been replaced and a few interior partition walls constructed but otherwise retains integrity. Because the structures were not used by the public there is little information concerning the history. Nashville Metropolitan Historical Commission has researched the barns and produced little information. The buildings had been continuous use by the city until recently.	
_____ See attachments: _____ photographs _____ maps _____ other:	

NPS COMMENTS:

Date NPS Reviewer

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FEB 25 2010

6. Statement of significance: The WPA Municipal Garage complex at Rolling Mill Hill was constructed in the late 1930s with funds from the Works Progress Administration, a federal Great Depression-era program. The garages, which were used by the City Sanitation Department, consisted of seven one-story brick buildings that were laid out in an orthogonal grid. Only six of the original buildings remain. The buildings reflect the major investment in city structure made by public works building projects in the Depression era.

"The Works Progress Administration (WPA) was one of the most far-reaching and controversial programs initiated during the New Deal. Designed to put people to work, WPA received an initial Congressional appropriation of \$5 billion. Between 1935 and its termination in 1943, the WPA employed approximately 8 million workers and spent \$11 billion.

From his headquarters in Nashville, WPA state administrator Harry S. Berry, a World War I artillery commander, launched the Tennessee program. The WPA put thousands of unskilled and semiskilled Tennesseans to work, mainly on the state's roads. Farm-to-market, rural, and city street road projects accounted for over 60 percent of total WPA appropriations in the state. But Tennessee WPA workers also built sewer systems, bridges, waterways, dams, viaducts, and overpasses." Eclectic in the search for worthwhile projects, WPA workers excavated ancient Cherokee earthen mounds and village sites on Hiwassee Island and unearthed a pre-Columbian Indian village near Hurricane Mills. They worked on a community house in Sparta and a home for the poor in Cookeville. Workers built several lakes, including Marrowbone in Davidson County.

Some of Tennessee's largest WPA projects reflected the arrival of the age of flight. WPA workers helped complete landing fields and airports at Jellico, Cookeville, Lebanon, Jackson, and Milan. They built major airports in Memphis, Chattanooga, Knoxville, Nashville, and at the Tri-Cities of Bristol, Johnson City, and Kingsport.

In Memphis, local political leader Edward H. Crump and U.S. Senator Kenneth D. McKellar dispensed patronage through the WPA. Besides providing extensive road and street work, the WPA employed thousands of men in digging ditches, painting buildings, and resurfacing sidewalks in Memphis. Larger WPA projects included Crump Stadium, the city zoo, a juvenile court building, a new hospital, and several housing developments. When the flood of 1937 swept over the city's low-lying areas, the damage was lessened by the efforts of thousands of WPA workers who constructed makeshift levees and hastily erected flood walls. WPA employees also helped care for fifty thousand refugees left stranded by the flood, while Nashville WPA workers cared for the five thousand flood victims in that city.

In Nashville WPA workers restored Civil War-era Fort Negley, completed projects at Percy and Edwin Warner Parks, helped construct a new Tennessee Highway Department building, worked at the Hermitage, and refurbished several public schools. These workers also improved city parks, built a city garage and repair building, and completed almost twenty-five miles of street work. The WPA operated service and arts programs that employed a number of Tennesseans. Adult education classes, public health services, and school lunch programs hired teachers, nurses, and dietitians. In the largest cities the WPA operated women's sewing and canning classes at domestic training centers and employed writers, actors, artists, and musicians in programs in the arts.

Young Tennesseans also benefited from New Deal initiatives. The National Youth Administration (NYA) offered vocational classes to young fulltime students and employed many others in part-time jobs. NYA youth built shops and vocational buildings in twenty-three counties and gyms and recreational buildings in thirteen others.

Although segregated by race in accordance with the prevailing Jim Crow standards, the NYA and other New Deal programs employed African Americans. Across the South, 750,000 unemployed African Americans worked on WPA projects, and thousands of Tennesseans were put to work this way.

The WPA ran into political trouble in 1938, when charges were made in seventeen states that the agency had used funds to provide financial support for political candidates. In Tennessee, incumbent Governor Gordon Browning claimed that Crump-McKellar-backed candidates had used WPA workers to bring about his defeat in the Democratic primary. Subsequent congressional investigations revealed considerable WPA involvement in the primary as well as other irregularities. In 1939 Congress passed the Hatch Act, which prohibited federal employees from participating in national elections.

Political scandals and the onset of war reduced the support and need for WPA-type employment. Ongoing WPA projects continued until the agency was terminated on June 30, 1943. During its eight years in Tennessee, the WPA employed an average of 30,000 men and women per year. Besides providing desperately needed wages, WPA construction projects built lasting monuments, such as its series of Colonial Revival-style post offices across the state. Among its greatest contributions was a series of state guidebooks produced by the Federal Writers' Project, including *The WPA Guide to Tennessee*, an engaging chronicle of the state.

(The Tennessee Encyclopedia of History & Culture; Copy write 1998 by Tennessee Historical Society, Nashville, Tennessee.)

7. Photographs and maps.

Attach photographs and maps to application

Continuation sheets attached: ☐ yes ☐ no

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 – DESCRIPTION OF REHABILITATION

NPS Office Use Only

NRIS No:

NPS Office Use Only

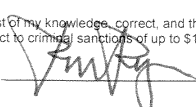
Project No:

Instructions: Read the instructions carefully before completing the applications. No certifications will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets. A copy of this form may be provided to the Internal Revenue Service. The decision by the National Park Service with respect to certification is made on the basis of the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings, and specifications), the application form shall take precedence.

1. **Name of Property:** Trolley Barns (WPA Garages)
Address of Property: Street 33 Peabody Street
City Nashville County Davidson State Tennessee Zip 37210-2125
☒ Listed individually in the National Register of Historic Places; give date of listing: _____
☐ Located in a Registered Historic District; specify: _____
Has a Part 1 Application (Evaluation of Significance) been submitted for this project? ☒ yes ☐ no
If yes, date Part 1 submitted: 9-29-2009 Date of certification: _____ NPS Project Number: 24504

2. **Data on building and rehabilitation project:**
Date building constructed: Circa 1940 Total number of housing units before rehabilitation: 0
Type of construction: Concrete, stone, brick, asphalt roof Number that are low-moderate income: _____
Use(s) before rehabilitation: Trolley Storage Barn Total number of housing units after rehabilitation: 0
Proposed use(s) after rehabilitation: Office/Business Number that are low-moderate income: _____
Estimated cost of rehabilitation: \$9,000,000.00 Floor area before rehabilitation: 90,000 SF
This application covers phase number 1 of 6 phases Floor area after rehabilitation: 90,000 SF
Project/phase start date (est.): February 2011 Completion date (est.): September 2011

3. **Project contact:**
Name Robert C.H. Mathews, III
Street 300 Broadway City Nashville
State Tennessee Zip 37201 Daytime Telephone Number 615-850-2701

4. **Owner:**
I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.
Name Phil Ryan Signature  Date 12-15-2010
Organization Metropolitan Development and Housing Agency
Social Security or Taxpayer Identification Number _____
Street 701 South Sixth Street City Nashville
State Tennessee Zip 37206 Daytime Telephone Number 615-252-8412

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application – Part 2" for the above-named property and has determined:

- ☐ that the rehabilitation described herein is consistent with the historic character of the property or the district in which it is located and that the project meets the Secretary of the Interior's "Standards for Rehabilitation." This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is completed.
- ☐ that the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's "Standards for Rehabilitation" if the attached conditions are met.
- ☐ that the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's "Standards for Rehabilitation." A copy of this form will be provided to the Internal Revenue Service.

Date

National Park Service Authorized Signature

National Park Service Office/Telephone No.

☐ See Attachments

TROLLEY BARN (WPA GARAGES)

Property Name

33 PEABODY STREET, NASHVILLE, TN
37210

Property Address

HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 2

NPS Office Use Only

Project Number:

5. DETAILED DESCRIPTION OF REHABILITATION / PRESERVATION WORK – Includes site work, new construction, alterations, etc. Complete blocks below

Number 1	Architectural feature <u>Exterior Steel Windows</u> Approximate Date of feature <u>1940</u>	Describe work and impact on existing feature: Existing windows will be repaired, repainted, and reglazed with clear glass. Missing muntins and other sash components will be replaced to match existing. Exterior protective steel grates will be removed. Brick sills to be repaired. New interior wood and glass storm sashes will be installed with fixed and operable components as needed. New tenant entry locations shall be installed as needed in former window openings. The sill location will be lowered and new steel window and door systems installed.
Describe existing feature and its condition: The original painted steel windows are built into the existing brick walls and are interior glazed. Many have missing muntins, broken glass, and portions of the steel frame that need repair. All of the existing windows are operable and are currently covered by a protective steel mesh guard or plywood. Brick rowlock sills are missing brick. Photo no. <u>4, 6A, 21, 40</u> Drawing no. <u>003, 004, 006, 007, 012, 014, 021</u>		
Number 2	Architectural feature <u>Exterior Steel Windows/Infill Location</u> Approximate Date of feature <u>c. 1970</u>	Describe work and impact on existing feature: Where an original window location existed and is now infilled with brick, the brick may be removed and a new steel window to match existing may be installed as required.
Describe existing feature and its condition: The location of an original steel window was infilled with brick. Photo no. <u>10, 29</u> Drawing no. _____		
Number 3	Architectural feature <u>Exterior Facade Wall</u> Approximate Date of feature <u>1940</u>	Describe work and impact on existing feature: Where the original brick facade wall exists, a new window will be installed as required. The new window will match adjacent existing windows.
Describe existing feature and its condition: A window is typically located within each column bay with the exception of several areas where one never existed. This is currently a blank brick wall at the end of each building. Photo no. <u>11, 12, 46, 47</u> Drawing no. _____		
Number 4	Architectural feature <u>Downspouts, Leader Boxes, and Cast Iron Boots</u> Approximate Date of feature <u>1940</u>	Describe work and impact on existing feature: Replace missing downspouts, leader boxes, and cast iron boots to match existing on each building.
Describe existing feature and its condition: Existing metal downspouts, leader heads and cast iron boots are located on all buildings. Downspouts, leader heads and boots are missing in some locations. Photo no. <u>13, 14, 42</u> Drawing no. <u>005</u>		

TROLLEY BARNS (WPA GARAGES)

NPS Office Use Only

Property Address

172

TROLLEY BARN (WPA GARAGES)

Property Name

33 PEABODY STREET, NASHVILLE, TN
37210

Property Address

HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 2

NPS Office Use Only

Project Number:

Number 9	Architectural feature <u>Non Original Man Door</u> Approximate Date of feature <u>c.1970</u>	Describe work and impact on existing feature: Replace all non original wood man doors to match the historic man doors on site. Remove plywood covering doors
Describe existing feature and its condition: Non original wood man doors are located in several places in the buildings. Some doors are covered in plywood. Photo no. <u>5, 24</u> Drawing no. _____		
Number 10	Architectural feature <u>Sloped Concrete Floor Slabs</u> Approximate Date of feature <u>1940</u>	Describe work and impact on existing feature: Replace existing sloped concrete floor slabs with new level concrete floor slabs.
Describe existing feature and its condition: Existing concrete floor slabs slope in 2 directions for drainage. Concrete is in fair condition. Photo no. <u>12A</u> Drawing no. _____		
Number 11	Architectural feature <u>Interior Brick Partitions</u> Approximate Date of feature <u>1940</u>	Describe work and impact on existing feature: Remove non original CMU and gypsum board walls as needed. Brick partitions and their finish type shall remain exposed. Openings in existing brick walls shall be closed (infilled with brick) or opened as needed.
Describe existing feature and its condition: Interior brick partitions are located in each building and are in good condition. Finish type of existing brick walls shall remain. Photo no. <u>6E, 25A</u> Drawing no. _____		
Number 12	Architectural feature <u>Exterior Lighting</u> Approximate Date of feature <u>1940</u>	Describe work and impact on existing feature: Install new exterior industrial light fixtures to match existing at all locations where missing or replaced.
Describe existing feature and its condition: Existing cylindrical industrial light fixtures are located on all buildings. The existing fixtures are in fair condition but many are missing or replaced with non-original design. Photo no. <u>25B</u> Drawing no. <u>018</u>		

HISTORIC PRESERVATION

TROLLEY BARN (WPA GARAGES)

Property Name
33 PEABODY STREET, NASHVILLE, TN
37210

Property Address

CERTIFICATION APPLICATION –
PART 2

NPS Office Use Only

Project Number:

Number 13	Architectural feature <u>Bead Board Ceiling</u> Approximate Date of feature <u>1940</u> Describe existing feature and its condition: Existing original painted bead board ceilings at exterior covered area (at main garage door entrance) are in fair condition Photo no. <u>5A</u> Drawing no. _____	Describe work and impact on existing feature: Existing original bead board ceilings will be repainted and remain exposed at the exterior covered areas.
Number 14	Architectural feature <u>Infilled Door Location</u> Approximate Date of feature <u>c.1970</u> Describe existing feature and its condition: A door was previously located in this area. It was filled in with brick at a later date. Photo no. <u>6B</u> Drawing no. <u>013</u>	Describe work and impact on existing feature: The brick will be removed and the original door location will be opened. A new door to match the historic door will be installed.
Number 15	Architectural feature <u>Steel Trusses</u> Approximate Date of feature <u>1940</u> Describe existing feature and its condition: Existing Steel trusses form the main piece of the building roof structure. The original trusses are in good condition. Photo no. <u>12B</u> Drawing no. _____	Describe work and impact on existing feature: Existing roof trusses will remain and shall remain exposed to view as much as possible.
Number 16	Architectural feature <u>Exterior Façade Modifications</u> Approximate Date of feature <u>c. 1970</u> Describe existing feature and its condition: In several locations, non original openings were cut into the brick façade for doors or mechanical equipment. An original pilaster has been cut for a door. Photo no. <u>3_25</u> Drawing no. <u>016</u>	Describe work and impact on existing feature: Remove non original door openings in brick façade and pilasters and infill with brick.

HISTORIC PRESERVATION

TROLLEY BARN (WPA GARAGES)

Property Name
33 PEABODY STREET, NASHVILLE, TN
37210

Property Address

CERTIFICATION APPLICATION –

PART 2

NPS Office Use Only

Project Number: _____

<p>Number 17</p>	<p>Architectural feature <u>Wood Ramps and Flooring</u></p> <p>Approximate Date of feature <u>1940</u></p>	<p>Describe work and impact on existing feature:</p> <p>The wood ramp and flooring systems will be removed to accommodate use of this space. The poured concrete wall will be lowered for installation of a new floor system to match the floor level of the remainder of the building.</p>
<p>Describe existing feature and its condition:</p> <p>Wood ramps and flooring systems are located in the rear portion Building 5. They are in poor to fair condition. The raised flooring system is supported by a poured concrete wall.</p> <p>Photo no. <u>6C, 6D</u> Drawing no. _____</p>		
<p>Number 18</p>	<p>Architectural feature <u>Exterior Building Façade</u></p> <p>Approximate Date of feature <u>1940</u></p>	<p>Describe work and impact on existing feature:</p> <p>Remove CMU at infill locations. Install either new door or window to match existing historic door or window. Remove all unused cabling, wiring, and attachments from the exterior façade. Remove metal louvers and replace steel window.</p>
<p>Describe existing feature and its condition:</p> <p>In several locations, original window or door locations have been infilled with CMU over time. Wiring and cables have been attached to the façade that are no longer in use. Metal louvers have been installed in former window locations.</p> <p>Photo no. <u>2, 6, 8, 9, 20, 41</u> Drawing no. _____</p>		
<p>Number 19</p>	<p>Architectural feature _____</p> <p>Approximate Date of feature _____</p>	<p>Describe work and impact on existing feature:</p>
<p>Describe existing feature and its condition:</p> <p>Photo no. _____ Drawing no. _____</p>		
<p>Number 20</p>	<p>Architectural feature _____</p> <p>Approximate Date of feature _____</p>	<p>Describe work and impact on existing feature:</p>
<p>Describe existing feature and its condition:</p> <p>Photo no. _____ Drawing no. _____</p>		

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

Historic Preservation Certification Application
State Historic Preservation Office Review & Recommendation Sheet
Rehabilitation—Part 2/Part 3

Project Number: 24504

Number 1	Trolley Barns (Property) 33 Peabody Street (Property) Nashville, Tennessee	<input type="checkbox"/> Preliminary done
		<input type="checkbox"/> Non-standard billing
Certified Historic Structure? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> pending		
Type of Request: <input checked="" type="checkbox"/> Part 2 <input type="checkbox"/> Part 3 (Part 2 previously reviewed) <input type="checkbox"/> Part 3 (Part 2 not previously reviewed) <input type="checkbox"/> Amendment		
Date application received by State <u>12/15/2010</u> Date(s) additional information requested by State _____, _____, _____ Complete information received by State <u>12/15/2010</u> Date transmitted to NPS <u>12/28/2010</u> Property visit by State staff <u>06/22/2010</u> (before) (during) (after) rehab.		
<div style="border: 1px solid black; padding: 5px;"><p style="text-align: center;">PROJECT SUMMARY REVIEW</p><p><input checked="" type="checkbox"/> Fully reviewed by SHPO</p><p><input checked="" type="checkbox"/> No outstanding concerns</p><p><input checked="" type="checkbox"/> Owner informed of SHPO recommendation</p><p><input type="checkbox"/> In-depth NPS review requested</p></div>		

Number 2	STATE RECOMMENDATION:
	<p>Louis Jackson, Richard Tune who meet the Secretary of the Interior's Professional Qualification Standards, have reviewed this application.</p> <p>The project: <input checked="" type="checkbox"/> meets the Standards. <input type="checkbox"/> meets the Standards <i>only</i> if the attached conditions are met. <input type="checkbox"/> does not meet Standard number(s) _____ for the reasons listed on reverse. <input type="checkbox"/> warrants denial for lack of information. <input type="checkbox"/> This application is being forwarded without recommendation.</p> <p>For completed work previously reviewed, check as appropriate: <input type="checkbox"/> completed rehabilitation conforms to work previously approved. <input type="checkbox"/> completed rehabilitation differs substantively from work previously approved (describe divergences from Part 2 application on reverse).</p>

12/23/10 E. Patrick Hartz
Date State Official Signature Deputy SHPO

This is a review sheet only and does not constitute an official certification rehabilitation.

Number 3	ISSUES:	
	<input type="checkbox"/> Additions, including rooftop	<input type="checkbox"/> Alteration of significant exterior features or surfaces
	<input type="checkbox"/> Alteration, removal, or covering of significant interior finishes or features	<input type="checkbox"/> Adjacent new construction, extensive site work, or demolition of adjacent structures
	<input type="checkbox"/> Changes in significant interior spaces or plan features (including circulation patterns).	<input type="checkbox"/> Window replacements on any major elevation that do not match historic configuration, material, and profiles
	<input type="checkbox"/> Damaging or inadequately specified masonry treatments	<input type="checkbox"/> Other (explain)

Number 4	Basis for Recommendation. Focus on how the issues checked in NUMBER 3 are being addressed. Where denial is recommended, explain fully. Comment on noteworthy aspects of the project, including any technical or design innovations, or creative solutions.
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STATE EVALUATION OF PROJECT & CONCERNS:

This is phase 1 of a 6 phase project involving 6 buildings. This application covers the exterior rehabilitation and partial demolition and floor leveling of the interior.

We recommend approval

INNOVATIVE SOLUTIONS/NOTEWORTHY ASPECTS:

☐ new technical process ☐ creative design solution ☐ noteworthy project

☐ See attachments: ☐ plans ☐ specifications ☐ photographs ☐ other:
☐ Items sent separately: ☐ plans ☐ specifications ☐ photographs ☐ other:
☐ Other documentation on file in State:

NPS COMMENTS:

APPENDIX G:
GRANBY COTTON MILL HISTORIC PRESERVATION CERTIFICATION APPLICATION

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 - DESCRIPTION OF REHABILITATION

NPS AUG 26 2004

SO DCM

NPS Office Use Only
NRIS No.

NPS Office Use Only
Project No.

15633

Instructions: Read the instructions carefully before completing this application. Information will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets. A copy of this form may be provided to the Internal Revenue Service. The decision by the National Park Service with respect to certification is made on the basis of the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings, and specifications), the application form shall take precedence.

A H # 2004020

1. Name of Property: Granby Cotton Mill
Address of Property: Street 340 Heyward Street
City Columbia County Richland State SC Zip 29201
☐ Listed individually in the National Register of Historic Places; give date of listing: _____
☒ Located in a Registered Historic District; specify: Granby Historic District
Has a Part 1 Application (Evaluation of Significance) been submitted for this project? ☒ yes ☐ no
If yes, date Part 1 submitted: 8/5/1999 Date of certification: 10/13/1999 NPS Project Number: 4865

2. Data on building and rehabilitation project:
Date building constructed: 1897 Total number of housing units before rehabilitation: 0
Type of construction: Masonry Number that are low-moderate income: 0
Use(s) before rehabilitation: Industrial Total number of housing units after rehabilitation: 146
Proposed use(s) after rehabilitation: Residential Number that are low-moderate income: 0
Estimated cost of rehabilitation: \$22 million Floor area before rehabilitation: 252,000
This application covers phase number 1 of 1 phases Floor area after rehabilitation: 330,000
Project/phase start date (est.): 3/04 Completion date (est.): 5/05

3. Project contact:
Name Patrick Hauck, Powers & Co., Inc.
Street 211 N. 13th Street, Suite 500 City Philadelphia
State PA Zip 19107 Daytime Telephone Number 215.636.0192

4. Owner:
I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.
Name Greg Webster Signature [Signature] Date 8/24/04
Organization O G Mills Building Owner, LLC
Social Security or Taxpayer Identification Number [Redacted]
Street 1411 Walnut Street City Philadelphia
State PA Zip 19102 Daytime Telephone Number 215.247.0200

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application - Part 2" for the above-named property and has determined:

- ☐ that the rehabilitation described herein is consistent with the historic character of the property or the district in which it is located and that the project meets the Secretary of the Interior's "Standards for Rehabilitation." This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is completed.
- ☒ that the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's "Standards for Rehabilitation" if the attached conditions are met
- ☐ that the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's "Standards for Rehabilitation." A copy of this form will be provided to the Internal Revenue Service.

Date 3/17/05 Antonio Aguilar HPS/TPS
National Park Service Authorized Signature National Park Service Office/Telephone No.
202-354 2032

☐ See Attachments

HISTORIC PRESERVATION
CERTIFICATION APPLICATION - PART 2

need
11-1-04.

Granby Cotton Mill
Property Name
340 Heyward Street, Columbia SC
Property Address

Granby Mill is a four-story, brick industrial building constructed in 1897 that symbolizes the textile industry's development in South Carolina in the late 19th and early 20th century. The exterior is organized in vertical bays, with two 5-story towers at the north façade. Significant additions and alterations to the original main mill building have occurred over the years including the following:

- East Processing Wing Addition (four-story, seven-bay) c.1900 and the East Processing Wing Addition (four-story, five-bay) c.1910. These additions continue the rhythm and fenestration and materials of the original mill structure with brick construction, large arched window openings and the same multi-light windows. Attached to this addition are two non-historic modern appendages: a) a one-story, shed roof, concrete block addition at the east end and b) an open frame, shed roofed loading dock at the south elevation.
- Connector (four-story, two-bay) c. 1910 addition to the east end of the main mill that connects the original mill to the East Wing and was built over the top of the original loading bay and dock area.
- Air Conditioning and Filtration Addition - A four-story, sixteen-bay concrete and brick infill addition spanning the middle bays of the south elevation of the main mill between the two original rear stair towers, c.1958.
- Building #2 (Receiving and Weighing), a modern one-story addition with metal loading docks attached at the north elevation, c.1960.
- Gatehouse - a small, one-story, free standing brick structure on Heyward Street, c.1941.

Besides these additions to the original main mill structure, the alteration that most impacted the character of this historic resource occurred when the air conditioning and filtration system was installed throughout the mill in the late 1950's. With the introduction of this new system all of the multi-paned wood sash windows, jambs and entries were removed and infilled with masonry. Even with this significant loss of fabric and major visual change, the mill's mass and rhythmic structural integrity remains intact.

1. Site

Adjacent to the city of Columbia, the rectangular site is in unincorporated Richland County, bounded by Heyward Street, Williams Street, the Olympia Mill property, and to the rear by undeveloped land with an adjacent rock and gravel quarry. The main mill is set back from Heyward Street, with historic wings to the east and a modern loading area facing Heyward Street.

The key character-defining element of the Granby Mill site is its distinctive 19th century monumental industrial presence within the Columbia urban area. The mill's rhythmic massive brick walls and stair towers rise abruptly from its principally un-landscaped open surroundings. The historic adjacent office building across Heyward Street and the cleared lots and large parking areas help identify this as a former industrial complex. The context is enhanced by the adjacent and even more imposing Olympia Mill site begun in 1899, which also parallels Heyward Street. The common fencing, sidewalk, gatehouses and setbacks strengthen this association of the structure's principal facades. Granby's cohesive and architecturally distinct village of "saltbox" houses is visually separated from the mill by an early railroad spur running diagonally across the Granby Historic District.

The rear area of the property along the southern elevation of the main building is cleared unimproved space containing the foundations of some former additions that were removed by a previous owner. On its southern border the overall site topography falls to the Congaree River and adjacent rock quarry.

Photograph(s): 1-5, 7, 8

Drawings: C1.1, AS1.0

HISTORIC PRESERVATION
CERTIFICATION APPLICATION - PART 2

Granby Cotton Mill
Property Name
340 Heyward Street, Columbia SC
Property Address

Impact of Proposed Work:

The existing main mill building and its historic additions will be retained. The existing trees and other landscaping elements along Heyward Street will be retained. Existing foundation planting beds will be retained and may be extended in areas along the façade. The fence line along Heyward Street will be removed. The gatehouse will be retained and preserved. The existing driveway between Granby Mill and Olympia Mill will be improved and resurfaced and will provide access to a new parking area behind the south elevation of the main mill building.

The modern 1-story addition with metal loading dock projecting from the main façade's four-story connector will be removed.

The steel overhead conveyor belt that connects the Granby Mill to the Olympia Mill will be retained and preserved.

The cleared space behind the southern elevation will be landscaped and improved. A 288 space parking area will be incorporated into the landscape and recreation facilities will be constructed to the southeast of the parking area. The new facilities include a one-story outdoor recreation building, tennis and basketball courts, and a swimming pool (Note: Pool is scheduled in Phase 2 of the development). All of these features will have little impact on the historic character of the site since their location is below and behind the mill, away from its adjacent historic village. All new construction is designed with modern details compatible with the existing vocabulary of the historic resource.

2. Brick

Description:

The exterior of Granby Mill is laid in monochromatic red brick with simple ornamentation. A narrow brick corbelled cornice remains. All of the segmental arched window openings have been infilled with masonry. The upper (fifth) levels of the two towers have round-headed openings flanked by oculus windows, a belt course, and modillions along the upper cornice. A brick cornice separates this area from the fourth level of each tower.

The Air Conditioning and Filtration Addition at the south elevation of the c.1958 is a poured-in-place reinforced concrete frame with buttresses, girts, poured deck and column system with areas with brick spandrel panels.

In general the masonry is in overall good condition. The masonry shows limited areas of deterioration and few structural cracks. Due to the massive foundations and brick and concrete buttresses the structural integrity is intact. The brick at the lower level shows some signs of rising damp and mortar deterioration, particularly at the west end. In some areas entire brick units are missing. 90% of the original stone sills have been removed throughout. When the door and window units were removed c.1958, a considerable damage occurred at the masonry which was generally repaired with a poor quality repair.

A 4-story, 2-bay addition is located near the east end of the main mill and connects the original mill to the East Processing wing. The masonry on the north elevation of this portion of the mill remains intact. The facing of the southern elevation of the Connector Wing was removed and boarded over by previous owners and covered with aluminum siding who demolished an addition that once extended from this elevation.

Photograph(s): 1-14

Drawing(s): N/A

Impact of Proposed Work:

The brickwork will be cleaned to remove the accumulations of soot, fly ash, carbon deposits, etc. and areas of localized staining. Prior to proceeding with any cleaning, test panels will be completed to determine the appropriate

HISTORIC PRESERVATION
CERTIFICATION APPLICATION - PART 2

Granby Cotton Mill
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dilution ratio, the length of dwell time and the number of applications, etc. The cleaning process will not cause damage to any historic materials.

The two methods proposed for field testing are: a mild detergent cleaning ("Ion 417X," manufactured by Chemique) and a commercially available chemical cleaner ("Sure Klean Restoration Cleaner" manufactured by ProSoCo). The method that is determined to be the most effective and gentlest will be used for the cleaning. The manufacturers' recommended procedures will be followed. The cleaning will be followed by a cold pressure washing, not to exceed 600 psi and 4 to 5 gpm with a fan tip nozzle.

Inappropriate paint and graffiti will be removed using an alkali-based thixotropic paint stripper, such as "Heavy Duty Paint Stripper" manufactured by ProSoCo, Inc. The manufacturers' recommended procedures should be followed. The stripper will be washed off and flushed from the surface with a cold water pressure spray NTE 600 psi and 4-5 gpm using a fan tip spray. When all paint has been removed, a neutralizer, such as "Sure Klean Limestone & Masonry Afterwash," manufactured by ProSoCo, Inc., will be applied.

In those locations where the mortar is eroded, the mortar joints will be spot pointed as needed with a matching mortar in the proportion of 1 part Portland (ASTM C-150, Type II, white non-staining) 3 parts Lime (ASTM C-207, Type S, Hydrated) and 9 parts Sand (ASTM C-144). The new mortar will match the color, texture, composition and joint profile of the original mortar.

The brick spandrels panels in The Air Conditioning and Filtration Addition at the south elevation will be removed (See item #6)

There will also be a change in the exterior appearance of the south elevation of the Connector, now covered with aluminum and/or asbestos siding. The existing finish will be removed and new windows installed to accommodate the new use of the space. New operable wood shutters will be installed within the heavy reinforced concrete frame. (See item #5).

3. Windows

Description:

The original wood windows were removed and the openings infilled when air-conditioning and filtration systems were installed c. 1958. The entire wooden jamb and sash systems were removed as were many of the masonry sills. Roughly 90% of the former window openings are missing sills.

The openings were infilled with cement block and insulation, and faced on the exterior with a common red brick. Some of the windows at the south wall were reworked as doorways into the rear addition, and some windows facing the connector were made into passage openings. A few interior facing windows were infilled with modern steel sash windows with wire glass; however the majority of the window openings were infilled with masonry.

As seen in the pre-1958 view, the heavy mullion wood windows were a key character-defining element of the structure, as important as the brick work and vertical towers. They defined the voids between the masonry piers or buttresses. Their removal and loss of fabric compromised the architectural clarity of the 19th century building's visual character.

There are a variety of openings and reworked openings on the south elevation of the rear addition on the southern elevation, with remnants of modified industrial metal sash and the predominant systems of glass-block infill and metal louvered panels.

HISTORIC PRESERVATION
CERTIFICATION APPLICATION - PART 2

Granby Cotton Mill
Property Name
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Photograph(s): 1-12, 14, 28

Drawing(s): A2.0, DSK-AW-1-11 and DSK-AW-14

Impact of Proposed Work:

Fortunately one original wooden window system was found on the interior of the building prior to the commencement of the rehabilitation. This window was fully documented by the architects and matched in creating a new window to be installed in the complex. The brick and block window infill from the 1950's will be removed and the masonry jambs and sills repaired or replaced in kind, as needed. **New wood sash and frames designed to match the remaining original windows in material, configuration, operation, profile and dimensions,** will be installed throughout the building, with the exception of the south elevation of the rear addition (See item #5) and the connector wing (See Item #6) .

On the south elevation of the Air Conditioning and Filtration Addition the random infill systems which fill the cast concrete frame will be removed. Within these openings operable wood shutters will be installed within the heavy reinforced concrete frame (See Item #6)

The three bays on the upper floors on the three-bay Connector Wing will feature new wooden six-light, operable wood windows with a fixed window below. These windows will have the same profile as the rest of the new windows being installed throughout the complex but will be clearly distinguishable from these windows by virtue of their different configuration.

The original southern elevation of the mill is intact behind the Air Conditioning and Filtration Addition will be and will be retained and preserved. New wood windows, designed to match the remaining original windows in style, profile and dimension, will be installed.

4. Entrances/Doors

Description:

The original doors at the main arched openings in the base each of the stair towers on the north elevation have been replaced with modern, double-leaf, single-light aluminum doors.

Photograph(s): 4, 6 and 19

Drawing(s): A2.0, DSK-AW-12-13, DSK-AW-14

Impact of Proposed Work:

The non-historic metal double doors at the tower entries on the north elevation will be removed and replaced with **more historically accurate paneled wood and glass doors with divided light transoms.**

A new main entrance will be introduced at the southern elevation of the Connector Wing. This entrance will lead directly to the new lobby for the residential development. The entrance will feature three sets of glazed, wooden, double doors with transoms. The entrance will be protected and demarcated by a projecting **metal entrance canopy.** (See item # 5).

5. CONNECTOR WING

Description:

The Connector wing is a 4-story, 2-bay addition is located near the east end of the main mill that connects the original mill to the East Processing wing. The north elevation of this wing originally featured fenestration matching that of the main mill. As with the rest of the building, the original wood windows were removed and openings infilled when air-conditioning and filtration systems installed. The facing of the southern elevation of the Connector Wing was removed and boarded over by previous owners who demolished an addition that was attached to the mill and extended from this elevation.

HISTORIC PRESERVATION
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Impact of Proposed Work: At the north elevation of the Connector Wing the brick and block window infill will be removed and the masonry jambs and sills repaired or replaced in kind, as needed. New wood windows designed to match the remaining original windows in style, profile and dimension, will be installed.

At the southern elevation of the Connector Wing, the principal entrance to the main lobby will be created at the first level. This entrance will feature three sets fully glazed, wooden, double doors with transoms. The entrance will be protected and demarcated by a projecting metal entrance canopy. The three bays on the upper floors will feature new contemporary 6-light, operable wood windows with a fixed window below. The southern elevation of this wing will read as a compatible contemporary addition to the south elevation.

6. Rear Addition

Description:

The Rear Addition is a full-height, 16-bay wide rear addition, two bays deep, was constructed c.1958 between the existing rear service towers to house air filtration, air-conditioning, and electric systems. The addition is a poured-in-place reinforce concrete frame with buttresses, girts, poured deck and column system with brick spandrel panels. There are a variety of openings and reworked openings, with industrial metal sash, glass-block infill, or metal louvered panels.

Photograph(s): 12, 14

Drawing(s): A2.0

Impact of Proposed Work: The space will utilized as shared common space. The major change will be the removal of most of the brick spandrel panels which infill the cast concrete frame. Reopening these original window openings and the installation of operable wood shutters within the heavy reinforced concrete frame will change the exterior appearance of the non-historic infill. It will read as a compatible contemporary addition to the south elevation. The change will not result in any loss of historic fabric. The original southern elevation of the mill that is located beyond the additions will be retained and preserved and new wood windows designed to match the remaining original windows in style, profile and dimension, will be installed.

7. Roof

Description:

The main mill building, wings and extensions have a mix of modified bitumen and single membrane insulated roof decks, mostly coated with a light silver color for heat reflection. Large enclosed HVAC ducts and part of the air filtration system have been housed in rooftop additions over the years.

Photograph(s): N/A

Drawing(s): N/A

Impact of Proposed Work:

Roofing in general will be replaced as necessary with material matching the existing finishes. The large enclosed rooftop HVAC duct and air filtration additions will be removed. The project will not introduce large cooling towers or additions to the roof. Additional small scale mechanical equipment will be located on the main roof but will be set back from the roof edge as much as possible thus minimizing their visibility.

8. Interior Floor Plan and Features

The interior of Granby Mill is open in plan with an exposed wood post and beam structural system of longleaf pine. The massive regularly spaced wood columns that visually identify the structural bays of the mill are major character

HISTORIC PRESERVATION
CERTIFICATION APPLICATION - PART 2

Granby Cotton Mill
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defining features. Tongue-and-groove heavy plank decking runs above the beams and is finished at levels 2-4 with a layer of narrow rock maple strip flooring. At the basements and first level there are poured concrete floors.

The exterior perimeter walls and exposed beam ceilings are generally painted brick with masonry openings that have been infilled with exposed brick or block. Several arched openings that provide access to service areas (restrooms and break rooms) remain open, but the majority has been infilled with wood or masonry materials. All the mechanical, electrical and sprinkler systems are exposed.

An office with modern finishes was constructed along the north wall of the main mills second floor and at the first level of the east addition. Some office spaces were also created in rear service towers and the connector.

Despite heavy industrial use and a period of abandonment the majority of the interiors are in sound and fair condition.

Photograph(s): 16, 17, 20, 21, 23-27, 29, 30, 33-35, 39, 42 and 43 Drawing(s): AE.1.1, AE1.2, A1.0,
A1.1, A1.2, A1.3, A1.4

Impact of Proposed Work:

In the proposed rehabilitation, all existing modern framing, offices, restrooms and all of the existing mechanical, plumbing and electrical will be removed. The main mill, connector, east wing and east wing addition will be rehabilitated into 142 apartments. On each floor, a central, double-loaded corridor will be created along the east-west axis of the building behind the column bay thus leaving these columns fully exposed. Within these large corridors, common rooms will be created for the enjoyment of the tenants. Any walls created within the common rooms will be only eight feet high and thus will not interrupt the volume of the space. With the slightly irregular placement and alignment of the connector, east wing and addition, there will be substantial variation in the apartment plans. The important considerations in laying out the apartments are to retain the rhythm of the column lines and exterior window openings, and to use the full height of the exterior windows within a single unit. The units will incorporate the full height of each floor in the main living area and lofts will be created in the rear to utilize the vertical space that is available.

9. Vertical Circulation

Exterior access to and circulation among all four levels of the Main Mill and its Wing and additions were provided through the intact bead and board wood main stair towers and through the westernmost rear service tower. The rear service tower has a modern pan steel stair with pipe rails. Modern fire and sprinkler standpipes are run exposed. At the fifth level the treads and risers are split and deteriorated.

A one-story stair in very poor condition connects the basement and first floor within the East Addition. There is also a four-story exterior fire escape at the south elevation of the Addition.

The main circulation for mill use was through freight elevators, one in the western rear service tower and one in the East Wing. Both have been replaced with modern elevator systems.

Photograph(s): 11-14, 18, 31, 32, 36, 38, 40 and 41 Drawing(s): AE.1.1, AE1.2, A1.0,
A1.1, A1.2, A1.3, A1.4

Impact of Proposed Work:

The main stair towers and the westernmost rear service tower will be retained and preserved. A fire rated door will be installed at the stair entry and the stairs will be fully sprinklered. All deterioration of the treads and risers at the fifth level of the towers will be repaired.

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The one-story stair connecting the basement and first floor within the East Addition will be removed.

The four-story exterior fire escape at the south elevation of the Addition will be retained and preserved.

The existing modern elevator systems located in the western rear service tower the East Wing will be retained, upgraded and reused.

8. Ceiling Finishes

Ceilings at all levels of the Main Mill are painted exposed heavy timber beams with heavy wood planking. There are many areas where wood beams are sistered or replaced with steel. Some areas have cable and steel trusses to span a structural bay or bays.

Photograph(s): 16, 17, 20, 21, 26, 27, 29, 30, 33-35, 39, 42, 43

Drawing(s): N/A

Impact of Proposed Work:

In the proposed rehabilitation the heavy timber framing will be retained, repainted and remain exposed. The underside of the floor decks on floors one through four will be infilled with metal framing and gypsum board for sound insulation while all of the structural elements will remain exposed.

9. Posts/Columns

Rows of painted wood and metal columns support wood beams. The Main Mill originally featured five rows of 32 posts running the length of the building. The posts, like the walls and ceilings are painted. A cast iron collar plinth and simple iron or steel capital appear at most of the column locations. At a few locations simple Doric cast iron capitals appear.

Photograph(s): 16, 17, 20, 21, 24-27, 29, 30, 33-35, 39

Drawing(s): AE.1.1, AE1.2, A1.0,
A1.1, A1.2, A1.3, A1.4

Impact of Proposed Work:

In the proposed rehabilitation, the posts and columns will remain exposed and painted where ever possible and will be incorporated into the design and configuration of the residential units.

10. Interior Wall Finishes

Wall finishes include painted brick at the exterior perimeter walls and along the major north-south partition walls.

Photograph(s): 18-32, 36-43

Drawing(s): N/A

Impact of Proposed Work:

In the proposed rehabilitation, the painted brick at the exterior walls within the apartment units will be finished out with metal framing and gypsum board to make the units energy efficient and to contain wiring and other utilities as required. All other walls within the units will also feature new drywall finished walls. The perimeter brick walls within the public spaces will remain exposed and will be repainted.

11. Flooring

The first floor level floors are poured concrete. Flooring throughout the mill on the other levels is rock maple over heavy wood decking. There are varying degrees of damage from machinery and oil, floors have been painted in places and is some locations concrete pads have been poured on top of flooring. Many floors have vents or chase

HISTORIC PRESERVATION
CERTIFICATION APPLICATION - PART 2

Granby Cotton Mill
Property Name
340 Heyward Street, Columbia SC
Property Address

penetrations. In addition, extensive areas of the 4th floor maple flooring show areas of water damage. In the rear HVAC addition and most of the service areas the existing floors are poured concrete.

Photograph(s): 16-27, 29-31, 33-36, 39-43

Drawing(s): N/A

Impact of Proposed Work:

In the proposed rehabilitation, all of the wood floors will be retained and remain exposed in both the public and private spaces (except for kitchens and bathrooms which will be ceramic tile). In-kind repairs will be made as needed and the floors will be refinished. All of the concrete floors will be carpeted and tiled to accommodate the residential use.

12. Gatehouse

The brick gatehouse is a three-part composition: two square offices with hipped roofs linked by a gable- roofed open breezeway. It is a prominent feature along the main public north side of the mill. Its brickwork and materials date the gatehouse to 1930-1950. It was probably constructed about the time that Pacific Mills sold the houses in the village, ca. 1941. Wood casement windows and beaded board ceilings remain. The gatehouse is in fair condition with most glazing and woodwork in a deteriorated state.

Photograph(s): 2, 15

Drawing(s): N/A

Impact of Proposed Work:

In the proposed rehabilitation, the gatehouse will be retained and preserved. The brick will be cleaned as necessary using appropriate methods and materials (See: Brick, Item #2). The existing windows and doors will be retained and repaired as required. The roof will be repaired in kind.

13. Fire Escape

An iron fire escape is located at the southern elevation of the East Processing Wing.

Photograph(s): 11,12, 13

Drawing(s): A2.0

Impact of Proposed Work:

The historic iron fire escape will be retained and preserved.

14. Additions to the East Processing Wing

Two non-contributing appendages are attached to the East processing wing. These are a modern, one-story, shed roof, concrete block addition at the east end and an open frame, shed roofed loading dock at the south elevation.

Photograph(s): 8, 10, 11, 12 and 14

Drawing(s): N/A

Impact of Proposed Work:

The non-contributing appendages attached to the East processing wing will be demolished.

APPENDIX H:
MONAGHAN MILL HISTORIC PRESERVATION CERTIFICATION APPLICATION

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 1 - EVALUATION OF SIGNIFICANCE

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NPS Office Use Only

NRIS No:

NPS Office Use Only NOV 01 2004

Project No:

SC Department of

Archives & History

44H 2005-005

Instructions: Read the instructions carefully before completing application. No certifications will be made unless a completed application is received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets.

1. Name of Property: Monaghan Mill
Address of Property: Street 201 Smythe St
City Greenville County Greenville State SC Zip 29611
Name of historic district: n/a
☐ National Register district ☐ certified state or local district ☒ potential district

2. Check nature of request:
☐ certification that the building contributes to the significance of the above-named historic district (or National Register property) for the purpose of rehabilitation.
☐ certification that the structure or building, and where appropriate, the land area on which such structure or building is located contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes
☐ certification that the building does not contribute to the significance of the above-named historic district.
☒ preliminary determination for individual listing in the National Register.
☐ preliminary determination that a building located within a potential historic district contributes to the significance of the district.
☐ preliminary determination that a building outside the period or area of significance contributes to the significance of the district.

3. Project contact:
Name Mark Harris
Street 201 Smythe St City Greenville
State sc Zip 29611 Daytime Telephone Number 229-344-7279

4. Owner:
I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.
Name Mark Harris Signature [Signature] Date 10-20-04
Organization Monaghan Mill, LLC
Social Security or Taxpayer Identification Number [Redacted]
Street 201 Smythe St City Greenville
State SC Zip 29611 Daytime Telephone Number 864-232-0850

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application - Part 1" for the above-named property and hereby determines that the property:

- ☐ contributes to the significance of the above-named district (or National Register property) and is a "certified historic structure" for the purpose of rehabilitation.
☐ contributes to the significance of the above-named district and is a "certified historic structure" for a charitable contribution for conservation purposes in accordance with the Tax Treatment Extension Act of 1980.
☐ does not contribute to the significance of the above-named district.

Preliminary determinations:

- ☐ appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 CFR Part 60.
☐ does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.
☐ appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer.
☐ appears to contribute to the significance of a registered historic district but is outside the period or area of significance as documented in the National Register nomination or district documentation on file with the NPS.
☐ does not appear to qualify as a certified historic structure.

Date

National Park Service Authorized Signature

National Park Service Office/Telephone No.

☐ See Attachments

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 1**

Monaghan Mill
Property Name

201 Smythe St Greenville, SC 29611
Property Address

NPS Office Use Only
Project Number:

5. Description of physical appearance: The site and building are part of the Monaghan Mill Community. The building is surrounded by 726 original "mill village" homes dating back to the early 1900's. The mill was designed by the Lockwood Greene and Company Architectural Firm. The building is constructed of a brick veneer exterior on a combination slab and crawl space. The structural shell of the building is constructed with a combination of heart pine columns, beams, and flooring. There are several additions to the building that occurred in the mid 1900's as there were needs for modern expansions to accommodate new equipment. These areas were built out of steel beams, concrete slabs, and C.M.U. construction. The building has unique architectural details throughout consisting of arched windows, detailed cornice and brackets, smoke stack, courtyard, boiler rooms, industrial mill dorrs, and exterior "L" bracket bracing. Over 95% of the building is historic with very few modern obstructions. Those which are modern were built in the 1940's. The size of the building is 456,000 square feet. It is a four story structure with a split level basement. The basement contains most of the plant's original plant maintenance equipment. The building has three freight elevators that service 5 floors. The roof is a flat build up E.P.D.M. rubber roof that is approximately 8-10 years old. The site has original landscaping complimented by an architectural wrought iron fence bordering the perimeter of the property. There is a water tower currently supplying the mill with water for the fire suppression system from its onsite pond.

Date of Construction: 1900 Source of Date: Monaghan Centennial Celebration

Date(s) of Alteration(s): 1940's

Has building been moved? ☐ yes ☒ no If so, when? _____

6. Statement of significance: During the 1890's, several textile plants were built in the Greenville area. On the outside, the plant is a four-story landmark of the beginning of the 20th century. With the financial support of their grandfather, Lewis and Thomas Parker established the new plant along the Reedy River, just west of downtown Greenville, and named it for their grandfather's native Irish county, Monaghan. The plant manufactured print cloths, fancy dress goods, shirting and shade cloth. In 1907, there were over 500 employees with about 1,600 people living in the village's then 210 houses. Thomas Parker became nationally known for the industrial employee programs instituted at Monaghan. In 1904, Parker built at Monaghan, on land given by his mother, the first industrial YMCA in the south. His programs for the uplifting of the intellectual, spiritual and physical well being of the community was widely recognized and provided a pattern which was copied throughout the South. Parker hired Lawrence Peter Hollis, who headed the student YMCA at the University of South Carolina as assistant director of the YMCA. "Pete" Hollis became director of the YMCA a few months later. He introduced basketball, soccer, and the Boy Scouts. He not only built a baseball field and gymnasium, he organized the first Boy Scout Troop in South Carolina. Pete Hollis became a legend to the textile belt people of not only Monaghan but for all the 14 mill communities in the Parker District. As the 20th century began to wind down, many changes were in store for Monaghan. As more and more foreign cloth came to the US, textile companies, in order to compete with low wage countries, had to modernize their mills in order to increase productivity. This trend led to running Monaghan with fewer employees. Since there was less opportunity for work at Monaghan, young people were looking elsewhere as Greenville's economy diversified away from textiles. People moved out of the village and either sold or rented to people not connected with the mill. Many mill houses became run-down, were vacant or abandoned. Monaghan reached its 100th birthday, a major milestone, and one not easily achieved in the textile manufacturing. It was a result of many generations of outstanding people working together to meet consumers' needs.

7. Photographs and maps.

Attach photographs and maps to application

Continuation sheets attached: ☒ yes ☐ no

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE



OCT 31 2005

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 - DESCRIPTION OF REHABILITATION

SC Department of
Archives & History

NPS Office Use Only

NRIS No:

NPS Office Use Only

Project No:

15393

Instructions: Read the instructions carefully before completing the applications. No certifications will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets. A copy of this form may be provided to the Internal Revenue Service. The decision by the National Park Service with respect to certification is made on the basis of the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings, and specifications), the application form shall take precedence.

1. Name of Property: Monaghan Mill
Address of Property: Street 201 Smythe St.
City Greenville County Greenville State SC Zip 29611

☒ Listed individually in the National Register of Historic Places; give date of listing: TBA

☐ Located in a Registered Historic District; specify: _____

Has a Part 1 Application (Evaluation of Significance) been submitted for this project? ☒ yes ☐ no

If yes, date Part 1 submitted: November 1, 2004 Date of certification: N/A (TBA) NPS Project Number: N/A 15393

2. Data on building and rehabilitation project:

Date building constructed: 1900 Total number of housing units before rehabilitation: 0

Type of construction: Brick Number that are low-moderate income: 0

Use(s) before rehabilitation: Industrial Textile Mill Total number of housing units after rehabilitation: 178

Proposed use(s) after rehabilitation: Multi-Family Residential Number that are low-moderate income: 0

Estimated cost of rehabilitation: 18 Million Floor area before rehabilitation: _____

This application covers phase number 1 of 1 phases Floor area after rehabilitation: _____

Project/phase start date (est.): August 2005 Completion date (est.): May 2006

3. Project contact:

Name Mark Harris OR Amanda Randall

Street 201 Smythe St. City Greenville

State SC Zip 29611 Daytime Telephone Number (864) 232-0850

4. Owner:

I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.

Name H. Pace Burt, Jr. Signature [Signature] Date _____

Organization Monaghan Mill, LLC

Social Security or Taxpayer Identification Number [Redacted]

Street 201 Smythe St. City Greenville

State SC Zip 29611 Daytime Telephone Number (864) 232-0850

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application - Part 2" for the above-named property and has determined:

- ☐ that the rehabilitation described herein is consistent with the historic character of the property or the district in which it is located and that the project meets the Secretary of the Interior's "Standards for Rehabilitation." This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is completed.
- ☐ that the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's "Standards for Rehabilitation" if the attached conditions are met.
- ☐ that the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's "Standards for Rehabilitation." A copy of this form will be provided to the Internal Revenue Service.

Date

National Park Service Authorized Signature

National Park Service Office/Telephone No.

☐ See Attachments

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION -
PART 2**

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Monaghan Mill
Property Name

NPS Office Use Only **DEC 1 2005**

201 Smythe St. Greenville, S.C. 29611

Project Number **SC Department of
Archives & History**

Property Address

5. DETAILED DESCRIPTION OF REHABILITATION / PRESERVATION WORK - Includes site work, new construction, alterations, etc. Complete blocks below.

<p>Number 1</p>	<p>Architectural feature <u>Landscaping</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: The original mature Dogwood trees will be kept in their current condition to provide shady areas for the residents. The grassy lawn accentuates these features which will be maintained in their current condition with the exception of the removal of the 2 dead dogwoods.</p>
<p>Describe existing feature and its condition: Original landscaping exists along the building's front (NORTH) side in the form of mature Dogwood trees as well as a grassy front lawn area. These areas are in good condition with the exception of two dead Dogwoods at the EAST corner of the site.</p>		
<p>Photo no. <u>3,4, 51-54</u> Drawing no. <u>SITE PLAN</u></p>		
<p>Number 2</p>	<p>Architectural feature <u>Existing Parking Areas</u> Approximate Date of feature <u>(non-historic)</u></p>	<p>Describe work and impact on existing feature: The site plan design integrates a new ingress and parking area at the North East corner of the property. The entrance design will work around the existing Dogwoods and wrap around the corner of the building to merge with the existing parking on the SOUTH side of the property. 72 new parking spaces will be added to help meet the code requirements. The existing ingress at the South West corner of the property will remain. No existing dogwoods will be cut to create the new driveway.</p>
<p>Describe existing feature and its condition: Parking for the building exists on the WEST side of the site as well as the SOUTH side of the building. There is also a lot for overflow parking across Smythe St. These areas are in relatively good condition and in need of seal coating.</p>		
<p>Photo no. <u>5-8</u> Drawing no. <u>SITE PLAN</u></p>		
<p>Number 3</p>	<p>Architectural feature <u>Wrought Iron Fence</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: The fence will be refurbished and portions replaced as needed to match the existing fence.</p>
<p>Describe existing feature and its condition: The existing fence that surrounds the NORTH and WEST sides of the property is in need of some repair. The paint is chipping and some portions are missing.</p>		
<p>Photo no. <u>9,10</u> Drawing no. <u>SITE PLAN</u></p>		
<p>Number 4</p>	<p>Architectural feature <u>Smoke Stack</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: No work will be done to the smokestack.</p>
<p>Describe existing feature and its condition: The smokestack on site is in good condition.</p>		
<p>Photo no. <u>28</u> Drawing no. <u>SITE PLAN</u></p>		

No. 4389 P. 2

Dec. 1, 2005 10:29AM

Monaghan Mill
Property Name

201 Smythe St. Greenville, S.C. 29611
Property Address

HISTORIC PRESERVATION
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Project Number: DEC 1 2005

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Number 5	Architectural feature <u>Water Tower</u> Approximate Date of feature <u>1900</u> Describe existing feature and its condition: The water tower on site is in relatively good condition with some paint missing and some rust present. Photo no. <u>27</u> Drawing no. <u>SITE PLAN</u>	Describe work and impact on existing feature: The water tower will be cleaned using low pressure water and then repainted to replicate the original finish.
Number 6	Architectural feature <u>Sidewalks</u> Approximate Date of feature <u>(non-historic)</u> Describe existing feature and its condition: The existing sidewalk leads from the NORTH side of the property to the main entrance and around the the NORTH WEST corner of the building. It is in good condition with some cracks. Photo no. <u>13</u> Drawing no. <u>SITE PLAN</u>	Describe work and impact on existing feature: The sidewalks will be maintained and repaired as needed.
Number 7	Architectural feature <u>Onsite Pond</u> Approximate Date of feature <u>1900</u> Describe existing feature and its condition: The onsite pond is located on the SOUTH border of the property and is in good, historic condition. Photo no. <u>30</u> Drawing no. <u>SITE PLAN</u>	Describe work and impact on existing feature: No work will be done to the onsite pond.
Number 8	Architectural feature <u>Butresses</u> Approximate Date of feature <u>1900</u> Describe existing feature and its condition: The existing butresses that are located on the NORTH WEST and the SOUTH EAST corners of the building for support are in relatively good condition with some minor staining present. Photo no. <u>29</u> Drawing no. <u>A-1</u>	Describe work and impact on existing feature: The butresses will be cleaned using low pressure water to remove the staining. See attach masonry restoration spec.

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**HISTORIC PRESERVATION
CERTIFICATION APPLICATION -
PART 2**

Monaghan Mill

Property Name

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Property Address

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Archives & History**

<p>Number 9</p>	<p>Architectural feature <u>Building Cornice and Details</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: The cornice will be cleaned using Sure Klean Restoration Cleaner. It will then be properly caulked, primed, and repainted.</p>
<p>Describe existing feature and its condition: The wooden cornice around the upper portion of the building is in deteriorating condition with some staining and paint chipping.</p>		
<p>Photo no. <u>11</u> Drawing no. <u>ELEVATIONS</u></p>		
<p>Number 10</p>	<p>Architectural feature <u>Exterior Brick Veneer (Mill)</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: The brick will be cleaned and repointed as needed as outlined in the specification for masonry cleaning. Mortar will be compatible with the original and match in texture and color.</p>
<p>Describe existing feature and its condition: The existing exterior brick veneer of the mill is in good condition.</p>		
<p>Photo no. <u>1,12</u> Drawing no. <u>ELEVATIONS</u></p>		
<p>Number 11</p>	<p>Architectural feature <u>Exterior Brick Veneer (Apparatus Rooms)</u> Approximate Date of feature <u>c1940</u></p>	<p>Describe work and impact on existing feature: Some of the exterior brick will be removed to make openings for new windows. These areas will be repointed with mortar that will match the existing structure as closely as possible to prep the opening for the window. The remaining brick will be cleaned and repointed as needed as outlined in the specification for masonry cleaning.</p>
<p>Describe existing feature and its condition: The existing exterior brick veneer of the Apparatus Room additions is in good condition.</p>		
<p>Photo no. <u>2</u> Drawing no. <u>ELEVATIONS</u></p>		
<p>Number 12</p>	<p>Architectural feature <u>First Floor Entrance</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: The entrance will be cleaned with Sure Klean Restoration Cleaner as necessary and a new door will be selected to fill the opening as depicted in the Historic Photos submitted. The door did not have a cover over it and the original door deteriorated the new door will match the new windows in framing and material.</p>
<p>Describe existing feature and its condition: The first floor entrance to the building is in relatively good condition. The door has been removed.</p>		
<p>Photo no. <u>23,24</u> Drawing no. <u>ELEVATIONS, A-2, DOOR DETAIL</u></p>		

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HISTORIC PRESERVATION CERTIFICATION APPLICATION - PART 2

Monaghan Mill
Property Name

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<p>Number 13</p>	<p>Architectural feature <u>Main Mill Windows</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: The openings will be filled with an aluminum frame thermal-pane window unit. These windows will be double-hung and feature an arched top with a 9 over 9 light configuration to match the historic window configuration. The window will be as depicted in the shop drawing by Seal Craft Window Company attached to this application</p>
<p>Describe existing feature and its condition: All the windows in the main building were removed circa 1940.</p>		
<p>Photo no. <u>17</u> Drawing no. <u>ELEVATIONS/WINDOW INVENTORY</u></p>		
<p>Number 14</p>	<p>Architectural feature <u>Apparatus Room Windows</u> Approximate Date of feature <u>(Non-Historic)</u></p>	<p>Describe work and impact on existing feature: new window openings will be cut into the existing masonry as shown on the elevations. The openings will then be filled with a contemporary compatible window. These windows will be different in that they will not have an arched top, but will keep the 9 over 9 light configuration.</p>
<p>Describe existing feature and its condition: There are currently not any window openings in the Apparatus Room Towers. The openings that are present are from vents used to cool the machinery housed in this area.</p>		
<p>Photo no. <u>14</u> Drawing no. <u>ELEVATIONS/WINDOW INVENTORY</u></p>		
<p>Number 15</p>	<p>Architectural feature <u>South West Bathroom Tower Windows</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: All window openings in the southwest tower will be filled with new aluminum frame thermal-pane window units. These windows will match the historic configuration and aesthetics. The openings will be filled with an aluminum frame thermal-pane window unit as depicted in the shop drawing by Seal Craft Window Company attached to this application.</p>
<p>Describe existing feature and its condition: 90% of the windows in the southwest bathroom tower are missing. Those that are present are deteriorated and in need of repair.</p>		
<p>Photo no. <u>15</u> Drawing no. <u>ELEVATION/WINDOW INVENTORY</u></p>		
<p>Number 16</p>	<p>Architectural feature <u>South East Bathroom Tower Windows</u> Approximate Date of feature <u>1900</u></p>	<p>Describe work and impact on existing feature: The windows that are missing frames will be replaced by new aluminum frame thermal-pane windows in the same historic feel and configuration as the existing. The windows with frames still present will only be cleaned and maintained as necessary and reglazed with clear thermal-pane glass.</p>
<p>Describe existing feature and its condition: The southeast bathroom tower has two types of windows. The windows on the front of the tower have all been removed prior to purchase. Some of the window frames on the sides of the tower are present, but in deteriorated condition.</p>		
<p>Photo no. <u>16</u> Drawing no. <u>ELEVATIONS/WINDOW INVENTORY</u></p>		

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Monaghan Mill

Property Name

201 Smythe St. Greenville, S.C. 29611

Property Address

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Project Number:

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Number 17	Architectural feature <u>Boiler Room Windows</u> Approximate Date of feature <u>1900</u>	Describe work and impact on existing feature: The windows are original and will be preserved. We will keep the original panes and glass and will clean these with soap and water as necessary.
Describe existing feature and its condition: The windows in the boiler room are in relatively good condition with some minor staining on the panes.		
Photo no. <u>18,19</u> Drawing no. <u>ELEVATIONS/WINDOW INVENTORY</u>		
Number 18	Architectural feature <u>Windows above the Boiler Room</u> Approximate Date of feature <u>1900</u>	Describe work and impact on existing feature: The windows that still have frames present will be cleaned as necessary and replaced with clear thermal-pane glass. Those windows that do not have frames present will be replaced with an exact replication of the existing metal frame and then replaced with clear thermal-pane glass. The configuration will be exactly the same as the existing frames.
Describe existing feature and its condition: The windows above the boiler room are in deteriorated condition. All of the glass has been broken out of the frames and the frames are rusting. There are 5-7 windows on the side of the structure that the frames are missing.		
Photo no. <u>20,21</u> Drawing no. <u>ELEVATIONS/WINDOW INVENTORY</u>		
Number 19	Architectural feature <u>Existing Interior Stairway</u> Approximate Date of feature <u>1900</u>	Describe work and impact on existing feature: The stairway walls will be scraped of the chipping lead based paint and then sealed with a latex encapsulant. The newell posts and handrails will be hand scraped and then sealed with a latex encapsulant. The landings will be infilled with concrete and carpeted. Stair treads will be cleaned and repainted. Ceilings will be scraped and painted with latex paint.
Describe existing feature and its condition: The existing interior stairway is in good condition. The walls are covered in lead-based paint which is chipping badly.		
Photo no. <u>25</u> Drawing no. <u>A-1 through A-5</u>		
Number 20	Architectural feature <u>Metal Fire Doors</u> Approximate Date of feature <u>1900</u>	Describe work and impact on existing feature: The doors will be cleaned using Sure Klean Restoration Cleaner and water, then repainted to match the original finish.
Describe existing feature and its condition: There are several original fire doors throughout the building. They are covered in chipping lead-based paint. These doors are in relatively good condition with only some minor staining and rusting present.		
Photo no. <u>26,39</u> Drawing no. <u>A-1 through A-5</u>		

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Number 21	Architectural feature <u>Interior Brick</u> Approximate Date of feature <u>1900</u>	Describe existing feature and its condition: The interior brick is in good condition. It is exposed and is at its original, natural state. The chipping lead based paint has been water and sand blasted to removed it in most of the areas of the first through the fourth floors, and is still present in the historic stairways.	Describe work and impact on existing feature: The areas throughout the mill that still have chipping lead based paint present will be scraped and encapsulated with latex paint. No other areas will be stripped of paint using water and sand.
Photo no. <u>32</u>	Drawing no. <u>N/A</u>		
Number 22	Architectural feature <u>Heart Pine Columns</u> Approximate Date of feature <u>1900</u>	Describe existing feature and its condition: The heart pine columns are in good condition. They are covered in chipping lead based paint.	Describe work and impact on existing feature: The columns will be scraped of loose paint and remaining paint encapsulated with latex paint. Two of the original columns were sand blasted and they will be sanded back to a finish to match the original column finish and repainted with latex paint. No other wood work will be stripped using water and sand.
Photo no. <u>33-35</u>	Drawing no. <u>A-1 through A-5</u>		
Number 23	Architectural feature <u>Heart Pine Beams and Ceilings</u> Approximate Date of feature <u>1900</u>	Describe existing feature and its condition: The heart pine beams and ceilings are in good condition. The beams and deck have been blasted with water and sand. The paint has been removed from these areas.	Describe work and impact on existing feature: The beams and ceilings, where the grain is raised, will be sanded to a finish which matches the original historic wood smoothness.
Photo no. <u>36, 37</u>	Drawing no. <u>N/A</u>		
Number 24	Architectural feature <u>Exterior Fire Stair</u> Approximate Date of feature <u>(New Construction)</u>	Describe existing feature and its condition: One exterior fire stair exists on the South East side of the building. It is in good condition. Another fire stair is required to provide egress from the upper floors that meets current fire code requirements.	Describe work and impact on existing feature: No work will be done on the existing exterior fire stair. However, a new fire stair will be constructed on the interior to meet the county fire code requirements. It will be constructed of a steel frame surrounded by fire rated sheetrock to blend with the interior of the building.
Photo no. <u>38</u>	Drawing no. <u>A-2</u>		

Dec. 1. 2005 10:30AM

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION -
PART 2**

Monaghan Mill

Property Name

201 Smythe St. Greenville, S.C. 29611

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Project Number:

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<p>Number <u>25</u> Architectural feature <u>Loading Dock Area</u> Approximate Date of feature <u>1996</u></p> <p>Describe existing feature and its condition: A small loading dock is located on the WEST side of the building. It is in good condition.</p> <p>Photo no. <u>40</u> Drawing no. <u>A-1-A-2</u></p>	<p>Describe work and impact on existing feature: The existing concrete loading dock will remain as a loading and utility dock to provide an area for household and building maintenance. New window openings will be cut into the exterior brick wall to provide enough lighting to meet the code requirements for the living units.</p>
<p>Number <u>26</u> Architectural feature <u>Elevators</u> Approximate Date of feature <u>1996</u></p> <p>Describe existing feature and its condition: There are three original elevators, two of which are still intact with elevator cars and equipment. The cars and doors are not functional. These elevators are in deteriorating condition and in need of replacement.</p> <p>Photo no. <u>41-43</u> Drawing no. <u>A-1 through A-5</u></p>	<p>Describe work and impact on existing feature: The existing elevators do not meet current code requirements and will be replaced with modern elevators using the existing shafts and door openings.</p>
<p>Number <u>27</u> Architectural feature <u>Main Corridors</u> Approximate Date of feature <u>(New Construction)</u></p> <p>Describe existing feature and its condition: The main corridors of the building are not present.</p> <p>Photo no. <u>44</u> Drawing no. <u>A-1 through A-5</u></p>	<p>Describe work and impact on existing feature: The main corridors of the building will be constructed by the outer walls of the living units. The corridor will run down the center of the floor measuring about 8 feet wide. The corridors walls will be finished in painted sheet rock. Walls will rise from the floor to the ceiling and be open, exposing the historic elements of the ceiling. Walls and ceilings in the public areas will be painted.</p>
<p>Number <u>28</u> Architectural feature <u>Living Units</u> Approximate Date of feature <u>(New Construction)</u></p> <p>Describe existing feature and its condition: There are no current living units in the building.</p> <p>Photo no. <u>n/a</u> Drawing no. <u>A-1 through A-15 and DP-1 through DP-15</u></p>	<p>Describe work and impact on existing feature: There will be 182 living units designed to work around the interior historic elements of the building.</p>

2 1 1 2005

DEC 1 2005

HISTORIC PRESERVATION CERTIFICATION APPLICATION - PART 2

Monaghan Mill
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Number 29	Architectural feature <u>Mechanicals</u> Approximate Date of feature <u>(non historic)</u>	Describe work and impact on existing feature: New HVAC and plumbing systems will be installed. All living units and corridors will have exposed spiral HVAC Duct work.
Describe existing feature and its condition: There were no original HVAC systems in the building.		
Photo no. <u>n/a</u> Drawing no. <u>M-1 through M-13</u>		
Number 30	Architectural feature <u>Basement Interior</u> Approximate Date of feature <u>1900</u>	Describe work and impact on existing feature: Basement spaces will be re-used largely in their original configurations as storage, mechanical, and community spaces.
Describe existing feature and its condition: The basement interior has a number of storage and mechanical rooms including the old boiler room.		
Photo no. <u>45, 46</u> Drawing no. <u>A-1</u>		
Number 31	Architectural feature <u>Apparatus Room Interior</u> Approximate Date of feature <u>1940</u>	Describe work and impact on existing feature: Living units will be utilized within the two apparatus room additions. The spaces will be gutted and divided into appropriate living units. New interior finishes will be installed.
Describe existing feature and its condition: The existing apparatus rooms on the NORTH side of the building have a similar interior configuration as the historic building. The four story additions contained equipment necessary for the air quality of the mill. These areas have identical finishes to the main mill building.		
Photo no. <u>47, 48</u> Drawing no. <u>A-1 through A-5</u>		
Number 32	Architectural feature <u>Main Roof Areas</u> Approximate Date of feature <u>1900</u>	Describe work and impact on existing feature: No work will be done on the roof.
Describe existing feature and its condition: The existing roof is in good condition. It is flat with a slight pitch and internal scupper boxes.		
Photo no. <u>49, 50</u> Drawing no. <u>n/a</u>		

No. 4389 P. 9

Dec. 1, 2005 10:30AM

HISTORIC PRESERVATION
CERTIFICATION APPLICATION -
PART 2

Monahgan Mill
Property Name

201 Smythe St. Greenville, S.C. 29611

Property Address

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Project Number:


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Number <u>33</u>	Architectural feature <u>Floors</u> Approximate Date of feature <u>1900</u> Describe existing feature and its condition: The existing floors are a combination of maple and heart pine floors throughout.	Describe work and impact on existing feature: Floors will be capped with a 2.5" concrete cap to meet local code requirements from county and fire districts. Refer to blue prints. Floors will be carpeted to reduce noise transmission.
Photo no. <u>55-58</u> Drawing no. <u>SEE CUT AWAY</u>		
Number .	Architectural feature _____ Approximate Date of feature _____ Describe existing feature and its condition:	Describe work and impact on existing feature:
Photo no. _____ Drawing no. _____		
Number	Architectural feature _____ Approximate Date of feature _____ Describe existing feature and its condition:	Describe work and impact on existing feature:
Photo no. _____ Drawing no. _____		
Number	Architectural feature _____ Approximate Date of feature _____ Describe existing feature and its condition:	Describe work and impact on existing feature:
Photo no. _____ Drawing no. _____		

NO. 4389 P. 10

Dec. 1, 2005 10:30AM



**HISTORIC PRESERVATION
CERTIFICATION APPLICATION -
PART 2**

Monaghan Mill
Property Name

201 Smythe St. Greenville, S.C. 29611
Property Address

NPS Office Use Only
Project Number:

Renew
Copy

5. DETAILED DESCRIPTION OF REHABILITATION / PRESERVATION WORK. Includes site work, new construction, alterations, etc. Complete blocks below.

<div style="border: 1px solid black; padding: 2px;">Number 1</div>	<p>Architectural feature <u>Landscaping</u></p> <p>Approximate Date of feature <u>1988</u></p> <p><small>Describe existing feature and its condition:</small> Original landscaping exists along the building's front (NORTH) side in the form of mature Dogwood trees as well as a grassy front lawn area. These areas are in good condition.</p> <p>Photo no. <u>3.4</u> Drawing no. <u>SITE PLAN</u></p>	<p><small>Describe work and impact on existing feature:</small> The original landscaping will be kept and maintained as necessary.</p> <p style="font-size: 1.2em;">VAGUE DESCRIPTION LANDSCAPE IMPORTANT SITE PLAN SHOWS CHANGES.</p>
<div style="border: 1px solid black; padding: 2px;">Number 2</div>	<p>Architectural feature <u>Existing Parking Areas</u></p> <p>Approximate Date of feature <u>(non-historic)</u></p> <p><small>Describe existing feature and its condition:</small> Parking for the building exists on the WEST side of the site as well as the SOUTH side of the building. There is also a lot for overflow parking across Smythe St. These areas are in relatively good condition and in need of seal coating.</p> <p>Photo no. <u>3.5</u> Drawing no. <u>SITE PLAN</u></p>	<p><small>Describe work and impact on existing feature:</small> The existing parking areas will be resurfaced and spaces painted to be utilized by residents.</p> <p style="font-size: 1.2em;">new pkg. areas? site plan appears to show new, too.</p>
<div style="border: 1px solid black; padding: 2px;">Number 3</div>	<p>Architectural feature <u>Wrought Iron Fence</u></p> <p>Approximate Date of feature <u>1988</u></p> <p><small>Describe existing feature and its condition:</small> The existing fence that surrounds the NORTH and WEST sides of the property is in need of some repair. The paint is chipping and some portions are missing.</p> <p>Photo no. <u>3.18</u> Drawing no. <u>SITE PLAN</u></p>	<p><small>Describe work and impact on existing feature:</small> The fence will be refurbished and portions replaced as needed to match the existing fence.</p>
<div style="border: 1px solid black; padding: 2px;">Number 4</div>	<p>Architectural feature <u>Smoke Stack</u></p> <p>Approximate Date of feature <u>1988</u></p> <p><small>Describe existing feature and its condition:</small> The smokestack on site is in good condition.</p> <p>Photo no. <u>28</u> Drawing no. <u>SITE PLAN</u></p>	<p><small>Describe work and impact on existing feature:</small> No work will be done to the smokestack.</p> <p style="font-size: 1.2em;">THIS MEANS NO WORK AT ALL.</p>

www.maryhelen.com - not a replacement

HISTORIC PRESERVATION CERTIFICATION APPLICATION - PART 2

Monaghan Mill
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201 Smythe St. Greenville, S.C. 29611

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Property Name
201

Number 5 Architectural feature Water Tower
Approximate Date of feature 1900

Describe existing feature and its condition:
The water tower on site is in relatively good condition with some paint missing and some rust present.

Describe work and impact on existing feature:
The water tower will be cleaned by the gentlest means possible and then repainted to replicate the original finish.

*cleaned how?
test panels...*

Photo no. 27 Drawing no. SITE PLAN

Number 6 Architectural feature Sidewalks
Approximate Date of feature (non-historic)

Describe existing feature and its condition:
The existing sidewalk leads from the NORTH side of the property to the main entrance and around the the NORTH WEST corner of the building. It is in good condition with some cracks.

Describe work and impact on existing feature:
The sidewalks will be maintained and repaired as needed.

Photo no. 13 Drawing no. SITE PLAN

Number 7 Architectural feature Onsite Pond
Approximate Date of feature 1900

Describe existing feature and its condition:
The onsite pond is located on the SOUTH border of the property and is in good, historic condition.

Describe work and impact on existing feature:
No work will be done to the onsite pond.

Photo no. 30 Drawing no. SITE PLAN

Number 8 Architectural feature Butresses
Approximate Date of feature 1900

Describe existing feature and its condition:
The existing butresses that are located on the NORTH WEST and the SOUTH EAST corners of the building for support are in relatively good condition with some minor staining present.

Describe work and impact on existing feature:
The butresses will be cleaned by the gentlest means possible to remove the staining.

*masonry cleaning
needs to be more specific
or it will require a
Condition*

Photo no. 29 Drawing no. A-1

HISTORIC PRESERVATION CERTIFICATION APPLICATION - PART 2

Monaghan Mill
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201 Smythe St. Greenville, S.C. 29611
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Project Number:

Number 9	Architectural feature <u>Building Cornice and Details</u>
	Approximate Date of feature <u>1900</u>

Describe existing feature and its condition:
The wooden cornice around the upper portion of the building is in deteriorating condition with some staining and paint chipping.

Describe work and impact on existing feature:
The cornice will be cleaned by the gentlest means possible and then repainted where necessary.

cleaning techniques?

Photo no. 11 Drawing no. ELEVATIONS

Number 10	Architectural feature <u>Exterior Brick Veneer (Mill)</u>
	Approximate Date of feature <u>1900</u>

Describe existing feature and its condition:
The existing exterior brick veneer of the mill is in good condition.

Describe work and impact on existing feature:
The brick will be cleaned by the gentlest means possible where necessary.

as before, masonry cleaning must be specified or it will be constative

Photo no. 112 Drawing no. ELEVATIONS

Number 11	Architectural feature <u>Exterior Brick Veneer (Apparatus Rooms)</u>
	Approximate Date of feature <u>c1940</u>

Describe existing feature and its condition:
The existing exterior brick veneer of the Apparatus Room additions is in good condition.

Describe work and impact on existing feature:
Some of the exterior brick will be removed to make openings for new windows. These areas will be repointed with mortar that will match the existing structure as closely as possible to prep the opening for the window. The remaining brick will be cleaned by the gentlest means possible.

elevations too small to review proposed windows, mortar mixture

Photo no. 2 Drawing no. ELEVATIONS

Number 12	Architectural feature <u>First Floor Entrance</u>
	Approximate Date of feature <u>1900</u>

Describe existing feature and its condition:
The first floor entrance to the building is in relatively good condition. The door has been removed.

Describe work and impact on existing feature:
The entrance will be cleaned as necessary and a new door will be selected to fill the opening, keeping with the historic model.

design of new door & basis for that design?

Photo no. 23,24 Drawing no. ELEVATIONS, A-2

HISTORIC PRESERVATION CERTIFICATION APPLICATION - PART 2

Monaghan Mill
Property Name

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Number 13	Architectural feature <u>Main Mill Windows</u>
	Approximate Date of feature <u>1900</u>

Describe existing feature and its condition:
All the windows in the main building were removed circa 1940.

Describe work and impact on existing feature:
The openings will be filled with an aluminum frame thermal-pane window unit. These windows will be double-hung and feature an arched top with a 9 over 9 light configuration to match the historic window configuration. Picture number 31 shows what the windows will look like BUT IT IS NOT AN ACTUAL WINDOW FOR OUR PROPERTY.

*new windows -
see separate comments.*

Photo no. 17.31 Drawing no. ELEVATIONS/WINDOW INVENTORY

Number 14	Architectural feature <u>Apparatus Room Windows</u>
	Approximate Date of feature <u>(Non-Historic)</u>

Describe existing feature and its condition:
There are currently not any window openings in the Apparatus Room Towers. The openings that are present are from vents used to cool the machinery housed in this area.

Describe work and impact on existing feature:
Window openings will be fabricated using the gentlest means possible. The openings will then be filled with a contemporary compatible window. These windows will be different in that they will not have an arched top, but will keep the 9 over 9 light configuration.

*concept ok, but
see separate comments
for new windows.*

Photo no. 14 Drawing no. ELEVATIONS/WINDOW INVENTORY

Number 15	Architectural feature <u>South West Bathroom Tower Windows</u>
	Approximate Date of feature <u>1900</u>

Describe existing feature and its condition:
90% of the windows in the southwest bathroom tower are missing. Those that are present are deteriorated and in need of repair.

Describe work and impact on existing feature:
All window openings in the southwest tower will be filled with new aluminum frame thermal-pane window units. These windows will match the historic configuration and aesthetics of the tower.

same

Photo no. 15 Drawing no. ELEVATION/WINDOW INVENTORY

Number 16	Architectural feature <u>South East Bathroom Tower Windows</u>
	Approximate Date of feature <u>1900</u>

Describe existing feature and its condition:
The southeast bathroom tower has two types of windows. The windows on the front of the tower have all been removed prior to purchase. Some of the window frames on the sides of the tower are present, but in deteriorated condition.

Describe work and impact on existing feature:
The windows that are missing frames will be replaced by new aluminum frame thermal-pane windows in the same historic feel and configuration as the existing. The windows with frames still present will only be cleaned and maintained as necessary and reglazed with thermal-pane glass.

*this could be more clearly
described with an attachment
showing windows kept
vs. replaced.
need details in alum repl. for
steel often difficult*

Photo no. 16 Drawing no. ELEVATIONS/WINDOW INVENTORY

HISTORIC PRESERVATION CERTIFICATION APPLICATION -

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Project Number:

Number
17

Architectural feature Boiler Room Windows

Approximate Date of feature 1900

Describe existing feature and its condition:

The windows in the boiler room are in relatively good condition with some minor staining and graffiti on the panes.

Describe work and impact on existing feature:

The windows will be cleaned as necessary.

Photo no. 18,19

Drawing no. ELEVATIONS/WINDOW
INVENTORY

Number
18

Architectural feature Windows above the Boiler Room

Approximate Date of feature 1900

Describe existing feature and its condition:

The windows above the boiler room are in deteriorated condition. All of the glass has been broken out of the frames and the frames are rusting. There are 5-7 windows on the side of the structure that the frames are missing.

Describe work and impact on existing feature:

The windows that still have frames present will be cleaned as necessary and reglazed with thermal-pane glass. Those windows that do not have frames present will be replaced with an exact replication of the existing metal frame and then reglazed with thermal-pane glass. The configuration will be the exact same as the existing frames.

see #16

Photo no. 20,21

Drawing no. ELEVATIONS/WINDOW
INVENTORY

Number
19

Architectural feature Existing Interior Stairway

Approximate Date of feature 1900

Describe existing feature and its condition:

The existing interior stairway is in deteriorating condition. The walls are covered in lead-based paint which is chipping badly. The landings are only subflooring and the poles and handrails are rusting and chipping badly.

Describe work and impact on existing feature:

The stairway will be refurbished as necessary keeping with the historic feel. The walls will be freed of the chipping lead based paint using the gentlest means possible and then encapsulated. The poles and handrails will be cleaned where necessary and then painted to match the original paint.

method of cleaning

Photo no. 25

Drawing no. A-1 through A-5

Number
20

Architectural feature Metal Fire Doors

Approximate Date of feature 1900

Describe work and impact on existing feature:

The doors will be cleaned by the gentlest means possible and then repainted to return them to their original state.

HISTORIC PRESERVATION CERTIFICATION APPLICATION – PART 2

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5. DETAILED DESCRIPTION OF REHABILITATION / PRESERVATION WORK – Includes site work, new construction, alterations, etc. Complete blocks below.

<p>Number 21</p> <p>Architectural feature <u>Interior Brick Veneer</u></p> <p>Approximate Date of feature <u>1900</u></p> <p>Describe existing feature and its condition: The interior brick veneer is in deteriorated condition. It is covered in chipping lead-based paint</p> <p>Photo no. <u>32</u> Drawing no. <u>N/A</u></p>	<p>Describe work and impact on existing feature: The majority of the lead based paint will be removed using the gentlest means possible. The brick will then be sealed to prevent damage.</p> <p><i>already sand blasted. why is this not stated?</i></p>
<p>Number 22</p> <p>Architectural feature <u>Heart Pine Columns</u></p> <p>Approximate Date of feature <u>1900</u></p> <p>Describe existing feature and its condition: The heart pine columns are in good condition. They are covered in chipping lead-based paint.</p> <p>Photo no. <u>33-35</u> Drawing no. <u>A-1 through A-5</u></p>	<p>Describe work and impact on existing feature: The chipping lead based paint will be removed using the gentlest means possible. The columns will then be sealed to prevent further chipping of the remaining lead-based paint.</p> <p><i>actual treatment?</i></p>
<p>Number 23</p> <p>Architectural feature <u>Heart Pine Beams</u></p> <p>Approximate Date of feature <u>1900</u></p> <p>Describe existing feature and its condition: The heart pine beams are in good condition. They are covered in chipping lead-based paint.</p> <p>Photo no. <u>36, 37</u> Drawing no. <u>N/A</u></p>	<p>Describe work and impact on existing feature: The chipping lead based paint will be removed using the gentlest means possible. The beams will then be sanded by hand to remove any raised grain and then sealed to protect the wood.</p> <p><i>paint?</i></p>
<p>Number 24</p> <p>Architectural feature <u>Exterior Fire Stair</u></p> <p>Approximate Date of feature <u>(New Construction)</u></p> <p>Describe existing feature and its condition: One exterior fire stair exists on the South East side of the building. It is in good condition. Another fire stair is required to provide egress from the upper floors that meets current fire code requirements.</p> <p>Photo no. <u>38</u> Drawing no. <u>A-2</u></p>	<p>Describe work and impact on existing feature: No work will be done on the existing exterior fire stair. However, a new fire stair will be constructed on the interior to meet the county fire code requirements. It will be constructed of a steel frame surrounded by fire rated sheetrock to blend with the interior of the building.</p>

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Number 26	Architectural feature <u>Loading Dock Area</u> Approximate Date of feature <u>1900</u>	<p>Describe work and impact on existing feature: The existing concrete loading dock may remain as a loading and utility dock to provide an area for household and building maintenance. New window openings will be punched into the exterior brick wall to provide enough lighting to meet the code requirements for the living units.</p> <p><i>look @ window design.</i></p>
<p>Describe existing feature and its condition: A small loading dock is located on the WEST side of the building. It is in good condition.</p> <p>Photo no. <u>40</u> Drawing no. <u>A-1, A-2</u></p>		
Number 26	Architectural feature <u>Elevators</u> Approximate Date of feature <u>1900</u>	<p>Describe work and impact on existing feature: The existing elevators do not meet current code requirements and will be replaced with modern elevators in the existing openings.</p>
<p>Describe existing feature and its condition: There are three original elevators, two of which are still intact with elevator cars and equipment. The cars and doors are not functional. These elevators are in deteriorating condition and in need of replacement.</p> <p>Photo no. <u>41-43</u> Drawing no. <u>A-1 through A-5</u></p>		
Number 27	Architectural feature <u>Main Corridors</u> Approximate Date of feature <u>(New Construction)</u>	<p>Describe work and impact on existing feature: The main corridors of the building will be constructed by the outer walls of the living units. The corridor will run down the center of the floor measuring about 8 feet wide. The corridors will have the heart pine columns exposed as well as the heart pine beams.</p> <p><i>columns & beams exposed.</i></p>
<p>Describe existing feature and its condition: The main corridors of the building are not present.</p> <p>Photo no. <u>44</u> Drawing no. <u>A-1 through A-5</u></p>		
Number 28	Architectural feature <u>Living Units</u> Approximate Date of feature <u>(New Construction)</u>	<p>Describe work and impact on existing feature: There will be 182 living units designed to work around the interior historic elements of the building.</p>
<p>Describe existing feature and its condition: There are no current living units in the building.</p> <p>Photo no. <u>n/a</u> Drawing no. <u>A-1 through A-15 and DP-1 through DP-15</u></p>		

APPENDIX I:
OAKLAND MILL HISTORIC PRESERVATION CERTIFICATION APPLICATION

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

RECEIVED
OMB Approved
No. 1024-0009
NOV 17 2009

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 1 - EVALUATION OF SIGNIFICANCE

SC Department of
Archives & History

NPS Office Use Only

NRIS No:

NPS Office Use Only

Project No:

Instructions: Read the instructions carefully before completing application. No certifications will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets.

1. Name of Property: Oakland Mill A+H 2010-002

Address of Property: Street 2802 Fair Ave

City Newberry

County Newberry

State South Carolina

Zip 29108

Name of historic district:

☐ National Register district

☐ certified state or local district

☐ potential district

2. Check nature of request:

☐ certification that the building contributes to the significance of the above-named historic district (or National Register property) for the purpose of rehabilitation.

☐ certification that the structure or building, and where appropriate, the land area on which such structure or building is located contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes

☐ certification that the building does not contribute to the significance of the above-named historic district.

☒ preliminary determination for individual listing in the National Register.

☐ preliminary determination that a building located within a potential historic district contributes to the significance of the district.

☐ preliminary determination that a building outside the period or area of significance contributes to the significance of the district.

3. Project contact:

Name Ms. Misty West

Street P.O. Box 734

City Newberry

State South Carolina

Zip 29108

Daytime Telephone Number 803-276-1884

4. Owner:

I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.

Name Ms. Misty West

Signature Misty West

Date 11-16-09

Organization Oakland Mills Redevelopment, LLC

Street P.O. Box 734

City Newberry

State South Carolina

Zip 29108

Daytime Telephone Number 803-276-1884

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application - Part 1" for the above-named property and hereby determines that the property:

☐ contributes to the significance of the above-named district (or National Register property) and is a "certified historic structure" for the purpose of rehabilitation.

☐ contributes to the significance of the above-named district and is a "certified historic structure" for a charitable contribution for conservation purposes in accordance with the Tax Treatment Extension Act of 1980.

☐ does not contribute to the significance of the above-named district.

Preliminary determinations:

☐ appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 CFR Part 60.

☐ does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.

☐ appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer.

☐ appears to contribute to the significance of a registered historic district but is outside the period or area of significance as documented in the National Register nomination or district documentation on file with the NPS.

☐ does not appear to qualify as a certified historic structure.

Date

National Park Service Authorized Signature

National Park Service Office/Telephone No.

☐ See Attachments

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 1**

Oakland Mill
Property Name

2802 Fair Ave., Newberry, SC 29108
Property Address

NPS Office Use Only
Project Number: _____

5. Description of physical appearance:

Main Mill Building

The main mill building has a rectangular plan with four-stories over a basement, contains features of the Romanesque Revival style of architecture. It was constructed of red brick, wooden floors, heavy timber framework, some of which was replaced with steel in subsequent building campaigns. Four rows of steel columns, designed to support the weight of heavy textile machinery, reinforce the interior floors and provide an open interior plan. A flat roof with a corbelled frieze caps the structure. Though the windows were bricked in, and the structure underwent major building campaigns, which doubled the size of the structure, the additions were in-kind to the original design, featuring similar brickwork, and corbelled friezes to create a homogeneous aesthetic appeal.

Main Office Building

Erected the same time as the original mill building in 1911-12, the one-story brick structure features a flat roof, with a stepped parapet and a wooden dentilled cornice. The building was originally three by six bays, but was subsequently enlarged. Some of the windows were bricked in, presumably around the same time as the mill building in 1949-50. It is now a 1,700 sf brick structure with 8 offices, 1 lobby, 1 security vault, 1 computer room and 2 restrooms.

Power House/Boiler House

Erected at the same time as the original mill building in 1911-12, the two-story brick structure was originally rectangular in shape, 2 by 3 bays with a flat roof. The original fenestration of the structure closely resembles the original mill building and office, with a flat roof, arched doors and segmental windows, and exposed eaves and rafter tails under the soffit, which are both painted white. A one-story projection extends out of the southwest side adjacent to the smoke stack. It features an arched doorway, a flat roof and firewalls on the northeast and southeast sides. A small wood frame shed with a hipped roof was constructed on the southwest side next to the doorway at some point, and is accessed by double batten doors on the southwest façade. The structure was enlarged around 1949, when the mill building was modernized, adding a two-story, one by three bay extension on the southwest side, and subsequently giving it a square plan. After 1951 the window sashes and frames were removed and the openings were bricked in, installing modern pressure dampers. The structure is currently 2,000 sf.

Brick Smokestack

The brick smokestack sits on a concrete foundation. It is connected to the powerhouse and rises a full story above the main mill building.

Brick Auxiliary Building

A small, flat roofed, one-story brick structure. It is accessed on the southwest façade by six light paneled double doors, and features nine light sash windows on both the northeast and southeast façades.

Reservoir

The Oakland Cotton Mills Reservoir is situated north of the powerhouse, and was constructed at the same time as the mill to provide the original source of power.

Warehouse 1

One-story, wood-frame brick structure constructed the same time as the mill building. It features a loading dock that spans the length of the building and wraps around the northwest façade where the main access door is, and then gives way to a ramp to the ground level. It has a flat roof, which is pierced by four main firewalls.

Warehouse 2

Constructed in 1950, this flat roofed, brick and concrete structure features similar construction as the first warehouse, though slightly smaller. It is ornamented with a stone belt course, which tapers from the center of the building to each side. It is now 2,300 sf equipped with HVAC and lighting, 2 restrooms, production equipment for training, caged area for company store, 1 small private office and an office addition on the southwest side.

Wooden Auxiliary Structures

1 wood frame shed, open in the front, front gable asphalt shingle roof, exposed rafter tails, double batten doors on rear of southwest side.
1 wood frame shed, open in the front, pyramidal asphalt shingle roof, exposed rafter tails, a tin shed roof on the front, divided into 2 bays.

Water Tower 1

The taller of the two towers was constructed by 1950 to aid in the mill's fire defense system.

Water Tower 2

The shorter of the two towers was erected at the same time as the first for holding drinking water.

Railroad Spur

Stands between the main mill building and the warehouses and powerhouse. It dates to when the mill was constructed and was imperative to the function of the mill. Only a small portion of it survives.

Date of Construction: 1911-12 Source of Date: _____

Date(s) of Alteration(s): 1949-50, 1950-51, 1964-65, 1966

Has building been moved? ☐ yes ☒ no If so, when? _____

6. Statement of significance: the property is 16.59 acres, just north of Newberry College, adjacent to the city limits of Newberry, South Carolina. At the present time the property contains the massive four-story, red brick rectangular mill building, constructed from December 1910 to February of 1912, designed by renowned Boston engineering firm of Lockwood, Green and Company, with W. D. Milne serving as the supervising architect, reflects the design and engineering of the textile industry in the early twentieth century. A railroad spur stands between the main building and the other contributing structures that are part of the mill complex include: a one-story brick office building, a two-story brick boiler house with a brick smokestack and auxiliary building, two masonry and concrete warehouses, two wood-frame auxiliary storage buildings, a railroad spur, two water towers and a reservoir all contribute to the historic character and significance of the property. They are significant for their association with the development of the textile industry in Newberry from 1911 to the recent past.

7. Photographs and maps.

Attach photographs and maps to application

Continuation sheets attached: ☐ yes ☒ no

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 - DESCRIPTION OF REHABILITATION

NPS Office Use Only

NRIS No:

NPS Office Use Only

Project No:

Instructions: Read the instructions carefully before completing the applications. No certifications will be made unless a completed application form has been received. Type or print clearly in black ink. If additional space is needed, use continuation sheets or attach blank sheets. A copy of this form may be provided to the Internal Revenue Service. The decision by the National Park Service with respect to certification is made on the basis of the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings, and specifications), the application form shall take precedence.

1. Name of Property: Oakland Mill
Address of Property: Street 2802 Fair Avenue
City Newberry County Newberry State SC Zip 29108
☐ Listed individually in the National Register of Historic Places; give date of listing: _____
☐ Located in a Registered Historic District; specify: _____
Has a Part 1 Application (Evaluation of Significance) been submitted for this project? ☒ yes ☐ no
If yes, date Part 1 submitted: November 17, 2009 Date of certification: 10 Dec. 2009 NPS Project Number: 24212

2. Data on building and rehabilitation project:
Date building constructed: 1912, 1949, 1951 and 1965 Total number of housing units before rehabilitation: 0
Type of construction: Brick Number that are low-moderate income: 0
Use(s) before rehabilitation: Industrial Textile Mill Total number of housing units after rehabilitation: 123
Proposed use(s) after rehabilitation: Multi-Family Residential Number that are low-moderate income: 0
Estimated cost of rehabilitation: 18 Million Floor area before rehabilitation: 279,624 sq. ft.
This application covers phase number 1 of 1 phases Floor area after rehabilitation: 279,624 sq. ft.
Project/phase start date (est.): Jan. 2010 Completion date (est.): Jan. 2012

3. Project contact:
Name Ms. Misty West
Street P.O. Box 734 City Newberry
State SC Zip 29108 Daytime Telephone Number 803-276-1884

4. Owner:
I hereby attest that the information I have provided is, to the best of my knowledge, correct, and that I own the property described above. I understand that falsification of factual representations in this application is subject to criminal sanctions of up to \$10,000 in fines or imprisonment for up to five years pursuant to 18 U.S.C. 1001.
Name Ms. Misty West Signature [Signature] Date 2-9-2010
Organization Oakland Mills Redevelopment LLC
Social Security or Taxpayer Identification Number 26-4458802
Street P.O. Box 734 City Newberry
State SC Zip 29108 Daytime Telephone Number 803-276-1884

NPS Office Use Only

The National Park Service has reviewed the "Historic Certification Application - Part 2" for the above-named property and has determined:

- ☐ that the rehabilitation described herein is consistent with the historic character of the property or the district in which it is located and that the project meets the Secretary of the Interior's "Standards for Rehabilitation." This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is completed.
- ☐ that the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's "Standards for Rehabilitation" if the attached conditions are met.
- ☐ that the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's "Standards for Rehabilitation." A copy of this form will be provided to the Internal Revenue Service.

Date

National Park Service Authorized Signature

National Park Service Office/Telephone No.

☐ (See Attachments)

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 2**

NPS Office Use Only

2802 Fair Avenue, Newberry, S. C.

Property Address

Project Number:
24212**5. DETAILED DESCRIPTION OF REHABILITATION / PRESERVATION WORK** – Includes site work, new construction, alterations, etc. Complete blocks below.

Number 1	Architectural feature <u>Fair Avenue</u> Approximate Date of feature <u>1912</u> Describe existing feature and its condition: Street paving in good condition. Photo no. <u>1</u> Drawing no <u>L1 and MP</u>	Describe work and impact on existing feature: The City of Newberry is planning to add landscaping, curbs and gutters.
Number 2	Architectural feature <u>Parking lot at SE elevation</u> Approximate Date of feature <u>1951</u> Describe existing feature and its condition: The existing parking lot is in good condition Photo no. <u>2</u> Drawing no <u>L1 and MP</u>	Describe work and impact on existing feature: The existing trees will be retained. The parking lot will be better defined. The brick of the top three stories of the 1950's addition will be removed between the pilasters and the bottom of the existing arch and a new aluminum windows to match original 1912 configuration will be installed. The chain link fence will be removed.
Number 3	Architectural feature <u>Water tanks</u> Approximate Date of feature <u>1950</u> Describe existing feature and its condition: The water tanks are in fine condition Photo no. <u>3</u> Drawing no <u>MP</u>	Describe work and impact on existing feature: The water tanks will be retained. No other work is planned.
Number 4	Architectural feature <u>Paint storage buildings</u> Approximate Date of feature <u>early 20th century</u> Describe existing feature and its condition: Two small wooden outbuildings in fair conditions Photo no. <u>4</u> Drawing no <u>MP</u>	Describe work and impact on existing feature: These buildings will have roof stabilization and minor siding repair.

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 2**

NPS Office Use Only

2802 Fair Avenue, Newberry, S. C.

Property Address

Project Number:
24212

Number 5	Architectural feature Office tower northeast elev. Approximate Date of feature 1950 Describe existing feature and its condition: The existing brick is in excellent condition. metal windows are intact. Photo no. 5 Drawing no. A401	Describe work and impact on existing feature: Existing metal windows will be cleaned and repainted.
Number 6	Architectural feature Office and Toilet tower Approximate Date of feature 1949 and 1950 Describe existing feature and its condition: The existing brick is in excellent condition. Windows are in good condition. Photo no. 6 Drawing no. A401	Describe work and impact on existing feature: Glass block will be removed and new aluminum windows will be installed.
Number 7	Architectural feature Southeast addition Approximate Date of feature 1966 Describe existing feature and its condition: The existing brick is in excellent condition. Photo no. 7 Drawing no. A401	Describe work and impact on existing feature: Vent openings will be infilled with brick.
Number 8	Architectural feature Cotton Warehouse Approximate Date of feature 1912 Describe existing feature and its condition: The existing brick is in excellent condition. Roof is in good condition. Photo no. 8 Drawing no. MP	Describe work and impact on existing feature: The building will be stabilized and secured.

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 2**

NPS Office Use Only

2802 Fair Avenue, Newberry, S. C.

Property Address

Project Number:

24212

Number 9	Architectural feature <u>Southeast Elevation of Mill</u> Approximate Date of feature <u>1950</u> Describe existing feature and its condition: The existing brick is in excellent condition.	Describe work and impact on existing feature: The brick of the top three stories of the 1950's addition will be removed between the pilasters and the bottom of the existing arch and a new aluminum windows to match original 1912 configuration will be installed.
Photo no. <u>9</u> Drawing no. <u>A401</u>		
Number 10	Architectural feature <u>Northeast Facade of Mill</u> Approximate Date of feature <u>1900</u> Describe existing feature and its condition: The existing brick is in excellent condition.	Describe work and impact on existing feature: The brick of the top three stories of the 1950's addition will be removed between the pilasters and the bottom of the existing arch and a new aluminum windows to match original 1912 configuration will be installed.
Photo no. <u>10</u> Drawing no. <u>A401</u>		
Number 11	Architectural feature <u>Southern corner of 1950's addition.</u> Approximate Date of feature <u>1950</u> Describe existing feature and its condition: Existing brick is in excellent condition.	Describe work and impact on existing feature: The brick of the four story 1950's addition will be removed between the pilasters and the bottom of the existing arch and a new aluminum windows to match original 1912 configuration will be installed. Glass block of the 1950's stair tower will be retained
Photo no. <u>11</u> Drawing no. <u>A401</u>		
Number 12	Architectural feature <u>Southern apparatus tower on the southwest facade.</u> Approximate Date of feature <u>1966</u> Describe existing feature and its condition: The existing brick is in excellent condition.	Describe work and impact on existing feature: The brick of the four story 1966 apparatus tower will be removed between the pilasters and new aluminum windows will be installed.
Photo no. <u>12</u> Drawing no. <u>A401</u>		

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –
PART 2**

NPS Office Use Only

2802 Fair Avenue, Newberry, S. C.

Property Address

Project Number:

24212

Number 13	Architectural feature Northern apparatus tower on the southwest facade. Approximate Date of feature 1966 Describe existing feature and its condition: The existing brick is in excellent condition. Photo no. 13 Drawing no Elevations A401	Describe work and impact on existing feature: The brick of the four story 1966 apparatus tower will be removed between the pilasters and new aluminum windows will be installed.
Number 14	Architectural feature Northwest elevation of Mill Approximate Date of feature 1912 Describe existing feature and its condition: The existing brick is in excellent condition. Photo no. 14 Drawing no A401	Describe work and impact on existing feature: 1949 brick infill will be removed. Windows will be replaced with new aluminum windows to match original configuration. Two large opening will be infilled to the size of the original window opening.
Number 15	Architectural feature Toilet tower Approximate Date of feature 1949 Describe existing feature and its condition: Brick is in good condition. Glass block window are in fine condition Photo no. 15 Drawing no A401	Describe work and impact on existing feature: Glass block windows will be removed and new aluminum windows will be installed.
Number 16	Architectural feature Metal building and elec. substation Approximate Date of feature 1960 / 1970 Describe existing feature and its condition: metal building is in good condition Photo no. 16 Drawing no MP	Describe work and impact on existing feature: The metal building and substation will be removed.

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION -****PART 2**

NPS Office Use Only

2802 Fair Avenue, Newberry, S. C.

Property Address

Project Number:
24212

Number 17	Architectural feature <u>Existing Metal window</u> Approximate Date of feature <u>1950</u> Describe existing feature and its condition: Existing metal windows of the office tower are in fair condition. There is some peeling paint. Photo no. <u>17</u> Drawing no <u>A401</u>	Describe work and impact on existing feature: The stair will be cleaned and the peeling paint scraped. The stair will be sealed with a latex encapsulant. Ceilings will be scraped and painted with latex paint.
Number 18	Architectural feature <u>Northeast corner of the mill.</u> Approximate Date of feature <u>1912</u> Describe existing feature and its condition: Existing brick is in excellent condition. Existing basement window is in good condition Photo no. <u>18</u> Drawing no <u>A401</u>	Describe work and impact on existing feature: The existing basement window will be retained, restored and Painted. This window will serve as the profiles for the aluminum window profiles.
Number 19	Architectural feature <u>Northeast facade of mill.</u> <u>Toilet tower.</u> Approximate Date of feature <u>1949</u> Describe existing feature and its condition: Existing brick on the mill is in excellent condition. Glass block windows are in fine condition. Photo no. <u>19</u> Drawing no <u>A401</u>	Describe work and impact on existing feature: Glass block windows will be removed and replaced with new aluminum windows.
Number 20	Architectural feature <u>Northeast corner of the mill.</u> Approximate Date of feature <u>1912</u> Describe existing feature and its condition: Existing brick is in excellent condition. Existing basement door is in good condition Photo no. <u>20</u> Drawing no <u>A401</u>	Describe work and impact on existing feature: The existing basement door will be retained and repainted.

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION -****PART 2**

NPS Office Use Only

2802 Fair Avenue, Newberry, S. C.

Property Address

Project Number:

24212

Number 21	Architectural feature Interior of one story addition Approximate Date of feature 1966 Describe existing feature and its condition: Existing brick is in excellent condition. Photo no. 21 Drawing no A202	Describe work and impact on existing feature: A new wellness center will be created in this space. New window and Door openings will be cut in the southwest and southeast walls. vent openings in the northeast wall will be infilled with brick.
Number 22	Architectural feature Interior north stairway Approximate Date of feature 1949 Describe existing feature and its condition: The existing glass block windows are in good condition. Masonry is in good condition. Photo no. 22 Drawing no A202 A203	Describe work and impact on existing feature: The stair will be cleaned and the peeling paint scraped. The stair will be sealed with a latex encapsulant. Ceilings will be scraped and painted with latex paint.
Number 23	Architectural feature first First floor interior of mill Approximate Date of feature 1950 Describe existing feature and its condition: Interior in good condition. Photo no. 23 Drawing no A202	Describe work and impact on existing feature: The floors will be repaired as needed, then sanded and sealed with a matte finish. Areas of concrete flooring will be cleaned and carpeted. Bricks will be removed between the pilasters and exterior arch and new aluminum windows will be installed. New partitions will be added to creat 123 apartmnets
Number 24	Architectural feature First floor southwest elevation Approximate Date of feature 1949 Describe existing feature and its condition: Existing brick is in good condition. Photo no. 24 Drawing no A202	Describe work and impact on existing feature: The floors will be repaired as needed, then sanded and sealed with a matte finish. Areas of concrete flooring will be cleaned and carpeted. Bricks will be removed between the pilasters and exterior arch and new aluminum windows will be installed. New partitions will be added to creat 123 apartmnets

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –****PART 2**

NPS Office Use Only

Project Number:

24212**2802 Fair Avenue, Newberry, S. C.**

Property Address

Number 25	Architectural feature <u>Second floor southwest elev.</u> Approximate Date of feature <u>1949/1950</u>	Describe work and impact on existing feature: Temporary office partitions will be removed. The floors will be repaired as needed, then sanded and sealed with a matte finish. Areas of concrete flooring will be cleaned and carpeted. Bricks will be removed between the pilasters and exterior arch and new aluminum windows will be installed.
Describe existing feature and its condition: Brick wall is in good condition. Floors are in good condition		
Photo no. <u>25</u> Drawing no. <u>A203</u>		
Number 26	Architectural feature <u>Second floor southwest elev.</u> Approximate Date of feature <u>1950</u>	Describe work and impact on existing feature: The floors will be repaired as needed, then sanded and sealed with a matte finish. Areas of concrete flooring will be cleaned and carpeted. Brick will be removed between the pilasters and exterior arch and new aluminum windows will be installed.
Describe existing feature and its condition: Brick wall is in good condition. Floors are in good condition		
Photo no. <u>26</u> Drawing no. <u>A203</u>		
Number 27	Architectural feature <u>Second floor southwest elev.</u> Approximate Date of feature <u>1949</u>	Describe work and impact on existing feature: Brick infill will be removed and new aluminum windows will be installed.
Describe existing feature and its condition: Brick wall is in good condition		
Photo no. <u>27</u> Drawing no. <u>A203</u>		
Number 28	Architectural feature <u>Interior of one story addition</u> Approximate Date of feature <u>1966</u>	Describe work and impact on existing feature: A new wellness center will be created in this space
Describe existing feature and its condition: the one story addition is in good condition.		
Photo no. <u>28</u> Drawing no. <u>a202</u>		

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –****PART 2**

NPS Office Use Only

Project Number:

24212**2802 Fair Avenue, Newberry, S. C.**

Property Address

Number 29	Architectural feature <u>Northeast Facade of the office</u> Approximate Date of feature <u>1912 / 1966</u> Describe existing feature and its condition: The existing brick is in excellent condition. Roof is in good condition. Photo no. <u>29</u> Drawing no <u>MP</u>	Describe work and impact on existing feature: The building will be stabilized and secured.
Number 30	Architectural feature <u>Southeast Facade of the office</u> Approximate Date of feature <u>1912 / 1966</u> Describe existing feature and its condition: The existing brick is in excellent condition. Roof is in good condition. Photo no. <u>30</u> Drawing no <u>MP</u>	Describe work and impact on existing feature: The building will be stabilized and secured.
Number 31	Architectural feature <u>Southwest corner of Office</u> Approximate Date of feature <u>1912 / 1966</u> Describe existing feature and its condition: The existing brick is in excellent condition. Roof is in good condition. Photo no. <u>31</u> Drawing no <u>MP</u>	Describe work and impact on existing feature: The building will be stabilized and secured.
Number 32	Architectural feature <u>Southeast corner of Office</u> Approximate Date of feature <u>1912 / 1966</u> Describe existing feature and its condition: The existing brick is in excellent condition. Roof is in good condition. Photo no. <u>32</u> Drawing no <u>MP</u>	Describe work and impact on existing feature: The building will be stabilized and secured.

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION -****PART 2**

NPS Office Use Only

Project Number:

24212**2802 Fair Avenue, Newberry, S. C.**

Property Address

Number 33	Architectural feature <u>Cotton Warehouse</u> Approximate Date of feature <u>1912</u> Describe existing feature and its condition: The existing brick is in excellent condition. Roof is in good condition. Photo no. <u>33</u> Drawing no. <u>MP</u>	Describe work and impact on existing feature: The building will be stabilized and secured. Metal tubes will be removed.
Number 34	Architectural feature <u>Cotton Warehouse</u> Approximate Date of feature <u>1912</u> Describe existing feature and its condition: The existing brick is in excellent condition. Roof is in good condition. Photo no. <u>34</u> Drawing no. <u>MP</u>	Describe work and impact on existing feature: The building will be stabilized and secured. Metal tubes will be removed.
Number 35	Architectural feature <u>Guard shed</u> Approximate Date of feature <u>1966</u> Describe existing feature and its condition: Shed addition in poor condition. Photo no. <u>35</u> Drawing no. <u>D202</u>	Describe work and impact on existing feature: Shed will be removed.
Number 36	Architectural feature <u>Exterior of Boiler House</u> Approximate Date of feature <u>1912 / 1950</u> Describe existing feature and its condition: Exterior is in good condition Photo no. <u>36</u> Drawing no. <u>MP</u>	Describe work and impact on existing feature: No work will be done to the Boiler house.

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –****PART 2**

NPS Office Use Only

2802 Fair Avenue, Newberry, S. C.

Property Address

Project Number:

24212

Number 37	Architectural feature Exterior of Boiler room Approximate Date of feature 1912 / 1950	Describe work and impact on existing feature: No work will be done to the Boiler house.
Describe existing feature and its condition: Exterior is in good condition		
Photo no. 37 Drawing no MP		
Number 38	Architectural feature Exterior of Boiler room Approximate Date of feature 1912 / 1950	Describe work and impact on existing feature: No work will be done to the Boiler house.
Describe existing feature and its condition: Exterior is in good condition		
Photo no. 38 Drawing no MP		
Number 39	Architectural feature Interior of Boiler room Approximate Date of feature 1912 / 1950	Describe work and impact on existing feature: No work will be done to the Boiler house.
Describe existing feature and its condition: Interior is in good condition		
Photo no. 39 Drawing no Site Plan		
Number 40	Architectural feature Coal Trestle Approximate Date of feature 1912	Describe work and impact on existing feature: No work will be done to the trestle.
Describe existing feature and its condition: Trestle is in fair condition		
Photo no. 40 Drawing no MP		

Oakland Cotton Mill

Property Name

**HISTORIC PRESERVATION
CERTIFICATION APPLICATION –****PART 2**

NPS Office Use Only

Project Number:

24212**2802 Fair Avenue, Newberry, S. C.**

Property Address

Number 41	Architectural feature <u>Smoke stack</u> Approximate Date of feature <u>1912</u> Describe existing feature and its condition: The smokestack on site is in good condition. Photo no. <u>41</u> Drawing no <u>MP</u>	Describe work and impact on existing feature: No work will be done to the smokestack.
Number 42	Architectural feature <u>Water tanks</u> Approximate Date of feature <u>1950</u> Describe existing feature and its condition: The water tanks are in great condition. Photo no. <u>42</u> Drawing no <u>MP</u>	Describe work and impact on existing feature: The water tanks will be retained. No work will be done to the Water tanks.
Number 43	Architectural feature <u>Onsite Pond</u> Approximate Date of feature <u>1912</u> Describe existing feature and its condition: The onsite pond is located to the Southeast of the main mill building and is in good historic condtion. Photo no. <u>43</u> Drawing no <u>MP and L1</u>	Describe work and impact on existing feature: No work will be done to the onsite pond.
Number 44	Architectural feature <u>Mechanical/ plumbing/ elec.</u> Approximate Date of feature <u>Non-historic</u> Describe existing feature and its condition: There were no original HVAC systems in the building Drawings P-1 - P-9 M1.1 - M8.2 E001 - E 402 Photo no. _____ Drawing no _____	Describe work and impact on existing feature: New HVAC, elec. and plumbing systems will be installed. All living units and corridors will have exposed spiral HVAC Duct work.

Historic Preservation Certification Application
State Historic Preservation Office Review & Recommendation Sheet
Significance - Part 1

Project number: _____

1

Property: Oakland Mill, 2802 Fair Ave., Newberry, SC
Historic District:
☐ NR District
☐ Certified State or Local District

☐ Preliminary Done
A&H number: 2010-002

10/27/09 Date application received by State
11/17/09, 12/4/09 Date(s) additional information
received by State
12/4/09 Date complete information received by State
12/4/09 Date of transmittal to NPS
Property visited by State staff? ☒ yes ☐ no

SHPO REVIEW SUMMARY

☒ Fully reviewed by SHPO
☒ No outstanding concerns
☒ Owner informed of SHPO recommendation
☐ In-depth NPS review requested
☐ Recommendation different from applicant's request

2

STATE RECOMMENDATION

Andrew W. Chandler, Architectural Historian, who meets the Secretary of the Interior's Professional Qualification Standards, has reviewed this application.

- ☐ The property is included within the boundaries of a registered historic district, contributes to the significance of the district, and is a "certified historic structure" for the purpose of rehabilitation.
- ☐ The property is included within the boundaries of a registered historic district, contributes to the significance of the district, and is a "certified historic structure" for a charitable contribution for conservation purposed in accordance with the Internal Revenue Code.
- ☐ The property does not contribute to the significance of the above-named district.
- ☐ Insufficient documentation has been provided to evaluate the structure.
- ☐ This application is being forwarded without recommendation.

Preliminary determinations:

- ☒ The property appears to meet National Register Criteria for Evaluation and will be nominated.
- ☐ The property does not appear to meet National Register Criteria for Evaluation and will not be nominated.
- ☐ The property appears to contribute to the significance of a:
- ☐ potential historic district that appears to meet the national Register Criteria for Evaluation and will likely be nominated.
 - ☐ registered historic district but is outside the period(s) or area(s) or significance as documented in the National Register nomination or district documentation on file with the NPS.
- ☐ The Property is located in a proposed historic district and:
- ☐ The Property does not appear to contribute to the significance of the proposed historic district.
 - ☐ The proposed historic district does not appear to meet the NR criteria for Evaluation and will not be nominated.

12-4-2009

Elizabeth M. Johnson

Date

State Official Signature

3

ISSUES

- ☐ Extensive loss or deterioration of historic fabric
- ☒ Substantial alterations over time
- ☐ Significance less than 50 years old
- ☐ Obscured or covered elevation(s)
- ☐ Moved property
- ☐ State recommendation inconsistent with NR documentation
- ☐ Functionally related complex or multiple buildings within an individual nomination
- ☐ Other (explain)

4

Complete items below as appropriate:

- (1) _____ is the period(s) of significance of the district.
- (2) The property is mentioned in the NR or state or local district documentation, Section _____, Page _____.
- (3) For preliminary determinations, the status of the nomination for the property/historic district:
- ☐ Nomination has already been submitted to State Review Board, and will be forwarded to the NPS within _____ months. Draft nomination is enclosed.
- ☐ Nomination was submitted to NPS on _____.
- ☒ Nomination process will likely be completed within thirty months.
- ☐ Other, explain:
- (4) The property is located in a registered district but its current condition is inconsistent with the determination of its contribution to the district as stated in the nomination. Supplemental Listing Record requested.

5

Describe problematic issues or other concerns: (Summary of mill complex's building history)

The Oakland Mill, built initially between Dec. 1910 and Feb. 1912, is located at 2802 Fair Ave. in Newberry, SC. From 1949-1951 the main mill bldg. was expanded twice, first to add 4 bays with large square-headed metal windows to the SE end of the bldg, and to add a stair tower with block glass windows at the NW [front corner], and a stair and freight elevator tower with block glass windows on the SE [rear] corner. By April 1950 though all windows in the 1910-12 bldg., and its 4-bay 1949 addition, were enclosed and ventilators installed in the bricked-in openings. Then, by 1951 the main bldg. was doubled in size, w/ the rhythm of the brick-enclosed, arched headed windows of the original bldg repeated in the 1951 addition. All other cosmetic features of the bldg's exterior, including the full-height brick pilasters and roof edge details were repeated as well. A stair tower with block glass windows was added as well to the S end of the bldg's street facade, and the roof monitor was removed and a uniform roofing material applied. Another cotton warehouse was added to the property as well, just N of the original cotton warehouse. Two large air handling towers were added to the bldg's street facade in the mid-1960s when the small ventilators along the bldg's front and other elevations were enclosed w/ brick. See enclosed site plan with contributing and non-contributing properties identified, a draft NR nomination, and additional historical material on the mill. All bldgs and structures on the ownership parcel contribute, except for two modern warehouses [15 and 16] at the rear of the property, and a brick utility bldg [17] adjacent to the 2 water towers. The eligible mill complex has an overall integrity of 1910-1951, while the main mill bldg itself has integrity to ca. 1950.

X See attachments: X photographs X maps X other: NR nomination draft & documentation

NPS COMMENTS:

Date

NPS Reviewer

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