

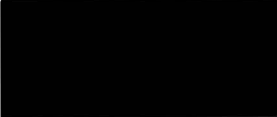


United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240





August 7, 2020



PROPERTY: **William Joseph Thomas House, 607 Bay Street, Beaufort, SC**
PROJECT NUMBER: **40860**

Dear 

I have concluded my review of your appeal of the March 10, 2020 Decision of Technical Preservation Services (TPS), National Park Service, denying certification of the rehabilitation of the property cited above. The appeal was initiated and conducted in accordance with Department of the Interior regulations [36 C.F.R. Part 67] governing certifications for federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank you and 

 for meeting with me via videoconference on May 15, 2020, and for providing a detailed account of the project.

After careful review of the complete record for this project, including the materials presented as part of your appeal, I have determined that the proposed rehabilitation of the William Joseph Thomas House is not consistent with the historic character of the property and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation (the Standards). I hereby affirm the denial of certification of the Part 2 – Description of Rehabilitation application issued by TPS on March 10, 2020.

The William Joseph Thomas House, built in 1908, is a two-story on a raised basement masonry building with a hipped roof. The south facade faces Bay Street and the water beyond and features a full-width, two-story porch supported by paired Doric columns on pedestals that are connected by balustrades. The five-bay, symmetrical façade features paired doors with transoms centered along the elevation and flanked by triple hung windows on both floors. A single dormer aligned with the centerline of the hip of the roof is also a prominent feature of the street elevation.

The Thomas House, and much of downtown Beaufort, were destroyed by fire in 1907. William Thomas commissioned Emile T. Vielt, a French immigrant stonecutter from Charleston to rebuild a fireproof house constructed from molded concrete blocks cast to resemble cut stone. Virtually all of the exterior masonry is concrete, which the Beaufort Gazette described in 1908 as, *“Every block is perfectly molded and the whole has the effect not of imitation stone but has character of its own which resembled a fine grade of sandstone.”* While concrete is an unusual construction material for early-20th-century residential buildings in Beaufort, the Thomas House design reflects the character-defining “Beaufort Style,” which combines elements of Colonial and Georgian architecture, as well as Greek Revival and Spanish styles.

Besides the two-story front porch, the interior plan also reflects such influences. The interior arrangement of the rooms follows the symmetry of the exterior. The plan features a wide center hall flanked by symmetrically arranged rooms of square proportions and tall ceilings on both floors. The two front rooms on the first floor are each entered from the center hall through a pair of tall pocket doors. On the second floor the center hall connects the stair landing to the double doors which open to the upper-floor porch. The center-hall plan is typical of low country architecture and is a character defining feature of the building. The house remained in the family for over a hundred years, although vacant for the last two decades, prior to its sale to the current owners. TPS certified on September 27, 2019, that the property is a “certified historic structure” that contributes to the significance of the Beaufort Historic District, which is both a National Register and National Historic Landmark historic district.

The proposed rehabilitation would convert the former single-family house into an inn, with the original parlors and bedrooms converted to guestrooms and the upstairs center hall to a kitchenette. The proposed work was well underway before the National Park Service received the Part 2 – Description of Rehabilitation application, thus limiting the potential input from the TPS review to assure the completed project will be consistent with the historic character of the structure. The regulations state, *“Owners are strongly encouraged to submit part 2 of the application prior to undertaking any rehabilitation work. Owners who undertake rehabilitation projects without prior approval from the Secretary do so strictly at their own risk.”* [36 C.F.R. 67.6(a)(1)].

After reviewing the Part 2 application, TPS determined that there were problematic alterations to the building, including 1) replacing the pocket doors on the front rooms on the first floor with single doors, 2) narrowing the first-floor center hall opposite the stair, 3) converting most of the second-floor center hall into a kitchenette, and 4) adding two dormers to the roof. TPS further determined that these alterations contravened Standards 2, 3, and 5. Standard 2 states, *“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.”* Standard 3 states, *“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.”* Standard 5 states, *“Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.”*

In my review of the now nearly-complete rehabilitation, the physical impact of the changes the TPS review identified as problematic are clearly evident. Regarding the two sets of pocket doors for the front parlors, you explained in the appeal presentation that the pocket doors still exist within the walls in the open position. The door opening was infilled with a single-leaf hinged door and you argued that both sets of doors could be restored with one leaf fixed and the other made hinged. Although both sets of pocket doors can be restored to operating condition, the option you presented would visually resemble the historic condition on the center-hall side but would appear as a single-leaf door on the room side. Although I acknowledge that would be an improvement over the current condition, it would still fall short of complying with Standards 2 and 5. Regarding the argument that code requires the new guest room door to have a fire rating, the regulations state, “*The Secretary’s Standards for Rehabilitation take precedence over other regulations and codes in determining whether the rehabilitation project is consistent with the historic character of the property and, where applicable, the district in which it is located.*” [36 C.F.R. 67.7(e)].

Regarding the narrowing of the first-floor center hall, the center hall—nine feet wide and eleven feet tall and extending through the full depth of the building—is a character-defining feature of the property. The program for the project called for two guest bathrooms to be inserted in the back parlor on the east side of the building, their size requiring a projection into the center hall that also included a closet for the reduced-size back parlor. The bathroom and closet, which extend two feet into the center hall, compromise its historic character and I concur with TPS that the narrowed center hall contravenes Standards 2 and 5.

Regarding enclosing the second-floor center hall—as wide as and approximately the same height as the first-floor center hall—it is also a character-defining feature. Here, two closets and double doors close off the south end of the center hall from the stairwell, and the kitchenette cabinetry also narrows the truncated space. These changes compromise the historic character of the center hall and I concur with TPS that subdividing and narrowing the center hall contravenes Standards 2 and 5.

Regarding the two dormers added to the side slopes of the hip roof, they allow the insertion of three guestrooms into the former attic. Although TPS was concerned that their design, matching that of the dormer on the street side of the roof, created a false sense of history, they are mostly hidden from view from the street by the steep angle of view caused by the building’s height and, although replicative design is not a recommended treatment, in this particular case the new dormers are not significant/visible enough to contribute to the project’s failure to meet the Standards. With regard to the new ridge caps being larger and more prominent than on the original roof, that change does not rise to the level of a denial issue. Consequently, the changes to the roof are not significant enough to contribute to the overall project failing to meet the Standards and I have dismissed both roof changes TPS identified as denial issues.

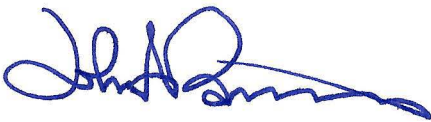
Although it is possible to remediate the changes to the front parlor pocket doors, remediating the changes to the two center halls may not be practicable. Both center halls are significantly impacted by the insertion of new bathrooms into the building. The first-floor projection into the center hall accommodates a toilet and the vertical plumbing chase for the upstairs bathrooms on the east side of the house. The two closets projecting into the second-floor center hall also serve

as vertical plumbing chases for the third floor (former attic) bathrooms. And, on both the first and second floors the ceilings of the center halls were dropped to hide horizontal plumbing runs, further compromising their spatial proportions and thus their historic character. The second floor kitchenette could be moved to the small guest room above the first floor kitchen and the double doors removed, but that would be at the cost of a guest room and the ability to rent the front two guest rooms as a suite with a kitchenette and private porch. Consequently, although the changes could technically be remediated, as a practical matter that may not be feasible

Although I am affirming the Part 2 denial of certification issued by TPS on March 10, 2020, please note that you have the option of submitting—through the normal process—an amendment to the Part 2 application resolving the issues that were cited in the TPS Decision and described above. If TPS were to review and deny certification of a Part 2 amendment, this decision would not preclude an appeal of that potential decision.

As the Department of the Interior regulations state, my decision is the final administrative decision with respect to the March 10, 2020 Decision that TPS issued regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,



John A. Burns, FAIA, FAPT
Chief Appeals Officer
Cultural Resources

cc: SC SHPO
IRS

