



United States Department of the Interior

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



June 24, 2020



PROPERTY: Zion-Olivet Presbyterian Church, 134 Cannon Street, Charleston, SC
PROJECT NUMBER: 37481

Dear [REDACTED]

I have concluded my review of your appeal of the May 16, 2019 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, [REDACTED] for meeting with me on December 6, 2019, 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, and the additional information submitted by [REDACTED] on April 14, 2020, in response to my questions made on March 20, 2020, I have determined that the proposed rehabilitation of the Zion-Olivet Presbyterian Church 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 May 16, 2019.

The Zion-Olivet Presbyterian Church is a rare example of Modernist architecture in the City of Charleston, a city better known for its 18th- and 19th-century architecture. Constructed in 1964 for an African-American congregation by the H.A. DeCosta Company, a prominent African-American-owned contracting company, the church was a prominent meeting place during the civil rights movement of the 1960s in Charleston.

Zion-Olivet Presbyterian Church features two main volumes, the sanctuary and a Sunday school wing. The sanctuary is a double-height rectangular space with a shallow gable roof and a same-height but narrower entrance vestibule. The sanctuary is a double-height interior space with an exposed wood plank ceiling supported by laminated wood beams on wood-paneled pilasters and lit by large stained-glass windows. The chancel, which is raised three steps above the sanctuary floor and located at the east end of the sanctuary, is the focal point of the space.

Typical of Modernist design, the sanctuary's interior was sparsely ornamented, but included carefully detailed finish materials on the walls and ceiling. A photograph from the dedication program shows that the chancel featured a pierced metal reredos behind the altar, flanked by wood pilasters and glazed-brick wall panels, and, on the right side, a raised platform for the organ console with an organ pipe enclosure above it, and, on the left side, a musician and choir gallery with an organ pipe enclosure above it. A pulpit and a lectern flanked the altar.

The Sunday school wing is a rectangular, one-story, flat-roofed both clad in running bond brick. The interiors of the Sunday school rooms, offices, and other support spaces of the church were much more simply detailed. These spaces featured painted concrete block walls and minimal detailing surrounding the doors and metal windows.

The Part 1 – Evaluation of Significance application, dated September 20, 2017, requested a preliminary determination for individual listing (PDIL) in the National Register of Historic Places. TPS determined that the property appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 C.F.R. Part 60. TPS issued the PDIL on December 7, 2017.

The Part 2 – Description of Rehabilitation application states that the former church will be converted to a performance space. The denial issues identified in the TPS Decision included 1) the lack of adequate documentation of pre-rehabilitation conditions, 2) removing historic character-defining features rather than repairing them or replacing them in-kind, and 3) the installation of a large exposed duct down the center of the sanctuary. TPS determined that these issues caused the rehabilitation to contravene Standards 2, 5, and 6. 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 5 states, “*Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*” Standard 6 states, “*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.*”

In my review, I discovered that the chancel features, visible in the 1964 dedication photograph, appear to have been in place as late as December 2015, from photographs of the space posted on the church’s Facebook page. The only apparent change between the two photographs, taken more than fifty years apart, is that a large cross was hung on the pierced metal reredos. The only change to the chancel mentioned in the Part 1 application was that, “*The pierced screen and*

wooden cross were removed by the congregation before they moved to a new location.” However, the supplemental information submitted by [REDACTED] confirms the actual items that were removed by the congregation were far more extensive, to also include the altar, the pulpit, the lectern, the organ, the organ pipe enclosures, and most of the pews. Thus, the ecclesiastical features had been removed for reuse prior to the start of the rehabilitation.

Regarding wood paneling on the walls and pilasters of the sanctuary, evident in the Facebook photographs, the Part 1 application stated that, *“The paneling was removed due to damage.”* In a letter to [REDACTED] dated October 18, 2018, [REDACTED] stated that, *“Under the ownership of Mr. Smith, in the Spring of 2016, emergency repairs were made to the roof. Rotting wood in the sanctuary ceiling was removed and replaced in kind, and moisture-soaked ceiling tiles and other finishes were removed to allow for sale of the building.”* [REDACTED] further noted that this work was prior to consideration of potential use of the rehabilitation tax incentives.

Regarding Denial Issue 1, I agree with TPS that denying the Part 2 application for lack of information was justified. However, the information presented as part of the appeal, and especially the supplemental research submitted by [REDACTED] more recently, convince me that there is now adequate information available to complete the review of the proposed work. Much of the recent research came from the papers of Herbert DeCosta, the contractor for the construction of the church, in the collections of the College of Charleston’s Avery Institute, which had been closed to researchers for two years for renovation of their building.

Regarding Denial Issue 2, I agree with TPS that removing the historic wooden wall and pilaster paneling from the sanctuary violates Standards 2 and 5, and, even though there is not adequate evidence of the severity and extent of the water damage, not repairing the paneling or replacing it in-kind violates Standard 6. However, from the additional information provided by [REDACTED], I have determined that the chancel had been stripped of its ecclesiastical features by the congregation and thus had lost its historic integrity and architectural character prior to the rehabilitation. Consequently, I have determined that the changes proposed in the area of the former chancel will not significantly compromise the historic character of the former sanctuary and thus do not violate Standards 2 and 5. And, I note that the DeCosta papers include the contract for the construction of the church, modifications made to reduce costs as construction progressed, invoices for materials, building permits, and the 1964 pamphlet from the dedication of the church. Although it is beyond the scope of this appeal, I further note that from these documents it may be possible to reasonably replace and match the visual appearance of the historic wooden wall and pilaster paneling that has been removed from the sanctuary and thus comply with Standard 6.

Regarding Denial Issue 3, I agree with TPS that the large, white-colored, and thus visually prominent HVAC duct already installed down the center of the sanctuary ceiling significantly alters and diminishes the historic character of that space and violates Standard 2. However, I acknowledge that the historic, under-floor location of the HVAC ducts is no longer usable because of the increased risk of flood damage. And, I agree that the installation of a single fabric duct with dozens of small holes rather than rigid ducts and branches with framed diffusers is a reasonable solution for providing HVAC in the sanctuary space and would comply with the

Standards except for its white color. [REDACTED] research determined that the duct is available from the manufacturer in different colors, so it could be replaced with a color that would be less visually intrusive and potentially comply with Standard 2.

Although I am affirming the Part 2 denial of certification issued by TPS on May 16, 2019, 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. 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 May 16, 2019 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

[REDACTED]