



United States Department of the Interior

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



June 7, 2024

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

PROPERTY: High Hampton Inn, 1525 Highway 107 South, Cashiers, NC
PROJECT NUMBER: 43316, Part 2 and Part 3
APPEAL NUMBER: 1685
ACTION: Final Administrative Decision

Dear [REDACTED]

I have concluded my review of your appeal of the November 13, 2023 Decision of Technical Preservation Services (TPS), National Park Service, denying certification of the Part 2 – Description of Rehabilitation and Part 3 – Request for Certification of Completed Work applications for the property cited above (the Decision). 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] [REDACTED] for meeting with me via videoconference on February 7, 2024, 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, subsequently submitted at my request on February 19, 2024, and my own online research, I have determined that the overall impact of the rehabilitation on the High Hampton Inn 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 and Part 3 – Request for Certification of Completed Work applications issued in the TPS Decision of November 13, 2023.

Located in the Cashiers Valley of North Carolina, the High Hampton Inn Historic District is a functionally-related complex of recreational buildings listed in the National Register of Historic Places in 1991. Stylistically, the buildings are in a rustic style found in lodges, hotels, and resorts built up and down the Appalachian Mountains in the early to middle 20th century. They are meant to harmonize with the natural environment, with detailing derived from the Arts and Crafts and American Picturesque styles, using chestnut bark siding with a variety of textures, irregular rooflines, and stickwork decoration. The Smokehouse and the Supply Building originally date from c.1890 and predate the development of the resort but were later adapted for use as part of the resort. Prior to the start of the project, the resort buildings contributing to the significance of the historic district consisted of the Main Inn, eleven cottages dating from 1932 and 1941, the Smokehouse and the Supply Building, and a Stable across Highway 107. The cottages and other outbuildings are nestled around the Inn on the west shore of Hampton Lake, which had been created as part of the resort. The buildings were determined by the NPS to be “certified historic structures” for purposes of rehabilitation on July 22, 2022. The approximately 30-acre historic district is the core of a much larger residential development and golf course surrounding the original resort complex, which has been rehabilitated for continued historical use as a mountain resort.

The National Park Service received the Part 1 application on April 19, 2021, and the Part 2 and Part 3 applications on December 13, 2022. The Part 2 application narrative stated that the work on the complex had been completed by February 1, 2021, well before submission of the Part 1, 2, and 3 applications. The NPS placed the review of the Part 2 and 3 applications on hold in January 2023 for additional information regarding several items of concern: demolition of three contributing buildings, new construction, lack of adequate documentation (i.e., historical photographs or other supporting documentation), and the extent of replacement materials. You submitted additional information in August and October of 2023 and TPS issued the Decision on November 13, 2023. Your appeal was timely filed on December 11, 2023.

TPS stated in the denial letter that, “*The rehabilitation does not meet the Standards primarily due to the demolition of three contributing buildings within the functionally-related resort complex, incompatible alterations to the exterior of several historic cottages and outbuildings, and lack of information.*” The supplemental materials you submitted on February 19th provide substantially more context and more detailed information regarding the scope of the overall project, effectively eliminating the lack of information as a denial issue.

My review encompassed all aspects of the rehabilitation, not just the denial issues identified in the TPS Decision, including related landscape features of the site and environment, as well as related new construction. For instance, the supplemental materials included information on several historic buildings not within the National Register historic district, but which have been rehabilitated as part of the overall project. The c.1900 Aunt Minnie's Log Cabin was moved from another site and rehabilitated as a guest cottage. The log Honeymoon Cottage on Jewel Lake was similarly rehabilitated. The c. 1932 Caddy Shack is now the History Center. The 1960s alterations to the c. 1932 Whiteside Cottage (listed as non-contributing in the NR nomination and planned for demolition) were removed and the original building was retained and rehabilitated. And the Pro Shop was rehabilitated as the General Store. These are positive aspects of the overall project.

However, the supplemental information also confirms that the condition of the three contributing structures that were demolished, Appletree Cottage, Caroline Cottage, and Lewis Cottage, did not appear to be in worse condition than the cottages that were retained and rehabilitated. And the Section 106 review by the Army Corps of Engineers had previously determined that their demolition had an adverse effect on the historic district and required mitigation in the form of record documentation. Consequently, I disagree with the argument that the condition of the three cottages justified their demolition and concur with TPS that the demolition of Appletree, Caroline, and Lewis Cottages is a primary denial issue, contravening Standards 2, 5, and 6.

In addition, I note that the Stable across Highway 107 – included in and listed as contributing to the historic district – was demolished as part of the related construction to reconfigure the golf course and is now the location of the green for the sixth hole. I have determined that the demolition of the Stable is as significant a denial issue as the demolition of the three cottages.

Regarding the TPS denial issues of incompatible additions to the exterior of several historic cottages and outbuildings, the supplemental information confirms the incompatible treatments TPS described in the Decision. Further, I have concluded that they are part of a larger programmatic choice to have all of the buildings adhere to a consistent architectural aesthetic, namely that of a 1930s era rustic resort set in rural North Carolina. The characteristic chestnut bark siding with a variety of textures, irregular rooflines, diamond-patterned roofing, stickwork decorative features, and natural wood finishes had remained on the inn and many of the cottages. In the rehabilitation, those features, details, and materials (albeit with poplar bark replacing chestnut bark) have been applied to all of the remaining historic buildings whether or not they had those finishes prior to the rehabilitation. And those same features, details and materials were used in the related new construction, including the Entrance Gate House, Range House, and the new kitchen addition to the inn, contravening the requirement of Standard 9 that new construction shall be differentiated from the old. Further, the remaining historic windows were replaced, and the same windows were used in the new construction. The result is that all of the

buildings in the completed project appear to date from the 1930s. The impact of the decision to dictate a uniform visual appearance across the resort creates a false sense of history, contravening Standard 3, which 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.*”

Other aspects that create a false sense of historical development include the Supply Building/Noah’s Ark, which had board and batten siding prior to the rehabilitation, but was reclad with plank siding matching that on the 1970s Boat House. The same plank siding was used on the new Pool House and Bath House constructed between the two older buildings. And in the new residential development on Sawmill Road, immediately north of the historic district, real estate listings show that the new homes have a strikingly similar massing and choice of materials as the historic cottages, further expanding the false sense of history.

Regarding the landscape features on the site, a small area of which was designated a contributing Recreational Area in the National Register nomination, the project eliminated the recreational area and extended the entrance drive to provide an access road to the new residential development north of the historic district. Jackson County GIS maps and aerial photographs show that the project made significant changes to the landscape west of the entrance drive and on both sides of the extended access road. And roads and building lots were laid out in the forested hills surrounding the historic district. Several mature stands of trees were removed within the historic district, notably at the north end of the Inn and on the north side of the Supply Building/Noah’s Ark. The alteration of landscape features and loss of mature trees and historic viewsheds significantly compromises the historic setting of the property.

As described above, I have determined that there were a series of changes made to the buildings, the site, and its environment that cumulatively, significantly compromise its historic character and integrity beyond those cited by TPS in its Decision. As the regulations state, “*The Chief Appeals Officer may base his decision in whole or part on matters or factors not discussed in the decision appealed from.*” [36 C.F.R. 67.10(c)].

Thus, the overall impact of the rehabilitation has significantly compromised the historic character of the High Hampton Inn, its site, and environment, causing the completed work to fail to meet the Secretary of the Interior’s Standards for Rehabilitation. Accordingly, I affirm the Part 2 and Part 3 denial of certification issued by TPS in its November 13, 2023 Decision.

As the Department of the Interior regulations state, my decision is the final administrative decision with respect to TPS’s November 13, 2023 Decision 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 Digitally signed by JOHN A
BURNS
Date: 2024.06.07 22:11:19 -04'00'

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

cc: NC SHPO
IRS

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