

**North Carolina Department of Cultural Resources**  
**State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Pat McCrory  
Secretary Susan Kluttz

Office of Archives and History  
Deputy Secretary Kevin Cherry

November 4, 2013

Lori Molitor  
URS Corporation  
6000 Fairview Road, Suite 200  
Charlotte, NC 28210

Re: Historic Architectural Resources Survey Report, Lexington Depot District Multi-Modal Station,  
Davidson County, ER 12-0759

Dear Ms. Molitor:

In response to the meeting on September 12, 2013, between the City of Lexington, URS, Shook Kelley Architects, and our office, we offer this revised letter regarding the above survey report. This letter is intended to replace our previous letter of July 30, 2013, in its entirety.

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the **Grace Episcopal Church** (DV 0530, URS Survey #19) is listed in, and remains eligible for listing in, the National Register of Historic Places under Criterion C for architecture, meeting Criteria Consideration A for religious properties. The existing National Register boundaries remain appropriate.

We also concur that both the **Wenonah South Side Mill Village** (URS Survey #4) and the **Wenonah Cotton Mill** (URS Survey #5) are eligible for listing in the National Register. However, given that the history, function, and significance of these two properties are intricately connected, we recommend joining both into a single **Wenonah Cotton Mill and Mill Village Historic District**. This larger historic district is eligible for listing in the National Register under Criterion A for industry and Criterion C for architecture, with a period of significance from the mill's founding in 1886 to 1963. See Attachment 1 for our recommended National Register boundaries, which combine the proposed boundaries of the mill and mill village from the survey report. We note that several houses in the 800 block of South State Street identified as "Wenonah Mill Houses" are contributing to the Lexington Residential Historic District, which was listed in the National Register in 2007. However, due to major modern development along South Main Street, there is no remaining historic fabric to make a connection between the State Street houses and the mill or South Side Mill Village.

We concur that **Uptown Lexington Historic District Expansion** (URS Survey #18) is eligible for listing in the National Register under Criterion A for commerce and government and Criterion C for architecture, and that the National Register boundaries proposed in the survey report appear appropriate. This expansion area includes: the **W.T. Grant Department Store/Kimbrell's Furniture Building** (URS Survey #15); **Redwine's Grocery and Clodfelter's Market** (URS Survey #16); and, the **Hedrick Block** (URS Survey #18A) as contributing resources. We concur that the **Hedrick Block** is also individually eligible for listing in the National Register under Criterion C for architecture. The Hedrick Block National Register boundaries proposed in the survey report appear appropriate. The **Family Shoe Center** (URS Survey #17) is a non-contributing resource within this expanded historic district due to major alterations and loss of historic integrity.

The **Sink, Taylor, and Evans Auto Sales and Service Building** (URS Survey #14), located adjacent to the Uptown Lexington Historic District Expansion, is *not* eligible for listing in the National Register as part of the expanded historic district or as an individual property.

The survey report concludes that the **Dixie Furniture Company** (URS Survey #7) is not eligible for listing in the National Register as there are numerous buildings and additions to the site constructed in 1962 or later and that Criteria Consideration G, requiring properties less than fifty years of age to be of exceptional significance, is not met. We understand that the planning and architectural survey work for this project has been ongoing for some time now, but in evaluating the site today, any construction that dates to 1963 or earlier is not required to meet Criteria Consideration G. Within the Dixie Furniture complex, 8 of the 28 buildings (221,500 of the total 738,000 square feet) were constructed after 1963. However, these later buildings are generally located on the periphery of the site and do not detract from the overall historic integrity of the property.

Historically, the northwestern side of the Southern Railroad, centered along Railroad Street, contained the highest concentration of industrial buildings in Lexington, ranging from factories, mills, bottling plants, water and power infrastructure, and rail-related sites. Today, the remaining industrial sites here offer the best opportunity to convey the significance of manufacturing to the development and economy of Lexington, and are prime examples of local industrial architecture and design. We recommend that a large historic district encompassing the early- to mid-twentieth century industrial, infrastructural, and rail related sites be determined eligible for listing in the National Register under Criterion A for industry and Criterion C for architecture. We propose that this **Lexington Industrial Historic District** include the following properties as contributing resources: the **Dixie Furniture Company** (URS Survey #7); the **Mountcastle Knitting Company/Dixie Furniture Company Showroom** (URS Survey #7A); the **North Carolina Candy Company** (URS Survey #7B); the **Lexington Southern Railway Freight Depot** (URS Survey #8); the **Lexington City Light and Water Office** (URS Survey #9); the **Siceloff Manufacturing Company** (URS Survey #10); the **Eureka Trouser Company** (URS Survey #11); and the **Lexington Shirt Company** (URS Survey #12). A period of significance beginning in 1906 with the construction of the earliest extant resource, the Eureka Trouser Company, to 1963 appears appropriate.

This district also includes the railroad right-of-way, the one-lane tunnel under the railroad connecting Railroad Street and Elk Street, and the enclosed elevated passage over Railroad Street between Buildings 16 and 23 as contributing resources. The tunnel is shown as early as the 1923 Sanborn Map and this elevated passage is shown on the 1948 Sanborn Map update, both within the period of significance. At this time, barring additional information to the contrary, the remaining resources are non-contributing. The three other elevated passages connect Building 16 to Buildings 20 and 28, which were constructed in 1983 and 1980, respectively; logically, these elevated passages were also built well outside the period of significance. The connections between Buildings 10 and 11 and between Buildings 14 and 19 appear to be for equipment/utilities only and are not considered historic resources. Please note, for National Register purposes, post-1963 buildings that were constructed as additions to contributing historic buildings are usually considered part of the contributing resource. Our proposed boundaries for this historic district are shown in Attachment 2; a map and list of the contributing/non-contributing resources within the district are included as Attachments 3 and 4.

We concur that, at this time, barring additional information to the contrary, the following properties are *not* eligible for listing in the National Register:

- **United Furniture Industries** (URS Survey #1);
- **Lexington Chair Company** (URS Survey #2);
- **Elk Furniture Company/United Furniture Company** (URS Survey #3);
- **South Salisbury Street Houses** (URS Survey #6, containing 700, 701, 715, 720, 724, and 726 South Salisbury Street and 23 East Second Avenue);
- **Wellborn Building** (URS Survey #13);
- **Floyd Lee Berrier VFW Post No. 3074** (URS Survey #20); and,
- The 36 remaining properties in **Section C** of the survey report.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-807-6579 or [renee.gledhill-earley@ncdcr.gov](mailto:renee.gledhill-earley@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



 Ramona M. Bartos

Enclosure

cc: Tammy Absher, City of Lexington, [tammya@lexingtonnc.net](mailto:tammya@lexingtonnc.net)  
Marvin Brown, URS, [marvin.brown@urs.com](mailto:marvin.brown@urs.com)  
Jeanne Johnston, Lexington Historic Preservation Commission, [jjohnston@lexingtonnc.net](mailto:jjohnston@lexingtonnc.net)  
John Winkle, FRA, [John.Winkle@dot.gov](mailto:John.Winkle@dot.gov)

**Attachment 4**  
Lexington Industrial Historic District

| URS Survey No.      | Site Name/Use                                     | Contributing Status   |
|---------------------|---|-----------------------|
| 8                   | Lexington Southern Railway Freight Depot          | Contributing          |
| 9                   | Lexington City Light and Water Office             | Contributing          |
| 10                  | Siceloff Manufacturing Company                    | Contributing          |
| 11                  | Eureka Trouser Company                            | Contributing          |
| 12                  | Lexington Shirt Company                           | Contributing          |
| 7                   | Dixie Furniture Company Complex                   | Contributing          |
| Bldg. 25-1          | Storage   | Non-Historic Addition |
| Bldg. 25-2          | Storage   | Non-Historic Addition |
| Bldg. 25-3          | Storage   | Contributing          |
| Bldg. 25-4          | Storage   | Contributing          |
| Bldg. 25-5          | Storage   | Contributing          |
| Bldg. 25-6          | Finished Product Storage                          | Contributing          |
| Bldg. 25-7          | Garage  | Non-Historic Addition |
| Bldg. 25-8          | Garage  | Non-Historic Addition |
| Bldg. 25-9          | Wood Processing                                   | Non-Historic Addition |
| Bldg. 25-10         | Warehouse and Kilns                               | Contributing          |
| Bldg. 25-11         | Wood Parts Storage                                | Contributing          |
| Bldg. 25-12         | Woodworking                                       | Contributing          |
| Bldg. 25-13         | Wood Sanding                                      | Contributing          |
| Bldg. 25-14 (A/B)   | Woodworking and Boiler Room                       | Contributing          |
| Bldg. 25-15         | Woodworking, Gluing, and Cutting                  | Contributing          |
| Bldg. 25-16         | Packing, Cutting, and Gluing                      | Contributing          |
| Bldg. 25-17         | Office and Showrooms                              | Contributing          |
| Bldg. 25-18         | Office and Showrooms (Mountcastle Knitting)       | Contributing          |
| Bldg. 25-19         | Office  | Contributing          |
| Bldg. 25-20 (A/B)   | Finishing and Spraying Room                       | Non-Contributing      |
| Bldg. 25-21         | Finishing   | Contributing          |
| Bldg. 25-22 (A/B)   | Laundry (Shoaf-Sink Hosiery Mill Warehouse)       | Contributing          |
| Bldg. 25-23         | Finishing (Shoaf-Sink Hosiery Mill Knitting Room) | Contributing          |
| Bldg. 25-24         | Storage and Parking Deck                          | Non-Contributing      |
| Bldg. 25-25         | Finishing   | Contributing          |
| Bldg. 25-26         | Finishing   | Contributing          |
| Bldg. 25-27 (A/B/C) | Finishing (North Carolina Candy Co.)              | Contributing          |
| Bldg. 25-28 (A/B)   | Packing, Rubbing and Trim                         | Non-Contributing      |
| Bldg. 25-P1         | Elevated Passageway (Bldg. 16 to 20A)             | Non-Contributing      |
| Bldg. 25-P2         | Elevated Passageway (Bldg. 16 to 23)              | Contributing          |
| Bldg. 25-P3         | Elevated Passageway (Bldg. 16 to 28A)             | Non-Contributing      |
| Bldg. 25-P4         | Elevated Passageway (Bldg. 16 to 28B)             | Non-Contributing      |
| n/a                 | Southern Railway Corridor                         | Contributing          |
| n/a                 | Tunnel under Southern Railway                     | Contributing          |
| n/a                 | 216 East Second Avenue                            | Non-Contributing      |



Attachment 1

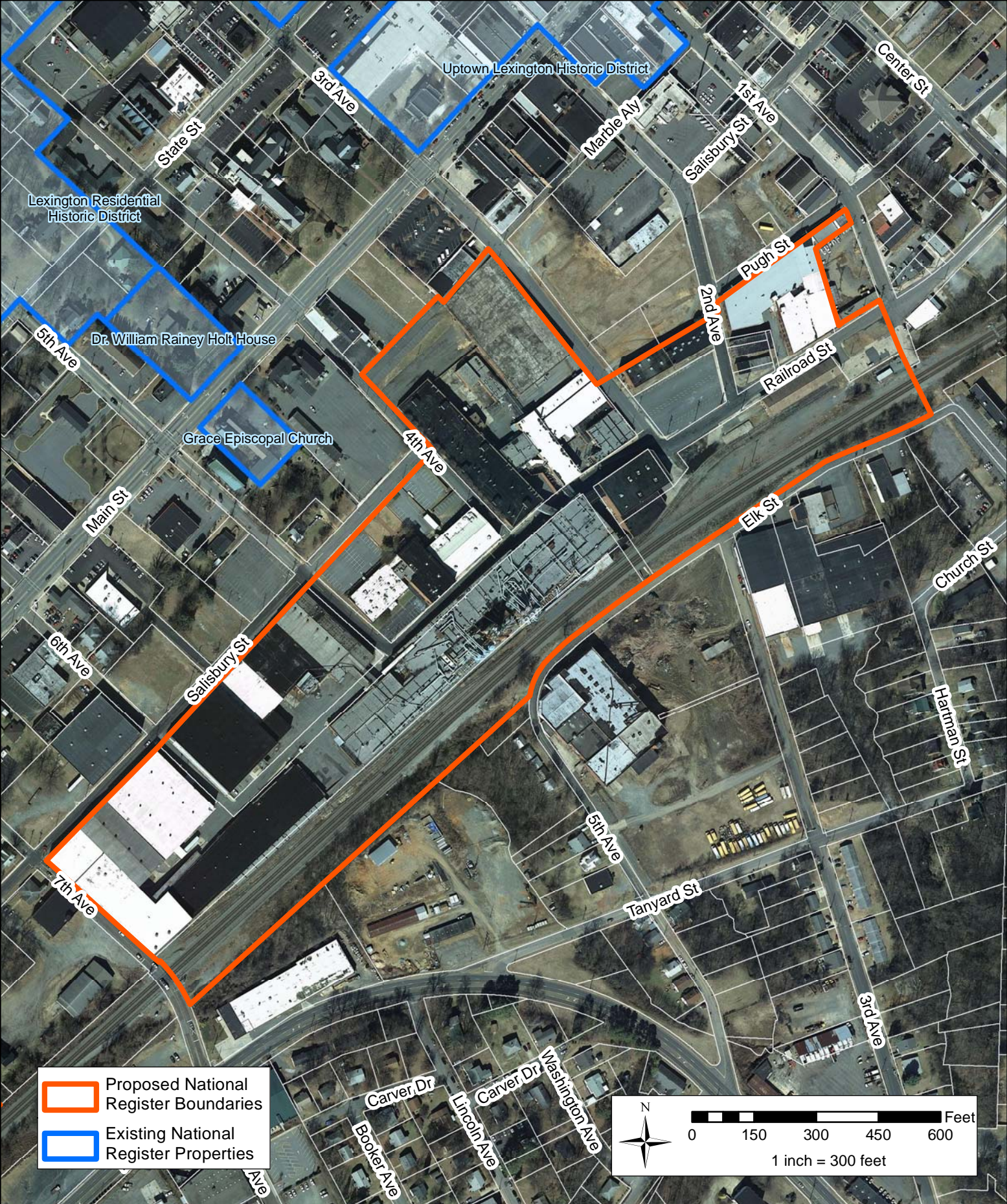
# Wennonah Cotton Mill and Mill Village Historic District





# Attachment 2

## Lexington Industrial Historic District





# Lexington Industrial Historic District

Contributing and Non-Contributing Resources

