



North Carolina Department of Natural and Cultural Resources
State Historic Preservation Office

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary Susi H. Hamilton

Office of Archives and History
Deputy Secretary Kevin Cherry

April 26, 2018

MEMORANDUM

TO: Kate Husband
Office of Human Environment
NCDOT Division of Highways

FROM: Renee Gledhill-Earley 
Environmental Review Coordinator

SUBJECT: Re-evaluation of Grimesdale Subdivision, R-5744, Balfour Parkway, Henderson County,
ER 16-2007

Thank you for your March 20, 2018, email concerning the above-referenced undertaking and a property that was included in the Historic Structures Survey Report. On November 14, 2017, we concurred with the report's determination that the Grimesdale Subdivision is not eligible for listing in the National Register of Historic Places. Since then, residents of the neighborhood have objected to that finding and provided the Department of Transportation and us with additional information. Having reviewed that information, members of our Survey and National Register Branch visited Grimesdale Subdivision and nine other subdivisions dating from the third quarter of the twentieth century in or near Hendersonville and believe a second look at Grimesdale's potential eligibility is warranted for the following reasons:

1. The report does not adequately place the Grimesdale Subdivision within a broader context of mid-twentieth-century development in and around Hendersonville. A review of the USGS topographic maps of 1935, 1946, 1965, and 1978 indicates that the period from 1946 to 1965 was one of significant growth in the area. Our fieldwork supports this notion and reveals that the building standards from this period were wide-ranging to meet the varied needs of Hendersonville's growing population and different socio-economic classes. In layout and architecture, Grimesdale most closely relates to Stoney Crest (1952-1960s) and Town Forest (1958-1968), although both subdivisions are significantly smaller.
2. The Period of Significance of the Grimesdale Subdivision should be reevaluated. While the report states on page 93 that Charles P. Grimes "steadily developed the neighborhood between 1956 and 1962," a review of the construction dates reveals that construction occurred fairly consistently through the 1960s and into the early 1970s. The NPS has previously advised that the POS of an historic district may be extended into the 50-year period, without the need to claim Criteria Consideration G, provided a) that the majority of the POS falls before the 50-year mark; and b) the architecture of the resources less than 50 years old is consistent with the character of the resources greater than 50 years. Furthermore, the NPS has advised that the POS may extend into the 50-year period by, perhaps, 5 years, but not much more than that without claiming Criteria Consideration G. Because the dwellings in the Grimesdale Subdivision dating from 1968 to roughly 1974 are highly consistent with those from 1956-1968 in size, scale, setback, design, materials, and landscaping, we believe the POS should be 1956-1974. Extending the POS into the early 1970s will change the status of approximately nine resources from non-contributing to contributing.

3. The status of buildings that are non-contributing due to alterations should be reevaluated based on the nature of those alterations. Multiple periods of alteration over time have made many historic buildings in Grimesdale non-contributing. However, some buildings have been determined to be non-contributing even though the alterations are nominal or done in a way that does not significantly impact the building's character. Examples include carports that are fully or partially enclosed with transparent materials, where carports are enclosed with materials that are clearly differentiated from the original construction (e.g. by using different materials), or where they are enclosed with a rollup garage door. We do not know how many historic buildings would be considered contributing based on a more careful inspection of their alterations.

We look forward to learning the results of your re-evaluation of this property and commenting upon the 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 environmental.review@ncdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.

cc: Mary Pope Furr, NCDOT, mfurr@ncdot.gov

From: [Husband, Katherine L](#)
To: [DCR - Environmental Review](#)
Subject: ER 16-2007, Grimesdale Subdivision, Henderson County
Date: Tuesday, March 20, 2018 8:34:25 AM
Attachments: [image001.png](#)
[Cindy Lemon Historic Document.pdf](#)

ER 16-2007

Good Morning Renee,

We have received comments and feedback from the residents of the Grimesdale Subdivision (HN1970), a mid- to late 20th century subdivision that was evaluated within the Historic Architecture Survey Report for TIP R-5744, Balfour Parkway in Henderson County. The subdivision was determined not eligible for National Register listing under any criteria as it does not retain sufficient integrity for eligibility. The residents of the neighborhood disagree with this finding, and have prepared a document of their own that I have attached. Please review the provided information, and please advise if you and your staff determine that a re-evaluation of the subdivision is warranted.

Thank you,
Kate

Due -- 4/18/18

S- *expeders*
RSC 4/16/18

Kate Husband
Architectural Historian
Human Environment Section
North Carolina Department of Transportation

919 707 6075 office
klhusband@ncdot.gov

1020 Birch Ridge Drive, Building B
1598 Mail Service Center
Raleigh, NC 27699-1598



Nothing Compares

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

Email correspondence to and from this sender is subject to the N.C. Public Records Law and may be disclosed to third parties.

A Review of the NCDOT *Historic Architecture Eligibility Evaluation Report*

February, 2018

Prepared by Grimesdale resident Cindy Lemon for the Grimesdale Homes Association

On September 28, 2017, Kate Husband, an Architectural Historian for the North Carolina Department of Transportation (NCDOT), forwarded a *Historic Architecture Eligibility Evaluation Report*¹ to the NCDOT Human Environment Unit concerning several Henderson County neighborhoods that are within the NCDOT BALFOUR PARKWAY STUDY AREA. This report, prepared by AECOM Technical Services of North Carolina, Inc., included an analysis of the 123-home Grimesdale subdivision in order to determine if Grimesdale met the eligibility requirements of the National Register of Historic Places (NRHP). The report concluded that the subdivision did not meet those requirements. Out of 123 homes in the Grimesdale subdivision, 47% (58 homes) were deemed to be contributing both in age and style, 15% (19 homes) were deemed to be noncontributing due to age, and 37% (46 homes) were deemed to be noncontributing due to alterations.

In reviewing the report, four points in particular are significant and worth emphasizing:

1. The dates of those considered noncontributing fall between 1970 and 2016. Some of these homes may still be considered within the date range to be considered historic yet were excluded.
2. Some homes were identified as noncontributing due to alterations to carports, yet criteria for many cities evaluating post-World War II homes allow minor alterations to carports for inclusion as historic neighborhoods.
3. Studies completed regarding the evaluation of post-World War II homes have indicated that replacement windows on ranch style homes should not eliminate them from being contributing, yet some homes were excluded based upon that criterion (along with the carport alterations above).
4. What is a majority? The majority of homes needs to be contributing, but what constitutes a majority?

DATE RANGE ISSUES

In 2012, the American Association of State Highway and Transportation Officials in cooperation with the Federal Highway Administration commissioned a study to develop a model for the identification and evaluation of Post World War II homes, structures and neighborhoods to be used by state Departments of Transportation to assist in compliance with the National Historic Preservation Act, setting out a consistent and predictable approach for identifying and evaluating postwar residential resources. The result was NCHRP Report 723 – *A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing*.²

¹ Brown, Marvin A., Potere, Sarah. "HISTORIC ARCHITECTURE ELIGIBILITY EVALUATION REPORT" September 2017. (<http://www.hpo.ncdcr.gov/ER/ER-Reports/ER%2016-2007.pdf>)

² Emily Pettis Amy Squitieri Christina Slattery Christine Long Mead & Hunt, Inc. Madison, Wisconsin Patti Kuhn Debra McClane Sarah Groesbeck Louls Berger group, Inc. Washington DC. "NCHRP Report 723 – A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing" 2012 <http://www.trb.org/Publications/Blurbs/167790.aspx>

Within this report, the dates identified as Post-World War II evaluation were 1946-1975, including the following citations among several:

*Spanning the period from 1946 to 1975, the contextual information provides the larger national framework within which to place local residences and subdivisions or neighborhoods as they are evaluated on a project-by-project basis.*³

The objectives of the research project, as stated in the Statement of Work, are to:

1. *Develop a methodology for identifying and evaluating the National Register eligibility and non-eligibility of: a. Postwar single-family housing built between 1946 and 1975 that is not part of a planned subdivision or unplanned neighborhood, and b. Postwar single-family housing developments built between 1946 and 1975 as a planned subdivision or unplanned neighborhood.*⁴

*Following research and outline development, the national historic context was prepared. This context compiles information about resources that share a common theme and time period, in this case single-family residences built from 1946 to 1975.*⁵

Applying the above date criterion, the overall percentage of homes identified as contributing would increase from 58 to 69 (from 47% to 56%). It is asserted that the date range identified within Report 723 should be the determining factor, invalidating the 11 noncontributing designations of the following homes:

3104 Cheryl - 1970
3106 Magnolia - 1970
3077 Napier - 1970
3083 Napier - 1970
3110 Cardinal - 1971
3242 Magnolia - 1972
3128 Florida - 1972
3074 Napier - 1972
3071 Napier - 1973
3136 Magnolia - 1974
3135 Magnolia - 1974

³ Emily Pettis Amy Squitieri Christina Slattery Christine Long Mead & Hunt, Inc. Madison, Wisconsin Patti Kuhn Debra McClane Sarah Groesbeck Louls Berger group, Inc. Washington DC. "NCHRP Report 723 – A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing" 2012 (<http://www.trb.org/Publications/Blurbs/167790.aspx>) p2

⁴ Emily Pettis Amy Squitieri Christina Slattery Christine Long Mead & Hunt, Inc. Madison, Wisconsin Patti Kuhn Debra McClane Sarah Groesbeck Louls Berger group, Inc. Washington DC. "NCHRP Report 723 – A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing" 2012 (<http://www.trb.org/Publications/Blurbs/167790.aspx>) p3

⁵ Emily Pettis Amy Squitieri Christina Slattery Christine Long Mead & Hunt, Inc. Madison, Wisconsin Patti Kuhn Debra McClane Sarah Groesbeck Louls Berger group, Inc. Washington DC. "NCHRP Report 723 – A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing" 2012 (<http://www.trb.org/Publications/Blurbs/167790.aspx>) p5

Following those corrections , the overall percentage of contributing would increase from 47% to 56%.

Even without that expanded date range, the NPS National Register Bulletin of 2002⁶ regarding historic subdivisions indicates “When the majority of homes and other resources, however, are less than 50 years of age, a case for **exceptional importance is required**. Subdivisions of this type found not to possess exceptional importance should be reevaluated when the majority of resources achieve 50 years of age”. At the time that building the BALFOUR PARKWAY is expected to commence (2024) all the above homes would then be in reconsideration, again putting the total at 56%.

CARPOR ALTERATIONS

NCHRP Report 723 has some references to carport alterations indicating that “if these (carports) are present, they should have minimal alterations”⁷ with no written criteria defining “minimal alterations”, but there is a note indicating that “enclosures of carports or incorporation of garages into interior living spaces” would be an alteration that compromise integrity. The report also emphasizes that “It is important to note that surveyors should use professional judgment and evaluate alterations, including unsympathetic additions, on a case-by-case basis. In some instances, the alterations listed may not rule out a property for individual eligibility”⁸ A further elaboration is found on page 46:

Alterations That Do Not Compromise Integrity. Common alterations that typically do not result in diminished integrity in a historic district include:

- *Exterior alterations to a small number of properties within the district, including siding and alterations of garages and carports (see figures 70 and 71)*⁹

⁶ U.S. Department of the Interior, National Park Service “National Register Bulletin, Historic Residential Suburbs, Guidelines for Evaluation and Documentation For The National Register of Historic Places” 2002. (<https://www.nps.gov/nr/publications/bulletins/suburbs/index.htm>)

⁷ Emily Pettis Amy Squitieri Christina Slattery Christine Long Mead & Hunt, Inc. Madison, Wisconsin Patti Kuhn Debra McClane Sarah Groesbeck Louls Berger group, Inc. Washington DC. “NCHRP Report 723 – A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing” 2012 <http://www.trb.org/Publications/Blurbs/167790.aspx> p16

⁸ Emily Pettis Amy Squitieri Christina Slattery Christine Long Mead & Hunt, Inc. Madison, Wisconsin Patti Kuhn Debra McClane Sarah Groesbeck Louls Berger group, Inc. Washington DC. “NCHRP Report 723 – A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing” 2012 <http://www.trb.org/Publications/Blurbs/167790.aspx> p45

⁹ Emily Pettis Amy Squitieri Christina Slattery Christine Long Mead & Hunt, Inc. Madison, Wisconsin Patti Kuhn Debra McClane Sarah Groesbeck Louls Berger group, Inc. Washington DC. “NCHRP Report 723 – A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing” 2012 <http://www.trb.org/Publications/Blurbs/167790.aspx> p46



Figure 70. Although these 1950s Ranch houses in Lexington, Nebraska, have modified windows and garage entrances, they are considered contributing in a potential historic district (Mead & Hunt photograph).



Figure 71. Ranch house in National Register-eligible Eastridge Historic District in Lincoln, Nebraska, constructed c.1953; one of several homes with an altered garage that is considered contributing (Mead & Hunt photograph)

Several cities have completed historic subdivision surveys tackling the issue of alterations to carports and have further defined for their studies what would be included as part of an Historical Area of Significance in particular addressing those alterations. In a 2005 study completed by Jason Fox and R. Brooks Jeffery of the Arizona State Historic Preservation Office (*Carport Integrity Policy*) (<http://www.tempe.gov/home/showdocument?id=5371>), the group determined a more liberal application was appropriate to carport/garage conversions. Their final recommendation is:

3. All residences with compatible carport garage conversions and compatible enclosures into habitable space are considered contributors.

This is the recommended scenario for the evaluation of Winterhaven's carport as the most liberal interpretation of the intended flexibility in carport modification as outlined in the historic background text above. This allows properties with either compatible garage conversions or compatible carport enclosures to garages to be considered contributors. In this scenario, non-original carport extensions are considered to be non-contributors because the extensions alter the proportion and scale of the residence's original design and intrude on the subdivision's uniform setback thus compromising the broad, landscaped streetscape as a character defining feature of the neighborhood. This scenario would identify 45 Winterhaven properties as non-contributors due to carport integrity.¹⁰

Their conclusion is documented as follows:

Conclusion

The carports on many post-World War II ranch style house types were designed as flexible spaces with the intent that homeowners could later enclose them as their family grew or as they simply desired more space. This policy, therefore, recommends that properties with compatible carport garage conversions and compatible enclosures into habitable space be considered contributors to a larger National Register district. Conversely, this policy recommends that properties with non-compatible garage conversions and enclosures, as well as carport extensions be considered as non-contributors to a larger National Register district. This policy also recommends applying the criteria outlined above as a method for evaluating carport integrity in post-World War II ranch style house types.¹¹

In a similar study, the city of Colorado's Department of Transportation completed an analysis of historic residential subdivisions of metropolitan Denver in April 2011 (<https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>). They indicate the following citing the Fox/Jeffrey study:

Replacing or enclosure of a carport to gain a garage or its conversion into living space would not render the dwelling noncontributing if executed in a compatible manner. Examples of incompatible changes include lateral expansion of the number of bays in the carport or extension of the carport from the house toward the street. For enclosures, the use of incompatible wall materials, windows at odds with the type and scale used elsewhere on the house, or the addition of a doorway in the

¹⁰ Fox, Jason and Jeffrey, R. Brooks of the Arizona State Historic Preservation Office "Carport Integrity Policy" (<http://www.tempe.gov/home/showdocument?id=5371>) p7

¹¹ Fox, Jason and Jeffrey, R. Brooks of the Arizona State Historic Preservation Office "Carport Integrity Policy" (<http://www.tempe.gov/home/showdocument?id=5371>) p8

*former garage door opening represent changes that might impact integrity. By the same reasoning, the conversion of a garage into living space would not necessarily render a house noncontributing. However, expansion of a garage laterally or toward the street would negatively impact the historic physical integrity of a dwelling.*¹²

In a report completed in 2012 by the city of Tempe Arizona regarding the admission of Bordon Homes into the NRHP, the following statement addressed carport alterations in a manner similar to the above reports:

*SHPO has recently published guidance for evaluating building additions and alterations (AZ SHPO 2011). The SHPO protocol has been included for reference as Appendix A of these guidelines. SHPO evaluation protocol requires the significance of the addition to be assessed regardless of compliance with the Secretary's Standards. Under SHPO evaluation protocol, the typical carport addition in Borden Homes Historic District could be determined not to be historically significant. However, the typical carport addition would still meet the Secretary's Standards and, therefore the property could still be considered to contribute generally to the historic character of the district. Again under the SHPO evaluation protocol, in instances where a carport addition is determined to be significant and does not meet the Standards, most would be considered minor alterations and the property could still be considered contributing.*¹³

Of the 46 homes determined to be noncontributing due to alterations, 21 were identified as having alterations to carports (no other noncontributing factor was documented). It is felt that these homes should be re-evaluated to determine if the alterations detract significantly from the historic nature of the architecture and not simply be eliminated from consideration due to any alteration. While certainly not all of the 46 would qualify under the less stringent guidelines, some could be considered as contributing

Those homes that should be reevaluated are:

3159 Cardinal
3146 Charlyne
3156 Charlyne
3226 Charlyne
3233 Charlyne
3236 Charlyne
3124 Cheryl
3143 Cheryl
208 Crabapple
3208 Florida
3092 Magnolia
3096 Magnolia

¹² Bunyak Research Associates, Front Range Research Associates Inc., Colorado Department of Transportation Applied Research and Innovation Branch, "Denver Post-World War II Suburbs", April 2011 (<https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>) p194

¹³ Bunyak Research Associates, Front Range Research Associates Inc., Colorado Department of Transportation Applied Research and Innovation Branch, "Denver Post-World War II Suburbs", April 2011 (<https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>) p36

3126 Magnolia
3201 Magnolia
3221 Magnolia
3231 Magnolia
3101 Wesley
3102 Wesley
3111 Wesley
3121 Wesley
3152 Wesley

REPLACEMENT WINDOWS

According to NCHRP Report 723, the ranch form house can have replacement windows as long as they are the original sash configuration to the original windows¹⁴ (page 17). Several of the homes within the Grimesdale study were excluded due to window replacement (along with carport alterations) and should be reevaluated under the criteria in the above report. Those homes are:

292 Brookside Camp
3147 Florida
3232 Magnolia

WHAT CONSTITUTES A MAJORITY?

The NPS National Register Bulletin of 2002 *indicates* “*Integrity of materials in an architecturally significant neighborhood requires that the **majority of dwellings** retains the key exterior materials that marked their identity during the historic period*”.¹⁵ However no definition of majority exists within those guidelines. A majority is defined as “the number greater than half the total”. If that definition is applied, those homes that are older than 50 years (with no other excluding factors) at the beginning of construction would constitute historic structure designation.

¹⁴ Emily Pettis Amy Squitieri Christina Slattery Christine Long Mead & Hunt, Inc. Madison, Wisconsin Patti Kuhn Debra McClane Sarah Groesbeck Louls Berger group, Inc. Washington DC. “NCHRP Report 723 – A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing” 2012 <http://www.trb.org/Publications/Blurbs/167790.aspx> p17

¹⁵ U.S. Department of the Interior, National Park Service “National Register Bulletin, Historic Residential Suburbs, Guidelines for Evaluation and Documentation For The National Register of Historic Places” 2002. (<https://www.nps.gov/nr/publications/bulletins/suburbs/index.htm>)