



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

October 5, 2017

MEMORANDUM

To: Shelby Reap, Architectural Historian
NCDOT/PDEA/HES

sreap@ncdot.gov

From: Renee Gledhill-Earley *RGE*
Environmental Review Coordinator

Re: Interchange reconfiguration at Exit 100 on I-40, I-5874, Burke County, ER 17-1224

Thank you for your July 27, 2017, letter transmitting answers to the questions that we raised in our July 22, 2017, memorandum about the findings of the Historic Structures Survey Report for the above-referenced undertaking. We apologize for our delayed response, but are experiencing a severe staffing shortage that has created backlogs in processing requests for review.

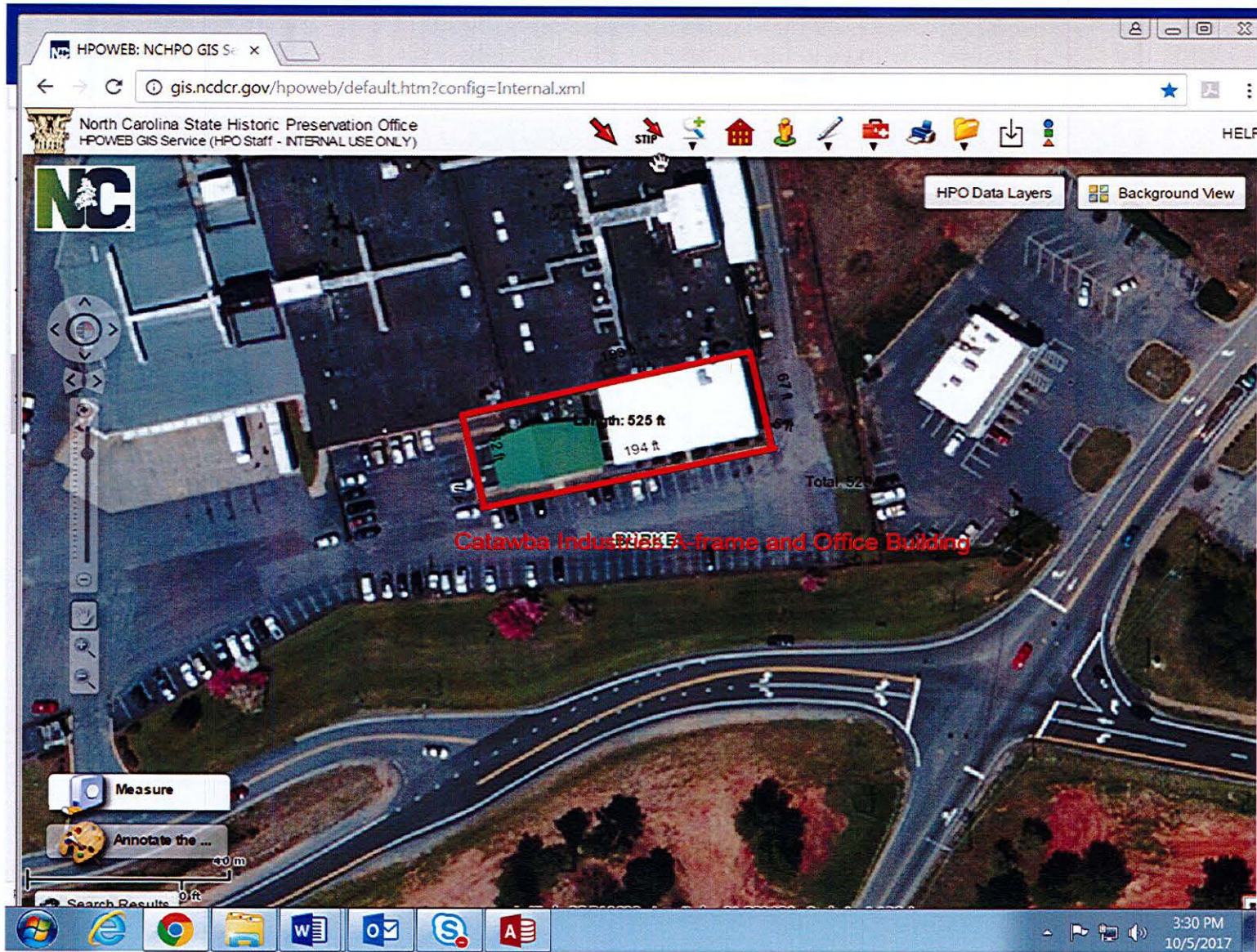
While we rarely comment on the quality of reports submitted to us, we feel compelled to note that the original report and response to our questions by the consultant are of poor quality and have made offering comments problematic. Given this situation and understanding that additional questions are unlikely to lead to a better product, we provide the following eligibility comments so the planning for the proposed undertaking can move forward in a timely manner.

We believe that the A-frame entrance bay and two-story, New Formalism office building on the front of the Catawba Industries Complex form a cohesive duo and is a rather rare example of mid-1960s architectural design employed by a manufacturing company in western North Carolina. Thus, the pair together appear to be eligible for listing in the National Register of Historic Places under Criterion C. A map of the proposed boundary is attached for your consideration.

Minus additional information, we are willing to agree that the remainder of the Catawba Industries Complex does not appear eligible for listing. We will, however, reconsider this opinion should additional information be presented in support of its eligibility.

These 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 comments, please contact Renee Gledhill-Earley, Environmental Review Coordinator, at (919) 807-6579. In all future communications regarding this project, please site the above-referenced tracking number.



Catawba Industries A-Frame and 2-Story Office Buildings – Criterion C for Architecture/Proposed boundaries



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

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Renee Gledhill-Earley
Deputy State Historic Preservation Officer
North Carolina Department of Cultural Resources
4617 Mail Service Center
Raleigh, North Carolina 27699-4617

July 27, 2017

Dear Gledhill-Earley:

RE: I-5874—Interchange Reconfiguration at Exit 100 on I-40 in Burke County

Thank you for your letter dated July 22, 2017. We appreciate your response to the eligibility evaluation of the resources in the Area of Potential Effects of the above referenced project. We contacted JMT, the consulting firm that wrote the report and asked them to respond to your concerns. Below is that response.

In reference to comments about the evaluation of Catawba Industries under Criterion A, the report refers to the Catawba Industries, Inc. as a Burke County corporation because that is how it is described in the 1966 deed. As for further information about the Catawba Industries, Inc. thorough research, including a visit to the Burke Co. Library North Carolina Room, did not uncover any further information about Catawba Industries. In addition, the company was merged with Tiffany Textiles in 1967 only a year after the building was constructed. Therefore, Catawba Industries' association with the building was short-lived.

In reference to the 1963 silo, there is not a longer use of the property than indicated in the report. Aerial photos from 1960 show the area as undeveloped forested/partially-cleared land with no discernable improvements. The 1964 USGS maps shows a small black square indicating a structure of some sort, which could be the silo. No other buildings/structures are indicated on the map.

In addition, the 1967 merger of the Catawba Industries and Tiffany Textiles does not appear to signal a change in the local textile industry generally. It seems to be a simple corporate merger. Something that happened repeatedly at this location throughout the rest of the 1960s and 1970s. Therefore, the lack of available

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information about the Catawba Complex combined with the short association with the company, as well as the repeated change of ownership throughout the building's history, leads us to uphold the recommendation that the Catawba Industries Complex is not eligible under Criterion A.

In reference to the context argument for Criterion C, the section was set up so as to compare the Catawba Industries Complex to a National Register listed example of a Modern Style industrial building (although not in Burke County), a Modern Style industrial building located in Burke County (although not listed in the National Register), as well as a National Register listed industrial/mill building (of a different style) located in Burke County. These examples were chosen after a thorough exploration of the area via fieldwork, as well as a search of HPOWeb and correspondence with SHPO's Annie McDonald. As stated in the report, "No National Register examples of industrial and/or manufacturing buildings eligible for their Modern Style were found in the Morganton or Burke County vicinity. Although the immediate area retains numerous industrial and manufacturing buildings, most are non-historic and those that are of a similar age to the Catawba Industries Inc. Complex have not been previously surveyed or listed in the National Register."

Although the A-Frame and New Formalist office building are architecturally interesting and worthy of acknowledgement, the majority of the property is a relatively common, vernacular industrial building. In addition, its integrity has been compromised by multiple additions and changes to the fenestration on secondary elevations. Therefore, these other elements outweigh the architecturally distinct A-Frame and New Formalist office building, which leads us to uphold the recommendation that the Catawba Industries Complex is not eligible under Criterion C.

Sincerely,

A handwritten signature in black ink that reads "Shelby Reap". The signature is written in a cursive, flowing style.

Shelby Reap
Historic Architecture Section