



# United States Department of the Interior

## NATIONAL PARK SERVICE

1849 C Street, N.W.  
Washington, D.C. 20240

IN REPLY REFER TO:

MAR 5 2007

Re: **Old Greyhound Bus Station, 1220 Blanding Street, Columbia, South Carolina**  
Project Number: **16943**  
Taxpayer's Identification Number:

Dear

My review of your appeal of the decision of Technical Preservation Services, National Park Service, denying certification of the rehabilitation of the property cited above is concluded. The appeal was initiated and conducted in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. Thank you for meeting with me in Washington on February 2, 2007, and for providing a detailed account of the project.

also attended.

After careful review of the complete record for this project, I have determined that the rehabilitation of the Old Greyhound Bus Station is not consistent with the historic character of the property, and that the project does not meet Standard 2 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, the denial issued on March 23, 2006, by Technical Preservation Services is hereby affirmed. However, I have further determined that the project could be brought into conformance with the Standards, and thereby be certified, if the corrective measures described below are undertaken.

The Greyhound Bus Depot was built in 1938-1939. It was listed in the National Register of Historic Places on December 28, 1989. The documentation on file with the National Park Service notes that the structure is an "exceptional example of an architectural style [Art Moderne] that is particularly representative of a significant period in American history...." The documentation cites the building as "Columbia's finest example" of the style.

The nearly completed rehabilitation of this "certified historic structure" was found not to meet the Secretary of the Interior's Standards for Rehabilitation owing to the construction of new additions on the exterior, as well as to the covering of the terrazzo floor with a new material, and changes to the floor plan on the interior.

In reviewing this matter, I find that the airlock entrances on the two side elevations are fairly modest in size, clearly contemporary, and relatively transparent. The new addition on the rear partially fills the space under a non-historic canopy added when the building was rehabilitated as a bank in the late 1980s. It does not impair a historic feature or add a conspicuous new one. Although the new post-op addition on the west elevation does modify the form of the building, it is relatively small, and fits underneath the historic canopy. As a result, I find that these elements generally meet the terms of Standards 9 and 10 governing new additions. Standard 9 states: "*New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be*

*differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.” Standard 10 states: “New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”*

As for covering the terrazzo floor: this treatment is not a recommended one, but the harm occasioned to the overall character of the building in this case is slight. And while in my opinion the evidence does not demonstrate that the floor was not original to the building, its loss to view does not compromise the extant historic quality of the building’s interior, and thus the treatment does not cause the project to contravene Standard 2, which 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.”*

However, the same cannot be said of the interior floor plan changes undertaken during this rehabilitation. The interior of the Greyhound Bus Depot was historically marked by one-story service areas and a central two-story space that served as the passenger waiting room. This space remained basically unencumbered at the outset of this most recent rehabilitation, and I agree with the TPS decision that its subdivision alters the character-defining space in such a manner as to cause the project not to meet Standard 2, cited above. Similarly, the insertion of a partition to create an exam room just inside the historic main entrance has severed the important visual connection between the exterior and the interior of the building, a connection that is central to virtually every structure, but even more so to a building that served as a transportation hub for so large a community. As a result, the project does not preserve the overall historic character of the structure, and cannot be certified as meeting the minimum statutory test for certification.

While the rehabilitation as completed cannot be approved, I believe that the harm to the historic character of the Greyhound Bus Depot occasioned by these interior insertions can largely be undone if the changes proposed in your March 12, 2006, letter to \_\_\_\_\_ and outlined in your presentation were to be made. During our appeal meeting, you suggested that the upper portions of the paneled partitions in the new patient waiting room could be glazed, and that glass doors could be installed in place of the solid doors in the exam room behind the former entrance doors. These changes would be positive developments. In the case of the new partitions bisecting the two-story central space, the glazing would allow the space to “read” more readily as a historically continuous two-story space. Already that is the case in the “pre-op” portion of the building, and the insertion of clear glass in the partitions would make the true extent of the former passenger waiting room more evident. And the installation of ribbed glazing in the exam room doors near the former front entrance would reestablish the visual connection between the entrance and the principal interior space to an acceptable degree.

One other element of the project—the proposed rehabilitation of the sign—has not yet been undertaken. This work did not figure in the previous decision by TPS because the work cited by TPS and discussed above had already been completed, but the sign had not yet been touched. Because this sign is so prominent a feature, I agree that some guidelines for its treatment are warranted. Accordingly, I strongly recommend that the historic visual appearance of the sign be used as the basis for the rehabilitation of the sign. The original sign, of which you have photographs, featured a neon-lit greyhound logo and block lettering, and a neon outline. The white vinyl \_\_\_\_\_ lettering shown in the photographic mock-ups in your Part 2 application is not compatible with the iconic verticality of the sign. The lettering is both too bulky in proportion to the historic lettering and too abbreviated. One possible solution would be to place the business name in the rectangular field at the base of the sign and leave the vertical element plain. However, you may propose other design solutions.

If you choose to proceed with the additional measures described above, including rehabilitation of the sign, I would strongly suggest that you submit proposals specifying how the work will be accomplished and secure approval before proceeding. You may submit any proposals, with a copy to the South Carolina Department of Archives and History, to me at, Technical Preservation Services, National Park Service,

Note that this project will remain ineligible for the tax incentives until it is designated a "certified rehabilitation" following completion of the overall project.

As a final matter in this case, I have reviewed the entire history of this project, and do not find that either the South Carolina Department of History and Archives or Technical Preservation Services of the National Park Service were amiss in their review of this application. It would appear that proper procedures were followed. Indeed, the central problem in this case appears to stem from the fact that the project was not received by the State office until it was virtually complete. This is unfortunate, since neither the building nor its proposed reuse posed unique obstacles to certification in theory. Both the application instructions, page 2, and Department of the Interior regulations strongly encourage owners to apply before beginning work. While owners are free to apply after rehabilitation has begun, regulations state that "*Owners who undertake rehabilitation projects without prior approval from the Secretary do so strictly at their own risk.*" [36 CFR Part 67.6(a)(1).]

As Department of the Interior regulations state, my decision is the final administrative 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, FAIA  
Chief Appeals Officer  
Cultural Resources

cc: SHPO-SC

IRS