



## United States Department of the Interior

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



February 24, 2014

Re: **South Side High School, Pittsburgh, Pennsylvania**  
Project Number: **23208**

Dear

I have concluded my review of your appeal of the May 15, 2013, decision of the National Park Service's Technical Preservation Services (TPS) (which TPS reiterated on June 5, 2013), denying certification of the rehabilitation of the former South Side High School in Pittsburgh, Pennsylvania. You initiated your appeal under the 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 and [redacted] for meeting with me in Washington on August 7, 2013, and for providing a detailed account of the project. After that meeting [redacted] provided additional information to me via letters dated November 21, 2013, and December 13, 2013, and in an email on January 10, 2014.

After careful review of the complete record for this project, including the additional information recently provided to me, I agree with TPS that the rehabilitation of the property is not consistent with its historic character and that the project does not meet Standard 2 in the Secretary of the Interior's Standards for Rehabilitation (Standards). Accordingly, I hereby affirm TPS's decision.

Built in 1897, with additions in 1923 and 1935, the Former South Side High School was listed in the National Register of Historic Places on September 30, 1986. The completed rehabilitation of this "certified historic structure" was found not to meet the Standards for Rehabilitation owing to the installation of exposed, unpainted, HVAC ducts within the former classrooms, auditorium, and other spaces. In many of the classrooms the ducts were installed close to the windows and are visible from the exterior. Unfortunately, the ductwork was not installed as described in the Historic Preservation Certification Application Part 2—Description of Rehabilitation, which was approved by TPS in 2009. The Part 2 application proposed to conceal the ductwork, as

recommended in NPS guidance. Instead, for reasons you state are still not clear to you, the Part 2 proposal was disregarded in construction. Upon receipt of photographs documenting the completed work, TPS found that the treatment as undertaken caused the rehabilitation not to meet 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.”*

I agree with TPS’s finding. The exposed and unpainted metal ductwork—characteristic of industrial buildings—contrasts markedly with the historically finished interiors of this late-nineteenth/early-twentieth century school. The contrast, evident throughout the building, is most egregious where the ducts run across windows. Consequently, I find that the ducts installed along the exterior walls are incompatible with the historic character of the former classrooms, and that their locations and unfinished appearance make them prominently visible both within the building and without. Further, in the 1897 section of the building, their location alters the spatial characteristics of the affected spaces by being too close to the exterior walls and suspended too far below the ceiling level. As a result, the project cannot be approved as it stands.

At our August 7, 2013, meeting you proposed additional measures to address the deficiencies discussed here. As detailed in the material submitted by \_\_\_\_\_ with his November 21, 2013, and December 13, 2013, letters, the proposal called for the ductwork in the auditorium to be concealed within the walls; it also set forth various options to address the problem in the other spaces. These included moving the ductwork in some places, painting it in others, and attempting to conceal it behind scrims of various sorts. After considering these proposals, as well as the additional photographs supplied by \_\_\_\_\_ in his email message of January 10, 2014, I find that they would not suffice to remedy the objections to certification cited above.

However, I believe that the some of the remedial measures you have proposed, if expanded in scope, could bring the project into conformance with the Standards, as follows:

- In order to reduce the visual prominence of the exposed and unpainted metal ductwork, you have proposed painting it in some—but not all—of the units. Instead, paint the exposed ductwork in all of the units.
- You have proposed to remove the exposed ductwork in the auditorium and conceal it within the walls or in chases. Although it could remove this impediment to certification, the proposed new work concealing the ducts has not been reviewed by TPS.
- You have proposed relocating the exposed ductwork to lowered ceilings above the bathrooms and kitchens in units 219, 318, and 319, in the 1897 section of the building. Instead, relocate the ducts in these three units and also in units 216, 217, 218, and 317, so that the units facing East Carson and South 10<sup>th</sup> Streets in the 1897 section would be consistently treated. As with the auditorium, this proposed new work has not been reviewed by TPS.

Consequently, since your proposed remedial work—and the recommendations I have made above—include new measures that have not been previously reviewed by TPS, if you decide to

continue to pursue certification, then you must submit to TPS an amended Part 2 application, with a copy to the Pennsylvania Historical and Museum Commission, which TPS will review and evaluate on its own merits. As stated in the first paragraph of this letter, however, I hereby affirm TPS's decision, announced on May 15, 2013, and reiterated on June 5, 2013, denying certification for the project as it currently stands. As stated in 36 C.F.R. § 67.10(d), this letter announces the final administrative decision on your pending appeal.

If you have any questions about this letter, please call me at (202) 354-2118.

Sincerely,

A handwritten signature in blue ink, appearing to read "John A. Burns". The signature is fluid and cursive, with a long, sweeping underline.

John A. Burns, FAIA  
Chief Appeals Officer  
Cultural Resources

cc: SHPO-PA  
IRS