



# United States Department of the Interior

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



April 30, 2019

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**PROPERTY: Nash Automotive, 657 St. Louis Street, Mobile, AL**  
**PROJECT NUMBER: 35600**

Dear [REDACTED]:

I have concluded my review of your appeal of the decision of Technical Preservation Services (TPS), National Park Service, denying certification of the rehabilitation of the property cited above. The appeal was initiated and conducted in accordance with 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 your representative, [REDACTED] for meeting with me via conference call on February 25, 2019, and for providing a detailed account of the project.

After careful review of the complete record for this project, including the additional information submitted as part of your appeal, and recently submitted by [REDACTED], I have determined that the completed rehabilitation of the Nash Automotive building is not consistent with the historic character of the property and the historic district in which it is located, and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation (the Standards). Accordingly, the denial issued by TPS on November 30, 2018, is hereby affirmed.

The property at 657 St. Louis Street began its life as two adjacent buildings, both constructed circa 1925. One building was Nash Automotive and the other housed a florist. The Nash Automotive building is a single-story brick building with two distinct sections. The corner section was the sales showroom, and is almost square in footprint with a rounded corner showroom window at the intersection of St. Louis Street and North Washington Avenue. The showroom's street facades featured large storefront windows, and most likely had a curved glass section to wrap around the curved corner of the building. These historic storefronts were missing at the beginning of the rehabilitation. The other section of the Nash Automotive building, fronting on St. Louis Street, was the service facility. It is a three-bay gable-front structure with a stepped parapet and a large garage door flanked by two large showroom windows. All three

openings had been infilled with brick. The former florist building is a simple story-and-a-half concrete block building covered with smooth stucco. It has three off-center bays, with double entrance door flanked by two large steel industrial windows in a four-high by six-wide grid. In the late 1950s, the florist operations expanded with an addition that filled in the courtyard behind the building, and interconnected with the former Nash Automotive building to operate as a single commercial florist. In the 1970s, after the period of significance for the district, the Nash Automotive showroom windows were altered to a segmented storefront with a heavy projecting hood. The combined property is now considered a single building and was determined to be a contributing resource within the National Register of Historic Places listed Automobile Alley Historic District, and thus is a "certified historic structure."

In the denial determination, TPS found that the new stucco finish on the original florist building does not match the stucco finish it replaced, contravening Standard 6, which states, "*Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*" TPS also found that the partial removal of paint from the former Nash Automotive building (and conversely the partial painting of new brick areas constructed during the rehabilitation) created the visual appearance of a deteriorated building not consistent with the historic character of an automotive sales and service building, contravening Standard 2. Standard 2 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.*"

In my review regarding the original florist building, I determined that there are virtually no remaining historic exterior features except the overall massing of the building and the three openings on the St. Louis Street façade. The new replacement stucco system you installed requires expansion joints rather than the historic stucco applied directly to the underlying masonry, which did not. Although expansion joints do not necessarily contravene the Standards, in this case, the expansion joints are exaggerated and break the façade into a series of panels that more closely resemble a contemporary EIFS finish, not the historic stucco finish it replaces. And, the coarse texture of the replacement stucco does not match the historic smooth stucco. Thus, I concur with TPS that the new stucco finish does not comply with Standard 6, quoted above. I also note that the replacement windows do not match the windows they replace, the new windows each having a four-high by eight-wide grid with a center vertical mullion.

In addition, although the new, modern canopies are clearly differentiated from the historic building, consistent with Standard 9, I have determined that the new canopies significantly contribute to the now-contemporary overall appearance of the building, which contravenes Standard 2, quoted above. 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.*"

With regard to the partial removal of the paint on the brick facades of the original Nash Automotive building, and partial painting of the new brick, I concur with TPS that the end result is that the building appears deteriorated, not rehabilitated, thus contravening the overall purpose of the rehabilitation tax incentives and Standard 2, quoted above.

In addition, with regard to the reconstruction of the corner showroom windows, the Sanborn map (Volume 1, Sheet 38, 1924 – Oct. 1950) shows that the solid walls of the showroom were brick (pink color on the map), and the showroom windows had a frame head supported on posts (yellow color on the map, with the word POST on the outside curve of the exterior wall). Consequently, I have determined that the new showroom windows, with brick piers supporting a steel lintel and a brick head are not based on the available documentary evidence, thus contravening Standard 6, quoted above. Further, I have also determined that the installation of glass block in the curved section of the showroom windows is not consistent with the historic purpose of the showroom windows to see the automobiles available for sale inside. Although glass block more closely follows the curve of the building's corner, it does not provide the transparency of clear glass. A series of faceted clear glass windows would better provide the historic transparency of the original showroom windows. Thus, I find that glass block is an inappropriate replacement material for the curved corner window.

With regard to my findings concerning the new canopies on the original florist building and the reconstruction of the Nash Automotive showroom windows, which were not issues identified in the TPS denial, the regulations state, "*The Chief Appeals Officer may base his decision in whole or part on matters or factors not discussed in the decision appealed from.*" [36 C.F.R. 67.10(c)].

Consequently, I find that overall impact of the rehabilitation of the Nash Automotive building significantly compromises the historic character of the property and thus fails to meet the Standards and hereby affirm the previous decision.

As Department of the Interior regulations state, my decision is the final administrative decision with respect to the November 30, 2018, denial that TPS issued 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, FAPT  
Chief Appeals Officer  
Cultural Resources

cc: SHPO-AL  
IRS

[REDACTED]