

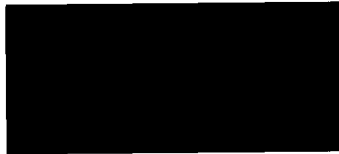
United States Department of the Interior

NATIONAL PARK SERVICE

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



December 31, 2020



Re: **Plumbers & Steamfitters No. 60 Building, 1919 St. Claude Avenue, New Orleans, Louisiana**
Project Number: **41558**

Dear [REDACTED]

I have concluded my review of your appeal of the February 13, 2020 Decision of the National Park Service that the property cited above does not contribute to the significance of the New Marigny Historic District (the Decision). 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. I thank you and [REDACTED] for meeting with me in a video conference and for providing a detailed account of the project.

After careful review of the complete record for this project, including the well-developed additional materials subsequently submitted by Ms. Duhon, I am resubmitting this matter to the National Park Service for further consideration. The 1994 New Marigny Historic District map identifies the property as contributing to the significance of the district and remains the official designation in the National Register nomination for the district. The informal determination by the SHPO in its review of the Part 1 application does not correct that official record. Consequently, the error in the historic district map must be corrected before I can issue a final decision on the appeal. However, even based on the information before me, I would determine that the Plumbers & Steamfitters No. 60 Building does not represent a contributing resource within the New Marigny Historic District and therefore would not qualify as a "certified historic structure" for purposes of Federal tax laws. The denial of certification issued in the February 12, 2020 Decision by the National Park Service is hereby resubmitted to the National Park Service and the SHPO to address the mapping error for the historic district.

The New Marigny Historic District was listed in the National Register of Historic Places in 1994 under Criterion C in the area of Architecture. Containing approximately 2,760 contributing buildings, the district represented the physical development of several adjacent faubourgs (suburban plats) northeast of downtown New Orleans during the period 1830-1944. Constructed circa 1952, the Plumbers & Steamfitters No. 60 Building was built well outside the period of significance for the New Marigny

Historic District (1830-1944). The SHPO noted that the 1994 map in the National Register nomination mistakenly identified the subject property as contributing, stating:

Our NR Coordinator referenced the hard file for the district and discovered that the building was classified as an 'intrusion' on the previous revisions of the map, and that its 'contributing' status on the final map submitted to NPS in the 1994 nomination was a mapping error.

I concur with the SHPO's analysis of the nomination map. Buildings completed outside the period of significance for an historic district can only contribute to a district if they are individually eligible for listing within their own period or area of significance.

Although the 1944 end date for the district's period of significance was ostensibly based on the 50-year mark at the time of listing in 1994, in order to incorporate the broadest collection of resources and patterns of historic development, it cannot be considered automatically as an arbitrary sliding scale. The 1944 end date coincides in this case with a major element of twentieth century history—World War II. The current documentation provides no context for post-war development in the New Marigny neighborhood. Without that context it is impossible to understand and articulate the evolving patterns of local development and architectural design. The relative paucity of Depression era and war-time construction commonly resulted in a dramatic change in post-war development patterns and architecture, with modern materials and construction forms often emerging in the post-war boom. It cannot be assumed that the period of significance can be moved up to each new point along the 50-year continuum without extensive, well-developed supporting documentation for the entire district.

The 1953 completion of the Plumbers and Steamfitters No. 60 Building currently stands outside the documented period of significance for the New Marigny Historic District and the information submitted with the appeal provides no solid justification for an adjustment of the district's period. Additional district-wide context would be necessary in order to amend the period of significance, not just the story of a single building.

The individual qualities and historic aspects of the Plumbers and Steamfitters building as outlined in the submitted application and appeal do not appear sufficient to merit the property's individual eligibility for the National Register. The building's overall design, while perhaps reflective of the post-war modernism aesthetic is relatively unremarkable and appears to be more a product of the post-war rush to quickly rebuild and modernize infrastructure after the long war-time hiatus. The street façade has the composition of a blank billboard, with a surrounding frame of beige-colored brick and an inset center with struck horizontal joints that provide a horizontal emphasis. The centered double-door entrance is more deeply recessed. The touted steel sash windows were common catalogue components of a dominant industrial manufacturer of the twentieth century, while the brick veneer and concrete block wall construction is not innovative or significant. Much more context or analysis would be necessary to base any architectural significance on those aspects of the design. As the work of the noted but notorious architect Leon C. Weiss, the building does not rise to the level of the work of a master. Weiss was a politically connected architect who designed major buildings for the administrations of Governors Huey P. Long and Richard Leche, including the Louisiana State Capitol, the governor's mansion, and several buildings at Louisiana State University, all in Baton Rouge, and the LSU Medical School and Charity Hospital in New Orleans. By comparison, this building, designed after Weiss resumed architectural practice following his release from a prison sentence for corruption, was not a major commission nor did it represent a significant aspect of his career.

The union itself appears to be a typical twentieth-century labor organization, with no remarkable significance other than serving its working-class members. The building of the 1953 union hall was noted

as corresponding to a period of prosperity for the union, but no specific events or activities were documented meriting individual significance beyond the normal pro-labor activities. The notation that the post-war expansion of the petro-chemical industry in Southern Louisiana kept the union members busy only serves to emphasize the fact that the context for post-1944 New Orleans and its evolving patterns of development differs significantly from the context in the district's pre-war period of significance.

Although I would affirm a denial of certification issued by the National Park Service, subject to a final determination by the National Park Service and the SHPO as to the error on the nomination map, there would be two possible options for re-applying for historic structure certification. The first would entail providing a full and detailed historic context for the post-WW II era (minimally 1945-1960) in New Orleans and the New Marigny Historic District, establishing the important themes and patterns of local development and/or architectural design. Then assess the contributing nature of the Plumbers and Steamfitters No. 60 Building within that extended district-wide context. The district nomination would need to amend the period of significance and assess the effects of such a change on the entire body of district resources, not just the single building. The second alternative would be to develop sufficient contextual information to establish the individual National Register significance of the subject property within its own period or area of significance. An additional component of this alternative would be a comprehensive assessment of the building's historic physical integrity.

Please note that this letter does not constitute a final administrative decision regarding the appeal.

Sincerely,



John A. Burns, FAIA, FAPT
Chief Appeals Officer
Cultural Resources

cc: SHPO-LA
IRS

