



United States Department of the Interior

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



June 16, 2022

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

PROPERTY: Jacksonville Jewish Center, 205 W. 3rd Street, Jacksonville, FL
PROJECT NUMBER: 40803, Part 2
APPEAL NUMBER: 1657
ACTION: Final Administrative Decision

Dear [REDACTED]

I have concluded my review of your appeal of the January 14, 2022 Decision of Technical Preservation Services (TPS), National Park Service, denying certification of the Part 2 – Description of Rehabilitation application for the property cited above (the Decision). 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 videoconference on March 25, 2022, and for providing a detailed account of the project.

After careful review of the complete record for this project, including the materials presented as part of your appeal and submitted by [REDACTED] at my request, I have determined that the proposed rehabilitation of the Jacksonville Jewish Center is not consistent with the historic character of the property and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation (the Standards). I hereby affirm the denial of certification of the Part 2 – Description of Rehabilitation application issued in the TPS Decision of January 14, 2022.

The charter for the Jacksonville Jewish Center, issued on January 27, 1927, defined its purpose to be the operation of “*a Jewish Community Center in Jacksonville, Florida for the religious, social, physical, cultural, educational and recreational needs of the Jewish people.*” It was meant to serve all the Jewish congregations in Jacksonville in one location. However, the principal financial support came from just one congregation, B’Nai Israel, and that resulted in the two organizations merging and operating as a synagogue center out of a single building, with construction of some of the planned recreational and athletic facilities deferred until a later date. That original building, completed in December 1927, was on the corner of West Third and Silver Streets in the Springfield neighborhood of the city. In 1950, the planned community center, designed by architects Saxelbye and Powell in a late Art Moderne style, was finally constructed on Third Street, next to the original building. In 1957 an educational annex addition by the same architects was added on the north wall of the original building on Silver Street. A kitchen wing on the east side of the gymnasium bleachers of the community center served all three buildings. A new and larger facility was constructed in the Mandarin neighborhood in the 1970s and the Jewish Center formally relocated to that site in 1976. The Department of Labor opened a Job Corps Center in the complex in 1979, completed renovations in 1989, and continued operations until moving to a new location in 2005, at which time the property went through Section 106 review for the disposal of federal property. The original building in the now empty complex was consumed by a fire in 2011 and subsequently demolished. The remaining community center building, educational annex, and kitchen were individually listed in the National Register of Historic Places on April 2, 2021, under Criterion A for their association with the social and ethnic history of the local Jewish community.

The proposed rehabilitation will convert the complex to multi-family residential use, add three new multi-family residential buildings, two flanking the recreation building (one on the site of the original 1927 building and the other replacing a former dental office), and the third on a nearby but separate parcel. The work in the historic buildings will insert apartment units in the front section of the community center and in the educational annex, subdivide the interior of the gymnasium/auditorium to construct three floors of apartments, and demolish the kitchen wing.

TPS found that the proposed rehabilitation failed to meet Standards 1, 2, 6, and 9, primarily for the subdivision of the gymnasium/auditorium into apartment units. Standard 1 states, “*A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*” 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.*” Standard 6 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.” 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.”

Regarding the rehabilitation of the community center building front section, the facade will be repaired and the windows retained. The front two parlors on the first floor will be restored to their original configuration by removing the Job Corps partitions and dropped ceilings; the curved-wall reception office will be retained as the leasing office; and the terrazzo floor, original corridors, and two stairs will be retained. The remaining space on the first floor (probably originally classrooms) will be converted to offices, and the second-floor classroom spaces will be converted to four residential units.

In the gymnasium/auditorium section of the community center building, the bleachers will be removed, the east wall behind the bleachers will be removed except for the steel columns supporting the roof structure, the projecting apron and stairs of the stage will be removed, the wood trim around the proscenium will be removed, the proscenium will be infilled, and the sills for the tall windows on the west facade will be lowered. And the kitchen wing will be demolished. The new work will convert the full volume of the space, including the former backstage area, to three stories of residential units, eight per floor or twenty-four total. New window openings will be inserted at the new third floor level of the east and west facades, new window openings will be installed on all three levels of the north facade (originally the blank back wall of the stage), and the new replacement wall behind where the bleachers were removed (originally an interior wall) will have window openings for the first-floor units. The footprint of the former kitchen will become open space with an enclosure for pool equipment and an electrical transformer.

Regarding the educational annex building, its facades and windows will be repaired and on the interior the double-loaded corridors and the two stairs will be retained. The southwest corner of the building, where the one-story kitchen used to connect, will be rebuilt to two stories in height. The former corner of the kitchen, the new second floor space above it, and the former classrooms will be converted to sixteen residential units, eight per floor.

The two new buildings flanking the front section of the community center building are similar in massing to it but will have differentiated architectural details. The new building on the site of the original 1927 building will follow the same setback on both street facades but will be shorter in length than the 1927 building along Silver Street to allow space for a swimming pool between the new building and the educational annex building. The new building on the site of the former dental clinic will have six units, with space on the first floor for commercial use.

In the appeal presentation, ██████████ stated that it is important to recognize that the recreational programs offered at the center were broad, “. . . *not just specific to athletic programs but also to recreational clubs of different natures.*” He asserted that “*These recreational clubs primarily utilized the classrooms of the center and not the gymnasium,*” quoted from Philip Selber’s *Jacksonville Jewish Center History* that the athletic program “*remained limited in scope and never dominating in relation to the overall synagogue center program,*” and noted that the gymnasium was less than 6,000 of the of the community center’s 29,300 square feet of floor space. Accordingly, ██████████ argued that the gymnasium should be treated as a secondary space, and the classrooms as primary spaces, and that the impact of changes to the gymnasium should be evaluated in context with “*the retention and reuse with minimal alteration of these primary spaces.*” Consequently, he argued that the changes to the gymnasium will not be sufficient to cause the overall project to fail to meet the Standard 1.

The National Register nomination lists three historic functions for the Jacksonville Jewish Center: Church School, Sports Facility and Auditorium. Assigning secondary importance to the athletic use of the facility may be reasonable in this case, but it ignores the fact that the space used for athletic activities served other essential functions. As the largest space in the complex, the gymnasium also served as an auditorium with a projecting stage and proscenium that was used for religious services, scholarly lectures, choir concerts, dances, business luncheons, communal dinners, bar and bat mitzvah parties, and weddings: all primary functions of a community center. Regarding the classrooms, in the community center, although the two front parlors will be restored, the classrooms will be removed. In the educational annex, none of the classrooms will remain intact. Eight of the annex classrooms will become studio apartments with bathrooms and walk-in closets inserted, and four will become even more subdivided as one-bedroom units. Consequently, I disagree with the assertions that (1) the classrooms will be minimally altered, and (2) the gymnasium’s functions means it should be treated as secondary space. Thus, I concur with TPS that the proposed work will contravene Standard 1.

Standard 2 requires that the historic character of a property shall be preserved. In this case, the significance of the Jacksonville Jewish Center is embodied in its association with events that have made a significant contribution to the broad patterns of our history. The significance of those events—lectures, concerts, plays, weddings, dances, banquets, basketball games, scout meetings, club meetings, study groups, and hosting regional meetings of the Conservative movement—is conveyed by the spaces in which they took place. I acknowledge that the exterior of both buildings will remain substantially intact and note that the new windows inserted into the gymnasium/auditorium space would not, by themselves, be sufficient to cause denial of a project that otherwise meets the Standards. However, the interior changes to both buildings are significant, even if their corridors and staircases will remain substantially intact. Subdividing the gymnasium/auditorium both horizontally and vertically will trigger extensive loss of historic

materials and reconfiguration of the space so that its historic character will be obliterated. And none of the classrooms in either building, except for the two parlors, will remain intact. Further, the kitchen wing, which connected with and served all three historic buildings, will be demolished to create open space. Consequently, I concur with TPS that the proposed work will contravene Standard 2.

Standard 6 requires that deteriorated materials be repaired rather than replaced and that replacement materials must match. TPS determined that there is not sufficient information to justify replacing the wood flooring of the gymnasium/auditorium floor, and that the proposed replacement flooring of vinyl tile with a wood grain appearance will not match the historic wood flooring. I agree with TPS that vinyl tile flooring is not an appropriate substitute material. However, I acknowledge that, with adequate justification that replacing the original flooring is warranted by its current condition and a suitable replacement material is proposed, the original flooring could potentially be replaced in compliance with Standard 6. For that reason, I have not considered Standard 6 in this decision.

Standard 9 requires that 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. TPS determined that the symmetrical arrangement of the two new buildings flanking the community center building violated those requirements. In this instance, I disagree with the TPS determination. Standard 9 cites four measures of compatibility: massing, size, scale and architectural features. The two buildings are similar in massing, size and scale and, although they have similar architectural features, they are differentiated in their architectural details and materials. Further, the new buildings will have centered entrances flanked by balconies and thus will be suitably differentiated from the community center, which does not have balconies. And as TPS pointed out, each building of the complex had a distinct architectural character and setting; historically, both street elevations of the property were dramatically different in massing, scale, and style. Consequently, I disagree that the proposed symmetrical arrangement of the new buildings creates a false sense of historic development, but I acknowledge that it will create a new history once completed. Accordingly, I have concluded that the design of the two new buildings complies with Standard 9 and have dismissed Standard 9 as a denial issue.

I concur with TPS that the overall impact of the proposed rehabilitation on the Jacksonville Jewish Center will severely compromise its historic character and integrity, contravening Standards 1 and 2, cited above. I have dismissed Standards 6 and 9 as denial issues. Accordingly, I affirm the Part 2 denial of certification issued by TPS in its January 14, 2022 Decision.

As the Department of the Interior regulations state, my decision is the final administrative decision with respect to TPS's January 14, 2022 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, FAPT
Chief Appeals Officer
Cultural Resources

cc: FL SHPO
IRS

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