

## United States Department of the Interior

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



April 30, 2025

Property: 509 North Carrollton Avenue, New Orleans, LA

Project Number: 46201, Part 2

Appeal Number: 1699

Action: Remanded to TPS for further consideration

Dear

I have concluded my review of your appeal of the December 4, 2024 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 the Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank you,

for your participation in the appeal meeting on January 16, 2025, 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 the additional information submitted at my request, I have determined that the rehabilitation of 509 North Carrollton Avenue as completed is not consistent with the historic character of the property and the Parkview Historic District in which it is located. However, I have further determined that there is information that TPS did not consider as part of the December 4, 2024 Decision, and there may be additional work that could possibly bring the project into conformance with the Standards. Therefore, I am resubmitting this matter to TPS for further consideration and with the additional information noted below.

The subject building was constructed in two stages beginning in 1928 when an L-shaped two-story brick warehouse was constructed along an industrial railroad corridor. At a later date, a two-story brick addition filled in the missing corner to create a square-shaped building footprint. In reviewing the application materials and building history, I noted

that the construction date of the later addition that filled in the open L-shape had not been clearly identified as a historic addition containing character-defining features. TPS stated that the addition was built in the 1940s. Since the period of significance of the Parkview Historic District ends in 1945, it is important to know more definitively when the later addition was constructed so that the significance of this portion of the building is clear, and the Standards for Rehabilitation can be applied appropriately. Sanborn Fire Insurance maps accessible online through the Library of Congress confirmed that the later addition had not been constructed before 1940. Instead, a filling station abutted the building at 509 North Carrollton. The next Sanborn Map which shows the building footprint as it still exists today is dated 1940 through 1950, a date range that represents incremental changes and updates that were made to the map throughout that decade. I was able to find a digitized copy of a 1945 City Directory for New Orleans which lists a filling station at the address 501 Carrollton Avenue North, the street address that was eliminated by the addition to 509. Therefore, I conclude that the later addition to the 1928 building was constructed between 1945 and 1950 after the period of significance of the historic district. The addition is not significant to the historic character of the property and does not contain character-defining features or spaces.

The TPS Decision cited several aspects of the completed work that failed to meet the Standards, including the infill of the loading bay, the infill of arched openings, incompatible masonry repairs, and incompatible window replacement. Most, but not all, of this work took place in the non-historic addition. TPS also cited a lack of information relating to interior work in the Decision. By this letter, I request TPS to review these aspects of work once again, this time with the additional context of the later construction date of the building addition. As part of this appeals process, you have provided updated interior photos documenting the affects of the structural interventions on the interior of the building to address concerns related to a lack of information about interior work. This information has been added to the file and will be available to TPS for their review.

Although the historic development of this building is better understood now, please be aware that I find the project to still conflict with Standard 9 that requires exterior alterations be compatible with the architectural features of the historic property. (The full text of all ten Standards can be found in 36 C.F.R. 67.7(b).) My finding is primarily due to the patchwork appearance of exterior walls created by the masonry repairs. During our meeting, you offered to paint the exterior walls to cover the inconsistencies in brick and mortar color. I recommend that you prepare a project amendment that specifies exactly what work you would be willing and able to complete and submit such amendment to TPS to incorporate in their new review. In general, painting historic brick that was not previously painted is not a recommended treatment. Therefore, I suggest that you limit the areas of paint to the non-historic addition. Also, the goal is generally to achieve an appearance that allows the historic portions of a building to stand out and non-historic or new additions to visually recede and/or blend in. As such, color selection in your proposal will likely be important.

Because these matters have been resubmitted to TPS for further consideration, I have closed the appeal file for this property. If TPS were to once again deny certification of

either Part 2 or Part 3 of your application, this decision would not preclude an appeal of that potential decision. Questions about the next steps in your application process should be directed to Brian Goeken at Brian Goeken@nps.gov or 202-354-2033.

Sincerely,

## JENNIFER PARKER Digitally signed by JENNIFER PARKER Date: 2025.04.30 11:47:51 -04'00'

Jennifer Parker Chief Appeals Officer Cultural Resources, Partnerships, and Science Directorate

cc:

LA SHPO IRS

bcc: SOL-Blasco

2255-Goeken 2255-White File