



United States Department of the Interior

NATIONAL PARK SERVICE

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

JUN 20 2012

Re: **A.H. Bahnson House, West Fifth and Spring Streets, Winston-Salem, North Carolina**
Project Number: 26610

Dear

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 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank you,

for meeting with me in Washington on May 29, 2012, and for providing a detailed account of the project.

After careful review of the complete record for this project, I have determined that the rehabilitation of the A.H. Bahnson House is consistent with the historic character of the property, and that the project meets the Secretary of the Interior's Standards for Rehabilitation (the Standards). Therefore, the denial issued on November 29, 2011, by TPS is hereby reversed.

Built in 1920, the A. H. Bahnson House is listed individually in the National Register of Historic Places for its association with the industrialist Agnew Hunter Bahnson. The National Register documentation also cites its significance in architecture. Described as a "modernized English cottage," the structure "survives today as one of only two houses—and the only truly grand house—in an area once known locally as "Millionaires' Row" for the social prominence of the residents who made this section of Fifth Street a prestigious address.

TPS found that several modifications to the exterior contravene the Standards, namely, the enclosure of the porte-cochere, the enclosure of a recessed porch, and the construction of an egress stair tower addition. With regard to the first of these, I agree with TPS that enclosing a porte-cochere almost always causes a rehabilitation not to meet Standards 2 and 9. With regard to the enclosure of a recessed porch at the south end of the house, and a new egress stair tower immediately adjacent to the recessed porch at the south end of the west facade, TPS also found that these two elements did not comply with Standards 2 and 9. 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 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.*"

After reviewing the record, and the information you submitted at the appeal meeting, I have determined that the exterior alterations to the house must be considered in the context of the siting of the house on its lot. The property actually has three street facades, with Fifth Street to the north, Fifth-and-a-Half Street to the south, and Spring Street on the east. Although Fifth Street is known as "Millionaires' Row," the wide dimension of the rectangular lot is actually along Spring Street. In response to these conditions, the house was sited so that the vehicular entrance was from Fifth Street, the pedestrian entrance faced Spring Street and the service areas of the house, including the former carriage house, were along Fifth-and-a-Half Street. In response to the relative narrowness of the lot, the house was sited close to the west property line, so close, in fact, that the porte-cochere was less than a foot from the property line.

With regard to the porte-cochere, most are prominent features on the primary facade of a home. Here, the porte-cochere was located along a side lot line, deeply recessed from the Fifth Street facade. Thus, in this case, this usually prominent feature is not prominent. Further, whereas the west facade of the house originally faced another residential property, today that lot features a large commercial building whose rear wall is virtually atop the property line, within inches of the porte-cochere. The neighboring building significantly reduces the visibility not only of the porte-cochere, but of the entire west side of the Bahnson House. I note also that the porte-cochere infill is recessed four feet behind the original arch on the Fifth Street side; the shadow line the recess produces will diminish the visual impact of the infill. However, this is a secondary consideration. Consequently, in this instance, I have determined that the unique conditions of this site allow the porte-cochere to be partially infilled without substantially compromising the historic character of the property.

With regard to infilling the recessed porch at the southwest corner of the house, this was the service area of the house, with the porch visually resembling—and probably serving as—a loading dock. The carriage house that was originally at the southwest corner of the lot would have screened this porch from view along Fifth-and-a-Half Street. I have determined that, although this area is now visible, its historic function was of minor significance to the overall historic character of the property. I also note that the new infill is recessed slightly, so that the original arched opening of the porch can still be discerned. Considering these factors, I have determined that infilling this recessed porch does not significantly compromise the historic character of the property.

With regard to the new egress stair tower, it is located at the south end of the west wall, attached to the historic service areas of the house noted above, and adjacent to the rear wall of the commercial building on the next lot. Accordingly, I have determined that its location does not significantly compromise the overall historic character of the property. I have also determined that its scale, massing, and materials, are compatible with the historic character of the property. Consequently, I find that the stair tower does not significantly compromise the historic character of the property.

Thus, taken together, I find that the impact of these usually inappropriate alterations on the historic character of the property is not substantial enough to cause the overall rehabilitation to fail to meet the Standards.

TPS also cited one interior issue: the installation of structural supports "finished to look like coffered ceilings and pilasters" in several ground floor spaces. Although I have determined that the coffers placed in the dining room are deeper than would be preferable, I find that neither they nor the pilasters radically transform the interior of the house, or cause the overall impact of the

project to contravene Standard 5, cited by TPS. Standard 5 states: "*Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*"

Although I am reversing the TPS's denial of certification, the project will not become a certified rehabilitation eligible for the tax incentives until it is completed and so designated. Further, our regulations provide that final action cannot be taken on any application until the requisite fee for processing rehabilitation requests has been paid. Please fill out a Request for Certification of Completed Work and submit it to TPS through the North Carolina State Historic Preservation Office. Should you have any questions concerning procedures for final certification, please contact

As Department of the Interior regulations state, my decision is the final administrative decision with respect to the November 29, 2011, 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,

A handwritten signature in black ink, appearing to read "John A. Burns". The signature is fluid and cursive, with a large initial "J" and "B".

John A. Burns, FAIA
Chief Appeals Officer
Cultural Resources

cc: SHPO-NC
IRS