



United States Department of the Interior

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



September 18, 2013

[REDACTED]

Re: **Hawthorne Glove & Novelty Co., / Shrader Drug Co. Building, 529 S. Gilbert St., Iowa City, Iowa**
Project Number: **28398**

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 is concluded. 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 [REDACTED] for speaking with me via conference call on August 9, 2013, and for providing a detailed account of the project, and for subsequently submitting additional photographs showing the project nearing completion.

After careful review of the complete record for this project, I have determined that the rehabilitation of the Hawthorne Glove & Novelty Co. Building is consistent with the historic character of the property and the historic district in which it is located, and that the project meets the Secretary of the Interior's Standards for Rehabilitation (the Standards). Therefore, the denial issued on May 24, 2013, by TPS is hereby reversed.

In response to the submitted "Part 1 – Evaluation of Significance," for the property, the National Park Service issued a Preliminary Determination of Individual Listing on February 19, 2013, stating that the property appeared to meet the National Register Criteria for Evaluation and would "likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer."

TPS subsequently found that the proposed rehabilitation of this 1905 building failed to meet the Standards owing to changes on both the exterior and the interior. Regarding the exterior, TPS faulted several aspects of the proposed construction of a new addition housing an elevator and stairs. Regarding the interior, TPS cited the plan to cover the exposed brick perimeter walls with insulation and gypsum board.

With regard to the exterior, TPS did not object to the construction of the addition *per se*, but rather to several aspects of it. TPS cited the color and material of the addition's east elevation at the building's front (facing the street), and the highly visible north, side elevation, as well as the placement and design of window openings. In advance of our conversation, Mr. Shaw submitted photographs of the work completed in the months following review of the application by TPS. This documentation confirms that changes made to this element of the rehabilitation have satisfactorily addressed the objections cited in the May 24, 2013, decision. The east elevation is faced in brick, as TPS recommended. The north elevation, faced with a cementitious masonry material, is painted in the same color range as the building. The proposed, square, window openings were elongated, and will feature one-over-one windows; at the same time, the southern-most tier of windows has been deleted. All of these changes remedy the deficiencies cited by TPS. Accordingly, the exterior of the building has not entered into my decision.

With regard to the interior, TPS noted that the exposed brick walls are "one of the few historic interior features and materials that identify the building's industrial character," and that covering these exposed brick walls with insulation and wallboard has given the interior a finished character rather than a small-scale industrial character. Although I agree that the changes made to the perimeter walls have somewhat diminished the building's putative historic character, TPS did not note that the original industrial flooring was retained, repaired as necessary, and left exposed in the apartments.

In considering the impact of covering the previously exposed brick perimeter walls, I note that, although the building was built for industrial use in 1905 and continued in industrial use until 1956, for the past 57 years non-industrial uses have dominated. There were extensive changes made to the interior partitions during this latter period, and evidence of its industrial past had been mostly eradicated. Prior to this rehabilitation the only interior evidence remaining was the exposed brick perimeter walls and the historic industrial flooring. On the exterior, the building is remarkably intact and clearly expresses the straightforward utilitarian character of a former industrial building. Thus, I find that the historic significance of the property derives primarily from its exterior integrity.

With regard to the overall impact of the rehabilitation on the historic character of the property, I have determined that the rehabilitation—with the changes already made to the exterior stair tower—preserves the historic character of the exterior. I have further determined that, although covering the exposed brick interior perimeter walls is not a recommended treatment, that one remaining deficiency is not sufficient by itself to cause the overall project to fail to meet the Standards. Accordingly, I am reversing the previous decision.

However, please note that the project will not become a "certified rehabilitation" eligible for the tax incentives until the rehabilitation work is completed, and the building becomes a "certified historic structure" following its listing in the National Register of Historic Places. Should you have any questions concerning procedures for final certification, please contact Mr. Michael Auer at 202-354-2031.

As Department of the Interior regulations state, my decision is the final administrative decision with respect to the May 24, 2013, 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', written in a cursive style.

John A. Burns, FAIA
Chief Appeals Officer
Cultural Resources

cc: SHPO-IA
IRS