

## **MEMORANDUM**

TO: Chapel Hill Historic District Commission

FROM: Britany Waddell, Planning Director  
Anyah Grahn-Federmack, Principal Planner  
Charnika Harrell, Planner II

SUBJECT: National Register of Historic Places (NRHP) Nomination- Navy Reserve Officers Training Corps (NROTC) Naval Armory at UNC, 221 South Columbia Street

DATE: September 12, 2023

### **STAFF RECOMMENDATION**

Staff recommend the Historic District Commission:

- Review the Naval Armory's NRHP nomination and provide comments.
- Provide an opportunity for public comment.
- Find whether the property meets the criteria to be listed on the NRHP.
- Pass the resolution authorizing the HDC Chair to forward comments to the State Historic Preservation Office and property owner and sign the recommendation form.

### **OVERVIEW OF THE NRHP**

The NRHP ("National Register") is the nation's official list of historic buildings, structures, objects, sites, and districts that have been deemed worthy of preservation for their significance in American history, architecture, archeology, and culture.

Administered by the National Park Service, the US government authorized the National Register under the National Historic Preservation Act of 1966.

### **WHY IS THE HDC REVIEWING A NRHP NOMINATION?**

As a Certified Local Government (CLG), Chapel Hill reviews all new nominations to the NRHP for sites, structures, and districts within the Town's boundaries. As part of the NRHP review process, the HDC can provide comments on the application based on their shared expertise. The HDC can also provide a recommendation on the Naval Armory's nomination.

### **NRHP CRITERIA FOR EVALUATION**

Properties listed on the NRHP are nominated at a local, state, or national level of significance depending on the geographical range of the importance of a property or its associations. Most properties are listed at the local level of significance.

There are two features to consider when determining eligibility for the NRHP:

1. *Historic Significance*

The property must be associated with at least one of the following criteria:

- Criterion A: Important Events or Patterns of History.
- Criterion B: Important Historical Figure.
- Criterion C: Important Example of Period Architecture, Landscape, or Engineering.

- Criterion D: Information it is likely to yield (Archeology).

The Naval Armory's nomination finds that it is significant under Criterion A for its association with events that have made a significant contribution to the broad patterns of our history. Specifically, the NRHP nomination speaks of the site's significance in the areas of Military and Education.

2. *Historic Integrity. The seven aspects of integrity are:*

- Location: Where the historic property was constructed or the place where the historic event occurred.
- Design: Combination of elements that create the form, plan, space, structure, and style of a property.
- Setting: Physical environment of a historic property. This includes elements such as topographic features (such as the crest of a hill), vegetation, manmade features (such as paths or fences), and relationships between buildings.
- Materials: Physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship: Physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling: Property's expression of the aesthetic or historic sense of a particular period of time.
- Association: Direct link between an important historic event or person and a historic property.

To assess the integrity, consider the following:

- *Does the building or site reflect the physical features that existed during its period of significance?*
- *Would someone from the past who traveled to the future recognize the building?*
- *What elements of integrity are the most important to this site? Does it reflect those?*

For properties nominated under Criterion A, it's important that the building has retained architectural design features and spatial relationships to that extent that it is still largely looks and feels like the building that existed during the period of significance. The Armory's period of significance is 1943-1970. The nomination advocates that the building has retained the historic integrity of its original twentieth century Colonial (Georgian) Revival design.

### **PROCESS FOR LISTING A PROPERTY ON THE NRHP**

1. Nominations are submitted to the State Historic Preservation Office (SHPO) for review.
2. HPO staff provide guidance and work with applicants to review and revise the NRHP applications.
3. The property owner and local government are notified of the NRHP nomination, and the local Historic District Commission is given the opportunity to provide comments and a recommendation prior to the National Register Advisory Committee (NRAC) reviewing the application.

4. The NRAC reviews the application and forwards a recommendation on the nomination to the Keeper of the National Register for final approval.

### **NRHP VS. LOCAL HISTORIC DESIGNATIONS**

	Local Historic Districts	National Register Sites/Districts
<b>Locations</b>	<ul style="list-style-type: none"> <li>• Franklin-Rosemary</li> <li>• Cameron-McCauley</li> <li>• Gimghoul</li> </ul>	<ul style="list-style-type: none"> <li>• Chapel Hill Historic District (largely encompasses Franklin-Rosemary)</li> <li>• West Chapel Hill Historic District (largely encompasses Cameron-McCauley)</li> <li>• Gimghoul Historic District</li> <li>• Rocky Ridge Farm Historic District</li> <li>• Old Chapel Hill Cemetery</li> <li>• Individual sites such as the Beta Theta Pi Fraternity House (114 S. Columbia St.), Old Chapel Hill Town Hall, Old East at UNC, Playmakers Theatre at UNC, and the Carolina Inn</li> </ul>
<b>Creation of District</b>	<ul style="list-style-type: none"> <li>• Designates historic areas based on the historic resources identified by National Register nominations</li> <li>• Zoning overlay district approved by the Town Council</li> <li>• Historic district overlay does not control uses of a property. Uses are controlled by underlying zoning.</li> </ul>	<ul style="list-style-type: none"> <li>• Identifies, documents, and evaluates specific properties for their historic integrity and the character within the district</li> <li>• Sets boundaries tightly based on location of historic properties with high levels of historic integrity</li> <li>• Administered by the State Historic Preservation Office (HPO) but maintained by the U.S. Department of the Interior</li> </ul>
<b>Benefits of Designation</b>	<ul style="list-style-type: none"> <li>• Prevents uncontrolled exterior changes that may compromise the historic integrity or historic character of the districts through the Certificate of Appropriateness (COA) process and <a href="#">Chapel Hill Historic</a></li> </ul>	<ul style="list-style-type: none"> <li>• Provides property owners opportunities for state and federal rehabilitation tax credits</li> <li>• Provides limited degree of protection from federally funded projects (Section 106 review)</li> </ul>

	<a href="#"><u>Districts Design Principles &amp; Standards</u></a> <sup>1</sup>	
<b>Local Review Tools</b>	<ul style="list-style-type: none"> <li>• LUMO</li> <li>• COA process</li> <li>• Design Standards</li> </ul>	<ul style="list-style-type: none"> <li>• LUMO</li> </ul>
<b>Chapel Hill Permitting Process</b>	<ul style="list-style-type: none"> <li>• COA</li> <li>• Zoning Compliance Permit (ZCP)</li> </ul>	<ul style="list-style-type: none"> <li>• ZCP</li> </ul>
<b>Limitations on demolitions</b>	<ul style="list-style-type: none"> <li>• Authorizes the HDC to delay demolition by 365 days, but does not prohibit demolition (See <a href="#"><u>LUMO 3.6.2(d)(9)</u></a>)<sup>2</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>• Does not prohibit demolition</li> </ul>

### DISCUSSION

In reviewing the NRHP nomination for the Naval Armory, the Historic District Commission should determine whether or not the site meets the NRHP criteria.

### NOTE

The [Chapel Hill Historic Districts Design Principles and Standards](#)<sup>3</sup> are incorporated into the record by reference.

### ATTACHMENTS

1. Resolution A
2. Letter from HPO and the draft NRHP nomination for the Naval Armory at 221 S. Columbia Street
3. North Carolina Historic Preservation Office – National Register Fact Sheet 2
4. [North Carolina Historic Preservation Office – National Register of Historic Places](#)<sup>4</sup>
5. [National Register Bulletin: How to Apply the National Register Criteria for Evaluation](#)<sup>5</sup>

<sup>1</sup>[https://townhall.townofchapelhill.org/large\\_docs/historic\\_district/CH%20HD%20Design%20Principles%20and%20Standards.pdf](https://townhall.townofchapelhill.org/large_docs/historic_district/CH%20HD%20Design%20Principles%20and%20Standards.pdf)

<sup>2</sup>[https://library.municode.com/nc/chapel\\_hill/codes/code\\_of\\_ordinances?nodeId=CO\\_APXALAUSMA\\_ART3ZODIUSDIST\\_3.6OVDI](https://library.municode.com/nc/chapel_hill/codes/code_of_ordinances?nodeId=CO_APXALAUSMA_ART3ZODIUSDIST_3.6OVDI)

<sup>3</sup>[https://townhall.townofchapelhill.org/large\\_docs/historic\\_district/CH%20HD%20Design%20Principles%20and%20Standards.pdf](https://townhall.townofchapelhill.org/large_docs/historic_district/CH%20HD%20Design%20Principles%20and%20Standards.pdf)

<sup>4</sup> <https://www.hpo.nc.gov/historic-preservation/nationalregister>

<sup>5</sup> [https://www.nps.gov/subjects/nationalregister/upload/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf)

## ATTACHMENT 1

### **A RESOLUTION OF THE HISTORIC DISTRICT COMMISSION OF THE TOWN OF CHAPEL HILL SUPPORTING THE NOMINATION OF THE NAVY RESERVE OFFICERS TRAINING CORPS (NROTC) NAVAL ARMORY AT UNC-CHAPEL HILL, LOCATED AT 221 SOUTH COLUMBIA STREET, TO THE NATIONAL REGISTER OF HISTORIC PLACES.**

WHEREAS, the Town of Chapel Hill is a Certified Local Government (CLG) Program through the North Carolina State Historic Preservation Office (HPO); and

WHEREAS, as a CLG, the Town of Chapel Hill has the opportunity to review new National Register of Historic Places nominations and provide comments and a recommendation to the HPO; and

WHEREAS, the National Register of Historic Places includes “districts, sites, buildings, structures, and objects that exhibit a quality of significance in American history, architecture, archaeology, or culture that possess integrity of location, design, setting, materials, workmanship, feeling and association;” and

WHEREAS, The Historic District Commission at their regularly scheduled meeting of September 12, 2023, concurred with the National Register nomination, as prepared, that the NROTC Naval Armory is eligible for the National Register under Criterion “A,” and

WHEREAS, National Register Criterion “A” provides recognition for properties “that are associated Sidney and Mary Lyons Residence with events that have made a significant contribution to the broad patterns of our history;” and

BE IT RESOLVED by the Historic District Commission of the Town of Chapel Hill that, having considered the nomination of the NROTC Naval Armory to the National Register of Historic Places, makes the following finding:

1. The NROTC Naval Armory meets is eligible for the National Register of Historic Places under Criterion A.

BE IT FURTHER RESOLVED that the Commission hereby requests that:

1. The Historic District Commission Chair executes the recommendation form including an affirmative statement of opinion regarding the property’s National Register of Historic Places eligibility for the reasons stated herein, and
2. The NROTC Naval Armory is hereby recommended to the North Carolina State Historic Preservation Office and the Keeper of the National Register of Historic Places as eligible for the National Register of Historic Places.

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Signed - Historic District Commission Deputy Vice Chair, Polly van de Velde

This, the 12<sup>th</sup> day of September 2023.