

United States Department of the Interior

NATIONAL PARK SERVICE

Southeast Regional Office
Atlanta Federal Center
1924 Building
100 Alabama St., SW.
Atlanta, Georgia 30303

IN REPLY REFER TO:
I.A.2

MAR 17 2015

Jim Lewis
Historic Preservation Commission Chairman
Village of Pinehurst
80 Community Road
Pinehurst, NC 28374

Dear Mr. Lewis:

We want to thank you for reaching out to us to re-start a conversation between National Park Service staff and members of the Village of Pinehurst community. We are delighted that you were able to travel to Atlanta and meet with National Park Service Cultural Resources staff this January and were able to follow-up your visit with a phone conversation. We appreciate your commitment to historic preservation in the Village of Pinehurst and will do our best to support your efforts.

We wanted to take this opportunity to respond to a few points in your open letter, dated February 6, 2015, and to some issues that were raised in the subsequent phone conversation. It is important to us that the position of the National Park Service is clearly understood by all members of the Pinehurst community.

In 1996, the Secretary of the Interior designated Pinehurst as a National Historic Landmark for its role in the development of the sport of golf and resort communities (NHL Criterion 1) and for its association with Donald Ross (NHL Criterion 2). The National Historic Landmark nomination argues that the property achieved significance in these areas of significance between 1895 and 1948. The aim of the National Historic Landmark program is to preserve properties as they existed during their period of significance. The firm of Olmsted and Eliot of Brookline, Massachusetts, developed the conceptual plans of Pinehurst, which were further developed and carried out in large part by Warren H. Manning.

To convey its historic associations, the property should retain its appearance from this period. While the NHL nomination identifies the individual buildings, structures and sites that contribute to the overall significance of the District, it also states that "it is the group of buildings in the

developing landscape which has remained the strongest reflector of the historic character of the place” (p. 9 of the NHL nomination), meaning that while many buildings have architectural significance individually, it is their physical setting in the overall designed recreational resort landscape that remains paramount to conveying the exceptional significance of Pinehurst as a resort community. That is, the character-defining features of the District rest primarily in the carefully planned landscape, including the arrangement of open spaces, plantings, and the planned road system, rather than in specific architectural details.

The District’s NHL nomination identifies the Planned Road System, including the flanking landscape and accompanying sand and clay sidewalks, as “one of the most significant aspects of the planned landscape” (p. 66). In addition, the Village Green was at the center of the resort's original design for an evergreen landscape and is an essential component of the District’s picturesque style. Donald Ross should be able to recognize the area today; this means that key historic resources such as the Village Green, planned roadway system, and sand-clay paths should be preserved.

The National Park Service is charged with monitoring the integrity of National Historic Landmarks and to encourage the stewardship of these nationally significant resources. To monitor the condition of National Historic Landmarks the NPS has established four condition categories: Satisfactory, Watch, Threatened, and Emergency.

- **Satisfactory** (Priority 3) indicates that there is no known current or potential threats to the landmark.
- **Watch** (Priority 2) indicates NHLs that face impending actions or circumstances that likely will cause a loss of integrity.
- **Threatened** (Priority 1) indicates NHLs that have suffered, or are in imminent danger of, a severe loss of integrity.
- **Emergency** indicates that recent catastrophic damage has occurred that requires immediate intervention.

The Pinehurst National Historic Landmark is currently in the Threatened category.

To explain why the Pinehurst NHL is categorized as threatened we would like to first explain how the National Park Service evaluates the integrity of historic properties. Integrity is a property’s ability to convey its historic significance; it is the degree to which a property resembles its appearance at the time it achieved historic significance, which is called a period of significance. The National Historic Landmark nomination for Pinehurst establishes a period of significance of 1895 to 1948. Ideally, the Pinehurst NHL district should look as it did during this period. The National Historic Landmark program uses the same seven aspects of integrity that are used by the National Register of Historic Places, but National Historic Landmarks are held to a higher standard of integrity. These seven aspects of integrity are: location, design, setting, materials, workmanship, feeling and association. A full explanation of these seven aspects can be found in the National Park Services’ publication National Register Bulletin, *How to Apply the*

National Register Criteria for Evaluation. We have included this publication in a list of references attached to this letter.

The Pinehurst National Historic Landmark is considered a district. National Park Service staff further describe the Pinehurst district as a cultural landscape, which is a type of property that includes both cultural and natural resources. The National Park Service has developed specific guidance for both districts and cultural landscapes. References for these publications are included in the attachment. NPS evaluates the integrity of districts as a whole, but districts are composed of individual resources. Modification of a single resource, especially a prominent resource like the Village Green, could certainly diminish the integrity of the district. Diminished integrity can result from a significant change to a single resource, the accretion of small changes over time, or a combination of the two.

Ownership is not a factor in considering if resources contribute to the historic significance of a property. A contributing resource is a building, structure, object, or site that helps the district to convey its historic character. Contributing resources would have existed during the period of significance and should still look as they did during that period. You'll find a list of contributing and non-contributing resources for Pinehurst in the NHL nomination. Please note that just because a resource is non-contributing, in other words non-historic, that does not mean that changes to that resource cannot harm the district as a whole. An example would be doubling the size of a non-historic house within the district. The original non-historic house may fit in nicely with the surrounding historic homes, however, expanding it dramatically could alter the spatial relationship of the neighborhood and result in diminished integrity. An example of this concept specific to Pinehurst is the addition of the Roundabout at North Carolina 2 (Midland Road) and Carolina Vista Road. Although this area may have been altered in the 1970s, that does not mean that the addition of the Roundabout did not further diminish the integrity of the district.

Of course, in a large property such as Pinehurst, there are multiple owners within the district. These owners are free to manage their properties as they choose. National Historic Landmark designation in no way restricts private property rights. The National Park Service has no authority to approve projects or prescribe actions to owners of National Historic Landmarks. But if an owner so alters their property so that it no longer conveys its historic associations, NPS may move to withdraw NHL designation.

At its heart the National Historic Landmarks program is a preservation program. A key aim of the program is to allow the public to visit historic properties and see them as they would have appeared in the past. This point gets to two issues you raised during our phone conversation. First, you mentioned the desire to improve the appearance of Pinehurst. Aesthetics are not considered when evaluating the integrity of historic properties. In fact, projects intended to improve the looks of Pinehurst could negatively affect the property's integrity by removing or altering character-defining features of the district. Properties that are historically important need not be beautiful. Secondly, you mentioned the idea of executing a design that was planned by the original designers, but never carried out, specifically, the creation of the Tufts Memorial Green.

This practice runs against the idea of historic preservation, specifically, the Secretary of Interior's Standards for Restoration and Reconstruction. If a design that was proposed in the past but never realized is executed today, then a new, non-historic feature is created. This goes against the aim of preserving the property as it was historically. Similarly, the creation of the Arboretum does not improve the integrity of the National Historic Landmark because it never existed historically. We do however see the Arboretum as a positive development as it is outside the boundary of the National Historic Landmark and provides a place to showcase the historic plant materials that would have been used during the period of significance. We believe this is a great educational tool for Village residents and visitors to learn more about the history of Pinehurst as a nationally-recognized, designed landscape.

We would like to emphasize that historic properties can change over time and retain integrity. Changes can be made in a way that maximizes the preservation of historic features and is sympathetic to original designs. The *Secretary of the Interior Standards for the Treatment of Historic Properties* promote historic preservation best practices that help owners protect our nation's irreplaceable cultural resources. The Standards are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Guidelines offer general design and technical recommendations to assist in applying the Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historic property. The Standards were revised in 1992 so they could be applied to all historic property types, including districts and landscapes. A link to the *Secretary of Interior's Standards for the Treatment of Historic Properties* is included in the attachment. Safety concerns of historic properties should of course be addressed. Planning should be undertaken so that safety concerns can be addressed in a manner that minimizes harm to the historic property.

In 2009, National Park Service staff placed Pinehurst in the "Watch" condition category (Priority 2) because of the installation of a roundabout at the intersection of Carolina Vista and North Carolina Route 2, together with proposed changes to the Village Green. In our opinion, traffic safety concerns could have been addressed in a way that was more sensitive to the historic character of Pinehurst, such as the placement of a traffic light. It appears to us that aesthetics were prioritized over historic preservation. NPS also expressed concern over proposed changes to the Village Green. NPS staff cautioned that the Village Green had already been changed in significant ways since its period of significance, including two, one-story additions to the Village Chapel (added to the rear and side of the 1924 building in 1961 and 1991, respectively) and the Given Memorial Library (constructed in 1964 and expanded in 1975). NPS staff noted that the Village Green could not sustain many more changes without losing its historic character.

In January 2013, NPS was dismayed to see that certain proposed changes to the Village Green, including the relocation and reconfiguration of a parking lot and the construction of the Tuft's Memorial Park, were carried out. A 1939 aerial photograph, included in the John Milner and Associates Report prepared for the Village, shows the parking lot as a small crescent at the top left edge of the green. The parking lot today is considerably larger and in a different location. Its

construction also resulted in removing a large number of historic longleaf pines from the Village Green. By moving the parking lot the Village destroyed an original feature (the old parking lot and longleaf pines) and added a non-historic feature (the new parking lot). We believe the proposed parking garage, in a less sensitive area behind the Holly Inn, would have been a better solution with regard to the historic property. The Tufts Memorial Park is also a non-historic feature that alters the historic appearance of the Green. These two changes are quite dramatic.

The Pinehurst National Historic Landmark is now in a fragile state and future changes that adversely affect its integrity will push the NHL to a tipping point. For this reason, in March 2013, the National Park Service staff placed Pinehurst in the threatened condition category (Priority 1). Past insensitive alterations and patterns of development in Pinehurst continue to be a concern to NPS staff, these include:

- Village Green – is the biggest challenge to the integrity of the District. As noted above the Village Green has suffered a considerable loss of integrity and faces future threats. Additional threats including possible church expansion and possible library expansion further into the Green. Future changes that diminish the historic integrity will result in a recommendation to the Secretary of the Interior to de-designate the current NHL district.
- Changes in the right-of way as homeowners absorb public space for personal use/landscaping.
- Historic sand paths have/are disappearing throughout the District. In some areas astute property owners are maintaining the paths and landscaping as originally designed.
- Replacement of the historic clay paths with brick pavers from the resort to the downtown. The clay paths are a key character defining feature in the landscape.
- The lack of maintenance of the historic drainage swales/ditches is causing erosion problems in some areas.
- The installation of incompatible replacement sand in the parking lot and the destruction of natural drainage patterns has created soggy conditions in the landscape that naturally would not have existed.
- The thinning of longleaf pines in the Village Green and the introduction of grassed areas with non-historic plantings.
- Amphidrome had its original stucco replaced with an EFIS system; additionally, the original clay tile roof was replaced with a faux slate roofing material.
- The replacement of original roofing, windows, and doors on several historic buildings throughout the District is disturbing and odd. The Carolina Hotel, Holly Inn and Theater Building are just a few prominent examples where the now “signature” Pinehurst metal roofing, vinyl clad windows and aluminum columns, soffits and trim is standard. This development is contrary to the Secretary’s Standards, which encourage replacement of materials with materials in kind and maintenance of historic roof profiles.

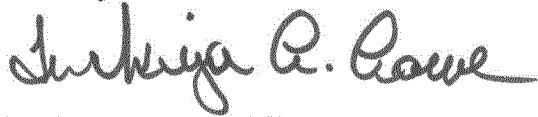
While there is cause for concern about some aspects of Pinehurst’s integrity, we are pleased to note that stewards have also taken positive steps. We would like to acknowledge and praise the restoration of Golf Course #2. This restoration is commendable and in keeping with the spirit of

the National Historic Landmark program. We hope that other property owners in Pinehurst will follow the lead of the stewards of Golf Course #2 and work to preserve or restore the historic properties under their control.

NPS staff understand that managing a large historic property is a complex task. We feel that the best way to protect against the district's incremental loss of integrity is to engage in comprehensive historic preservation planning. In the past NPS has strongly advised the Village to undertake a comprehensive study of the Village's built environment to identify the character-defining features of the district. We continue to advise this approach. This type of study, which is known as a Cultural Landscape Report, would make treatment recommendations based on best preservation practices and provide a basis for the Village Council to make informed decisions.

Our interest lies with the preservation of the historic property. To this end, we hope to continue be a preservation partner with you and other members of the Pinehurst Community.

Sincerely,

A handwritten signature in black ink, reading "Turkiya L. Lowe". The signature is fluid and cursive, with the first name being the most prominent.

Turkiya L. Lowe, Ph.D.
Chief, Cultural Resources, Research and Science Branch
National Park Service, Southeast Region

Enclosure

cc: Renee Gledhill-Earley, North Carolina State Historic Preservation Office (via email)
Nancy Roy Fiorillo, Mayor, Village of Pinehurst (via email)
William Reynolds, NPS SER Communications Officer (via email)

References:

Please see the National Register Bulletin, How to Apply the National Register Criteria for Evaluation, specifically the section on How to Evaluate the Integrity of a Property, for a full explanation of integrity: http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm

National Register Bulletin, How to Evaluate and Nominate Designed Historic Landscapes. <http://www.nps.gov/nr/publications/bulletins/nrb18/>

NPS has also developed a preservation Brief, number 36, entitled *Protecting Cultural Landscapes: Planning Treatment and Management of Historic Landscapes*: <http://www.nps.gov/tps/how-to-preserve/briefs/36-cultural-landscapes.htm>

The Secretary of Interior's Standards for the Treatment of Historic Properties can be found online: <http://www2.cr.nps.gov/tps/standards/four-treatments.htm>



April 6, 2015

**An Open Letter to the Citizens of Pinehurst, the National Park Service (NPS) and
our NC Elected Officials**

On March 17th, Historic Preservation Commission Chair Jim Lewis received a letter from the Chief of the Cultural Resources Branch of the NPS, Southeast Region. The letter was in response to a visit, follow-up email and a follow-up conversation between Jim and officials at NPS concerning the Pinehurst National Historic Landmark (NHL) District. Our Mayor was copied on all correspondence. While the Village has often received letters suggesting our NHL status may be affected to a point where we lose "historic integrity" or reach a development "tipping point," we were never told exactly what might cause a loss of status. This letter makes clear statements about when "Emergency" status will be reached.

First, the NHL program's aim is to "preserve properties as they existed during their period of significance," (which in our case is 1895-1948). It is further stated that the Landmark should "retain its appearance from this period...and that properties that are historically important need not be beautiful."

The Park Service recognizes NHL's in four categories: Satisfactory, Watch, Threatened and Emergency. In 2009 Pinehurst was placed on the "Watch" list due primarily to the installation by NC DOT, of a roundabout at the intersection of Carolina Vista and NC 2. The Park Service suggests that a traffic light rather than a roundabout would have shown more sensitivity to the historic nature of the Village. Also mentioned as reasons for the lowered status were additions to the Village Chapel and the Given Library in the 1960's and 70's before Landmark Status was awarded in 1996!

In 2013, the Village was placed on the "Threatened" list due to the construction of a 3/4 acre lawn (Tufts Park) and the relocation and improvement of the previous "sand lot." The NPS states it would have preferred construction of the proposed (but discarded) parking garage behind the Holly Inn.

We are now aware that the "Village Green - is the biggest challenge to the integrity of the Districtadditional threats including possible church expansion and possible library expansion.....will result in a recommendation to the Secretary of the Interior to de-designate the current NHL district."

A single historic structure can certainly retain integrity to its historic period. A District, encompassing 1,391 acres, 418 resources (including structures) and 15,000 people cannot be

"frozen" in 1948. How many cars were in the Village in 1948? And how many traffic lights? We know there were fewer than 1,500 full time residents.

As elected Village leaders, we are charged with providing services to our residents. Our goals for historic preservation must be included along with our goals for service delivery, growth management, response to a changing demographic and the needs of our Village economy. We are doing our best despite shrinking tax revenues and higher costs.

It is vitally important that we all understand not only the value of our NHL but the costs. While historic tax credits are available for income-producing properties in Landmark Districts, most properties in our District are residential.

It is our hope that the NPS may, in the future, show some flexibility in regulations for large Landmark Districts like ours. We are not trying to be difficult; we are trying to be reasonable. Here in Pinehurst, our door is always open for discussion.

Signed,

Nancy Fiorillo, Mayor

John Cashion, Mayor Pro Tem

John Strickland, Treasurer

Claire Phillips, Council Member

Clark Campbell, Council Member

(The full text of the NPS letter will be published on the Village web site. Other related documents are available at Village Hall.)

Cc: Dr. Turkiya Lowe, Southeast Regional Chief of History, National Park Service
Mr. John Skvarla, N.C. Secretary of Commerce, State of North Carolina