

AGENDA

**Wake County Historic Preservation Commission
Monthly Meeting
Tuesday, January 11, 2022 – 3:30 PM
Room 2800 – Wake County Justice Center
301 S. McDowell Street, Raleigh, North Carolina**

- I. Call to Order/ Roll Call**
- II. Approval of Agenda**
- III. Approval of October 12, 2021 and December 14, 2021 Minutes**
- IV. Committee Reports**
 - A. Outreach Committee
 - B. Designation Committee
- V. Staff Report**
 - A. Zebulon National Register Historic District Nomination Recommendation Process:
 - 1. Today – WCHPC vote to recommend (not recommend)
 - 2. January 18 --Zebulon Board of Commissioners Meeting.
 - B. Wake County Historic Landmark Monitoring Update
 - C. Minor Works Approval(s)
 - D. Other
- VI. Old Business**
 - A. Motion to Recommend (Not Recommend) Zebulon National Register Historic District Nomination
- VII. New Business**
- VIII. Other Business**
- IX. Chair's Report**
- X. Adjourn**

AGENDA

**Wake County Historic Preservation Commission
OUTREACH COMMITTEE
Tuesday, January 11, 2022
Room 2800 – Wake County Justice Center
301 S. McDowell Street, Raleigh, North Carolina**

- I. Call to Order**
- II. Approval of Agenda**
- III. Staff Report**
 - A. Preservation Celebration, May 1, Fuquay-Varina
 - B. Other
- IV. Other Business**
- V. Chair's Report**
- VI. Adjourn**

AGENDA

**Wake County Historic Preservation Commission
DESIGNATION COMMITTEE
Tuesday, December 14, 2021 – 3:00 PM
Room 2800 – Wake County Justice Center
301 S. McDowell Street, Raleigh, North Carolina**

- I. Call to Order**
- II. Approval of Agenda**
- III. Staff Report**
 - A. Zebulon Historical Marker(s)
 - B. Possible Landmark Candidates
 - C. Preservation Fund Balance
 - C. Other
- IV. Other Business**
- V. Chair's Report**
- VI. Adjourn**

MINUTES

Wake County Historic Preservation Commission
Tuesday, January 11, 2022 – 3:30 PM Room 2800 – Wake County Justice Center
301 S. McDowell Street, Raleigh, North Carolina

Members Present (9): Mr. Ed Morris (Chair), Mr. Jeff Hastings (Vice-Chair), Ms. Camille Morrissey, Ms. Nora Cambier, Mr. Tom Carrigan, Mr. Lee Tippet, Ms. Peggy Beach, Mr. Brendan Feters, Ms. Stephanie Ashworth (via phone)

Members Absent (3): Mr. Marshall Harvey, Ms. Lonneta Williams, Mr. Dan Turner

Staff (3): Mr. Gary Roth and Mr. Jeremy Bradham, Capital Area Preservation, Inc. (CAP)
Ms. Terry Nolan, Wake County Planning and Development Services Division

1. Call to Order / Roll Call:

Mr. Morris called the meeting to order at 3:35pm.

2. Approval of January 11, 2022, Agenda

Mr. Roth noted that Mr. Tippet has agreed to recuse himself from the discussion and vote concerning the proposed Zebulon NRHD due to a potential conflict of interest. Since Mr. Tippet will need to leave the room during the Zebulon NRHD discussion and vote, all items will be moved up to have the Zebulon NRHD discussion and vote at the end of the meeting. Therefore, Item A under Staff Report should be moved to the end of the Staff Report. **Upon a motion by Mr. Hastings, seconded by Ms. Morrissey, the agenda was approved as amended.**

3. Approval of October 12, 2021, Minutes

Hearing no objection, the minutes were approved as submitted.

4. Approval of December 14, 2021, Minutes

Hearing no objection, the minutes were approved as submitted.

5. Committee Reports

- a. Designation Committee: Did not meet.
- b. Outreach Committee: Ms. Morrissey reported that the 2022 *Wake County Preservation Celebration* is scheduled for Sunday, May 1, 2022, at the Fuquay-Varina Cultural Arts Center, 123 E. Vance Street, Fuquay-Varina – the same location planned, before COVID-19, for the 2020 *Wake County Preservation Celebration*. Ms. Morrissey stated that she will be passing out more information and assignments in March for those that haven't attended before. The event has typically been a great time for all and is used to recognize the newly designated historic landmarks, presenting each landmark owner with a landmark plaque.

6. Staff Report

- a. Wake County Historic Landmark Monitoring Update: Mr. Bradham asked commission members if any members have had difficulty using the HPOWEB map to locate landmarks near them. Some commission members suggested assignments by Staff. At the February meeting, Staff shall assign landmarks for each commission member for monitoring on an on-going basis.

- b. Minor Works Approvals: Minor works were submitted to staff just before today's meeting and will be processed and presented at the next meeting.
- c. Ms. Nolan introduced Lauren Ward, an intern with Wake County Parks, Recreation, and Open Space. She is working with both the planning and parks department and has an interest in history and architecture.
- d. Zebulon National Register Historic District Nomination Recommendation Process
 1. Today – WCHPC vote to recommend (not recommend)
 2. January 18 – Zebulon BOC Meeting

Mr. Roth noted that commission members attended the joint public hearing in Zebulon both in-person and online, on Monday, January 10. After the joint meeting, the Zebulon planning board met and voted to give its recommendation to the Zebulon BOC following the WCHPC hearing. Mr. Roth noted that the role of the WCHPC is very narrow. This commission looks at NR nominations and decides whether or not any nomination meets NR standards for listing. The Staff report will focus our comments on that question. Commission members can make comments based on the report itself as well as on what they heard at last night's meeting.

7. Old Business: Motion to Recommend (Not Recommend) Zebulon National Register Historic District Nomination: Mr. Bradham presented the following Staff Report:

Staff is of the opinion that the district, as proposed, has two glaring problems. First, it includes areas north of North Street that have no relationship to the core story of Zebulon as a railroad, tobacco, and textile town; and second, it excludes African American neighborhoods that do have a relationship to that core story. This is not to say that the post-war neighborhoods with their minimal traditional and ranch houses do not have merit, but rather that these structures, common to all of Wake County, are not unique to Zebulon and do not relate to the character-defining elements of Zebulon's core story. The period of significance for this proposed district stretches from 1906-1971, and, while SHPO claims that the average period of significance across North Carolina is 68.5 years, the period of significance in most other towns begins much earlier than 1906.

SHPO has taken the position that the 1960s and 1970s neighborhoods *must* be included to tell "the whole story of Zebulon" while at the same time, SHPO is amenable to leaving out African American neighborhoods on the basis they "may lack architectural merit," a position often attributed to the NPS by SHPO. However, in a recent training video hosted by the National Trust for Historic Preservation concerning amending National Register nominations, NPS historian James Gabbert stated that "there are no hard and fast rules," rather the NPS is looking for a reasoned explanation of how the significance of African American neighborhoods is reflected in their current appearance, even as they *superficially* appear to lack architectural merit. Ultimately, the NPS is looking to see if these neighborhoods "retain sufficient integrity to reflect significance," even in view of subsequent changes that appear to diminish integrity. In the very same training video, Virginia SHPO staff member Lena McDonald noted that "there often can be unintended class bias in how properties are evaluated for eligibility in terms of their integrity. Properties may not ever have had great workmanship or great design and materials, but it doesn't matter. That is not what makes the property significant...I always caution people not to say that a property doesn't have integrity just because it doesn't have fine quality materials." Structures in the African American neighborhoods have experienced numerous changes over the years, but their integrity should not be measured solely based on alterations. Ms. McDonald further stated that when weighing

integrity, it is important to refrain from looking at these African American neighborhoods through a “class-based lens.”

SHPO has further stated to Staff that Zebulon's downtown commercial and residential areas cannot stand alone as a district without the 1960s and 1970s Wakelon Heights neighborhood due to 1960s and 1970s changes to buildings in the downtown area. Nevertheless, two Study List Districts in Zebulon were approved prior to 2018. The first occurred in 1992 as part of the original Kelly Lally survey focused on the commercial downtown and its immediate areas. As part of the 2006 survey update for Wake County, MdM Consultants proposed, and SHPO approved, a larger Study List District in Zebulon with boundaries considerably tighter than those that are the basis for the currently proposed NR Historic District and notably absent the Wakelon Heights neighborhood. SHPO's position was that the downtown areas cannot stand alone as a district without the Wakelon Heights neighborhood, yet, the Study List Districts (approved by SHPO and the NRAC in 1992 and 2006, respectively) stood alone in both cases. To be sure, Wakelon Heights had not yet aged in by 2006, and its addition as an antidote to the changes downtown would not have been possible, but two facts stand out: (1) The 1960s and 1970s changes had all been made to the downtown by 2006, so there is essentially no difference between the condition of the downtown in 2006 and today (except, perhaps, the removal of a lot of those 1960s and 1970s changes); and (2) Had the Study List District, as of 2006, been added to the National Register in 2006 or shortly thereafter, it would have done so as a stand-alone district with a period of significance ending around 1950. Furthermore, the report states that the Wakelon Heights neighborhood was laid out on a grid in the same manner as the areas downtown and immediately adjacent. While true, that grid was created in 1907, one year after Zebulon was laid out on a grid and formally established. However, this area was not developed for another 50 years, so the structures in this area were not constructed contemporaneously with the structures immediately downtown, associated with the early years after the town's incorporation.

Most every single downtown in America experienced significant updates to storefronts and commercial buildings in the 1960s and 1970s, but until this nomination, that has never been used as a justification for including anything from that later period within a district's period of significance. For example, the Town of Apex's original NR Historic District was listed in 1994 as a collection of early 20th century buildings with later modifications from the 1960s and 1970s and a period of significance ending in 1943. These modifications, much like the ones that occurred in Zebulon, were considered secondary to the age of the buildings in the nomination at that time. The development of Wakelon Heights as a planned neighborhood is part of a county-wide trend in the decades after WW2 that is separate and distinct from the story of Zebulon as a railroad, tobacco, and textile town and should be the subject of a separate nomination, much like what could be done with the 2017 McCullers Pines Study List District near Fuquay-Varina.

In conclusion, Staff believes that the district, as proposed by *Preservation Zebulon*, in its current form, does NOT meet the National Register criteria to be listed on the National Register. Substantial changes need to be made to the report and to the proposed district boundaries in order to reflect a district that more accurately represents the history and story of the Town of Zebulon and would be closer to the 1992 and 2006 Study List District(s), with particular focus on the African American neighborhoods including their connection to the core story of Zebulon as a tobacco, railroad, and

*Copies of any of the designation reports and other information regarding agenda items available by calling 833-6404 or e-mailing info@cappresinc.org

textile town. While the claim continues to be made that the district can be amended at some unnamed and unknown time in the future, the commission should not approve the flawed form of the proposed district in the hope that, one day, the issues might be addressed to reflect a more appropriate boundary that addresses these glaring irregularities.

Following the presentation, staff recommended that the WCHPC not recommend that the Zebulon NRHD be sent to the National Register. Mr. Morris asked if there were any questions for staff.

QUERY: Ms. Beach asked if the NPS not having hard and fast rules on the integrity issue is a new phenomenon. Mr. Bradham stated that this is nothing new. Mr. Roth noted that at the first public hearing in May of 2021, architectural integrity in the African American neighborhoods seemed to be the roadblock for the NPS but it turns out that this isn't entirely true.

QUERY: Mr. Carrigan asked about the discrepancies between the 2016 Study List map and the proposed NRHD boundary. Mr. Bradham noted that the WCHPC received a grant to conduct a multi-phase survey in Wake County, but SHPO and the consultants ultimately determine the boundaries of Study List Districts. Mr. Carrigan asked why the earlier Study List map, which was approved by SHPO, is significantly different than what is being proposed in the nomination. Mr. Bradham noted that Staff raised this question to SHPO, referencing the 1992 and 2006 Study List Districts respectively. The response from SHPO was that *nothing is technically eligible for the National Register until it is officially listed in the National Register*. It is also important to note, as SHPO stated, that these Study List Districts were not created in a vacuum, but with collaboration between SHPO staff and the consultant writing the report. The WCHPC never decided on what should or should not be included in these proposed Study List Districts. Mr. Roth noted that the commission managed these surveys "in name only," as SHPO ultimately calls the shots in what is included and what is not.

With no further questions for Staff, Ms. Beach offered the following motion:

"We, the Wake County Historic Preservation Commission, as the Town of Zebulon CLG, have reviewed and discussed the nomination for the Zebulon Historic District and find that the property **does not meet** the criteria for listing in the National Register of Historic Places as stated in Section 8 of the report. We therefore, **do not recommend** that the property be submitted for listing in the Register. The reasons for our findings concerning this nomination are stated below:

- 1) The district, as proposed, includes 1960s and 1970s neighborhoods that have no relationship to the core story of Zebulon as an early 20th century railroad, tobacco, and textile town, while at the same time excluding African American neighborhoods that do have a relationship to that core story.
- 2) The areas north of North Street do not share the same distinctive characteristics of the same type, period, or method of construction as the areas south of North Street in the older section of the proposed district. There is a diverse collection of early 20th century architectural styles in the areas south of North Street; whereas the areas north of North Street contain mostly ranch-style houses, which are minimally represented south of North Street.

- 3) The district, as proposed, does not represent a significant and distinguishable entity, whether its components lack individual distinction or not (see #1 and #2)."

Seconded by Ms. Ashworth. In discussion, Ms. Beach stated that she is concerned that because the NPS doesn't have hard and fast rules concerning integrity in African American neighborhoods, she doesn't think that the commission can move forward with this application until those African American neighborhoods are examined more closely and the boundary further evaluated. Ms. Morrissey noted that it has come back to the "too large and too small" opinion that the commission had last year concerning the proposed district boundary. Furthermore, Mr. Morris stated that, sadly, the commission is stuck at the tail end of the horse, whereas it would have been nice to have this conversation before the nomination was turned in to SHPO. It seems more fitting that the commission should have had an opportunity to offer its input in the middle of the process instead of the tail end to address these concerns.

QUERY: Mr. Carrigan stated that his understanding is that there have been roughly three or four surveys over the last 30 years in this area, but four different boundary maps have been developed for a proposed district. He asked for clarification as to why the discrepancies in each of these surveys, specifically back to his question to staff earlier concerning the 2016 map and the current proposed boundary map. Mr. Bradham shared that each survey built on the previous surveys and tried to cover resources that may have been missed and to provide more context. Mr. Roth stated that many things that staff and the commission have been led to believe about this process prior to this point in time and the Study List aren't necessarily so, based on how it has been explained as of late by SHPO. Essentially, a survey can develop into a Study List District, which can in turn be used as the basis for a National Register nomination, but with the latter, SHPO gets more involved in the details and boundaries. Mr. Carrigan stated that it is still confusing how much it changed from 2016 to the current proposed district, considering SHPO was closely involved in the survey from 2016 and developing those boundaries with the consultant. Mr. Carrigan said this commission does not have the option to look at the boundaries, and its role is to only vote based on the nomination before the commission today, but the boundaries presented in this draft nomination seem to be done haphazardly. Mr. Morris noted that there is also a new staff at SHPO that offer a different perspective than previous staff, and SHPO did not work with the same consultant that prepared the 2016 Study List District. Mr. Roth noted that another issue raised by SHPO last night was that restoring a 1906 building with aluminum siding applied in the 1960s to its 1906 appearance might not be appropriate, as that would be removing material within the period of significance that stretches to 1971. There are many more questions than answers, but these issues are more for SHPO to answer than for staff to answer.

With no further discussion, the motion passed unanimously (Mr. Tippett recused from the vote).

N.B. Mr. Morris stated that this commission absolutely wants to see a Zebulon NR Historic District and hopes that the nomination does not get moved to the bottom of the pile - if it is to be resubmitted in a different form than its current one - despite the staffing shortage current at SHPO.

8. New Business: Ms. Beach reminded commission members that the Downton Abbey textiles exhibit at the NC Museum of History that will be open through January 17, 2022.

9. Other Business: Ms. Nolan asked how commission members felt about continuing to meet in person with the phone option and wanted to make sure everyone is still comfortable with this hybrid meeting option. Mr. Morris said that he hopes that the situation will improve in the coming months but having a meeting online in February is an option.

10. Chair's Report: Mr. Morris thanked everyone for being in attendance today and thanked the commission members that attended the Monday, January 10 joint public hearing in Zebulon and those who participated online.

11. Adjourned: Hearing no objection, the meeting was adjourned at 4:56pm.

Respectfully Submitted,

**Jeremy Bradham
Secretary**