



# AGENDA

## Town of Kure Beach Historical Preservation Commission

Wednesday, June 3, 2020

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A meeting of the Historical Preservation Commission will be held Wednesday, June 3, 2020 in the Council Chambers commencing at **6:00 PM**.

Page

**1. CALL TO ORDER**

**2. ADOPTION OF THE AGENDA**

**3. ADOPTION OF MINUTES**

- 2 - 3      3.1.    May 6, 2020 Regular Meeting  
[HPC Minutes-05-06-2020](#)

**4. PUBLIC COMMENT**

**5. OLD BUSINESS**

- 4 - 8      5.1.    Update on the designation report for the downtown Kure Beach Historic  
Overlay District (Galbraith)  
[HPC Kristi Brantley Email](#)

**6. NEW BUSINESS**

**7. ADJOURNMENT**



## HISTORICAL PRESERVATION COMMITTEE MINUTES

### REGULAR MEETING

Wednesday, May 6, 2020 @ 6:00 pm

The Kure Beach Historical Preservation Commission held its regular meeting on Wednesday, May 6, 2020. A quorum of members was present and Attorney Jim Eldridge attended.

#### HPC MEMBERS PRESENT

Chairman Craig Galbraith  
Member Bill Moore  
Member Kenneth Richardson  
Member David Garceau

#### HPC MEMBERS ABSENT

Member Tony Garibay

#### STAFF PRESENT

Mandy Sanders, Town Clerk  
John Batson, Building Inspector  
Beth Chase, Deputy Town Clerk

#### CALL TO ORDER

Chairman Galbraith called the meeting to order at 6:00 pm.

#### ADOPTION OF AGENDA

MOTION- Member Moore made a motion to adopt the agenda as presented

SECOND- Member Richardson

VOTE- Unanimous

#### APPROVAL OF MEETING MINUTES:

- March 4<sup>th</sup>, 2020 Regular Meeting

MOTION – Member Garceau made a motion to approve the minutes as presented

SECOND – Member Richardson

VOTE - Unanimous

#### PUBLIC COMMENTS

#### OLD BUSINESS

1. Update on the designation report for the downtown Kure Beach Historic Overlay District

Chairman Galbraith stated:

- Met virtually with the State on April 25<sup>th</sup>
- Overall the state approved of the report



## HISTORICAL PRESERVATION COMMITTEE MINUTES

### REGULAR MEETING

Wednesday, May 6, 2020 @ 6:00 pm

- After speaking with the State the main issue with the HPC Town Report was establishing the foundation in the report for the design guidelines that will be part of the COA process
- The legal implications in the future is if there is a challenge of a COA the legal challenge would go back to the original designation report
- The State would like to see a complete inventory of buildings and lots in the report and also requested the Town use a better site plan in the HPC report
- All comments from the State are advisory only and are nonbinding
- The second meeting was a virtual walkthrough of the district which 5 employees from the State were present
- The State had concerns regarding the vacant lots and didn't feel the need to include in the designation report. Once it was explained the vacant lots were originally buildings in the 1920-1950s understood why the vacant lots were included in the report

MOTION- Member Moore made a motion to excuse Tony Garibay from the HPC meeting

SECOND- Member Richardson

VOTE- Unanimous

Attorney Eldridge stated he agrees with Chairman Galbraith comments regarding the virtual meetings. Even through the State comments are advisory Chairman Galbraith and himself need to revise the report to include the recommendations from the State and present at the June HPC meeting.

### NEW BUSINESS

### MEMBER ITEMS

### ADJOURNMENT

MOTION-Member Richardson made a motion to adjourn the meeting at 6:28 p.m.

SECOND- Member Moore

VOTE- Unanimous

## Beth Chase

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**From:** Brantley, Kristi <kristi.brantley@ncdcr.gov>  
**Sent:** Friday, April 17, 2020 11:25 AM  
**To:** Beth Chase  
**Cc:** Bartos, Ramona; Beckman, Hannah S; David, Sarah W; Adolphsen, Jeff; Atkinson, Stephen B  
**Subject:** Kure Beach Proposed Historic Overlay District  
**Attachments:** NH\_Kure Beach\_Formal.pdf; LLDR-Guidelines.pdf; LDR-Checklist-002.pdf; NH\_KureBeachLHD\_REQUEST FOR DESIGNATION CONFIRMATION.docx

Dear Beth,

Attached is a copy of a formal letter written in response to the proposed designation of the **Kure Beach Historic Overlay District**. Please share a copy with the Commission Chairman. Also attached is a copy of the designation confirmation form for the property. Once the ordinance has been adopted to designate the property, please return a completed copy of the confirmation form to me with the date the ordinance was adopted.

In addition, I've attached a copy of our Local Report Guidelines and our Local Designation Report Checklist. Our office uses these when reviewing a report. Although this report was for a district, the principles and information requested for a landmark are likewise relevant. You can also find both on our *Tools for Historic Preservation Commissions* web page, under "Preparing a Local Landmark Report." The address is <https://www.ncdcr.gov/about/history/division-historical-resources/nc-state-historic-preservation-office/local-historic-0#preparing-a-local-landmark-report>.

Stephen Atkinson, Assistant State Archaeologist, does not recommend a statement of archaeological potential. He does note that future alterations to the grounds should still be undertaken with care to avoid inadvertent damage or destruction of any unknown resources during such ground disturbing activities.

National Register Specialist, Hannah Beckman Black, reviewed the report and offers the following comments:

*Thank you for submitting the report for the **Downtown Kure Beach Historic Overlay District Kure Beach, New Hanover County**. We have reviewed the information in the report and offer the following comments in accordance with North Carolina General Statute 160A-400.3 and 400.4.*

### **GENERAL COMMENTS**

*Name – It may be better to name the district something like “Kure Beach Local Historic District” or “Downtown Kure Beach Local Historic District”*

*Inventory-- I do have a number of suggestions to improve the inventory list.*

- *Each resource within the proposed district should have a separate description, even when there are multiple resources located on a single parcel. For instance, the South Wind Motel, located at 109 Fort Fisher Blvd S. appears to have two buildings constructed in 1963, one with an addition that dates to 1983. Each building should be described individually under a single heading. It is possible to have one contributing building and one noncontributing building on a single parcel. (See pages 16 and 17 National Register bulletin 16a <https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf> for more information about how to classify each resource and count them.)*

- *In several cases within the proposed district, secondary buildings (including garages) are not included in the building inventory. Please be sure to include every building, unless they are small, prefabricated sheds, in the building inventory.*
- *Please include all vacant/parking lots in the building inventory.*
- *Please note all current building materials (foundations, siding, roof, windows, doors, porch components, etc.) accurately in each resource description. These descriptions are important to understanding and setting forth the special character and integrity of the resources for Certificate of Appropriateness (COA) and preservation purposes. I did notice several instances where building materials were inaccurate when compared to photos and Google street view. For example, the siding on 117 Fort Fisher Blvd was noted to be vinyl, but actually appears to be asbestos, which may have been the original siding since the house appears to date to c. 1950.*
- *Be sure to note any changes to resources over time if known, including porch enclosure, additions, and changes in building materials. This step is helpful in assessing each building's integrity of design, materials, and workmanship.*
- *Dates and contributing status – As a general rule, resources must be at least 50 years of age, must retain their character-defining features, and must relate to the significance of the district to be considered “contributing resources”. We have some concerns about the assessment of contributing/noncontributing status of several resources within the inventory submitted, so we would encourage you to reexamine all the proposed district resources in terms of their age, significance, and integrity.*

*For instance, the 1960 Moran Motel at 118 Fort Fisher Blvd was noted to be noncontributing, but it clearly relates to the potential district's significance as a mid-century coastal tourist destination, it is more than 50 years old, and it retains many of its original character defining features. I would consider this property to be the most intact or unchanged building within the district, so it certainly should be listed as a contributing resource in this proposed local district. On the other hand, the Kure Beach Pier Building and Pier were noted to be contributing resources even though they were constructed c. 1993 and 1996 respectively. While these resources have taken the place of earlier important resources to the community that are no longer extant, they do not appear to be exact replicas of the original resources, and were constructed too recently to be contributing resources to the district.*

### **FROM THE CHECKLIST**

*The following comments are based on items on the checklist that are missing from the report.*

*Abstract 2.1 – The report lacks a clear summary statement of the proposed district's special character/significance and degree of integrity, and would benefit from inclusion of such a statement.*

- *Page 6 mentions the architectural significance but does not discuss architectural styles found within the district, and based on the resources present within the district, I would not recommend focusing on architecture solely as an area of significance.*
- *Page 6 also discusses the Archaeology/History significance of the district, focusing on Civil War History. The extant above-ground resources do not reflect this history.*
- *In our opinion, the best approach to significance for the potential district would be to focus on its recreation/entertainment history as a mid-century coastal tourist destination, since this history is what the resources seem to reflect best. Page 7 of the report says, “The District retains coastal community elements which lend themselves to a 1950's/1960's small-town, family-friendly feeling and make the District's surroundings a desirable family vacation destination with walkable streets in a relaxed environment.” Page 23 of the report says, “At the present time downtown Kure Beach is composed primarily of commercial buildings catering to entertainment and tourism with a distinct feel of a*

1950s/1960 beach community.” Both of these statements are a good start to discuss the special character and significance of the district, but stop a bit short. While the land on which Kure Beach stands has a long military history and tourism began in the early 1900s, the current extant historic resources mostly date to the mid-century development associated with entertainment, recreation, and tourism in the community. The proposed district is a mid-twentieth century coastal tourist community which features a collection of small houses, rental cottages, and motels, all surrounding the commercial strip along K Avenue, which terminates at the Kure Beach Pier.

- Integrity of the district as a whole and its ability to convey its significance as a mid-twentieth century coastal tourist community must be addressed and explained.

*Historic Background 3.1 – The narrative includes a lot of good history about Kure Beach’s association with the Battle of Fort Fisher in 1865 as well as the early development of the coastal tourist community up until the end of World War II, but has a much less robust historic background specifically focusing on the mid-twentieth century development as a tourist destination and the resources within the district. The report should include a more robust discussion of this era of development in the potential district and whether the proposed district and the resources inside its boundaries still retain that special character and integrity from the 1940s through 1960s era of development.*

*Historic Background 3.2 – Dates of original construction are given in most cases, but it is not clear how or what sources were used to determine the of construction.*

*Historic Background 3.3 – There is very little discussion of additions or alterations to buildings within the district over time or what was once on vacant lots within the district. This discussion is important to the analysis of integrity and articulation of the district’s context and special character. See discussion above about the inventory.*

*Assessment 1.1 – The report notes that the proposed district has architectural, archaeological/historical, and cultural importance. However, these areas of importance either are not fully explored, or reasons for architectural, archaeological/historical, and cultural importance are mentioned but do not necessarily relate to the extant resources for the proposed district (P 6-7). See discussion above in Abstract 2.1 and Historic Background 3.*

*Assessment 1.2 – See discussion above about the inventory and description of changes within the district.*

*Assessment 1.4 – In our opinion, the report as submitted does not have a sufficiently thorough evaluation of the overall district’s integrity of design, setting, workmanship, materials, feeling, and association to set forth the character of the historic district under NC GS Section 160A-400.3, necessary to articulate and explain the district’s special character under the General Statutes. In a comparison of historic aerial views and photos with current street views and aerials, it is apparent that there are several vacant lots or areas of new infill that once had commercial buildings, residences, and rental properties. Also, by looking at the current building materials, it is clear there are many instances of replacement materials, which is not necessarily unusual for a beach community prone to storm damage and repair and material degradation due to salt exposure. We would strongly encourage the report to address how the proposed district’s historic resources retain the integrity necessary to convey its significance. For additional information about how to evaluate the integrity of a property, National Register Bulletin 15, page 44, can be helpful:*

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

*To this end to answer the question posed by NC GS 160A-400.3, we would also encourage you to elaborate on the specifics of the proposed district’s special character, including the buildings and their*

*relationship to the land, including their scale, size, setbacks, style, in addition to their materials. North Carolina case law sets forth the need to outline and articulate this special character with some specificity to provide the needed context for COA decision making and design review.*

*In comparing the resources in the potential Kure Beach Local Historic District to National Register nominations of other coastal communities, it appears that in these circumstances there can be a bit more leeway on material changes to buildings within a district, recognizing the unique characteristics of the community and its buildings (exposure to salt water and storm damage). Please read the integrity statements for both the Cape Lookout Village Historic District (<https://files.nc.gov/ncdcr/nr/CR0266.pdf>) and the Ocracoke Historic District (<https://files.nc.gov/ncdcr/nr/HY0634.pdf>) to see how integrity was discussed for these coastal communities.*

*The buildings of Kure Beach, like those in most beach communities, have undergone years of material change to facilitate preservation. In these communities, the preservation of the forms and overall streetscapes and feeling is more important to preservation than the actual preservation of materials, which fail much faster in a marine environment. In the case of ocean-side historic districts, truly the focus must be on "the distinguishable entity whose components may lack individual distinction" rather than on the specific materials. We recommend that this matter be explained and articulate in your district report.*

*Because of the harsh environment of the coast, replacing exterior materials on buildings is common. Ideally, when replacement materials are needed, they should be in-kind with wood replacing wood, or cementitious siding which closely mimics wood, being used. Vinyl siding and vinyl replacement windows are less desirable, but they do not necessarily detract from the overall composition of the district when fenestration, form, and overall character are maintained. In many cases in a marine environment, the application of vinyl siding has prolonged the building's life. Going forward, owners should be encouraged to use replacement materials that are closer in appearance to the original than vinyl siding is to wood, but its existence on a building does not prevent that building from contributing to the district's historic character. The report should elaborate on this view of materials to address the materials' element of integrity and to aid in the COA design review process in the future.*

*One of my main concerns with the integrity of the district as currently articulated in the submitted report remains the vacant lots and new construction on lots that formerly had houses, commercial buildings, and hotels. It still appears to me when looking at historic photos and current aerial and street view photos that several buildings that would date to that mid-century time period were lost and this makes for a district with several gaps and infill that could be seen as diminishing its integrity and ability to convey significance. To that end, we would encourage a careful assessment and justification of historic resources and vacant lots proposed for inclusion in the district and the proposed district's boundary.*

*Assessment 1.5 –In determining boundaries for National Register districts, the goal is to select boundaries that fully encompass the most concentrated area of significant resources, while leaving out areas that do not contribute to the significance of the district (like vacant lots, areas that have undergone substantial changes, or date outside the given period of significance). Sometimes it is not possible to eliminate non-contributing buildings or vacant lots from the boundaries because eliminating them from the boundary would create a district boundary that is not contiguous or would create "doughnut holes." However, ideally vacant lots and noncontributing resources should be eliminated from the boundary wherever possible.*

*In reviewing the inventory next to the proposed boundary, it seems there are a few locations where*

*vacant lots, altered buildings, or those with later periods of construction could be eliminated from the boundary to create a tighter grouping of resources that retain the integrity necessary to convey their significance. A new logical boundary should be drawn, and guidance from National Register Bulletin 16a, page 56 (<https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf>) may be helpful to that end.*

*Including justifiable vacant lots would give the community the ability to regulate new in-fill development on these lots through the COA process so that it is not incongruous with the special character of the district.*

*Supporting Documentation 5.4 – The boundary map lacks any indication of contributing and noncontributing resources. The new map should indicate this. Also, it is missing a north arrow and a clear indication of the boundary line.*

*Bibliography/Source Citations 6.1 – There were several instances throughout the report where information was presented but not given a citation. The report should cite all paraphrased facts that are not common knowledge or the author’s own analysis. Please do not forget to include page numbers of resources where applicable. Also, there are two oral interviews cited. As part of those citations and the bibliography, please explain who these people are. Are they longtime residents? Local historians?*

*With these changes, we believe the designation report will provide the preservation commission and local governing board sufficient information to determine whether the Downtown Kure Beach Local Historic District possesses the requisite special local significance and integrity for local historic landmark designation and to provide context for the special character of the district for design review purposes. Thank you for the opportunity to review this local designation report. Please contact Hannah Beckman-Black at [hannah.beckman@ncdcr.gov](mailto:hannah.beckman@ncdcr.gov) or at 919.814.6577 with any questions you may have regarding our comments.*

I know this is a lot of information and feedback to share with you, so please don’t hesitate to reach out to me if you need any help. I look forward to “meeting” with you next virtually next Wednesday and touring Kure Beach.

Best,  
Kristi



**Kristi Brantley**

CLG/Local Government Coordinator  
NC State Historic Preservation Office  
NC Dept. of Natural and Cultural Resources  
Phone: (919) 814-6576  
[kristi.brantley@ncdcr.gov](mailto:kristi.brantley@ncdcr.gov)

109 East Jones Street | 4617 Mail Service Center | Raleigh, NC 27699-4617

Attachments area