



August 2, 2016

Ms. Lauren Kelly
Project Development Planner
City of Beaufort
1911 Boundary Street
Beaufort, SC 29902

Dear Ms. Kelly,

Thank you for your telephone call on Friday, July 29 and for your request that the South Carolina Department of Archives and History provide comments on a proposed parking structure in the block bounded by Craven, Charles, West, and Port Republic Streets. The comments are based on drawings that staff members from the State Historic Preservation Office accessed on August 1, 2016 at http://www.cityofbeaufort.org/Data/Sites/1/media/Departments/planning/hrb/august-10-2016/2016-07-22_concept-design-proposal.pdf and on the content of our telephone call on July 29. These comments are provided as technical assistance to the City of Beaufort, and are not the result of any consultation under Section 106 of the National Historic Preservation Act or the Coastal Zone Consistency Certification review by SCDHEC-OCRM.

We note that the garage is proposed for a transition block in the Beaufort Historic District, between the densely developed commercial area along Port Republic Street and the less dense residential area to the north. In another city with a more densely developed scale on all four sides, a similar setting may be ideal for such a project. Regrettably, given the low density of the residential area that borders the property on three sides, this particular design is too dense for this particular site. Further, the design relies much too heavily on the flat roof forms, front and side setbacks, and other architectural vocabulary of the commercial buildings, and has no connection to the hipped and gable roof forms, setbacks, and architectural vocabulary of the residential buildings. In this particular context we doubt a building of this height and large mass can be made compatible by applying architectural details/elevations to the facade, use of liner buildings, or through the use of vegetative screening, which could soften but not hide the massing and scale. If this agency were consulted under Section 106 of the National Historic Preservation Act, we would consider this parking garage to have an adverse affect on the Beaufort Historic District.

When we refer to the established preservation design guidelines for the City of Beaufort, (Beaufort Preservation Manual dated 1979, and the 1990 Supplement), we see more inconsistencies with the guidelines than consistencies. In the Section titled "Design Guidelines

for New Construction” (beginning on page 13 of the Supplement) we note several concepts that appear to be pertinent to this discussion: Scale; Absolute Size; Massing; and High density/large scale construction. We will not repeat the guidance from the Supplement, but do direct the City’s attention to the following, found primarily in the High density section: alternative sites; large scale structures set back from every street; upper floors recessed; and avoid demolition of historic buildings. These are the guidelines that seem pertinent based on our current level of information about the project. Clearly all the guidelines must be considered in every review. We trust that the City of Beaufort and its board of architectural review will find clarity in the 1990 Supplement that will allow it to use its standard procedures to make a sound decision based on those guidelines. Please feel to contact us if you have any questions.

Best regards,

A handwritten signature in cursive script that reads "W. Eric Emerson".

W. Eric Emerson, Ph.D.
Director and SHPO