



North Carolina Department of Natural and Cultural Resources  
State Historic Preservation Office

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary Darin J. Waters, Ph.D.

January 14, 2022

Jamie Lawson, AICP  
Principal Planner  
425 S. Lexington Ave.  
Burlington, NC 27215

RE: Proposed property removal from **West Davis – Fountain Place Local Historic District: 1004, 1010, 1016, and 1022 West Davis Street, Burlington, Alamance County.**

Dear Ms. Lawson:

Thank you for submitting the report for the amendment to **West Davis – Fountain Place Local Historic District: 1004, 1010, 1016, and 1022 West Davis Street, Burlington, Alamance County.** We have reviewed the information in the report and offer the following comments in accordance with North Carolina General Statute 160D-944.

The report well outlines the situation as we can understand it, and will aid the preservation commission in determining whether it should make a recommendation whether the designation of this portion of this local historic district should be “revoked or removed for cause” pursuant to its powers under NC GS § 160D-942(5).

We note that the reasons given by the applicant are as follows:

- “(1) No longer economically viable to be part of the district.
- (2) Financially disadvantageous to remain part of the district and keep up the property according to the standards imposed by the HPC.
- (3) Current standards severely limit the homeowner’s ability to make energy efficient updates and improvements to their dwelling.
- (4) Current standards limit the homeowner’s ability to use modern or current materials which increases the cost of improvements.”

The report frames a fundamental question – are the reasons given by the applicant the ones contemplated by the North Carolina General Statutes as being “for cause”? Have the special significance and/or integrity of this portion of the district changed or been destroyed since the local district designation was established? We refer the commission to NC GS § 160D-944: “Historic districts established pursuant to this Part shall consist of areas that are deemed to be of special significance in terms of their history,

prehistory, architecture, or culture and to possess integrity of design, setting, materials, feeling, and association.”

We also note the report predicts a precedential value and cascade effect that removal of this area may cause elsewhere in the local historic district, an effect that may work to the detriment of other citizen property owners and their positive expectations about investing and living in a locally designated historic district. We do not disagree with these observations.

Thank you for the opportunity to comment on the report. Please note, our comments are advisory only and therefore, non-binding. Once the governing board has received a recommendation from the Burlington Historic Preservation Commission, it should proceed in the same manner as would otherwise be required for an amendment to the zoning ordinance. Once the decision has been made, please return a completed copy of the enclosed form to our office.

This letter serves as our comments on the proposed amendment to the West Davis – Fountain Place Local Historic District: 1004, 1010, 1016, and 1022 West Davis Street, Burlington, Alamance County. Please contact me at or [Kristi.brantley@ncdcr.gov](mailto:Kristi.brantley@ncdcr.gov) (preferred) 919-814-6583 should you have any questions about our comments.

Sincerely,

A handwritten signature in black ink that reads "Kristi Brantley". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Kristi Brantley  
Local Preservation Commissions/CLG Coordinator

CC: Conrad Olmedo, Planning Manager  
Burlington Historic Preservation Commission Chair

Enclosure