



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

Ramona M. Bartos, Administrator

Governor Josh Stein
Secretary Pamela B. Cashwell

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

February 7, 2025

Rebekah Yousaf
Environmental Research Group, LLC
6049 Falls Road
Baltimore, MD 21209

becky.yousaf@envrg.com

Re: Section 110/106 Architectural Resources Survey of 81st Readiness Division US Army Reserve Center, Charlotte, 1330 Westover Street, Charlotte, Mecklenburg County, ER 24-2832

Dear Ms. Yousef:

Thank you for your email of November 27, 2024, transmitting the Historic Structure Survey Report (HSSR), "Architectural Assessment of United States Army Reserve Center, Charlotte, Mecklenburg County, North Carolina," prepared by Environmental Research Group for the U.S. Army Corps of Engineers Mobile District. We have reviewed the HSSR and offer the following comments.

We concur with the following determinations for the reasons listed in the report. Specifically, that neither the complex nor the individual structures are eligible for listing in the National Register of Historic Places due to building changes and diminished integrity.

ARC Facility #	HPO SSN	Name	NRHP Evaluation
1	MK4526	ARC 1	Not Eligible
14	MK4527	ARC 2	Not Eligible
2	MK4528	AMSA	Not Eligible
15	MK4529	ARC Adjacent Building	Not Eligible
Shed1	MK4530	Shed1	Not Eligible
Shed2	MK4531	Shed2	Not Eligible
Storshed2	MK4532	Storshed2	Not Eligible
Stor2	MK4533	Stor2	Not Eligible
Stor3	MK4534	Stor3	Not Eligible
1324a	MK4535	VMS	Not Eligible
Stor4	MK4536	Stor4	Not Eligible

However, we note that no SSN was issued to the overall complex, which if being intensively surveyed and evaluated as a whole, requires an SSN in order to create a full and complete record. Please request an SSN for the complex and update the report with that information where necessary. At the very least, the complex SSN should appear in the Management Summary results table and in the complex's evaluation discussion.

We do not require additional edits to the draft, but we would like to provide notes on preparing HSSRs for this type of resource in North Carolina for future reference.

- Although there was a history of the whole complex, each building was considered individually, and the reader was provided only an architectural description. It is not until the NRHP evaluation as a whole that there was any indication of changes to the buildings and their integrity. Individual evaluations typically get dedicated narrative sections and eligibility evaluation discussions.
- This report relies heavily on the assumption that the reader is very familiar with past evaluations and can follow that there is an overall evaluation and individual evaluations being performed at the same time but without the simple formatting and statements that would make the intent clear. Our staff makes an effort to ensure that anyone reading HSSRs submitted to this office can clearly and efficiently read and understand what the reports contain, not just field professionals.
- Use of both historic and recent photographs make comparison and understanding of changes over time much easier. They tend to be most helpful when placed closer together in the report or within the same evaluation section.

Please make the requested edits and submit the final HSSR to our office along with all required deliverables (printed and digital). A detailed list of deliverables can be found at <https://www.hpo.nc.gov/ER106/HSSR-standards>. Questions regarding deliverables production and submission should be directed to Katie Harville, Environmental Review Specialist, Katie.Harville@dncr.nc.gov.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or environmental.review@dncr.nc.gov. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



for Ramona Bartos, Deputy
State Historic Preservation Officer

cc Dan Thomas, U.S. Army Reserve

daniel.h.thomas12.civ@army.mil

CUI

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Division Chief, (803) 751 9947, daniel.h.thomas12.civ@army.mil
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Prepared for
US ARMY CORPS OF ENGINEERS
MOBILE DISTRICT



Prepared by
ENVIRONMENTAL RESEARCH GROUP, LLC



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