

**National Park Service**

**U.S. Department of the Interior**

**Carter G. Woodson Home National Historic Site**

**District of Columbia**



**GENERAL MANAGEMENT PLAN / ENVIRONMENTAL ASSESSMENT /  
INTERPRETATION PLAN**

**FINDING OF NO SIGNIFICANT IMPACT**

The National Park Service (NPS) has completed a general management plan / environmental assessment / interpretation plan for Carter G. Woodson Home National Historic Site (herein referred to as site or national historic site). Congress authorized the national historic site on December 19, 2003, by Public Law 108-192. The site was set aside to preserve, protect, and interpret, for the benefit, education, and inspiration of present and future generations, the home (and legacy) of the preeminent historian and educator, Dr. Carter G. Woodson, founder of the organization known today as the Association for the Study of African American Life and History. The national historic site includes Dr. Woodson's home at 1538 9th Street, NW, and two row houses adjacent to it located at 1540 and 1542 9th Street, NW, Washington, D.C.

Because it is a new unit of the national park system, the national historic site had not undergone previous comprehensive planning efforts. The *Carter G. Woodson Home National Historic Site General Management Plan / Environmental Assessment / Interpretation Plan* (GMP/EA) was prepared to present and analyze alternative directions for the management and use of Carter G. Woodson Home National Historic Site.

The plan examines two alternatives for the development, use, and management of the site. The alternatives, which were based on the purpose, significance, and special mandates of the historic site, present different ways to manage resources, visitor use, and development of the site. The no-action alternative describes the management direction that had been adopted by current (2012) park management. The no-action alternative also serves as a baseline for comparison with the preferred alternative. The preferred (selected) alternative outlines the full development, use, and management of the national historic site.

It is important to note that since the plan was written, the conditions of Dr. Woodson's home and adjacent buildings 1540 and 1542 have deteriorated due to an earthquake and a hurricane (Irene) which both occurred in Washington, D.C., in August of 2011. All three buildings show damage as a result of these natural disasters. After careful examination by contracted architects, engineers and NPS historic preservation experts, the National Park Service has determined the best treatment for the interiors and exteriors of all three buildings, under the preferred alternative, is now rehabilitation only and not the original plan of a combination of restoration and rehabilitation treatments. Original elements of the Woodson home will still be restored to the greatest extent possible, but the overall treatment of the home will now be one of rehabilitation. This decision has resulted in changes to the GMP/EA and these changes are listed in the attached errata sheets.

This environmental assessment was prepared in accordance with the National Environmental Policy Act of 1969, as amended, its implementing regulations by the Council on Environmental Quality (40 *Code of Federal Regulations* [CFR] 1500–1508), and NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making*, and the accompanying handbook. Compliance with section 106 of the National Historic Preservation Act of 1966, as amended, has occurred in parallel with the NEPA process.

## **SELECTED ALTERNATIVE**

The GMP/EA analyzed the rehabilitation of Dr. Woodson's home at 1538 9th Street, NW, and the two row houses adjacent to it at 1540 and 1542 9th Street, NW. Based upon the analysis, the NPS selected its preferred alternative for implementation which is described on pages 48–50 and 52–68 of the environmental assessment. The selected alternative allows the visitor to experience Dr. Woodson's life as if he had just stepped out of his home. Visitors will learn about Dr. Woodson by going on a ranger or volunteer-led tour of his home and through innovative and interactive interpretive exhibits, videos, materials, and programs in buildings 1540 and 1542 9th Street, NW. Buildings 1540 and 1542 will provide space for interpretive exhibits, retail sales, restrooms, universal accessibility (via an elevator and wheelchair lift), mechanical systems, and offices.

Specific actions under the selected alternative will include the following:

- The façades and rear walls of Dr. Woodson's home and buildings 1540 and 1542 will be rehabilitated with in-tact historic elements on the Woodson home restored (as reflected in the errata sheets).
- The interior of Dr. Woodson's home will be rehabilitated and used for interpretive purposes while preserving its historic integrity (as reflected in the errata sheets).
- The interiors of buildings 1540 and 1542 will be rehabilitated to provide space for interpretive exhibits, retail sales, restrooms, universal accessibility (via an elevator and wheelchair lift), mechanical systems, and offices.
- According to the interpretation plan, visitors will experience the site through interactive interpretive and educational exhibits, videos, materials, and programs using innovative technologies inside the structures. Visitors will also experience Dr. Woodson's home through a ranger- or volunteer-led tour.
- There will be interpretive wayside exhibits in front of Dr. Woodson's home and walking tours of the neighborhood could be available.
- Interpretation and education staff will be hired to manage the day-to-day operations of the site.
- Limited offices to support NPS operations would be located at the site.
- The general agreement between the National Park Service and Association for the Study of African American Life and History (ASALH) will be implemented. ASALH will be provided administrative space at the national historic site.

The acquisition of building 1544 9th Street, NW, from donation or a willing seller, is also proposed in the selected alternative (option two). At the time this document was written, the acquisition of this building was not a viable option because the building was recently purchased and rehabilitated for use as a private residence. If, in the future, the owner would like to donate or sell the building, the NPS would enter into a discussion with that person about acquiring the building for the purpose of adding it to the national historic site.

## **ALTERNATIVES CONSIDERED**

The other alternative considered was the no-action alternative. The emphasis under the no-action alternative would be the opportunity for visitors to experience Dr. Woodson's neighborhood, view the rehabilitated historic façades (all three historic structures), and learn about how the neighborhood influenced his life and work.

Visitors would not have access to the interiors of the structures, but would learn about Dr. Woodson's life and legacy through the park website and brochure and the wayside exhibits in front of Dr. Woodson's home. Visitors would also learn about Dr. Woodson by going on an interpretive walking tour of the neighborhood. Under this alternative, interpretation and education staff would be hired to manage the day-to-day operations of the site. National Capital Parks-East may also hire a maintenance worker, resource management specialist, or an administrative assistant to support the operation of the site. Additional operational support would be provided by existing National Capital Parks-East staff.

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

The NPS is required to identify the environmentally preferable alternative in NEPA documents presented to the public for review and comment. The NPS, in accordance with the Department of the Interior policies contained in its Departmental Manual (516 DM 4.10) and the Council on Environmental Quality NEPA's Forty Most Asked Questions, defines the environmentally preferable alternative as the alternative that best promotes the national environmental policy expressed in the National Environmental Policy Act (section 101[b] [516 DM 4.10]). In NEPA's Forty Most Asked Questions, the Council on Environmental Quality further clarifies the identification of the environmentally preferable alternative, stating, "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (CEQ n.d.). After considering the environmental consequences of the alternatives, including consequences to the human environment, the NPS has concluded that the selected alternative is also the environmentally preferable alternative. This alternative best realizes the full range of national environmental policy goals as stated in section 101 of the National Environmental Policy Act.

Both the no-action and selected alternatives would cause the least damage to the biological and physical environments because the emphasis of the proposed actions in these alternatives is on preserving and rehabilitating the three historic structures that comprise the national historic site. Also, the biological and physical environment around the national historic site is limited because of its urban location in Washington, D.C.

The selected alternative is the alternative that best protects, preserves, and enhances historic and cultural resources. Under this alternative, the three historic structures will be rehabilitated and opened to the public. The selected alternative will allow visitors to experience the various resources of the national historic site as they are developed, such as a retail sales area, the historic Woodson home, educational classes, an interpretive film, and personal services provided by NPS staff. The selected alternative supports diversity through programs that will place Dr. Woodson's legacy and his contemporaries in the framework or context of American history. These programs will help the visitor develop a sense of the importance of diversity in American culture. The selected alternative preserves important historic cultural and national aspects of our American heritage regarding Dr. Woodson's legacy of African American historiography.

## **MITIGATION MEASURES**

The NPS routinely evaluates and applies mitigation measures whenever conditions could adversely affect the sustainability of national park system resources. The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective and mitigation measures will be implemented as part of the selected alternative.

- Continue to inventory and research archeological resources, the historic structures, and ethnographic resources to better understand and manage these resources. Continue to follow federal regulations and NPS guidelines in managing cultural resources.
- Apply site-specific planning and compliance to projects. Minimize adverse impacts by applying *The Secretary of the Interior's Standards for Archeology and Historic Preservation* and *The Secretary of the Interior's Standards for the Treatment of Historic Properties* and by using sensitive design that will be compatible with historic resources. If adverse impacts are unavoidable, strategies to mitigate them will be determined through consultation with all interested parties.
- If during construction, archeological resources are discovered, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy developed. Staff from the national historic site and/or the NPS regional archeologist will consult with the District of Columbia Historic Preservation Office to ensure that the protection of resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined

protection of resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990, as amended (25 *United States Code* [USC] 3001) will be followed.

- Implement steps and approaches during the construction phase of this project to reduce greenhouse gas emissions, which will help the national historic site keep its carbon footprint low.

## **WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As documented in the environmental assessment, the National Park Service has determined that the selected alternative can be implemented without significant adverse effects. As defined in 40 CFR 1508.27, significance is determined by examining the following criteria:

***Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.***

Cultural resources (historic structures), visitor use and experience, the socioeconomic environment, and park operations will experience both beneficial and adverse impacts as a result of implementing the selected alternative. However, no significant impacts were identified that will require analysis in an environmental impact statement. Moderate adverse impacts are expected for historic structures due to the removal of historic fabric during the rehabilitation of the three buildings including the work needed to make the buildings accessible (e.g., creating entryways between Dr. Woodson's home and building 1540, installing an elevator, and creating proper egress). Beneficial and long-term impacts to visitor use and experience will be realized because the rehabilitated interiors will allow disabled people with limited mobility access throughout the national historic site. Beneficial and long-term impacts to the socioeconomic environment are expected as a result of opening the national historic site to the public and drawing in people who will support the local economy. Impacts to park operations will be beneficial and long term due to the increase in staffing and improved infrastructure that would adequately protect the historic structures, and provide for an enhanced visitor experience.

***The degree to which the proposed action affects public health or safety.***

The proposed action will positively affect visitors, employees, and volunteers by bringing the buildings up to proper public health and safety codes. Currently the historic structures are not accessible to the public and most NPS employees because of their deteriorated state. Rehabilitating the structures will give people safe access to them once again.

***Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.***

The national historic site is in an urban environment (Washington, D.C.). There are no park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas in the vicinity of the national historic site. The project will rehabilitate cultural resources, the three historic buildings that comprise the national historic site—1538 (Dr. Woodson's home), 1540, and 1542 9th Street, NW. Dr. Woodson's home was designated a national historic landmark in 1976, and all three structures are contributing resources in the Mount Vernon West National Historic District (1999). There will be loss of historic fabric as a result of rehabilitating the structures. However, the overall treatment of the structures will be beneficial to cultural resources.

***The degree to which the effects on the quality of the human environment are likely to be highly controversial.***

None of the actions proposed in the selected alternative have the potential to be highly controversial because the actions that will be taken are typical of other rehabilitation projects undertaken by the National Park Service.

***The degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.***

There were no effects on the quality of the human environment identified that are highly uncertain or involve unique or unknown risks. The actions laid forth in the selected alternative will be performed in accordance with NPS Director's Order 28: *Cultural Resource Management* and *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.

***The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.***

The selected alternative will not establish a precedent for future actions that will pose a significant effect or represent a decision in principle that will influence future considerations.

***Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.***

Implementation of the selected alternative will have no significant cumulative impacts. As described in the environmental assessment, past, present, and future actions and projects within the project area that could affect historic structures, visitor use and experience, the socioeconomic environment, and park operations include work done to Dr. Woodson's home and buildings 1540 and 1542 prior to NPS acquisition of them; NPS acquisition and stabilization of the three buildings; creation of three self-guided heritage trails in Washington, D.C. that included Dr. Woodson's home; construction and opening of the Washington Convention Center near the national historic site; acquisition and renovation of building 1544 by a private entity; implementation of the Convention Center Area Strategic Development Plan (2005) and District of Columbia Historic Preservation Plan (2008-2012); construction of a companion hotel for the Washington Convention Center; redevelopment of the historic O Street Market; and the City of Washington's plan to rehabilitate the Carter G. Woodson Park near the national historic site. The cumulative impacts conclusions were reached for the following resources: adverse, minor, and long term for historic structures, and long term and beneficial for visitor use and experience, the socioeconomic environment, and park operations.

***The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.***

After applying the Advisory Council on Historic Preservation (ACHP) criteria of adverse effects (36 CFR Part 800.5, Assessment of Adverse Effects), the NPS concluded that the proposed undertaking outlined in the selected alternative will have an adverse effect on historic structures, namely Dr. Woodson's home, which is a national historic landmark. The adverse effect will result from construction of entryways between Dr. Woodson's home and building 1540, and the construction of an elevator penthouse on the roof, and stairway addition on the back of building 1540. While there will be an adverse effect, it will not be a significant effect and it will not diminish the overall integrity of the historic structure nor compromise the listing of Dr. Woodson's home as a national historic landmark.

The NPS invited the District of Columbia Historic Preservation Office (DC SHPO) to participate in the GMP/EA planning process in May 2008. In response, the DC SHPO asked to review and comment on the draft plan when it became available. On August 1, 2011, the DC SHPO sent a determination of adverse effect letter to the NPS.

A memorandum of agreement, in accordance with 36 CFR Part 800.6, Resolution of Adverse Effects, was negotiated between the NPS and the DC SHPO which they signed on December 11, 2012. The memorandum of agreement stipulated how the adverse effects to historic structures will be mitigated. The Advisory Council on Historic Preservation declined to be a consulting party and signatory on the memorandum of agreement. In March 2012, the National Trust for Historic Preservation asked for and was given consulting party status as allowed under section 106 of the National Historic Preservation Act. The National Park Service incorporated their substantive comments into the memorandum of agreement.

***The degree to which the action may adversely affect an endangered or threatened species or its habitat, which has been determined to be critical under the Endangered Species Act of 1973.***

As required under section 7 of the Endangered Species Act of 1973, the NPS sent a consultation letter dated April 22, 2008, to the U.S. Fish and Wildlife Service regarding threatened or endangered species that might be affected by the actions proposed in this plan. In a letter dated May 29, 2008, the U.S. Fish and Wildlife Service replied that no proposed or federally listed threatened or endangered species are known to exist in or near the national historic site.

***Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.***

This action violates no federal, state, or local environmental protection laws.

## **PUBLIC INVOLVEMENT**

This environmental assessment was made available for public review and comment during a 30-day period ending March 13, 2012, through issuance of a press release, mailing, and posting on the Planning, Environment and Public Comment (PEPC) website (<http://parkplanning.nps.gov/woodsongmp>). During the public review and comment period, the NPS held an open house on Wednesday, February 22, 2012, at the African American Civil War Memorial and Museum at 1925 Vermont Avenue, NW, Washington, D.C., which 55 people attended.

A total of 81 responses were received during public review of the plan. Eight responses were received from nongovernmental organizations and the remaining 73 responses were received from unaffiliated individuals. A majority of the non-substantive comments supported the selected alternative.

Substantive comments on the environmental assessment included concerns about federal acquisition of property within the authorized national historic site boundary, the condition of Dr. Woodson's home, adaptive reuse of Dr. Woodson's home, interpretation of the site and Dr. Woodson's life, office space, funding, access to the museum collection, directions to the site, and training for Association for the Study of African American Life and History personnel. These concerns are addressed in the errata sheets attached to this Finding of No Significant Impact. No concerns were received that resulted in changes to the text of the environmental assessment.

## CONCLUSION

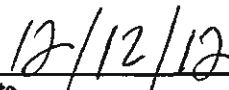
The NPS has selected option 1 of the Action Alternative for implementation. In light of the impacts described in the GMP/EA and with guidance from NPS *Management Policies 2006*, professional judgment, and consideration of other agency and public comments, the impacts that will result from the selected alternative will not impair any Park resources and values (see attached Impairment Determination). The selected alternative does not constitute an action that normally requires preparation of an environmental impact statement. The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. There are no significant impacts on historic structures, cultural landscapes, visitor use and experience, or the socioeconomic environment. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and thus will not be prepared. This is a finding of no significant impact.


Recommended:

  
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Alexcy Romero

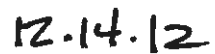
Superintendent, National Capital Parks-East

  
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Date

Approved:

  
\_\_\_\_\_  
Stephen E. Whitesell

Regional Director, National Capital Region

  
\_\_\_\_\_  
Date

**Appendix: Impairment Determination**  
**Carter G. Woodson Home National Historic Site**  
**General Management Plan / Environmental Assessment / Interpretation Plan**

NPS *Management Policies 2006* require analysis of potential effects to determine whether actions would impair park resources. The fundamental purpose of the national park system, established by the NPS Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid or to minimize, to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give the NPS the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park unit, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the NPS the management discretion to allow certain impacts within a park unit, that discretion is limited by the statutory requirement that the NPS must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise.

The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of these resources or values.

An impact to any park resource or value may, but does not necessarily, constitute an impairment; but, an impact would be more likely to constitute an impairment when there is a major or severe adverse effect on a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park and key to the natural or cultural integrity of the park
- identified as a goal in the general management plan or other relevant NPS planning documents of the park

An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated.

The park resources and values that are subject to the no-impairment standard include historic structures. Impairment findings are not necessary for visitor use and experience, socioeconomics, or park operations because impairment findings relate to park resources and values, and these impact areas are not generally considered park resources or values according to the Organic Act. They cannot be impaired in the same way that an action can impair park resources and values. Therefore, the only impact topic retained for analysis is historic structures.

## **HISTORIC STRUCTURES**

The national historic site includes Dr. Woodson's home at 1538 9th Street, NW, and two row houses adjacent to it at 1540 and 1542 9th Street, NW, Washington, D.C. Dr. Woodson's home is a national historic landmark, the highest designation a historic building can obtain, and the other two buildings are contributing resources in the Mount Vernon West National Historic District. All three buildings are in poor condition due to years of deterioration, as well as from the earthquake and hurricane Irene that occurred in August 2011. The preservation and maintenance of Dr. Woodson's home is necessary to fulfill the purposes for which the national historic site was established. Dr. Woodson's home and buildings 1540 and 1542 are key to the cultural integrity of the site, the opportunity for enjoyment of the site, and they are identified as significant resources in the *Carter G. Woodson Home Historic Resources Study*, *Woodson Home Historic Structures Report*, and the interpretation plan. The GMP/EA calls for the rehabilitation of these historic structures. This work will have impacts that are long term and adverse. The impact is due to the loss of historic fabric that will happen during the rehabilitation work, and the construction of the passageways between Dr. Woodson's home and building 1540.

A memorandum of agreement, in accordance with 36 CFR Part 800.6, Resolution of Adverse Effects, was negotiated between the National Park Service and DC SHPO which they signed on December 11, 2012. The memorandum of agreement stipulated how the adverse effects to historic structures will be mitigated. The Advisory Council on Historic Preservation declined to be a consulting party and signatory on the memorandum of agreement. In March 2012, the National Trust for Historic Preservation asked for and was given consulting party status as allowed under section 106 of the National Historic Preservation Act. The National Park Service incorporated their substantive comments into the memorandum of agreement.

The overall proposed treatments will not result in impairment to historic structures because the work will be performed in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the selected alternative.

**Errata Sheets**  
**Carter G. Woodson Home National Historic Site**  
**General Management Plan / Environmental Assessment / Interpretation Plan**

Corrections and revisions to the plan are listed in this section. Revisions were made as a result of the three historic buildings being closely examined after the earthquake and hurricane Irene by contracted architects, engineers and NPS historic preservation experts. The NPS determined that the best treatment for all three buildings is rehabilitation under the selected alternative. This determination was made after the plan was distributed for public review and comment. These revisions have not resulted in substantial modification of the selected alternative. It has been determined that the revisions do not require additional environmental analysis.

Additions to the text are shown in bold and text removed is shown with strikethrough. The majority of changes are striking through the word “restored” (or a variation of it) and adding the word “rehabilitated” (or a variation of it). The page numbers referenced are from the *Carter G. Woodson Home National Historic Site General Management Plan / Environmental Assessment / Interpretation Plan* dated January 2012.

p. i – 3rd paragraph

Under the preferred alternative (both options), the façades and rear sides of Woodson’s home and building 1540 would be **rehabilitated** ~~restored~~ , **with in-tact historic elements of the Woodson home restored**, and the façade and rear side of building 1542 would be rehabilitated. The interior of the Woodson home would be **rehabilitated and used for interpretive purposes while preserving its historic integrity** ~~restored to from~~ the time period Dr. Woodson lived there (1922–1950).

p. vii – first column, top of page

Visitors would learn about Dr. Woodson by going on a guided tour of his **rehabilitated** ~~restored~~ home, and through innovative and interactive interpretive exhibits, videos, materials, and programs in the adjacent buildings.

p. vii – under Historic Structures

Under the preferred alternative (both options), the ~~same exterior work would be done on exteriors of~~ Dr. Woodson’s home and buildings 1540 and 1542 **would be rehabilitated**. ~~as proposed in the no-action alternative.~~ The interior of Woodson’s home would be **rehabilitated and used for interpretive purposes while preserving its historic integrity from the period** ~~restored to look like it did, to the extent possible,~~ when Dr. Woodson lived there.

p. 28 – under Air Quality

The national historic site structures that would undergo rehabilitation ~~and restoration~~ would be surveyed for asbestos containing material or other hazardous materials prior to any construction activities.

p. 29 – first column, top of page

Any adverse impacts on air quality would be temporary, lasting only as long as the rehabilitation ~~and restoration~~ work.

p. 30 – under Soundscape Management

Any construction activities associated with the rehabilitation and **preservation** ~~restoration~~ of the historic structures as outlined in the alternatives, such as hauling of materials or the operation of equipment, could result in loud sounds, but such sounds would be negligible, short term, and not out-of-place in an urban setting.

p. 35 – under Implementation of the Plan

Once the *General Management Plan/ Environmental Assessment/ Interpretation Plan* has been approved, the National Park Service would be able to take immediate steps toward acquiring funding for, as well as the completion of, the following tasks: finalizing the functions of the interior spaces of the historic structures; preparing a structural engineering report to address the excavation of the basements and bowing exterior walls;

preparing design and construction drawings to ~~restore and rehabilitate~~ the historic structures; designing the interpretive exhibits, materials, and programs; and hiring for some of the positions.

p. 40 – under Desired Resource Conditions

The interior of Woodson's home would be **rehabilitated** ~~restored to the time period that Dr. Woodson lived there (1922–1950)~~ and maintained as a house museum.

p. 49 – under Woodson's Home and Building 1540

The exteriors (front and back) of the Woodson home and building 1540 would be **rehabilitated** ~~restored to the time period Woodson lived there (1922–1950)~~. The marble entrance stairways and cast-iron railings would be restored **on the Woodson home and rehabilitated on building 1540**. The original door on the Woodson home would be restored and a historically accurate door would be installed on building 1540. The other entryway features would be **rehabilitated** ~~restored~~ to their historic appearance.

p. 49 – under Woodson's Home and Building 1540

Prior to the **rehabilitation** ~~restoration~~ work taking place, the exteriors of the buildings may be stabilized.

pp. 52- 53 – under The Preferred Alternative, Overall Vision

Visitors would learn about Dr. Woodson by going on a guided tour of his **rehabilitated** ~~restored~~ home, and through innovative and interactive interpretive exhibits, videos, materials, and programs in the adjacent buildings.

p. 53 – under Architectural Barriers Act Accessibility Standards

Therefore, the National Park Service would follow the Architectural Barriers Act Accessibility Standards when ~~restoring and~~ rehabilitating the structures.

p. 53 – under Sustainable Design and Development

The National Park Service would use sustainable design and development practices during the ~~restoration and~~ rehabilitation of the buildings in accordance with the *Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*.

p. 53 – under Woodson Home (1538 9th Street, NW)

The interior of the Woodson home would be **rehabilitated** ~~restored~~.

p. 66 – under One-Time Costs (bullet #1)

~~Restoring and~~ **Rehabilitating** the exteriors and interiors of the historic structures.

p. 68 – under **\*\*One-Time Costs** (bullet #1)

Phase 1 of the preferred alternative-option one includes preparing a structural engineering report, preparing design and construction drawings, ~~stabilizing and restoring/~~rehabilitating the exteriors, and stabilizing the interiors of Dr. Woodson's home and buildings 1540 and 1542.

p. 68 – under **\*\*One-Time Costs** (bullet #2)

Phase 2 of the preferred alternative-option one includes ~~restoring and~~ rehabilitating the interiors of Dr. Woodson's home and buildings 1540 and 1542. Phase 2 of the preferred alternative-option two includes ~~restoring and~~ rehabilitating the interiors of Dr. Woodson's home and buildings 1540, 1542, and 1544.

p. 71 – under Table 3: Summary of Key Differences Among the Alternatives

	No Action Woodson Home and Buildings 1540 and 1542	Preferred Alternative (Option One): Woodson Home and Buildings 1540 and 1542	Preferred Alternative (Option Two): Woodson Home and Buildings 1540, 1542, and 1544
Woodson Home - Interior	Conduct periodic inspections and perform minor repairs as needed	<b>Rehabilitate</b> <del>Restore</del> the interior and refurnish it with historic furnishings	Same as option one

p. 82 – under Current Visitor Experience

The national historic site is not open to the public at this time because the National Park Service is in the early stages of planning for the ~~restoration~~, rehabilitation and adaptive use of the buildings.

p. 96 – under Impacts of the Preferred Alternative, Option One, Analysis

The exteriors of the Woodson home (building 1538) and buildings 1540 **and 1542** would be **rehabilitated**. ~~restored, while the exterior of building 1542 would be rehabilitated.~~ The ~~restoration and~~ rehabilitation work would be undertaken in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

p. 96-97 – under Impacts of the Preferred Alternative, Option One, Analysis

The interior of the Woodson home would be **rehabilitated and used for interpretive purposes while preserving its historic integrity from the** ~~restored and refurnished to the time period that Dr. Woodson lived there.~~

p. 97 – first column

The ~~restoration and~~ rehabilitation work would require in kind replacement of historic materials due to their deteriorated state, which would result in impacts that are adverse, site-specific, long term, and negligible to minor.

Any materials removed during ~~restoration or~~ rehabilitation efforts would be evaluated to determine their value to the national historic site's museum collection and/or for their comparative use in future preservation work at the site.

p. 98 – under Cumulative Impacts (Options One and Two)

The present action of the District of Columbia historic preservation plan (2008–2012) is in agreement with the NPS proposed plan of ~~restoring and~~ rehabilitating the exteriors of the buildings to keep their historic look and association intact.

p. 103 – under Duration

This duration was chosen to approximate the length of time initial construction work would take place (for example, ~~restoration and~~ rehabilitation of the historic buildings).

pp. 104–105 – under Impacts of the Preferred Alternative (Both Options), Analysis, Community Character

Under the preferred alternative – option one, the physical appearances of the Woodson home and adjacent buildings (1540 and 1542) would be improved through their ~~restoration and~~ rehabilitation resulting in an overall appearance that is consistent with the historic neighborhood.

p. 105 – under Local Economy

Similar to the no-action alternative, the local economy would likely experience a small boost in the short term due to the presence of construction workers during the ~~restoration and~~ rehabilitation of the buildings.

p. 108 – under Impacts of the Preferred Alternative (Both Options), Analysis

The extensive ~~restoration~~ and rehabilitation work required to open up the buildings to visitors would most likely be contracted out by the National Park Service.

p. 115 – under Section 106 Consultation

During the planning process for this general management plan, National Park Service staff from the National Capital Parks-East group and the National Capital Regional Office have informally met with representatives from the District of Columbia Historic Preservation Office to discuss proposed ideas on how the historic structures would be rehabilitated ~~and restored~~ for public use as a national historic site.

p. 116 – first column

Because this *General Management Plan / Environmental Assessment / Interpretation Plan* purposefully does not include enough detail about how the historic buildings would be rehabilitated ~~and restored~~, only informal section 106 consultation has taken place with the District of Columbia Historic Preservation Office and the Advisory Council on Historic Preservation. After this general management plan has been finalized, design and construction drawings detailing how the historic structures would be rehabilitated ~~and restored~~ would be prepared.

p. 152 – Appendix E

Action	Compliance Requirement
<b>Carter G. Woodson Home, 1538 9th Street NW, Washington D.C.</b>	
<b>Rehabilitate</b> <del>Restore</del> exterior and interior to the period of significance, 1922-1950.	Further consultation with District of Columbia Historic Preservation Office needed.
<b>1540 9th Street NW, Washington D.C.</b>	
<b>Rehabilitate</b> <del>Restore</del> the façade and back side to the period of significance, 1922-1950.	Further consultation with District of Columbia Historic Preservation Office needed.

**Responses to Selected Comments Received during Public Review  
Carter G. Woodson Home National Historic Site  
General Management Plan / Environmental Assessment / Interpretation Plan**

**Building 1544**

*Comment:* I oppose taking someone's private property to benefit a museum.

*Response:* As stated on pages iv, 5, 55, and 66, building 1544 9th Street, NW, through Public Law 108-192, is authorized for acquisition through donation or purchase from a willing seller. The National Park Service would only acquire the building through one of these two methods.

As stated on page 66, the National Park Service is deferring the acquisition of this property until there is a donor or willing seller.

As stated on page 151, due to the recent purchase of building 1544, its acquisition by the National Park Service is not feasible for the foreseeable future.

*Comment:* It should be very clear that it is in everyone's best interest to stop 'deferring' the acquisition of the private home at 1544 9th St NW, and take it off the table for consideration.

*Response:* Public Law 108-192 (December 19, 2003) that established the Carter G. Woodson Home National Historic Site states in Section 3.b.1, "The Secretary [of the Interior] may acquire any of the 3 properties immediately north of the Carter G. Woodson Home located at 1540, 1542, and 1544 9th Street, Northwest, described on the map as 'Potential Additions to National Historic Site,' for addition to the historic site." Because acquisition from a donor or willing seller may happen in the future, Option 2 of the Preferred Alternative was kept in the general management plan / environmental assessment.

*Comment:* It is suggested that should the property at 1544 become available again for acquisition at a reasonable price that the National Park Service should aggressively seek to incorporate the structure into the national historic site.

*Response:* The National Park Service is deferring the acquisition of this property until there is a donor or willing seller.

**Condition of Dr. Woodson's Home**

*Comment:* The National Park Service must take action in 2012 to remedy the earthquake damage, address ongoing deterioration, and stabilize Dr. Woodson's home.

*Comment:* The General Management Plan should place a high priority on immediately addressing the physical deterioration of the National Historic Landmark, particularly given that full implementation of the Park Service's plan may take many years.

*Response:* The National Park Service began to stabilize and remedy the earthquake damage to Dr. Woodson's home and buildings 1540 and 1542 9th Street in 2012. The efforts will continue into 2013.

*Comment:* The General Management Plan should describe in detail the current physical condition of the National Historic Landmark, including information gathered during assessments of earthquake damage.

*Response:* A detailed description of the condition of Dr. Woodson's home is not necessary for the purposes of the general management plan / environmental assessment. Efforts have been undertaken by the National Park Service outside of this planning effort to document the condition of Dr. Woodson's home and buildings 1540 and 1542 9th Street including Historic American Buildings Survey (HABS) documentation.

**Adaptive Reuse of Dr. Woodson's Home**

*Comment:* Great care must be taken when adaptively reusing the former residence as a 21st century museum, including the creation of new entryways through the walls of the National Historic Landmark to provide full public access to Dr. Woodson's home.

*Response:* The work done to Dr. Woodson's home will follow *The Secretary of the Interior's Standards for the Treatment of Historic Properties* and special attention will be given to the creation of the entryways between Dr. Woodson's home and building 1540 9th Street.

### **Interpretation and Education**

*Comment:* The National Park Service's programming for Dr. Woodson's home should encourage the visitor to experience other places in the Nation's Capital and throughout the country which were significant in Dr. Woodson's life and which serve to commemorate African American contributions to American heritage, including historic sites in the National Park System. These objectives can be accomplished in partnership with other private- and public-sector organizations, including the Association for the Study of African American Life & History.

*Comment:* Concern about the elements of the general management plan which call for the National Park Service to fill "all floors" of Dr. Woodson's home with reproduction and period furnishings in order to create the "look and feel" of a house museum. An alternative approach suggested was to furnish Dr. Woodson's home with his ideas. An example given was that of President Lincoln's Cottage in which "visitors gain new insights into Lincoln's private life and presidency through a conversational tour that uses multimedia to convey historical quotes and imagery [and] focus on Lincoln's ideas in the authentic place."

*Comment:* The National Park Service should consider whether only a few key rooms of Dr. Woodson's home should be furnished to replicate Dr. Woodson's household and office space.

*Comment:* It's recommended that the majority of useable space on all floors of Dr. Woodson's home be dedicated to the interactive, innovative, and inventive programming intended to engage the imagination of the visitors and encourage them to return with others for multiple visits.

*Comment:* It is recommended that the focus of the interpretive plan go well beyond restoring the house to "look like it did, to the extent possible, when Dr. Woodson lived there" to encompass a vision that will fully engage the public and adequately reflect the breadth of the history of Dr. Woodson's life and times.

*Comment:* Much of Dr. Woodson's work was accomplished at 1538 9th Street NW -- but the significance and impact of Dr. Woodson's life reaches far beyond those walls. So, too, should NPS interpretation of this historic figure.

*Response:* The National Park Service will consider these recommendations when implementing the interpretation plan (see chapter 6).

### **Office Space at the National Historic Site for National Park Service Employees**

*Comment:* It is recommended that most of the office space for the national historic site's seven and one-half full-time NPS employees should be located off-site at another National Capital Parks-East owned or leased facility.

*Response:* To ensure effective and proper day-to-day operations of the national historic site, NPS employee office space will be located at the national historic site.

## **Funding**

*Comment:* The general management plan / environmental assessment should acknowledge and emphasize the need for non-federal funding to preserve, protect, and interpret the national historic site. The plan should be revised to present and examine alternative sources of funding, including strategies for the National Park Service and partner organizations to collaborate and secure funding for Dr. Woodson's home.

*Response:* The general management plan / environmental assessment is not the tool the National Park Service uses to examine funding sources. The National Park Service has begun the process of exploring funding options outside of this planning effort for rehabilitating the historic buildings including non-NPS sources.

## **Woodson Collection**

*Comment:* It is recommended that all of the artifacts comprising the Woodson collection be digitized and made available to viewers and researchers on-line, especially any significant documents or items that will not be displayed or archived on-site.

*Response:* Currently the National Park Service has very few items associated with Dr. Woodson's life. The public can request to see these items by appointment. Making these items available on-line will be considered in the future.

## **Signage**

*Comment:* Clear, prominent signage should be provided to direct visitors to the site.

*Response:* The National Park Service will work with the city and all appropriate entities to properly direct visitors to the national historic site.

## **Transportation**

*Comment:* It is recommended that the National Park Service reach out to DC transportation officials to explore the potential for extending the DC Circulator route to include stops for the Shaw Historic District including both the Carter G. Woodson and Mary McLeod Bethune sites.

*Response:* The National Park Service will consider this recommendation.

*Comment:* The National Park Service should include information about transportation options including Metro and bus on the park's webpage.

*Response:* Directions to the national historic site will be put on [www.nps.gov/cawo](http://www.nps.gov/cawo) once the site is open to the public.

## **Association for the Study of African American Life and History**

*Comment:* It is recommended that all Association for the Study of African American Life and History personnel stationed at the national historic site undergo training that familiarizes them with the mission of the National Park Service and the philosophy behind NPS interpretation.

*Response:* The National Park Service will provide Association for the Study of African American Life and History personnel an opportunity to take NPS interpretation and mission related training.

**MEMORANDUM OF AGREEMENT**  
**between**  
**THE NATIONAL PARK SERVICE**  
**and**  
**THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER**  
**for the**  
**STABILIZATION, RESTORATION, REHABILITATION AND MANAGEMENT**  
**of the**  
**CARTER G. WOODSON HOME NATIONAL HISTORIC SITE**

**WHEREAS**, the National Park Service (NPS) proposes to stabilize, restore, and rehabilitate the Carter G. Woodson Home National Historic Site (Woodson Home) located at 1538 9<sup>th</sup> Street, NW, Washington, D.C., and to rehabilitate the adjacent buildings at 1540 and 1542 9<sup>th</sup> Street, NW, and to manage the properties as an historic house museum, visitor center and office space as described in the Woodson Home General Management Plan dated January 2012, and in Appendix A (Undertaking); and

**WHEREAS**, the Woodson Home is a designated National Historic Landmark and a contributing element of the National Register of Historic Places (National Register)-listed Shaw Historic District; and

**WHEREAS**, the property at 1540 9<sup>th</sup> Street, NW, also contributes to the Shaw Historic District, but the property at 1542 9<sup>th</sup> Street, NW has been so altered that it no longer contributes to the historic district; and

**WHEREAS**, the Woodson Home and the adjacent property at 1540 9<sup>th</sup> Street, NW, were in a state of advanced deterioration when they were acquired by the NPS in 2005 and have been experiencing accelerated deterioration since the August 2011 earthquake; and

**WHEREAS**, the NPS prepared an Historic Structures Report (HSR) to document the condition of the properties after their acquisition and more recently hired an engineering consultant to perform a structural assessment (post earthquake) and to design permanent stabilization measures, which the NPS hopes to implement this calendar year, prior to implementation of the larger Undertaking; and

**WHEREAS**, the NPS consulted with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the effects of the Undertaking on historic properties pursuant to Section 106 of the National Historic Preservation Act (16 U.S.C. 470) and its implementing regulations (36 CFR Part 800); and

**WHEREAS**, the NPS, in consultation with the DC SHPO, has determined that the Undertaking will have an adverse effect on historic properties in accordance with 36 CFR 800.5(a)(1); and

**WHEREAS**, the NPS and the DC SHPO have also determined that the Undertaking may have adverse effects on archaeological resources if any archaeological deposits are present and disturbed during implementation of the Undertaking; and

**WHEREAS**, the NPS notified the Advisory Council on Historic Preservation (Council) of the adverse effect pursuant to 36 CFR 800.6(a)(1) and 36 CFR 800.10(b) but the Council declined to participate in the consultation; and

**WHEREAS**, the NPS notified the Secretary of the Interior (Secretary) of the adverse effect pursuant to 36 CFR 800.6(c) but the Secretary also declined to participate in the consultation; and

**WHEREAS**, the NPS has consulted with, and invited the Association for the Study of African American Life and History (ASALH) to be a consulting party to this Memorandum of Agreement (Agreement) because the organization was founded by Dr. Carter G. Woodson and will occupy office space that will be created as a result of the Undertaking; and

**WHEREAS**, the NPS has also consulted with the National Trust for Historic Preservation and has invited them to be consulting parties to this Agreement, and has invited comment on this Agreement from 32 other individuals and organizations (Listed in Appendix B of this document); and

**WHEREAS**, the NPS considered alternatives and provided opportunities for public involvement in the context of complying with the National Environmental Policy Act of 1969 as provided for in 36 CFR 800.8; and

**WHEREAS**, the NPS sent notifications via email to all consulting parties, seeking their comments on the project plans, related information and the draft Agreement, which were posted on the NPS Planning, Environmental, and Public Comment website to inform the consulting parties and the public of the Undertaking; and

**WHEREAS**, the NPS has taken the comments received into account;

**NOW THEREFORE**, NPS and the DC SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the Undertaking on historic properties.

### **STIPULATIONS**

NPS shall ensure that the following measures are carried out:

**1. HABS RECORDATION:**

- a. Prior to implementing any work, the NPS shall complete Phase I Historic American Buildings Survey (HABS) documentation of 1538 and 1540 9<sup>th</sup> Street, NW.
- b. The recordation will include measured drawings, large format photography, and written historical reports documenting the existing interior and exterior conditions of 1538 and large format photography of the exterior of the adjacent buildings at 1540 and 1542.
- c. Once the documentation is complete, the NPS shall submit it to the HABS collection housed at the Library of Congress.

**2. RETENTION OF CHARACTER-DEFINING MATERIALS:**

- a. The NPS shall identify, protect, retain and restore as many character defining materials of 1538 and 1540 9<sup>th</sup> Street, NW, as possible during implementation of the Undertaking.
- b. The NPS shall take the periods of significance for the Woodson House (1922-1950) and the Shaw Historic District (1833-1932) into account when identifying such materials and shall consult with the DC SHPO if any questions arise regarding what does and does not qualify as character defining materials. Such materials may include, but not necessarily be limited to, walls, brackets, railings, cornices, windows architraves, door pediments, steps, mantels, joint and unit size, tooling and bonding patterns, coatings, and color.
- c. The NPS shall consult with the DC SHPO regarding the appropriate treatment of the character defining materials in accordance with the Design Review Stipulation 3 below, by specifically identifying the character defining materials that will be retained in the design documents and by specifying the proposed treatments.
- d. If the NPS and DC SHPO agree that certain character defining materials are deteriorated beyond repair, the NPS shall replace materials in-kind in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards)*.

**3. DESIGN REVIEW:**

- a. The NPS shall submit relevant design documents such as plans, renderings, sections, elevations, specifications, photographs, narrative scopes of work and related information on each phase of work to the DC SHPO for review and comment at the 30% and 60% levels.

- b. The DC SHPO shall have thirty (30) calendar days from the date of receipt to provide comments to the NPS.
- c. If the DC SHPO does not provide comments within the specified time period, NPS may move forward to the next step in the design process or implement the plans, as appropriate.
- d. If the DC SHPO provides comments within the specified time period, the NPS shall provide the DC SHPO with a written response including, as necessary, an explanation as to how the design will be revised to address the comments within thirty (30) calendar days of receiving comments from the DC SHPO.
- e. If, after reviewing the 60% design documents, the DC SHPO determines that it will be appropriate to review design documents at the 90% level, the DC SHPO shall request such a review in writing and the NPS shall provide the 90% design documents to the DC SHPO for an additional thirty (30) day review and comment period.

**4. POST-REVIEW MODIFICATIONS:**

In the event that minor modifications in design or materials are required after the design review process outlined in Stipulation 3 above has been completed and after construction has begun, such modifications may occur provided that the changes are consistent with the *Standards* and are approved by NPS cultural resources staff. The NPS will document such minor modifications in an internal memorandum to the files that will be made available for inspection by the DC SHPO. Following construction, the NPS shall provide a summary memorandum listing the modifications to the DC SHPO.

**5. MONITORING OF CONSTRUCTION ACTIVITIES:**

The DC SHPO may monitor construction activities pursuant to this Agreement. The NPS shall cooperate with the DC SHPO in carrying out any of these responsibilities by arranging site inspections or other monitoring activities or documents when requested by the DC SHPO. The public may monitor progress on the project by reviewing periodic updates that the NPS will post on its website.

**6. POTENTIAL ACQUISITION OF 1544 9<sup>TH</sup> STREET, NW:**

The NPS has considered acquiring the historic building located at 1544 9<sup>th</sup> Street, NW, and incorporating it into the Undertaking. At this time, the acquisition does not appear feasible. If the building is acquired in the future however, the NPS shall notify the DC SHPO in writing as soon as possible and consult to develop an amendment to this Agreement in accordance with Stipulation 12.

**7. APPLICABLE STANDARDS AND GUIDELINES:**

All preservation work and new construction implemented pursuant to this Agreement shall be carried out in accordance with the *Standards* by or under the direct supervision of a person or persons meeting, at a minimum, *The Secretary of the Interior's Professional Qualifications Standards* (48 FR 44738-39) for the discipline appropriate to the historic property in question. Nothing in this stipulation may be interpreted to preclude NPS or any agent or contractor thereof from using the properly supervised services of persons who do not meet the *Professional Qualifications Standards*.

**8. ARCHAEOLOGICAL INVESTIGATIONS:**

The NPS will pursue a phased approach to the identification and evaluation of archeological resources in consultation with the DC SHPO. Any investigations will be conducted by an archaeologist that meets or exceed the pertinent qualifications in the *Professional Qualifications Standards*. All archaeological work will follow the *Guidelines for Archaeological Investigations in the District of Columbia* (1998, as amended), the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (1983), and *NPS Director's Order 28: Cultural Resource Management* (1998). Treatment of potentially eligible resources will be determined in consultation with the DC SHPO. The NPS will curate archaeological collections, associated records, and digital data resulting from investigations for this Undertaking in accordance with 36 CFR 79.

**9. UNANTICIPATED DISCOVERIES:**

Should historic properties be unexpectedly identified during the implementation of the Undertaking or any actions taken pursuant to this Agreement, NPS shall ensure that reasonable efforts are made to avoid, minimize, or mitigate adverse effects to such properties, and shall consult with the DC SHPO to resolve any unavoidable adverse effects pursuant to 36 CFR 800.6. The NPS shall ensure that any resulting cultural resources work is accomplished in accordance with the relevant performance standards in Stipulation 8 above. The NPS and DC SHPO shall resolve any disputes over the evaluation or treatment of previously unidentified resources using the process outlined in Stipulation 11 of this Agreement.

**10. TREATMENT OF HUMAN REMAINS:**

- a. In the event that human remains, burials, or funerary objects are discovered during construction of the Undertaking or any action taken pursuant to this Agreement, NPS shall immediately halt subsurface construction disturbance in the area of the discovery and in the surrounding area where additional remains can reasonably be expected to occur. The NPS shall immediately notify the DC

SHPO and the District of Columbia Chief Medical Examiner (“CME”) of the discovery under DC Code Section 5-1406 and other applicable laws and regulations.

- b. If the CME determines that the human remains are not subject to a criminal investigation by federal or local authorities, the NPS shall comply with the applicable federal or local laws and regulations governing the discovery and disposition of human remains and consider the Council’s Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects (2007).

**11. DISPUTE RESOLUTION:**

- a. Should either signatory to this Agreement object in writing to any action carried out in accordance with the Agreement, the NPS and DC SHPO shall consult to resolve the objection. If the signatories are unable to resolve the disagreement, the NPS shall forward all documentation relevant to the dispute to the Council. Within 45 days after receipt of all pertinent documentation, the Council will either:
  - i. Provide NPS with recommendations, which NPS will take into account in reaching a final decision regarding the dispute; or
  - ii. Notify NPS that it will comment pursuant to 36 CFR 800.7(c), and proceed to comment. Any Council comment provided in response to such a request shall be taken into account by NPS in accordance with 36 CFR 800.7(c)(4) with reference to the subject of the dispute. Any Council recommendation or comment will be understood to pertain only to the subject of the dispute; the NPS’ responsibility to carry out all actions under this Agreement that are not subjects of the dispute will remain unchanged.
- b. At any time during implementation of the terms of this Agreement, should a concurring party, consulting party, or member of the public object to the manner of such implementation, NPS shall consult with the objecting party and inform the DC SHPO and the Council in writing of the objection, the results of the consultation, and NPS’ proposed resolution of the objection. The NPS shall implement its decision if the DC SHPO and Council fail to comment within fifteen (15) days of receipt of the NPS decision. If DC SHPO and Council do respond, NPS shall consult further with DC SHPO, Council and the objecting party to resolve the objection.

**12. AMENDMENTS:**

The NPS or DC SHPO may propose that this Agreement be amended, whereupon the signatories shall consult to consider such amendment. This Agreement may be amended only upon the written agreement of all signatories. The amendment shall be effective on the date a copy is signed by all signatories. The fully-signed amendment shall be promptly filed with the Council by the NPS.

**13. TERMINATION:**

- a. If any signatory proposes termination of this Agreement, the party proposing termination shall notify the other signatory to this Agreement and the Council in writing, explaining the reasons for proposing termination, and consult with the other signatory to this Agreement and the Council, if it chooses to participate, to seek alternatives to termination.
- b. Should such consultation fail, the signatory proposing termination may terminate this Agreement by promptly notifying in writing the other signatory to this Agreement and the Council. Termination shall render this Agreement without further force or effect.
- c. If this Agreement is terminated, the NPS shall reinitiate Section 106 consultation for all remaining unfinished work in accordance with 36 CFR 800.

**14. DURATION:**

This Agreement shall be in effect for ten (10) years from the date of its execution. If necessary, NPS shall initiate consultation with the other signatory to this Agreement approximately one (1) year prior to the expiration date of this Agreement to reconsider its terms. Reconsideration may include the continuation or revision of this Agreement by amendment.

**15. EFFECTIVE DATE:**

This Agreement shall take effect on the date that the last signatory signs the Agreement.

**16. ELECTRONIC COPIES:**

Within one (1) week of the last signature on this Agreement, NPS shall provide the DC SHPO with one electronic file that contains a full-color copy of the fully-executed Agreement and all of its attachments. If the file is too large to transmit via electronic mail, NPS shall provide the file to DC SHPO via a compact disc.

**17. ANTI-DEFICIENCY ACT:**

Any requirement for the payment or obligation of funds by the Government established by the terms of this Agreement shall be subject to availability of appropriated funds. No provision in this Agreement shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 USC Section 1341. If the availability of funds and compliance with the Anti-Deficiency Act impair the NPS' ability to perform under this Agreement, then the NPS shall consult in accordance with Stipulations 12 and 13 of this Agreement, as appropriate.


**18. EXECUTION:**

Execution of this Agreement, its subsequent filing with the Council, and implementation of its terms evidence that the NPS has taken into account the effects of this Undertaking on historic properties and has afforded the Council an opportunity to comment on the Undertaking and its effect on historic properties.

SIGNATURES FOLLOW ON SEPARATE PAGES

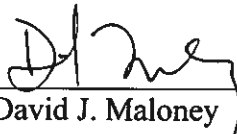
SIGNATORY PAGE  
MEMORANDUM OF AGREEMENT  
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THE NATIONAL PARK SERVICE  
and  
THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER  
for the  
STABILIZATION, RESTORATION, REHABILITATION AND MANAGEMENT  
of the  
CARTER G. WOODSON HOME NATIONAL HISTORIC SITE

**FOR THE NATIONAL PARK SERVICE**

By:  \_\_\_\_\_ Date 12.12.12  
Stephen Whitesell  
Regional Director, National Capital Region

SIGNATORY PAGE  
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CARTER G. WOODSON HOME NATIONAL HISTORIC SITE

**FOR THE DISTRICT OF COLUMBIA GOVERNMENT**

By:   
\_\_\_\_\_  
David J. Maloney  
State Historic Preservation Officer

12/11/12  
\_\_\_\_\_  
Date

## APPENDIX A

**MEMORANDUM OF AGREEMENT**  
**between**  
**THE NATIONAL PARK SERVICE**  
**and**  
**THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER**  
**for the**  
**STABILIZATION, RESTORATION, REHABILITATION AND MANAGEMENT**  
**of the**  
**CARTER G. WOODSON HOME NATIONAL HISTORIC SITE**

This project proposes to restore and rehabilitate the Carter G. Woodson Home National Historic Site (Woodson Home). Once completed, the property at 1538 9<sup>th</sup> Street, NW, will be operated as an historic house museum and the adjacent rehabilitated properties at 1540 and 1542 9<sup>th</sup> Street, NW, will provide visitor support facilities and office space. The project will be completed in several phases. Prior to Phase I, work will be done to stabilize the front façade of 1538 and the rear wall of 1540. Stabilization will also include the reconstruction of the front façade of 1540 and the “ell” wall at the rear of 1538. The reconstruction will re-use original materials to the greatest extent possible. Character-defining features will be preserved in all phases of preservation work wherever possible.

Generally, Phase I will focus on the restoration of the front façade of the Woodson Home and the exterior envelop of the Historic Site, with limited restoration work inside the Woodson Home. Phase II will complete the restoration work inside the Woodson Home as well as the interior rehabilitation of the two adjacent properties. The rehabilitated properties will house exhibit space and restrooms, an elevator and wheelchair lift for universal accessibility throughout the Site, code compliant egress stairs, and new mechanical, electrical, plumbing, and fire protection systems which will serve all three buildings. Phase III will include the installation of exhibitions and historic furnishings.

Exterior restoration of the Woodson Home will include limited masonry reconstruction in localized areas of brick failure including the side wall of the rear “ell”; the repointing and cleaning of the brick on all elevations and chimneys; cleaning and repointing of marble stairs and window sills; removal of existing metal security grilles, restoration of wood double-hung windows and the reconstruction of missing windows; restoration and reconstruction of wooden exterior doors, exterior wood trim, and the replacement of the standing seam metal roof.

APPENDIX B  
MEMORANDUM OF AGREEMENT  
STABILIZATION, RESTORATION, REHABILITATION AND MANAGEMENT  
of the  
CARTER G. WOODSON HOME NATIONAL HISTORIC SITE

List Of People/Organizations Sent Email Invitations Regarding Carter G. Woodson Home National Historic Site  
Draft Memorandum Of Agreement, August, 2012

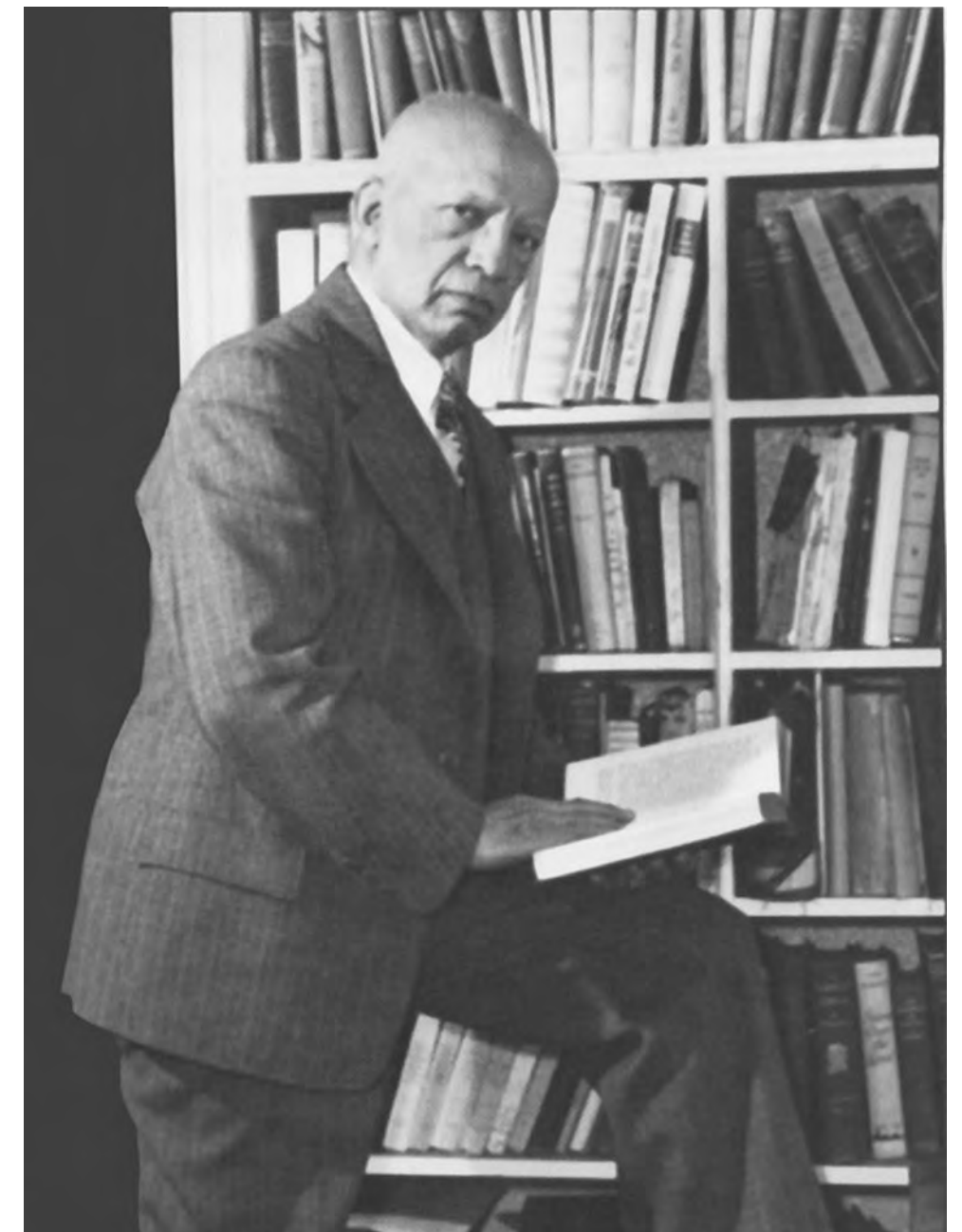
	<b>Name</b>	<b>Organization</b>	<b>Email</b>
1.	Marjorie A. Kinard	John Wesley A.M.E. Zion Church	makinard@hotmail.com
2.	Elois A. Morgan	ASALH Hampton Roads Organizing Branch	hrceeds@cox.net
3.	Alan Spears	National Parks Conservation Association	aspears@npca.org
4.	Martin Moulton	Convention Center Community Association	moultonm@aol.com
5.	Judith Gheuens	owners of 1544 9th Street	judithannag@gmail.com
6.	Kelly Gorsuch	co-owner of 1544 9th Street	kgorsuch@mac.com
7.	Robert Nieweg	National Trust for Historic Preservation	Robert_Nieweg@nthp.org
8.	Erin Slattery		erinmslattery@gmail.com
9.	Nicole Cohen		Nicole.cohen@gmail.com
10.	Sabrina Streagle		sabrina_calice@yahoo.com
11.	Ryan B. Wenstrup-Moore		ryanwenstrup@gmail.com
12.	Jess Rowlands		jessrowlands@gmail.com
13.	Rachael Wood		Rachael.1220@gmail.com
14.	Amy Putens		amtp81@hotmail.com
15.	Jehan A. Abdel-Gawad		yemphan@hotmail.com
16.	Brandy Heitkamp		brandyeric@nktelco.net
17.	J F. Levey	Cultural Tourism DC	jlevey@culturaltourismdc.org
18.	Joan Allen	Shiloh Baptist Church	bony3659@msn.com
19.	emily p. holmes		emilypierceholmes@gmail.com
20.	Linda Gillum		lindakanter@hotmail.com
21.	Julia D. Smith		Juliadsmith@gmail.com
22.	Stephanie K. Sherman		stephanieksherman@gmail.com
23.	Reginald A. Wills	Edmund Burke School	reggie_wills@eburke.org regwills@verizon.net
24.	Steph Meese		stephcude@hotmail.com
25.	Earl W. Yates	Shiloh Baptist Church, Social Justice Committee	ewyates44@yahoo.com
26.	Diane Anderson		diane.anderson@bison.howard.edu
27.	Claire Mooney		Clairebear40@hotmail.com
28.	Kathleen Crowley		kicrowley@yahoo.com
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# The Restoration of the Historic Carter G. Woodson Home & Adjacent Properties

1538 Ninth St NW | Washington D.C.

National Capital Planning Commission  
Concept Submission

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## Introduction

The Carter G. Woodson Home National Historic Site is located in the northwest quadrant of Washington, D.C., on Lot 819 in Square 365 at 1538 Ninth Street, NW. The home is one of a series of nine, three-story, brick row houses dating from the early 1870s constructed on rectangular lots measuring 120 feet deep and 17 feet 9 1/3 inches wide. Lot 819 is bounded on the east by Ninth Street, NW, and on the west by a 10-foot wide alley.

The Carter G. Woodson Home was designated a National Historic Landmark and listed on the National Register of Historic Places on 11 May 1976 and was listed in the District of Columbia Inventory of Historic Sites on 3 March 1979. It is also located within the Shaw Historic District and the Mount Vernon West National Historic District. In 2003, legislation was enacted authorizing the U.S. Department of the Secretary of the Interior to acquire the Carter G. Woodson Home in order to establish the site as a unit of the National Park System (Public Law 108-192, 117 Stat. 2873, 19 December 2003). The National Park Service purchased the home on June 10th, 2005. The property is located in Advisory Neighborhood Commission (ANC) 2C01. When NPS purchased the Woodson Home, they also purchased the adjacent two townhouses with the intent of restoring them to support the historic houses as an interpretive experience celebrating Woodson's life and accomplishments.

### *Historic Structures Report*

Beyer Blinder Belle Architects and Planners was hired in 2008 to complete a Historic Structures report. This HSR provided a full developmental history of the building, a detailed physical description of every component and system, a condition assessment of the building systems, a condition assessment of the building systems and recommendations for the treatment and use of the home. Included in the use options were the two properties directly to the north of the Woodson Home.

The HSR established that the home was divided into 5 distinct periods with the Period of Significance being Period 3, 1922-1950. These dates correspond to the years in which Dr. Carter G. Woodson owned and occupied the house, using it as a residence and as an office for the Association for the Study of Negro Life and History and its publishing agency, the Associated Printers, Inc.

Further investigation revealed that the home directly adjacent, 1540 Ninth Street, contained a significant amount of historic fabric. The exterior of this home should be restored to reflect the Period of Significance. 1542 Ninth Street was almost entirely reconstructed and all of the historic fabric for that home was lost allowing for a new design opportunity.

### *Management Plan*

Subsequent to the HSR, NPS proceeded with developing a General Management Plan/ Environmental Assessment (GMP/ EA) for the property which was executed in January of 2013. Taking into account input during public consultation, NPS developed management zones for the property. The two planning zones are as follows: Historic Woodson Home Zone (town house at 1538) and the Visitor use and Park Operations Zone (town houses

at 1540 and 1542). Section 106 compliance was completed through the execution of a Memorandum of Agreement on 12-12-12. A Finding of No Significant Impact was signed on 12-14-12

The GMP Plan defines these zones as follows:

*Historic Woodson Home Zone* - The historic Woodson Home zone would include the interior of Woodson's home and would be managed as a house museum and appointed with historically accurate furnishings displayed in a way that would be evocative of when Dr. Woodson resided there. The interior would be restored to the appearance of Dr. Woodson's occupancy (1922-1950).

*Visitor Use and Park Operations Zone* – This zone would be the management zone and would accommodate visitor orientation, education and other visitor needs. Buildings 1540 and 1542 would be rehabilitated and used to accommodate interpretive, educational, administrative and maintenance facilities as well a mechanical and utility needs. The required egress stairs and elevator to meet code would be provided in this zone as well. In this zone larger groups would be stages while waiting to take a tour of the adjacent home.

# Building History and Project Description

## Program

The following represents key program elements that were developed in both the HSR and the GMP and confirmed during the schematic design process:

*Tours and Exhibits* – It is expected that ranger guided tours of two groups at 6 to 8 people each would be allowed in Woodson's home at a time. The tour would meet at the first floor exhibit space. Rangers would lead the group outside to begin the tour on the sidewalk. The group would then move into the Woodson home, and experience the interpretive museum. The tour would end on the third floor where the group would then circulate through the exhibits and finish on the first floor.

*Park Staff* – NPS anticipate approximately 10 staff members to work at the site. A private office is provided for the Site Superintendent (GS-11) on the second floor at the rear of 1542. One shared office for two Park Rangers (GS-9) is located on the first floor at the rear of 1542. The remaining staff will use shared workstations located in the basement on 1540. The Welcome Desk in 1542 will also be staffed by Park Staff and volunteers.

*Circulation* – The primary visitor entry is at 1542. Stairs and a lift mitigate the grade change from street level to the first floor of 1542, which corresponds with the first floor levels of 1540 and 1538. Two fully enclosed egress stairs have been provided – one at the west end of 1540 and one coinciding with the entry sequence at 1542. The stair at the west end of 1540 requires that an additional floor be added to the two story construction to accommodate stair access to the third floor. These two stairs give floor access to all three floors and the basement. An elevator has been provided to give access to all three floors and the basement as well.

*Space for the Association for the Study of African American Life and History* – The Association for the Study of African American Life and History (ASALH) was established by Dr. Woodson in 1915 and the organization continues to thrive today. Both the enabling legislation for the National Historic Site and the General Management Agreement between the NPS and the ASALH declare that the ASALH would be allowed to “use a portion of the historic site for its own administrative purposes.”

The ASALH offices have been located at the east end of the Woodson Home on the basement level. The placement of the office space is symbolic in that ASALH offices will have offices within 1538, as they had when Dr. Woodson founded the organization. The space provides space for approximately 7 employees in slightly less than 500 square feet. The office space has a separate entrance accessible through a stairway at grade level but can also be accessed via the main entrance. ADA accessibility is provided through use of the elevator in 1542.

*Parking* – The rear yard of the three properties will not be used for visitor or staff parking. Due to the urban context of the site, no new parking will be provided for staff or visitors. The site is served by the Shaw-Howard University Metro Station and several DC bus lines that are less than 1/4 of a mile away. Accessible parking is provided at the street directly in front of the facility. However, the rear yard will include a supported seed and sod cover that will allow support of a maintenance vehicle.

*Sustainability* – The project will be designed with the goal of meeting LEED gold status. A completed NPS Sustainability Checklist has been included as part of this document. See Appendices.

*Gross Square Footage* – Although the site consists of 3 buildings, the gross square footage is relatively small at approximately 10,279 sq. ft. in total.

BBB identified 1542 to be the location for the main entrance to the Carter G. Woodson Historic National Site. Since the facade of 1542 is an all new construction, the team was able to create an entrance that was both visible from the street and easily identifiable as the main entrance. These spaces were organized into 5 zones among the three buildings.

*Program Summary* – NPS identified a number of programmatic needs including:

- Private and shared offices for approximately 8 NPS staff
- ASALH workspace
- A break room and locker area
- A multi-purpose room that could be used as an educational space or for special events.
- An Information and Orientation area including a reception desk
- Exhibit space for permanent and seasonal exhibits
- Museum storage and service closets

## Building History and Project Description

## Salient Design Features

*Carter G. Woodson Home* – The Carter G. Woodson Home will be restored to the determined Period of Significance (1920-1950) and will include full restoration of the front façade (windows, doors, masonry, entry stoop, decorative iron railings) as well as the restoration of the alley facades.

*1540* – The façade of the townhouse immediately adjacent to the Carter G. Woodson Home (1540) will be fully restored (windows, doors, masonry, entry stoop, decorative iron railings). The rear façade will be restored and the existing two story addition will receive a one floor extension to accommodate a new required egress stair.

*1542 Accessible Entry* – The goal is to provide a high level of accessibility and efficient circulation without compromising the historic character of the Carter G. Woodson Home. On the exterior, an accessible entrance is located at 1542 Ninth Street, thereby eliminating the need to alter the front or rear entrance to the Carter G. Woodson Home and compromise its integrity. The facade of 1542 had previously been altered and lost much of the historic fabric that still exists on the adjacent town houses. This allowed for the opportunity to rebuild the front facade to regain some continuity between the 3 homes and to provide an entrance at grade. Placing the accessible entrance at this location creates a clear and more visible entrance to the museum and National Historic Site. A wood and glass storefront will be provided that gives access to 1542 at the sidewalk level. Once visitors enter through this storefront into a lobby, they will have the choice to ascend up stairs to the first floor level of the town homes or to take a lift.

*Connectivity* – The proposed schematic design assumes that 1538, the Woodson Home, would be restored to the Period of Significance (Period 3:1922-1950) and would be established as an interpretive house museum. However, rather than keeping the circulation through the Carter G. Woodson Home separate from the adjacent structures, the design links it to the adjacent two town houses (1540 & 1542 Ninth Street) that the NPS owns.

*Interior Accessibility* – Interior accessibility is provided to every floor of the home by an elevator located within 1542 Ninth Street, taking advantage of the less important interior spaces of the property adjacent to the Carter G. Woodson Home. Furthermore, the entry/connection points into the historic house from the adjacent building have been carefully located on each floor to minimize changes to the form and integrity of the building and to provide minimal disruption to the historic fabric. Because the elevator and other modern amenities are located in the adjacent properties and placed outside the building envelope of the Carter G. Woodson Home, minimal alterations to the interior spaces of the historic house will be necessary. The elevator will require an extension above the roofline of 1542 to accommodate the elevator overrun.

*Mechanical Systems* – The preferred design alternative shows no equipment for building services for the Carter G. Woodson Home being located within the historic house museum. All of these services would be located in the adjacent townhouses and supplied discretely to the home through the party wall and within the existing building cavities. Condenser units are to be located at grade in the rear yard of 1542 and will be surrounded by an enclosure.

*New Egress Stairs* – The required second means of egress from the upper floors of the Woodson Home is satisfied by the use of the new egress stairs in the adjacent townhouses that are accessed by new opening in the party wall at all floor levels of the Woodson Home. One of these two stairs requires that an existing two story bump out at 1540 be extended upward by one floor so that the stair accommodates egress from all three floors and the basement.

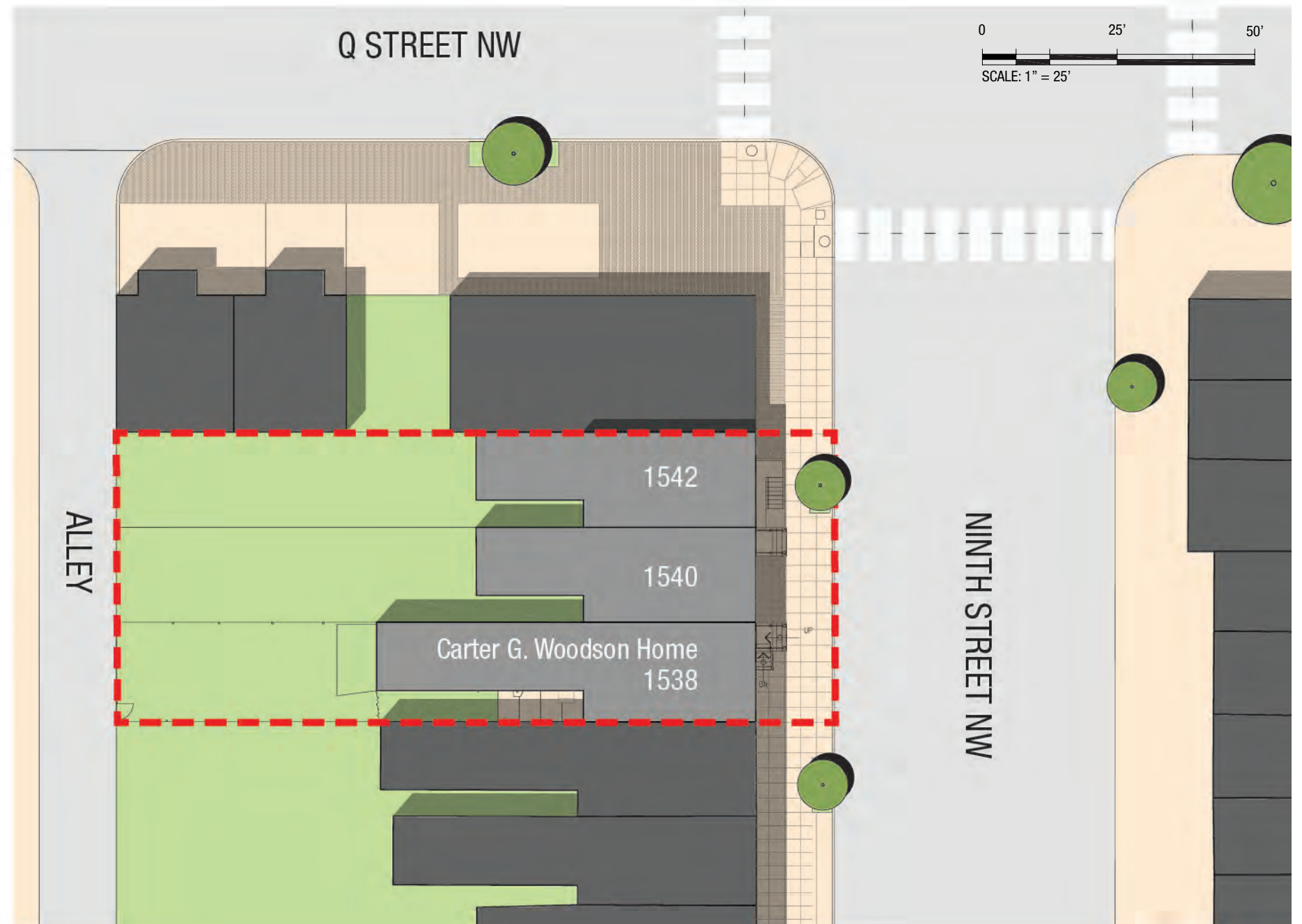
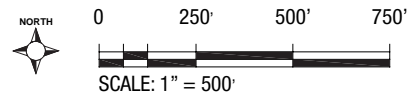
The entry and circulation allows for expanded administrative offices, exhibit space, exhibit support space, educational space and visitor orientation space in the adjacent townhouses that would augment the visitor experience to the home.

*Project Phasing* – Due to current budget environment, direction from the comptroller through the Regional Director, National Capital Region, it has been requested that the facility costs be broken down into two phases. They are as follows:

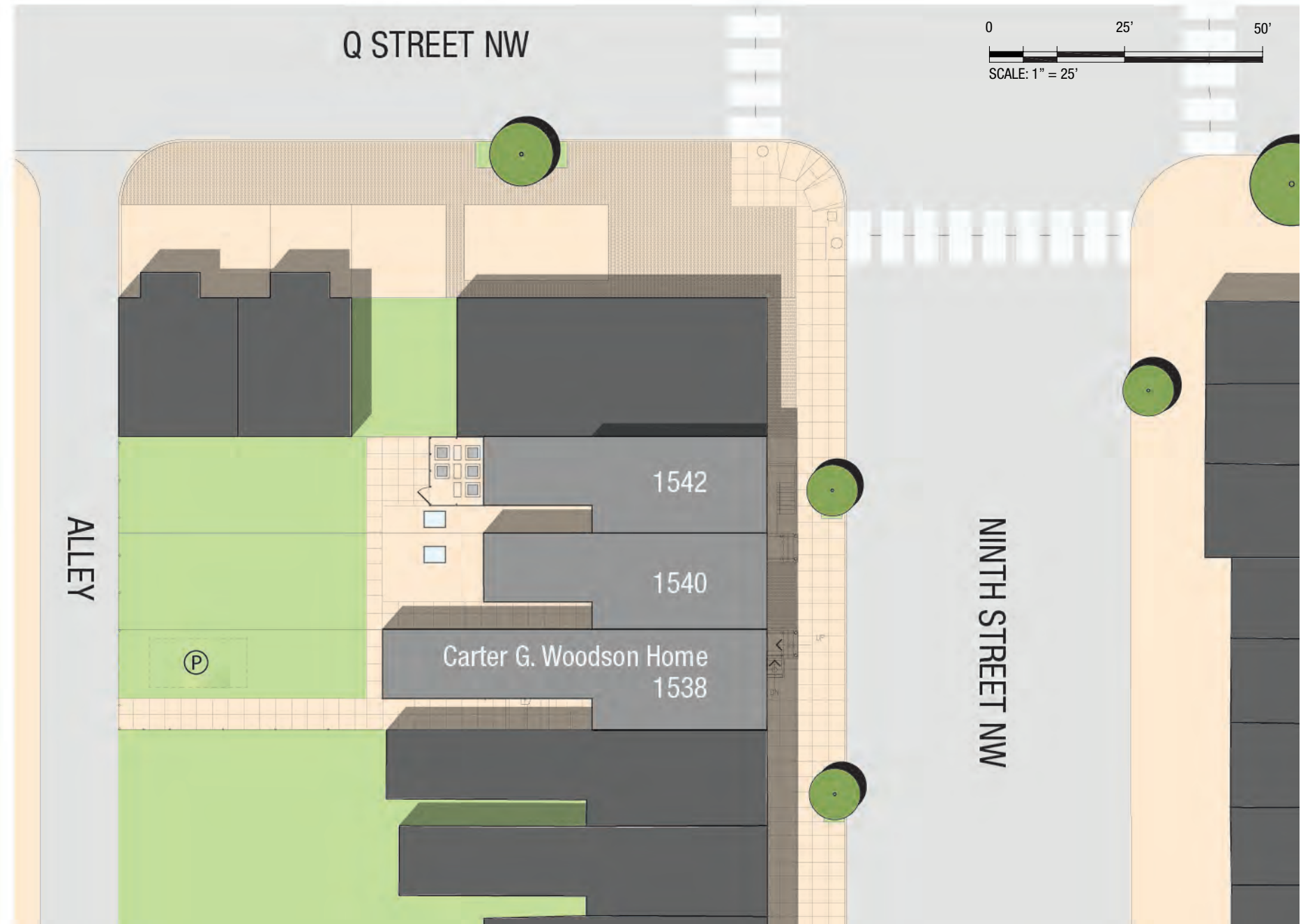
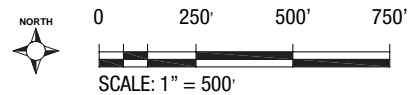
*Phase I* – Building Excavations, Systems Installation, and Historic Home Full Restoration – This phase would include the excavation of the basements of 1538, 1540, and 1542. It also includes restoring the exterior of the Woodson home 1538 and a full restoration of the interior. This phase would include the installation of all new building systems with the intent that most systems would be included in 1540/1542, not in the Woodson Home. The main goal of Phase I is to fully restore The Historic Home to open it for private tours and fund-raising events.

*Phase II* – Exterior Envelope and Interior Renovation of Adjacent Structures – This phase would include rehabilitating the exteriors of the adjacent buildings 1540 front facade including providing the addition to the west portion of 1540 to accommodate the future new stair. The rebuild of the east elevation of 1542 front and the construction of the main site entrance is part of this phase. Phase II includes rehabilitating the interiors of the adjacent buildings – 1540 and 1542.

## Building History and Project Description



## Existing Site Plan



# Proposed Site Plan



Ninth Street NW looking southwest



Ninth Street NW looking northwest



Q Street NW looking south

## Site Context



Existing West Elevation - Rear Facade



Existing East Elevation - Front Facade

## Existing Elevations



1320 9th Street NW



2009 14th Street NW



1807 14th Street NW



1831 14th Street NW

## Storefront Precedents



East Elevation - Front Facade  
scale: 1/8" = 1'-0"



Ninth Street NW looking east



West Elevation - Rear Facade

## Proposed Elevations