



George Washington Memorial Parkway
Glen Echo, Maryland

FINDING OF NO SIGNIFICANT IMPACT

Rehabilitate Clara Barton National Historic Site

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Glen Echo, Maryland

The National Park Service (NPS) prepared an Environmental Assessment (EA) to evaluate the impacts from the rehabilitation of the 130-year-old Clara Barton House (House) within the Clara Barton National Historic Site (NHS), a National Historic Landmark (NHL), located in Glen Echo, Maryland¹. The proposed action aims to develop a strategy for rehabilitating the House that preserves its historic integrity through targeted preservation, stabilization, and conservation of its original fabric. The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference.

The House has suffered from ongoing deterioration of materials and deferred maintenance. The building has deficiencies that need to be addressed for any intended use:

- The building does not have a safe, code-compliant means of egress in the event of a fire.
- The second-floor structure is undersized and not able to safely support code-required live loads.
- The lateral system does not meet the design load requirements of International Building Code.
- Three of the four floors are not accessible.

The House requires significant exterior and interior repair and rehabilitation work for preservation, structural stability, code compliance, and improved accessibility for persons with mobility limitations. Rehabilitation of the House will address deficiencies of the exterior envelope and interior structural framing, electrical, mechanical, and plumbing systems.

The rehabilitation of the House will minimize adverse effects by applying the Secretary of Interior Standards for the Treatment of Historic Properties, consistent with the rehabilitation standard in order to preserve the House and improve public use and access. Through Section 106 consultation the NPS determined that the project would have an adverse effect and therefore executed a Programmatic Agreement to resolve the adverse effects. The funding for this project is provided through the Great American Outdoors Act (Public Law 116-152).

¹ The Department of the Interior (DOI) published an interim final rule, NEPA Implementing Regulations, on July 3, 2025, “rescinding and making necessary targeted updates to its remaining regulations implementing” NEPA. 90 Fed. Reg. 29498 (July 3, 2025), as well as a DOI NEPA Handbook at 516 Departmental Manual 1. The park published a EA on July 15, 2025, relying upon preexisting NEPA procedures that predate July 3, 2025, because the plan’s NEPA review was sufficiently advanced at the time DOI issued the NEPA rule. Nonetheless, NPS will rely upon existing procedures to issue this FONSI, completing the NEPA review for the plan. The EA and FONSI are consistent with DOI’s July 3, 2025, NEPA Implementing Regulations and DOI NEPA Handbook.

PUBLIC AND AGENCY INVOLVEMENT

Public Scoping – The NPS relied on extensive coordination under Section 106 of the National Historic Preservation Act to involve the public in the project scoping process. See engagement below.

EA Public Review - The EA was released for agency and public review and comment on July 15, 2025, through September 9, 2025, at the PEPC project webpage [ParkPlanning - Rehabilitate Clara Barton NHS - Environmental Assessment](#). The EA public review period was announced on the PEPC project webpage and by news release and email blast. The NPS received a total of four correspondences on the EA. All four correspondences were appreciative of NPS' intentions of rehabilitating the House and requested increased interpretation and other amenities that were not within the current scope of this project.

National Historic Preservation Act, Section 106 Consultation – Pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), the NPS initiated consultation with the Maryland Historical Trust (MHT) in a letter dated June 3, 2022. The letter described the proposed improvements and defined a draft Area of Potential Effects (APE). MHT acknowledged receipt of the initiation letter on July 7, 2022. All consultation correspondence is provided in **Attachment E**.

The NPS identified agencies and organizations that were invited to serve as consulting parties for the rehabilitation project. These include the Town of Glen Echo, Montgomery County, Maryland-National Capital Park and Planning Commission, the National Capital Planning Commission, the American Red Cross, Glen Echo Park Partnership for Arts and Culture, Heritage Montgomery, Maryland Women's Heritage Center, Montgomery Preservation, National Parks Conservation Association, National Trust for Historic Preservation, Preservation Maryland, Piscataway Indian Tribe, and Piscataway-Conoy Tribe. Furthermore, NPS received requests from Bordertown Historical Society, National Collaborative for Women's History Sites, Society of Civil War Historians, Heather Huyck, Julia F. Irwin, Jacob Remes, Kathryn Sklar, Judith Wellman, Cassandra Good, Pearl J. Young, Tara Ross, Rosie Click, Nancy Hewitt, Katherine Jellison, and Elizabeth Regine to serve as consulting parties, and approved these requests. Because there was the potential for adverse effects on a National Historic Landmark, NPS also invited the NPS National Historic Landmarks Program and the Advisory Council on Historic Preservation to consult [pursuant to 36 CFR § 800.10 (b) and (c)], and both entities accepted.

Throughout the Section 106 consultation process, the NPS held multiple meetings to inform stakeholders of project details and updates, and to solicit feedback on project development. In addition, consulting parties were invited to comment on design drawings and other project documents. A summary of the meetings hosted and requested reviews to date is provided below:

- November 16, 2022: Consulting Parties Meeting - At this initial consulting parties meeting, objections were raised to a proposed partnership with a local organization and their shared use of the building. Consulting parties' comments received and compiled on January 9, 2023, revealed that inclusion of a partner was considered a change of the property's use and association inconsistent with the qualifications and criteria for inclusion of the site on the National Register of Historic Places. Another objection brought forth during the consulting parties meeting was the inclusion of a tower to house

lavatories, elevator, and egress stairwell and its diminishment of integrity of the design, setting, materials, workmanship, and feeling of the site.

- May 1, 2023: Consulting Parties Meeting - A revision of the undertaking was presented in a meeting with the consulting parties. In this meeting, the process was reset, a new path forward was charted to meet the goals of the Section 106 process and the collaboration continued with the NPS and consulting parties.
- July 31, 2023: Consulting Parties Meeting - Three schematic design alternatives were presented for consideration by the consulting parties. At the completion of the thirty-day comment period, respondents concurred that Alternative 2 (with modifications) was the preferred alternative adding that it allowed for access to the second floor with less diminishment to the integrity of the property's design, setting, materials, workmanship, and feeling of the House.
- January 30, 2024: Consulting Parties Meeting - The NPS preferred design alternative and the Assessment of Effects (AOE) report were presented to the consulting parties. The NPS published a draft AOE report that documented the rehabilitation of the Clara Barton National Historic Site and requested review and comment from consulting parties. At the conclusion of the 30-day comment period, respondents noted that many of the planned treatments for the historic structure would diminish the integrity of characteristics that qualify the historic property for listing in the National Register of Historic Places including design, materials, and workmanship. MHT and other commenters also noted the absence of archeological surveys of sensitive areas and evaluation of their eligibility for listing in the National Register of Historic Places.
- July 9, 2024: Consulting Parties Meeting – The NPS updated the consulting party members on the final assessment of effect determination, recent archeological findings, the submission of the code compliance waiver, the structural analysis findings, and presented information on formulating the programmatic agreement document. NPS also updated the group on the progression of the Environmental Assessment and advised that it could be released by late summer.
- February 19, 2025: Consulting Parties Meeting – The NPS shared an update regarding agency requirements to follow the International Building Code (IBC) and International Existing Building Code (IEBC). The NPS requested waivers to the full code requirements in cases where there were technical difficulties or where the historic structure might be significantly affected. The NPS Building Code Review Board approved all but one waiver, which relates to upgrades making the building resistant to lateral forces, like those resulting from wind. The presentation featured updated drawings and details to clarify code compliance while minimizing impacts to the historic structure. The Building Code Review Board granted compliance waivers for guardrail height, door swings, headroom heights, among others. The design team updated the AOE based on these waivers and requirements. The NPS requested comments on the AOE, based on the latest plans.
- April 16, 2025: The NPS shared the draft programmatic agreement for 30-day review by the signatories and interested parties.

Tribal Consultation - Based on the history of indigenous peoples associated with the area, Native American Tribal Governments invited to serve as consulting parties include the Accohannock Indian Tribe, Delaware Nation, Rappahannock Indian Tribe, Catawba Nation, Eastern Shawnee of Oklahoma, Seneca Cayuga Nation, and Pamunkey Indian Tribe. The NPS is committed to continuing consultation with Tribal Nations to identify historic properties of religious and cultural significance and develop alternatives and modifications for avoiding adverse effects, wherever feasible. Tribal consultation correspondence is provided in **Attachment C**.

Endangered Species Act, Section 7 Consultation - The NPS obtained an official list of terrestrial and freshwater species and critical habitat from the USFWS through the Information for Planning and Consultation (IPaC) database on May 13, 2025, that identified the federally listed endangered northern long-eared bat (*Myotis septentrionalis*) and federally proposed endangered tricolored bat (*Perimyotis subflavus*) and proposed threatened monarch butterfly (*Danaus plexippus*). The USFWS completed a review of the Clara Barton NHS rehabilitation project. As described in the documentation, minimal tree removal will occur as part of the work. Based on these conditions documented, the USFWS concluded in their Section 7 review received June 9, 2025, that the project “may affect, but is not likely to adversely affect” northern long-eared bat, and not likely to jeopardize the continued existence of the tricolored bat or the monarch butterfly. The consultation package submitted to USFWS is provided in **Attachment D**. Future Section 7 consultation may be needed if conditions change and bats are found during the construction.

ALTERNATIVES CONSIDERED AND SELECTED

The NPS analyzed the No Action Alternative and the proposed rehabilitation of Clara Barton National Historic Site (the Proposed Action and Selected Alternative). A detailed description of the alternatives can be found on pages 7-10 of the EA. The No Action Alternative was carried forward to provide a comparative baseline against which to analyze the effects of the Proposed Action (40 CFR Part 1502.14). Based on the analysis presented in the EA, the NPS selected the Proposed Action for implementation.

Under this alternative, the House would be rehabilitated. Rehabilitation is defined by the *Secretary of Interior's Standards for the Treatment of Historic Properties* as “the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” (2017). Rehabilitation may include the other treatments under the Standards: Preservation, Restoration, or Reconstruction where they assist in preserving and interpreting a historic site. The intent is grounded in the preservation of the structure, while making it compatible for contemporary use.

The project will be done in accordance with these standards and NPS preservation briefs, which provide guidance on preserving and rehabilitating historic buildings. Rehabilitation will involve the necessary interventions to meet life and safety codes, while retaining and enhancing features of the House to the period of significance (1897-1912) for interpreting the history of the Red Cross and Clara Barton. Emphasis will be on preserving the most historically intact rooms within the House. Rehabilitation will address deficiencies of the exterior envelope, structural framing, electrical, mechanical, and plumbing systems. The House has suffered from ongoing deterioration of materials and deferred maintenance. In addition to rehabilitating the building, the

project will improve visitor experience and safety with the addition of an emergency egress, by addressing code deficiencies, by providing accessible restrooms, and installation of a vertical platform lift. A vertical platform lift will provide access between the first and second floor. The lift will enable universal access for those who otherwise would not be able to climb the stairs.

Exterior Improvements – The exterior treatment focuses on preservation of original materials—metal roofing, clapboard siding, windows, and doors—with in-kind replacement only where deterioration requires it, in accordance with the Secretary of the Interior’s Standards. The stone foundation and towers will be repointed using historically appropriate mortar. The wood siding, primarily German siding, will be repaired or replaced in kind to match original profiles.

Windows and trim, including original sash and stained-glass elements, will be restored, with interior storm windows added for protection. Although many windows have been replaced, they retain the original fenestration pattern.

The existing front porch, a deteriorated Colonial Revival addition not from the period of significance, will be removed and replaced with a design that reflects the 1897 porch from Clara Barton’s time. The new porch will be historically appropriate and include an accessible ramp with compatible but differentiated detailing. Components of the third-floor balcony will also be replaced in kind where needed.

Interior Improvements – The Selected Alternative includes comprehensive interior rehabilitation of the House, addressing structural, mechanical, preservation, and restoration needs. Key interpretive and programmatic spaces on the first and second floors will have historic finishes restored, including the muslin fabric ceilings, which will be removed, conserved, and reinstalled to conceal new building systems; new, in-kind muslin will be installed where the existing finish is not historic. Wood trim will be preserved, and third-floor rooms will be repaired but remain unoccupied.

To support public access, the second floor will be structurally reinforced using concealed metal joists, with minimal visible impact. New shear walls, roof diaphragms, and hold-down hardware will improve lateral stability, mostly hidden behind existing finishes. Some structural elements on the third floor will be visible but discreetly placed.

The central atrium, a defining feature of the building, will be carefully preserved. A high-efficiency HVAC system will be installed with ductwork and piping hidden in closets or custom cabinetry to maintain historic character. Overall, the approach prioritizes preservation of original architectural fabric while enabling modern functionality and public interpretation.

Vertical Circulation and Restrooms – To improve accessibility and code compliance, the Selected Alternative includes a new fire egress stair, a vertical platform lift between the first and second floors, and two new accessible restrooms. These features will be located on the east side of the building, carefully placed to minimize impacts on historic fabric and views.

Design decisions were guided by the Historic Structures Report and existing building constraints, such as low ceiling heights, narrow passages, and the character-defining atrium. The east elevation was selected for the exterior egress landing to reduce visual and structural impacts. The design consolidates new features into a central core, creating an accessible vestibule between the lift and restrooms, and avoids widespread alterations throughout the building.

Landscape – Under the Selected Alternative, landscape changes include adding accessible parking and a route to the entrance of the House, which includes the removal or relocation of

some incompatible signage and vegetation, rehabilitating adjacent planting beds in historic locations, and adding appropriate lighting along the walk. Rehabilitation of the walk interprets a missing historic feature, which was the boardwalk that linked Clara Barton's front door and property with the adjoining Town of Glen Echo.

RATIONALE FOR DECISION

The NPS identified the rehabilitation of the House as the Selected Alternative because it meets the project purpose and need by addressing deficiencies in the exterior envelope, interior structural framing, and the electrical, mechanical, and plumbing systems while resulting in minimal environmental impacts. The No Action Alternative does not satisfy the need for the project because the House will continue to deteriorate, requiring frequent maintenance, and eventually loss of historic fabric.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. Despite minimizing many of the adverse effects, NPS determined that the overall project would still result in an adverse effect to the House. Since the Selected Alternative addresses rehabilitation of the Clara Barton National Historic Site, with a majority of work focused on the Clara Barton House, mitigations associated with the rehabilitation actions were developed through coordination during the Section 106 consultation process. In compliance with 36 CFR § 800.6(b) and 36 CFR § 800.14(b), the NPS developed a Programmatic Agreement via the Section 106 consultation process to resolve the adverse effects of the Selected Alternative. The NPS will carry out the mitigation and avoidance measures stipulated in the agreement document, which can be found in **Attachment B**.

In addition, as the planning and design progresses, the NPS will continue to consult with MHT, Tribes, and other consulting parties to develop and evaluate measures to minimize and mitigate adverse effects of the action.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT IMPACT

As documented in EA, the Selected Alternative has the potential for both beneficial and adverse impacts on cultural resources and visitor use and experience. However, the NPS has determined that the Selected Alternative can be implemented without significant adverse effects, as defined in 40 CFR § 1508.27. A summary of these impacts by resource is provided below; a detailed analysis of these effects is provided in Chapter 3 of the EA.

Historic Structures: Under the NPS Selected Alternative, the historic structure will undergo rehabilitation to resolve deferred maintenance, address code and accessibility deficiencies, and improve energy efficiency. Key upgrades include structural repairs, improved mechanical and electrical systems, and enhanced accessibility in compliance with the Architectural Barriers Act Accessibility Standard (ABAAS). These changes will benefit both the building's longevity and its historic and architectural significance.

However, some proposed alterations could have adverse impacts, such as the introduction of visible non-historic elements, removal or modification of historic features (walls, stairs, finishes), and changes to spatial volumes and views due to new additions and system installations. Despite these potential impacts, the overall effect is considered beneficial for the preservation and continued use of the historic structure.

Cultural Landscapes: While the addition of modern features like an accessible parking pad may slightly detract from the historic setting, the overall design—using compatible materials and layouts—will reflect the site's historic character. Improvements such as new circulation routes, pathways, historically appropriate vegetation, and restoration of exterior finishes will enhance the cultural landscape. Importantly, key views and vistas, including those of the Potomac River Valley, will remain unchanged. The National Park Service will maintain the site's sense of reverence, resulting in an overall beneficial impact to the cultural landscape under the Selected Alternative.

Archeological Resources: Under the Selected Alternative, limited impacts to archeological resources are expected due to planned ground-disturbing activities (e.g., walkway construction, porch modifications, foundation work, HVAC pad, and stormwater facility). A Phase I archeological survey (April 2024) identified potentially significant resources from both precontact Native American and historic (1891–1912) periods. A Phase II evaluation (February 2025) found that most disturbances will occur in areas without archeological features, except for the proposed sidewalk, which posed the greatest risk of damaging archeological resources.

To mitigate this, the sidewalk design was revised from a concrete path to a boardwalk system, minimizing ground disturbance by aligning it with already disturbed areas and limiting excavation to tested spots. In addition, if archeological resources are discovered during construction, work will stop in the area until proper identification and mitigation occur. In the event of discovering Native American human remains or cultural items, the Native American Graves Protection and Repatriation Act (1990) will be followed. If human remains are discovered during construction, the NPS shall determine the appropriate course of action following the Department of Interior's guidelines on human remains.

Visitor Use and Experience: Under the Selected Alternative, visitor experience will improve once the House is rehabilitated, and the public is welcomed back into the structure. It is anticipated that furnishings and other museum items will again be made available for display in climate-controlled cases, further restoring some of the previous visitor experience. With the addition of a lift, ABAAS restroom facilities, and other universally designed access, previous barriers will be removed, allowing for an expanded experience for the public.

ATTACHMENT A: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (54 USC 1100101).

The NPS has discretion to allow impacts on Park resources and values when necessary and appropriate to fulfill the purposes of a park (NPS 2006 sec. 1.4.3). However, the NPS cannot allow an adverse impact that will constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3). An action constitutes an impairment when its impacts “*harm the integrity of Park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values*” (NPS 2006 sec 1.4.5). To determine impairment, the NPS must evaluate “*the particular resources and values that will be affected; the severity, duration, and timing of the impact...and other impacts*” (NPS 2006 sec 1.4.5).

This determination of non-impairment has been prepared for the Selected Alternative described in this Finding of No Significant Impact. A non-impairment determination is made on the site’s historic structures, cultural landscapes, and archeological resources. These resources are considered fundamental to the Clara Barton National Historic Site. An impairment or non-impairment determination is not made for visitor use and experience or for park management and operations because impairment findings relate back to park resources and values. These impact areas are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values. This determination of non-impairment has been prepared for the Selected Alternative, described in Chapter 2 of the Rehabilitation of the Clara Barton National Historic Site Environmental Assessment.

In accordance with the National Park Service Organic Act of 1916 and the NPS Management Policies (2006), particularly Section 1.4.7, the National Park Service has evaluated the Selected Alternative for the rehabilitation of the Clara Barton National Historic Site to determine whether the proposed actions would result in impairment of park resources and values.

Historic Structures: The proposed rehabilitation will preserve and enhance the historic character of the Clara Barton House while addressing critical structural and systems deficiencies. Although some adverse effects may occur—such as the introduction of non-historic elements and limited removal of historic fabric—these impacts have been minimized through sensitive design and mitigation measures outlined in the executed Section 106 Memorandum of Agreement (MOA). The MD State Historic Preservation Office (SHPO) concurred that adverse effects to the historic setting and viewshed will be resolved (December 19, 2025).

Cultural Landscapes: The project will result in a net benefit to the cultural landscape. While minor intrusions such as an accessible parking pad may slightly alter the historic setting, the

overall design respects the site's historic character. Key views and vistas, including those of the Potomac River Valley, will remain intact, and the site's sense of reverence will be preserved.

Archeological Resources: Archeological surveys (Phase I and II) have guided the design to avoid significant impacts. The redesign of the proposed sidewalk into a boardwalk system has minimized ground disturbance. If archaeological resources or human remains are discovered during construction, work will cease in the affected area, and appropriate mitigation will be implemented in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) and Department of the Interior guidelines.

CONCLUSION

In conclusion, as guided by the expected outcomes noted above, implementing the Selected Alternative does not constitute impairment of any of the House's resources or values whose conservation is: (1) necessary to fulfill specific purposes identified in establishing legislation or proclamation of the Clara Barton National Site; (2) key to the natural or cultural integrity of the House or to opportunities for enjoyment; or (3) identified as a goal in the George Washington Memorial Parkway Foundation Document or other relevant National Park Service planning documents as being of significance. Any adverse effects will be avoided, minimized, or mitigated to the extent practicable, and the overall outcome will enhance the integrity and interpretive value of the site. This conclusion is based in the consideration of the purpose and significance of the Site, a thorough analysis of the environmental impacts described in the environmental assessment, relevant scientific studies, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of National Park Service.

ATTACHMENT B: SECTION 106 PROGRAMMATIC AGREEMENT

**PROGRAMMATIC AGREEMENT
AMONG THE NATIONAL PARK SERVICE,
MARYLAND HISTORICAL TRUST, AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REHABILITATION OF THE CLARA BARTON NATIONAL
HISTORIC SITE,
GEORGE WASHINGTON MEMORIAL PARKWAY,
GLEN ECHO, MARYLAND**

WHEREAS, this Programmatic Agreement (PA or Agreement) is made by and among the National Park Service (NPS), the Maryland Historical Trust, which is the Maryland State Historic Preservation Office (MD SHPO), and the Advisory Council on Historic Preservation (ACHP) (referred to collectively herein as the Signatories or individually as a Signatory) pursuant to Section 106 of the National Historic Preservation Act (NHPA) 54 U.S.C. § 306108 and the implementing regulations at 36 CFR part 800, regarding the rehabilitation of the Clara Barton National Historic Site (Undertaking); and

WHEREAS, NPS is the federal agency that has administrative control and custody of the George Washington Memorial Parkway (GWMP) of which the Clara Barton National Historic Site (CLBA) in Glen Echo, Montgomery County, Maryland, is a unit and includes the Clara Barton House and its immediate surrounds, which was designated a National Historic Landmark (NHL) in 1965 and listed in the National Register of Historic Places in 1974, and is also listed on the Maryland Inventory of Historic Properties; and

WHEREAS, CLBA has been determined to be nationally and locally significant under Criteria A, B, and C in its National Register documentation, due to its association with the American Red Cross, Clara Barton, and American vernacular architecture; and

WHEREAS, CLBA has been documented in a Historic Structure Report (2004), a Historic American Building Survey (1976 and 2003), a Cultural Landscape Inventory (2011), and a Cultural Landscape Report (2023); and

WHEREAS, CLBA was operated by NPS as a historic house museum but closed to the visiting public in 2015 due to several ongoing maintenance projects, water damage, and climate control issues. The museum collection, known as the Clara Barton Collection, was moved into storage at the NPS Museum Resource Center (Landover, Maryland) where it remains, though limited tours of the unfurnished house resumed in 2018; and

WHEREAS, the proposed Undertaking (Undertaking) will address structural, utility systems, life safety, and accessibility upgrades, as well as limited site work, in order to remediate deficiencies and enhance functionality; and

WHEREAS, Section 110(f) of the NHPA (54 U.S.C. § 306107) and 36 CFR § 800.10 require federal agencies to minimize the adverse effects of an Undertaking to the maximum extent possible at NHLs, including CLBA; and

WHEREAS, NPS plans to follow certain standards when executing the Undertaking, including the *Secretary of the Interior's Standards for Rehabilitation*, the *Architectural Barriers Accessibility Act Accessibility Standards*, the *International Existing Building Code (IEBC)* (2024), and the *Guidelines for the Treatment of Cultural Landscapes*, which were considered in consultation and in the development of the Construction Documents, Appendix C; and

WHEREAS, specifically, the Schematic Design Report (2023) informed requirements for repairs and structural upgrades necessary to meet the *IBEC* for sheer strength and desired occupancy loads, as shown in Appendix C; and

WHEREAS, NPS defined the Undertaking's Area of Potential Effects (APE) as the area in which both direct physical effects and visual effects may be experienced in and around CLBA. The area of physical impacts includes all staging areas, lie-down areas for equipment and materials, and areas of potential ground disturbance. The APE also includes the area within which visual, auditory, and/or atmospheric effects could diminish the integrity of historic properties for which setting, feeling, and association are defined as aspects of such integrity. The areas of physical impacts and visual, auditory, and/or atmospheric impacts, and all known historic properties within its bounds, are identified on the map presented in Appendix A; and

WHEREAS, NPS identified four (4) historic properties within and adjacent to the APE and of these, CLBA (NR 66000037) consists of a historic building that was Ms. Clara Barton's house and the original American Red Cross Headquarters, a nine (9) acre landscape, and the Clara Barton Collection, all of which are contributing features to the historic property. CLBA is adjacent to the Clara Barton Parkway, a listed historic property and a contributor to the GWMP historic district listed in the NRHP (1995: NR 95000605), the Glen Echo Park Historic District listed in the NRHP (1984: NR 84001850), and the Cabin John Right-of-Way / Brookmont Trolley Right-of-Way Historic District listed in the Maryland Inventory of Historic Properties (1979: M:35-31); and

WHEREAS, NPS applied the criteria of adverse effect pursuant to 36 CFR § 800.5 and found that the Undertaking will have an adverse effect on historic properties, specifically due to the loss of integrity to the historic building that will diminish materials, workmanship, and design of CLBA; and

WHEREAS, in 1978, NPS identified archeological site 18MO154, which has Pre-Contact and historic components within the APE. As analysis is in progress to evaluate the significance and National Register eligibility of this site, and the Undertaking's effects to it cannot be fully determined prior to the approval of the Undertaking, NPS is utilizing this PA to resolve known

adverse effects to other historic properties (i.e., to the NHL) while also setting forth a consultation process in accordance with 36 CFR § 800.14(b)(1)(ii) and (b)(3); and

WHEREAS, per 36 CFR § 800.3(c)(3), NPS formally initiated consultation with MD SHPO for the Undertaking on June 7, 2022 and received a response to this notification on July 7, 2022, and submitted an adverse effect finding and intention to prepare an agreement to resolve the adverse effect on June 3, 2024, and received concurrence from MD SHPO on July 15, 2024; and

WHEREAS, in 2022, NPS invited the Town of Glen Echo, Montgomery County, Maryland-National Capital Park and Planning Commission, and the National Capital Planning Commission to consult as representatives of local governments, in accordance with 36 CFR § 800.3(f)(1); and

WHEREAS, in 2022, NPS identified the American Red Cross, Glen Echo Park Partnership for Arts and Culture, Heritage Montgomery, Maryland Women’s Heritage Center, Montgomery Preservation, National Parks Conservation Association, National Trust for Historic Preservation, Piscataway Indian Tribe, Piscataway-Conoy Tribe, and Preservation Maryland as having a potential interest in the Undertaking and invited these organizations to consult in accordance with 36 CFR § 800.2(c)(5); and

WHEREAS, on October 31, 2022, NPS invited the federally-recognized Accohannock Indian Tribe, Delaware Nation, Rappahannock Indian Tribe, Catawba Nation, Eastern Shawnee of Oklahoma, Seneca Cayuga Nation, and Pamunkey Indian Tribe to participate in government-to-government consultation in accordance with 36 CFR § 800.2(c)(2)(iii)(C) and received a response from Catawba Nation on July 12, 2024; and

WHEREAS, NPS received requests from Bordertown Historical Society, Maryland Women’s Heritage Center, National Collaborative for Women’s History Sites, Society of Civil War Historians, Heather Huyck, Julia F. Irwin, Jacob Remes, Kathryn Sklar, Judith Wellman, Cassandra Good, Pearl J. Young, Tara Ross, Rosie Click, Nancy Hewitt, Katherine Jellison, and Elizabeth Regine to serve as consulting parties, and approved these requests per 36 CFR § 800.3(f)(3); and

WHEREAS, NPS formally initiated consultation with the National Historic Landmarks (NHL) Program, a division of the NPS and a representative of the Secretary of the Interior, on July 22, 2024, in accordance with 36 CFR § 800.10(c), and the NHL Program agreed to participate in consultation on July 30, 2024; and

WHEREAS, NPS notified ACHP of the adverse effect determination on July 31, 2024, in accordance with 36 CFR § 800.6(a)(1), provided the documentation specified in 36 CFR § 800.11(e), and the ACHP elected to participate in consultation pursuant to 36 CFR § 800.6(a)(1)(iii) in a response dated August 16, 2024; and

WHEREAS, due to the presence of Pre-Contact resources within site 18MO154, NPS shared the results of the 2024 Phase IB archeological investigation with the Tribal Historic Preservation Officer (THPO) for the Catawba Nation and tribal representatives for the other Tribes listed above (Consulting Tribes) with an invitation to each to continue consultation to seek to avoid effects to sites of religious or cultural significance; and

WHEREAS, beginning in 2022, NPS invited input from the Consulting Parties and hosted Consulting Party meetings on November 16, 2022; May 1, 2023; July 31, 2023; January 30, 2024; July 9, 2024; and February 19, 2025, to describe the proposed project, discuss design alternatives, present the Undertaking and Assessment of Effects finding, and discuss ways to resolve the adverse effects of the Undertaking; and

WHEREAS, in consultation with the Consulting Parties NPS identified measures to avoid and minimize adverse effects to CLBA from the Undertaking, such as concealing structural upgrades, repairing and replacing materials in kind, and salvaging original building fabric when possible. These measures are enumerated in Appendix B and incorporated into the Construction Documents (Appendix C); and

WHEREAS, independent from consultation on this Undertaking, NPS is conducting a public forum to collect input from interested external participants to inform ongoing development of an interpretive plan for the site and exhibits of the CLBA; and

WHEREAS, in coordination with consultation on this Undertaking, NPS developed an Environmental Assessment (*Rehabilitate Clara Barton National Historic Site Environmental Assessment*) published on NPS's Planning, Environment, and Public Comment (PEPC) system on July 15, 2025, pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. § 4331 et. seq.) and the implementing regulations (40 CFR Parts 1500-1508). The Undertaking is referred to as the Preferred Alternative in the EA, and a No Action Alternative was also described in the EA; and

WHEREAS, NPS acknowledges that during the EA public comment period, which was coordinated with Section 106 compliance and closed September 9, 2025, comments largely supported selection of the Preferred Alternative; and

WHEREAS, informed by consultation and public comments, NPS anticipates selecting the Preferred Alternative in the forthcoming Finding of No Significant Impact (FONSI), and

NOW THEREFORE, the Signatories agree that the Undertaking shall be implemented in accordance with the following stipulations to take into account the effect of the Undertaking on historic properties.

STIPULATIONS

The NPS shall ensure the following measures are carried out:

I. GENERAL REQUIREMENTS

- a. **Applicable Codes and Standards.** The Undertaking shall be executed by the NPS substantively in accordance with the Construction Documents (Appendix C) and 2023 *Cultural Landscape Report: Rehabilitate the Clara Barton National Historic Site* which consider the recommended approaches contained in the *Secretary of the Interior's Standards for Rehabilitation*, the *Architectural Barriers Accessibility Act Accessibility Standards*, and the *International Existing Building Code (IEBC)* (2024) and the *Guidelines for the Treatment of Cultural Landscapes*. All archeological investigations and studies conducted pursuant to this Agreement shall be consistent with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 Federal Register 44716-44742, September 1983), the ACHP's *Section 106 Archeology Guidance* (June 2007), and MHT's *Standards and Guidelines for Archeological Investigations in Maryland* (2022) (Applicable Standards and Codes).
- b. **Personnel Qualifications.** NPS shall ensure that all historic preservation and/or archeological work performed on its behalf pursuant to this Agreement shall be accomplished by, or under the direct supervision of a person or persons who meet(s) or exceed(s) the pertinent qualifications in the Secretary's Professional Standards (*Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines [As Amended and Annotated]*, 48 FR 44716, formerly published in 36 CFR § 61), the *Standards and Guidelines for Architectural and Historical Investigations in Maryland*, and the *Standards and Guidelines for Archeological Investigations in Maryland*, or subsequent adopted modifications of the *Standards* at the time of the action (Qualified Personnel).

II. AVOIDANCE AND MINIMIZATION

In the execution of the Undertaking, NPS shall avoid and minimize the Undertaking's adverse effect on historic properties by ensuring that the Undertaking is executed in accordance with Construction Drawings, as well as the Applicable Standards and Codes, and with direct supervision by Qualified Personnel, and also in the following ways:

- a. **Protection of Historic Interior Features:** NPS shall ensure that any historic interior historic building materials that are not specifically addressed (e.g., with notes and/or specifications) in the Construction Drawings will be protected during construction with a general note on the first page of the Construction Drawings and caution tape on site during construction.

- b. **Construction Best Practices**: The NPS shall minimize ground-disturbing activities to the extent practicable during construction, including using existing paved areas for equipment, matting or other forms of ground protection, fencing, and construction methods that minimize land disturbance. Best management practices shall be utilized in staging and equipment storage, and construction access, to minimize ground disturbance and avoid adverse effects to historic properties.
- c. **Vegetation Management**: Separate from the limited site work included in the Undertaking, as shown in the Construction Drawings, the NPS shall limit any additional non-historic vegetation removal within the APE to the extent practicable and shall use best practices to protect existing historic vegetation within construction zones and staging areas.

III. MITIGATION

- a. **Historic Property Documentation**
 - i. **HABS Update**: Within six (6) months of execution of this Agreement, and prior to demolition, removal, or alteration of any historic features of the CLBA NHS, NPS shall document the front porch according to the NPS Historic American Buildings Survey (HABS) Level I standards and submit a draft to Signatories for review and comment, consider comments timely received, and timely respond to them in writing prior to finalizing and submitting the documentation to HABS. Upon such submission, notice of which shall be provided to the MD SHPO in writing, NPS shall commence construction via a notice to proceed. The documentation should build upon and add to the existing HABS documentation for CLBA. The documentation shall focus on the porch's changing appearance over time as well as the sources used to design the new porch construction. HABS Level I documentation shall include:
 - 1. A detail set of measured drawings depicting existing conditions of the porch as well as the design of the historic porch to be reconstructed.
 - 2. Updated large-format photographs clearly depicting the appearance of the porch.
 - 3. A written history and description that relies on primary sources to the greatest extent possible, with a timeline of the construction history of the porch.
 - ii. **NR/NHL Update**: Following substantial completion of construction and before this Agreement expires, NPS or a qualified consultant meeting the *Secretary of the Interior's Qualification Standards* shall research and

update the 1974 CLBA National Register Nomination and 1965 NHL Nomination. Among other items, the updated NR and NHL nominations shall address the period of significance, the NHL boundary, physical changes that have occurred since completion of the existing nominations, and the elements that should be considered contributing features. The NHL nomination must be a complete replacement nomination. The draft nominations shall be submitted by NPS to the MD SHPO and the NPS National Capital Region/NHL Program Coordinator for review and comment, NPS shall consider comments timely received, and timely respond to them in writing prior to finalizing and submitting them to the MD SHPO and NPS National Capital Region NHL Program Coordinator and the Keeper of the National Register.

iii. **Historic Structure Report:** NPS shall complete a Historic Structure Report - Record of Treatment (HSR Part 3) that captures the physical changes to CLBA, for this Undertaking and any past projects that were completed after the 2004 HSR was compiled. This report shall include, at a minimum:

1. A summary of the documentation previously developed on the physical changes to the structures on the site.
2. Documentation of the intent of the Undertaking, the way in which project components were approached and accomplished, and information about the history of the Clara Barton House based on physical evidence discovered during construction.
3. Re-evaluation of the 2004 Historic Structure Report's analysis of the significance of individual rooms and other architectural elements, based on a combination of each room's physical integrity to the period of significance and its association with the building's historical significance.
4. Documentation shall also include copies of any relevant technical data such as field reports, material data sheets, field notes, correspondence, accounting spreadsheets, and contract summaries, as applicable.

The NPS shall provide the draft HSR Part 3 to the Signatories for review and comment. The NPS shall take into account any comments received within the 30-day review period from the Signatories, revising the draft as appropriate.

After the Signatories' review and comment period noted above, within six (6) years of substantial completion of construction, and at least one (1) year prior to the expiration of this Agreement, the NPS shall provide to the MD SHPO two (2) hard, comb-bound copies and one (1) electronic copy in Adobe Portable Document Format (.pdf) of the final HSR Part 3 report.

NPS shall also upload the report to the Integrated Resource Management Applications (IRMA) digital repository to be made available to the public.

- b. **Landscape Treatment Plan:** Beyond the limited site work included in the Undertaking, and as funds allow, NPS shall develop and implement recommended landscape treatments for CLBA consistent with the 2023 *Cultural Landscape Report: Rehabilitate the Clara Barton National Historic Site* and follow the review process described in Stipulation IV.b.
- c. **Interpretation:**
 - i. **Temporary Signage:** Prior to NPS commencement of construction via a notice to proceed, NPS shall develop and install temporary outdoor interpretive signage in consultation with MD SHPO, consisting of approximately two (2) signs. The temporary interpretive signage shall address the history of CLBA, including its construction and use. The signage shall also explain the Undertaking, including the purpose, need, and intended outcome. The signage shall include relevant historic and current images. The NPS shall provide the draft text and design of the signage, as well as proposed locations, to the Signatories for review and comment. The NPS shall address all comments received from Signatories within thirty (30) calendar days of receipt of the review materials. Signage shall be installed at key locations within sight of the project with six (6) months of the execution of this Agreement and shall remain through substantial completion of construction.
 - ii. **Photo Documentation of the Rehabilitation:** NPS shall photograph the progress of the construction work each day to produce a time lapse video. Within six (6) months of substantial completion of construction, the video shall be made available to the public online and hosted by NPS and shall remain available at least through the duration of this Agreement.
 - iii. **Virtual Tour/Film:** Within two (2) years of substantial completion of construction, NPS shall prepare a virtual tour/film of the completed rehabilitation of the Clara Barton National Historic Site building and landscape, utilizing language from the temporary interpretive signage, as reviewed by MD SHPO. The virtual tour/film shall be available to the public online and hosted by the NPS and shall remain available at least through the duration of this Agreement.
 - iv. **Permanent Interpretation of the Rehabilitation:** Within three (3) years of substantial completion of construction, and at least through the duration of this Agreement, NPS shall develop, install, and maintain interpretive

signage on site at CLBA, and/or virtually on the CLBA NPS website, to highlight features of the historic property, including:

1. The changes made to the porch during the Undertaking and the archival sources consulted to design the new porch.
 2. The historic character of the exterior and interior CLBA, its original design and construction, and the history of building modifications up to and including the present day (e.g., what elements have been removed or replaced, what elements remain).
- v. **Site 18MO154:** NPS shall consult with the Consulting Tribes to determine the interpretive potential of the Pre-Contact findings of the archeological surveys of site 18MO154, as appropriate, and will coordinate efforts with NPS compliance with the 1979 Archaeological Resources Protection Act and Section 304 of the NHPA. If interpretation related to Tribes' presence on the landscape is so developed, NPS may also share it with the Signatories, so as to coordinate such interpretation with the CLBA interpretation efforts.
- d. **Restoration Plan:** In consultation with the Signatories, and other Consulting Parties, NPS shall identify additional interior historic building materials that are candidates for restoration, to be completed on site or removed, restored, and re-installed by NPS in accordance with the *SOI's Standards for Rehabilitation or Restoration*.
- i. Within one (1) year of execution of this Agreement, NPS shall prepare a draft priority list of specific materials proposed for restoration, which shall be shared with Consulting Parties for review and comment per the process described in Stipulation IV.b.
 - ii. NPS shall prepare a Restoration Plan within three (3) years of execution of this Agreement. The Plan shall identify materials for restoration and provide proposed treatments for each one. NPS shall finalize the Plan per the process described in Stipulation IV.b., and endeavor to complete the work therein as part of the Undertaking.

IV. DESIGN MODIFICATION

NPS shall ensure that the Undertaking is executed in accordance with the Construction Drawings (Appendix C).

- a. **Design Modifications:** If the NPS desires any additions thereto or deletions therefrom from the final Construction Drawings that affects the historic features of CLBA, NPS shall furnish the Signatories by digital submission a statement of the requested changes, additions and/or deletions, with appropriate plans, specifications or other documentation for review and comment for no more than

fifteen (15) calendar days. If the Signatories do not respond in writing within that period or request up to an additional fifteen (15) calendar days to prepare a response, NPS shall move forward with no further consideration. NPS shall take into consideration any written comments received from the Signatories and shall notify the Signatories of its intentions, in writing, within five (5) calendar days of receiving the Signatories' comments. If comments are not resolved through consultation, NPS shall consult with the ACHP and, if necessary, seek resolution in accordance with Stipulation VII.f.

- b. **Separate Specialized Documents**: The NPS shall provide the Signatories a separate opportunity to review and comment on specialized planning documents associated with the Undertaking, such as a Landscape Treatment Plan and Restoration Plan, as follows:
 - i. The NPS shall provide these documents by digital submission to the Signatories, who shall have a thirty (30) calendar day review timeframe to provide written comments.
 - ii. The NPS shall take into consideration all comments received within thirty (30) calendar days, and consult with the Signatory(ies), as needed.
 - iii. If any comments are not resolved through consultation, NPS shall consult with the ACHP and then seek resolution in accordance with Stipulation VII.f.

V. ARCHEOLOGICAL SITE 18MO154

- a. After completion of the archeological investigations at 18MO154, the NPS shall submit to the MD SHPO and the Consulting Tribes, as appropriate, for their review and comment a technical report that contains the results of Phase II archeological investigation and an evaluation of NR eligibility. If 18MO154 is NR eligible, the NPS will also provide an assessment and determination of effect of the Undertaking on this site.
 - i. The NPS shall provide by digital submission the Phase II archeology report to MD SHPO and Consulting Tribes. Printed hard copy shall be provided only upon request of the MD SHPO or Tribal representative.
 - ii. The MD SHPO and Consulting Tribes shall have a thirty (30) calendar day review and comment period starting upon receipt. If no comments are received within the thirty (30) day review period, the NPS shall proceed with no further consideration.
 - iii. The NPS shall address all comments received within the thirty (30) day review period and provide final reports in an agreed upon format to each party.
 - iv. If the MD SHPO and Consulting Tribes concur with the recommendations, the NPS shall proceed with implementation of the recommendations. If the MD SHPO and Tribes do not concur, the parties

shall consult further to resolve the issues following the provisions for dispute resolution in Stipulation VII.f of this Agreement.

- b. The NPS shall provide the Signatories and the Consulting Tribes with the agency's determination of NR eligibility and finding of effect for archeological site 18MO154.
- c. If archeological site 18MO154 is ineligible for NR listing, consultation with MD SHPO on archeological resources is complete.
- d. If the Undertaking has no adverse effect to archeological site 18MO154, the NPS, in consultation with the Signatories and Consulting Tribes shall develop a Protection, Mitigation and Archeological Monitoring Plan for the site.
- e. If the Undertaking has an adverse effect on archeological site 18MO154, the NPS shall consult with the Signatories and Consulting Tribes, as appropriate, to identify measures to resolve the adverse effect, develop a Resolution Plan, and carry out those measures in accordance with the Resolution Plan. Resolution of an adverse effect may be achieved through data recovery, archeological monitoring, research and/or interpretive project, or any other commensurate strategy agreed upon by the Signatories and Consulting Tribes, as appropriate.
- f. If the mitigation activities include Data Recovery, the timing of this work shall be determined in consultation with the Signatories and Consulting Tribes, as appropriate, and, when agreed upon, may include investigations concurrent with construction activities.
 - i. NPS shall consult with MD SHPO and the Consulting Tribes on the development of the Phase III Data Recovery Plan. NPS shall provide the draft Data Recovery Plan to the MD SHPO and the Consulting Tribes for a thirty (30) calendar day review and comment period prior to initiating archeological investigations.
 - ii. All investigations shall follow the Applicable Standards and Codes and shall be conducted under the direct supervision of an archeologist that meets or exceeds the Professional Qualifications.

VI. UNANTICIPATED DISCOVERIES

If previously unidentified archeological sites or unanticipated effects to archeological historic properties are discovered in the APE during construction:

- a. NPS shall ensure that construction activity is immediately halted within a 50-foot radius of the discovery and interim measures (e.g., the use of tarps, flagging, fencing) are implemented to protect the discovery from looting and vandalism.

- b. For archeological historic properties, an archeologist meeting the Professional Qualifications (*Secretary of the Interior's Professional Qualifications Standards for Archeologists*) shall inspect the construction site to determine and document the extent of the discovery and provide recommendations regarding its NRHP eligibility and treatment.
- c. Within 48 hours of NPS's receipt of the notification of the unanticipated discovery, the NPS shall provide the Signatories, and for archeological historic properties Consulting Tribes, with its documentation of the discovery, evaluation of the NRHP eligibility of the discovery, and the measures the NPS proposes to take to resolve adverse effects. In making its official evaluation, the NPS, in consultation with the Signatories and Consulting Tribes, may assume the discovery to be NRHP-eligible for the purposes of Section 106 pursuant to 36 CFR § 800.13(c). The Signatories and Consulting Tribes shall respond within 48 hours after their receipt of NPS' submission of its official evaluation.
- d. NPS shall take into account the Signatories' and Consulting Tribes' recommendations on eligibility and treatment of the discovery, ensure that appropriate actions are carried out, and provide the Signatories and Consulting Tribes with a report on these actions after they have been implemented.
- e. Construction activities may proceed in the area of the discovery when the NPS has determined that implementation of the actions undertaken to address the discovery pursuant to Stipulation VI.d are complete.
- f. In the event an unanticipated discovery includes human remains, funerary objects, sacred objects, or objects of cultural patrimony, the NPS will comply with the Native American Graves Protection and Repatriation Act (NAGPRA, 25 U.S.C. 3001 *et seq.*) and the accompanying regulations at 43 CFR 10. Pursuant to an applicable NAGPRA Plan of Action or as otherwise required, the NPS will ensure that any human remains are left in situ, are not exposed, and remain protected while the park complies with relevant provisions of applicable Federal, State, and/or local laws.
- g. When applicable, the NPS will consider the principles within the ACHP's *Policy Statement on Burial Sites, Human Remains, and Funerary Objects*, dated March 1, 2023. In implementing the Agreement, the NPS will fulfill its obligation to consult with Tribes consistent with all relevant Executive Orders, Secretary's Orders, the Department of the Interior Departmental Manual, and NPS Director's Orders and Related Guidance. NPS recognizes and considers Indigenous

Knowledge in the Section 106 review process in accordance with the November 30, 2022, *Guidance for Federal Departments and Agencies on Indigenous Knowledge* issued by the White House Office of Science and Technology Policy and Council on Environmental Quality and the Departmental Manual (301 DM 7, *Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research*).

VII. ADMINISTRATION

- a. **Monitoring and Reporting.** By January 31 of each year, following the execution of this PA until it expires or is terminated, NPS shall provide the Signatories a summary report by e-mail or schedule a meeting, either virtually or as part of an on-site visit, detailing work carried out pursuant to its terms, which will promptly be made available to the Consulting Parties and the public upon written request to the NPS. Such report shall include any proposed scheduling changes, any problems encountered, and any disputes or objections received in NPS's efforts to carry out the terms of this PA. If a meeting is held in lieu of a report, meeting minutes will be e-mailed to the Signatories by NPS within one (1) month of the meeting and will promptly be made available to the Consulting Parties and the public upon written request to the NPS.
- b. **Anti-Deficiency Act.** The NPS obligations under this Agreement are subject to the availability of appropriated funds, and the stipulations of this Agreement are subject to the provisions of the Anti-Deficiency Act. The NPS shall make reasonable and good faith efforts to secure the necessary funds to implement this Agreement in its entirety. If compliance with the Anti-Deficiency Act alters or impairs the ability of the NPS to implement the stipulations of this Agreement, the NPS shall consult in accordance with the amendment and termination procedures found later in this Agreement.
- c. **Duration.** This Agreement shall become effective immediately upon signature of the ACHP, which shall retain a copy for its files. The Agreement shall expire ten (10) years from the date of the last signature. Prior to such time, the NPS may consult with the Signatories to reconsider the terms of the Agreement and revise or amend or extend the document as necessary.
- d. **Amendments.** This Agreement may be amended when such an amendment is agreed to in writing by the Signatories. Any amendments shall be effective on the date a copy signed by all Signatories is filed with the ACHP.
- e. **Termination.** If any Signatory to this Agreement determines that its terms shall not or cannot be carried out, that party shall immediately consult with the other Signatories to attempt to develop an amendment per Stipulation VII.d. If within

thirty (30) calendar days (or another period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the Agreement upon written notification to the other Signatories. Once the Agreement is terminated, and prior to work continuing on the Undertaking, NPS must either (a) execute a memorandum of agreement or another programmatic agreement in accordance with 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. NPS shall notify the Signatories as to the course of action it shall pursue.

- f. **Dispute Resolution.** Should any Signatory object in writing regarding any actions proposed, or the manner in which the terms of this Agreement are implemented, NPS shall consult with such party to resolve the objection. If NPS determines that such objection(s) cannot be resolved through this consultation, NPS shall:
- i. Forward all documentation relevant to the dispute, including NPS's proposed solution, to the ACHP and the other Signatories, with copies delivered to the Consulting Parties. Upon receipt of adequate documentation, the ACHP shall advise NPS on the resolution of the objection within thirty (30) calendar days. Prior to reaching a final decision on the dispute, NPS shall prepare a written response that takes into account timely advice or comments regarding the dispute from the Signatories and Consulting Parties and provide them with a copy of this written response. NPS shall then proceed according to its final decision.
 - ii. If the ACHP does not provide advice regarding the dispute within thirty (30) calendar days after receipt of adequate documentation, NPS may render a decision regarding the dispute and proceed accordingly. Prior to reaching such a final decision, NPS shall prepare a written response that takes into account any timely comments regarding the dispute from the Signatories and provide them with a copy of such written response.
 - iii. The responsibility of NPS to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute remain unchanged.
- g. **Entire Agreement.** This Agreement is the complete and exclusive agreement between the Signatories regarding the subject matter hereof and supersedes any other prior oral or written communications or understandings between the Signatories related to the subject matter hereof.
- h. **Counterparts.** This Agreement may be executed in several original counterparts, each of which shall be an original and all which counterparts taken together shall constitute one and the same agreement. Signatures to this Agreement transmitted by electronic means (including, without limitation, via .pdf) shall be valid and effective to bind the Signatory so signing.

- i. **Electronic Copies.** Within one week of the last signature on this Agreement, NPS shall provide each Signatory with one high quality, legible, full color, electronic copy of this fully executed Agreement and all of its attachments fully integrated into one, single document. Internet links shall not be used as a means to provide copies of attachments since links to web-based information often change. If the electronic copy is too large to send by email, NPS shall provide each Signatory with a copy of this Agreement as described above on a compact disc or other suitable electronic means.
- j. **Completion.** Upon the completion of all stipulations to this Agreement, NPS shall provide to the Signatories and other Consulting Parties a signed memorandum documenting that NPS has fulfilled all its responsibilities under this Agreement.
- k. **Emergencies.** Emergency responses are those actions deemed necessary by NPS as an essential and immediate response to disaster or emergency declared by the President, a Tribal government, or the Governor of the State of Maryland, or another immediate threat to life or property. In the event of an emergency, NPS shall follow the Emergency Actions Stipulation (VII) of the NPS Nationwide PA (2008).

EXECUTION of this Agreement by NPS, MD SHPO, and ACHP, and implementation of its terms evidence that NPS has taken into account the effects of this Undertaking on historic properties and afforded the ACHP a reasonable opportunity to comment.

[Signatures follow on separate pages]

Appendices:

Appendix A – Area of Potential Effects and Historic Properties

Appendix B – Minimization Measures

Appendix C – Clara Barton NHS Rehabilitation Plans – Selected Construction Documents

**SIGNATURE PAGE
PROGRAMMATIC AGREEMENT
AMONG THE NATIONAL PARK SERVICE,
MARYLAND HISTORICAL TRUST, AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REHABILITATION OF THE CLARA BARTON NATIONAL
HISTORIC SITE,
GEORGE WASHINGTON MEMORIAL PARKWAY,
GLEN ECHO, MARYLAND**

NATIONAL PARK SERVICE

By: **JENNIFER
MADELLO**

Jennifer Madello
Superintendent
George Washington Memorial Parkway

Digitally signed by JENNIFER
MADELLO
Date: 2025.12.10 20:10:58
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Date: December 10, 2025


**SIGNATURE PAGE
PROGRAMMATIC AGREEMENT
AMONG THE NATIONAL PARK SERVICE,
MARYLAND HISTORICAL TRUST, AND
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GEORGE WASHINGTON MEMORIAL PARKWAY,
GLEN ECHO, MARYLAND**

MARYLAND HISTORICAL TRUST

By: Elizabeth Hughes Date: December 19, 2025
Elizabeth Hughes
State Historic Preservation Officer

**SIGNATURE PAGE
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HISTORIC SITE,
GEORGE WASHINGTON MEMORIAL PARKWAY,
GLEN ECHO, MARYLAND**

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By:  _____ Date: January 21, 2026
Reid Nelson
Executive Director



- Legend**
- Area of Potential Effects
 - Clara Barton National Historic Site, National Historic Landmark
 - Glen Echo Park Historic District NR Listed & State Listed (M.35-411)
 - Clara Barton Parkway (part of GWMP) (NR Listed)
 - Cabin John Right-of-Way / Brookmont Trolley Right-of-Way State District (State Listed (M.35-31))

Note: An archeological site exists within the APE for this project.



SUB SHEET NO. APE 1	TELEGRAPH	ENVIRONMENTAL ASSESSMENT DRAWINGS	PAR/FIG NO. 312325
	AREA OF POTENTIAL EFFECTS		DATE 04/02/2025
CLARA BARTON NATIONAL HISTORIC SITE GEORGE WASHINGTON MEMORIAL PARKWAY GLEN ECHO MARYLAND			

Table 1. Aspects of Integrity Impacted, Analysis, and Minimization or Avoidance Measures by Character-Defining Feature

Character-Defining Feature		Is the feature altered?	Aspect(s) of Integrity	Is Integrity lost or diminished?	HSR-Assigned Significance of Feature or Rm ¹	Analysis	Minimization or Avoidance Measures
Location / Siting		No	Location	No	High		
Exterior							
Massing: Symmetrical front façade with stone towers, Porch (1897 style), and third floor balcony	Yes, directly	Design, Materials, Workmanship	No	Primary	The building elevation maintains its characteristic forms, such as false gable, corner towers, and fenestration. The proposed front porch replaces the existing symmetrical front porch (not period of significance) with the same extents from the east to west tower. Several components are severely deteriorated, as is the front wall siding, necessitating the removal of the porch to replace the rotted wood. Historic photographs and NPS drawings from c. 1978 will guide design of the new porch with compatible proportions for the railing and balusters. The third-floor balcony will be replaced in kind where wood materials are deteriorated.		
Massing: Roof	Yes, directly	Design, Materials, Workmanship	No	None given	All roofs will be replaced in kind with a lightning protection system at the highest points; the small lightning rods are approximately 10" in height and barely visible from the ground. New fall protection anchors at lower roofs and plumbing vent will be low profile and located near the third floor walls away from the roof edges to reduce visibility; they will also be painted to match the color of the roof metal. Four low gussets will protrude from the east and west low roofs covered with the same painted sheet metal.		
Texture, Materials: Uncoursed rubble stone foundation & corner	Yes, directly	Materials, Workmanship	No	Primary	The stone retains integrity, however the mortar lacks integrity. The stone will be repointed with mortar based on historic mortar analysis.		
Texture and Materials: German siding	Yes, directly	Materials, Workmanship	No	Primary - NE, NW elevations, Secondary - SE, SW elevations	Clapboard siding that is deteriorated will be replaced to match existing sizes and profiles. Historic wood species is pine; new wood will be cedar or douglas fir to improve resistance to rot. At the Northeast (front) elevation, the siding above the porch roof will be replaced; this siding is c. 1966. At southeast and northwest elevations, siding will be removed and reinstalled where new structural connections will be made at the floor and roof levels. At the southwest (rear) elevation, siding at the two sides will be removed and reinstalled, with an assumed 20% replacement where it is rotted or cupped. Areas of this siding were replaced c. 1978.		
Exterior Doors: Front entrance doors and screen doors (Doors 101A)	Yes, directly	Design, Materials, Workmanship	Yes	Primary	Existing front entrance doors will be re-hung to swing outwards. It is unknown if existing screen doors are original, however HSR documents screen doors being installed c. 1903 (Vol 2, pg 54).	Screen doors will be removed and salvaged. New egress hardware will be installed in sensitive manner at the interior side and be traditional style. Door operator may be omitted, due to occupancy below 300 people if code official and NPS permit.	
Exterior doors: East door, basement egress (Door B-7B)	Yes, directly	Design, Materials, Workmanship	No	Secondary - Exterior, Not Significant - Interior	Door was not included in HSR inventories because it was concealed at the interior; its date of construction is unknown although it is suspected to date to after the period of significance. The larger masonry opening suggests that a pair of wood doors were used for moving large items into storage in the basement. Existing door will be modified with wood rail (+/- 12" high) of matching species to elongate the door. Entire door will be painted.	Existing door will be modified and receive painted finish. It will receive egress hardware only at the interior side. The wood board infills at either side will remain and be painted. A landing at the exterior that is level with the interior floor is required by code at an egress door. The landing may require a slight depression with a low retaining wall at the north/northeast side and possibly a step at the south/southeast.	
Windows and trim: All floors except basement two openings	Yes, directly	Materials, Workmanship	Yes, small percentage of windows No, for most	Varies	Four windows at the south/southwest elevation will require extensions of the frame jambs and heads; wood sills will be replaced. Four clerestory windows (east and west elevations) will be infilled with shear plywood panels. These will be flashed similar to adjacent wall. Paint analysis indicates that some windows have been replaced, which concurs with the HSRs.	At north/northeast elevation, five windows at the second floor will be replaced with new sash to match existing (replacements c.1960s). Existing frames, sills, and frames will remain, except where repairs are needed. Interior storm windows will be added with frames to maintain the daylight opening sizes. New period window treatments will conceal the visibility of storm windows inside rooms.	

Table 1. Aspects of Integrity Impacted, Analysis, and Minimization or Avoidance Measures by Character-Defining Feature

Character-Defining Feature	Is the feature altered?	Aspect(s) of Integrity	Is Integrity lost or diminished?	HSR-Assigned Significance of Feature or Rm ¹	Analysis	Minimization or Avoidance Measures
Windows and trim: Two basement window openings	Yes, directly	Materials, Workmanship	Yes	Secondary	Windows at two openings on the east/southeast elevation will be replaced with wood louvers for outside air distribution.	The louvers will be toward the rear of the building for less visibility to public. Louvers will be designed in wood frames within the existing wood jambs/sills to match sizes of existing sash. Existing sash will be salvaged, although it is unknown if previously replaced.
Flagpole	Yes, indirectly	Materials, Workmanship	No	None given	Structural reinforcement of flagpole at third floor penthouse will occur from the third floor ceiling and roof during roof replacement; it will not be visible after muslin ceiling is reinstalled. Existing flagpole will be retained.	
Interior						
Muslim ceilings: Vestibule (Room 101), Main Hall (Room 102), Topmost Chamber (Room 303)	Yes, directly	Materials, Workmanship	No	Primary	The specialized conservation treatment is to remove the muslin offsite for cleaning and applying a new paper backing. The restored muslin will be reinstalled to match original locations and tacking.	
Muslim ceilings: Rooms 112, 113, 114, 212, 213, 301, 302, 304, 305 - modern replacements	Yes, directly	Materials, Workmanship	No	Non-historic	Non-historic muslin will be removed and replaced-in-kind on first floor to allow structural and mechanical improvements. The ceiling in Room 213 will be removed and abated due to 1970s asbestos backing.	
Muslim ceilings: Rooms 214, 215 - modern replacements	Yes, directly	Materials, Workmanship	Yes	Non-historic	The material will be replaced with drywall due to fire-rating requirements for egress stair (Room 214) and lift shaft (Room 215A); performance in Toilet Room (Room 215B) and Curatorial Workroom (Room 215).	The selection of Rooms 214 and 215 for interventions avoids the removal of historic plaster in other rooms.
Plaster ceilings: Rooms 103, 105, 108, 109, 111, 115, 116, 117, 118, 119, Rooms 201, 203, 206, 207, 208, 211, 218	Yes, directly	Materials, Workmanship	Yes	Varies	The plaster will be removed to allow structural and building system improvements. Many rooms have network cracking, delamination, water damage, failed patches, and post-historic board covering original material which would require extensive repairs.	The plaster will be replaced in-kind. Comprehensive material analysis has identified different compositions of plaster. An appropriate plaster mix is provided in the specifications.
Plaster walls: Rooms 103, 108, 109, 111, 118, 206, 207, 208, 209, 211, 215, 218	Yes, directly	Materials, Workmanship	Yes	Varies	Plaster wall material will be removed at the tops of walls near the ceiling intersections to access the joists for the structural lateral connections. The removals will be minimized to the greatest extent possible.	The plaster will be replaced in-kind. Comprehensive material analysis has identified different compositions of plaster. An appropriate plaster mix is provided in the specifications.
Plaster ceilings and walls with cracks and localized deterioration	Yes, directly	Materials, Workmanship	No	Varies	Plaster will receive patching to restore finish.	
Atrium - spatial organization and Main Hall closets	Yes, directly	Design, Materials, Workmanship	No	Primary	Finishes of the wood board and batten walls will be restored at three floors. The approach to 115 will be widened by relocating the north wall of closet CL-6 to the south by 12". The opening at 214 will be widened by 6". These widenings are required to meet the code-required minimum for clearance. The hall closets may require minor dismantling to install the cold-formed metal sisters to the joists; The closets will be repaired to match existing.	The new wider opening at Room 115 occurs between closets, thereby minimizing its view from the hall itself. Because the pattern of room approaches through closets and all finishes are maintained, the impact to the hall spatial organization is negligible. The visitor's "reading" of both first and second floor halls will remain the same, therefore not diminishing the integrity.
Atrium - closet interiors	Yes, directly	Design, Materials, Workmanship	Yes	Primary	Some closet interiors will receive vertical ductwork, piping, and conduit for building services. This will be coordinated with the existing (and good condition) sprinkler routing pathways and sprinkler heads. Closet CL-7 will receive a steel column to support the structure above for the new lift; its overall width will also be reduced to widen the approach to Room 115. Board and battens and the closet door will be removed and reinstalled to match existing proportions. The decorative header trim at the approach will be reconstructed at the new wider opening to Room 115.	Where new systems are added, routing will be grouped within small chases inside the closets or located at the closet rears. This avoids impact by minimizing number of penetrations. False backs can be added to conceal systems if closet doors will be opened regularly.
Wood board partitions: removals						
Room 115 Northeast side	Yes, directly	Design, Materials, Workmanship	Yes	Not significant	Vertical board partition, covered with modern fiberboard, will be removed. A new CMU load-bearing wall will be constructed to support the new lift; the wall will be shifted to the southwest from the original wall location to make the best use of space for the lift and restrooms.	Boards will be well documented and salvaged. Though the wall is removed, the new wall is in roughly the same location; this minimizes the loss because the perception of a chamber is maintained. The size and proportions are retained and the wall painted finishes for the new egress stair will be compatible with the rest of the building.

Table 1. Aspects of Integrity Impacted, Analysis, and Minimization or Avoidance Measures by Character-Defining Feature

Character-Defining Feature	Is the feature altered?	Aspect(s) of Integrity	Is Integrity lost or diminished?	HSR-Assigned Significance of Feature or Rm ¹	Analysis	Minimization or Avoidance Measures
Room 214 Northeast side	Yes, directly	Design, Materials, Workmanship	Yes	Secondary	Vertical board partition, covered with modern fiberboard, will be removed. A new CMU load-bearing wall will be constructed to support the new lift; the wall will be shifted to the southwest from the original wall location to make the best use of space for the lift and restrooms.	Boards will be well documented and salvaged. Though the wall is removed, the new wall is in roughly the same location; this minimizes the loss because the perception of a chamber is maintained. The size and proportions are retained and the wall painted finishes for the new egress stair will be consistent with the rest of the building.
Wood board partitions: bedroom						
Room 116 Southwest side	Yes, directly	Design, Materials, Workmanship	Yes	Secondary	Vertical beaded board partition, covered with modern fiberboard, will be removed. The non-historic stair to the basement will also be removed. The additional space is needed for the lift and restroom.	Boards will be well documented and salvaged. The impact of the lift could be minimized by retaining the outer framing of the closet and building the new kitchenette within the former closet.
Room 215 Southwest side	Yes, directly	Design, Materials, Workmanship	Yes	Secondary	Vertical board partition, covered with modern fiberboard, will be removed. The additional space is needed for the lift and restroom.	Boards will be well documented and salvaged. Like Room 116 on the floor below, the new configuration can still be understood as two smaller interventions within a larger room. The wood floor will be continuous on both sides of the privacy wall that separates the Curatorial Workroom (215) from the lift lobby (215A). A salvaged door will be installed as a slider in the privacy wall.
Wood board partitions: preservation by concealing or partial concealing						
Room 115 Southwest side	Yes, indirectly	Design, Materials, Workmanship	No	Not significant	Beaded board partition will remain behind new shaft wall for egress stair. Impact of new egress stair is minimized by preservation of beaded board wall behind new shaft wall. The new shaft wall should "float" in front of board wall and not be fastened directly to the historic wall.	
Room 116 Northeast side	Yes, directly	Design, Materials, Workmanship	Yes for new opening	Secondary	Board and batten partition will remain with the new restroom wall "floated" behind the board partition. A new opening will be created for the door to the restroom (Room 116B). Much of the board partition will be exposed on both sides. The existing thru-door to Room 117 will remain.	Impact of new restroom is minimized by preservation of the board and batten wall. The new restroom wall should "float" inside board wall and not be fastened directly to the historic wall.
Room 117 Northeast side	Yes, indirectly	Design, Materials, Workmanship	No	Secondary	Vertical board partition will remain with the new restroom wall "floated" in front of the board partition. Two doors will be fixed in place so they are not operable (reversible action in future).	
Room 214 Southwest side	Yes, indirectly	Design, Materials, Workmanship	No	Secondary	Vertical board partition, covered with modern fiberboard, will remain behind new shaft wall for egress stair. Impact of new egress stair is minimized by preservation of vertical board wall behind new shaft wall. The new shaft wall should "float" in front of board wall and not be fastened directly to the historic wall.	
Room 215 Northeast side	Yes, indirectly	Design, Materials, Workmanship	No	Secondary	Vertical board partition will remain with the new restroom wall "floated" in front of the board partition. Two doors will be fixed in place so they are not operable (reversible action in future). Impact of new restroom is minimized by preservation of the vertical board partition. Closet in Room 216 is maintained behind new finished restroom wall.	
Plaster walls: preservation by concealing with new shear walls						
Rooms 103, 108, 203A, 206 - walls surrounding the Main Stair (105, 205)	No	Design, Materials, Workmanship	No	Secondary	The existing plaster walls will remain preserved behind the new shear walls.	
Wood paneling in Main Hall / Atrium: removal and reinstallation						
Room 101	Yes, indirectly	Materials, Workmanship	No	Primary	Removal of full wall paneling at two locations to allow the structural work at the ceiling/wall connection. Paneling will be reinstalled.	

Table 1. Aspects of Integrity Impacted, Analysis, and Minimization or Avoidance Measures by Character-Defining Feature

Character-Defining Feature	Is the feature altered?	Aspect(s) of Integrity	Is Integrity lost or diminished?	HSR-Assigned Significance of Feature or Rm ¹	Analysis	Minimization or Avoidance Measures
Room 102	Yes, indirectly	Materials, Workmanship	No	Primary	Removal of full wall paneling for a wall segment to the north of the Main Stair and near Door 111A to allow the structural work at the ceiling/wall connection. Paneling will be reinstalled. Other locations will be concealed within the backs of closets.	
Wood railings	No	Materials, Workmanship	No	Varies	Finishes will be restored.	
Interior wood paneled doors, trim profiles, and corner blocks						
Opening to Room 115, Door 115	Yes, directly	Design, Materials, Workmanship	Yes	Primary - Main Hall, Not significant - Room 115	Door 115 (four panel wood door) and its transom window will be removed and replaced-in-kind to meet the fire-rating. Because the opening is relocating by 12" to the north to add the egress stair, the vertical trim at the south end of the opening will remain to mark the location of the original opening. Reproduction trim will frame the new opening to match existing. Salvaged vertical boards will cover the new wall.	Door and transom will be well documented and salvaged. A new egress stair with fire-rated enclosure is required for safe egress from the building. Several alternative locations were studied; all single-door openings directly attached to the Main Hall would have required modifications to meet the door + latch code requirement for clearance. Opening 115 is towards the rear of the Main Hall and Room 115 is Not Significant. While altering the original door opening is a loss of integrity, the original opening will be visible with the historic trim in place such that the change can be distinguished.
Opening to Room 116A	Yes, directly	Design, Materials, Workmanship	Yes	Primary - Main Hall, Secondary Room 116	Door 116A (four panel wood door) will be removed to provide the 32" opening for accessible route to the lift. The door stops will also be removed.	Door and hinges will be well documented and salvaged.
Openings in CL-9 and CL-10 (doors previously removed)	No	Materials, Workmanship	No	Secondary (Room 117)	This closet had been reversed to open into Room 117 after the period of significance. The doors are currently missing, possibly stored with artifacts in the basement. To create flush wall for Toilet Room 116B, salvaged doors can be fixed in the openings, or the openings will be infilled and the Sanitary trim will remain.	
Glazed doors - Vestibule doors 102A	No	Design, Materials, Workmanship	No	Primary	Doors with decorative yellow-glazed upper panels will remain swinging inwards. They will be fixed in place.	
Opening to Room 214, Door 214	Yes, directly	Design, Materials, Workmanship	Yes	Primary - Main Hall / Secondary - Room 214	Door 214 (four panel wood door) will be removed and replaced-in-kind to meet the fire-rating. Because the opening will be widened by 6" to add the egress stair, the vertical trim and corner block at the north end of the opening will be removed and reinstalled at the wider opening, and the top trim will be modified.	Door and transom will be well documented and salvaged. A new egress stair with fire-rated enclosure is required for safe egress from the building. Several alternative locations were studied; all single-door openings directly attached to the Main Hall would have required modifications to meet the door requirement for clearance. Opening 214 is towards the rear of the Main Hall and Room 214 has secondary significance. While altering the original door opening is a loss of integrity, the trim is reinstalled to maintain character of opening.
Opening to Room 215A	Yes, directly	Design, Materials, Workmanship	Yes	Primary - Main Hall, Secondary - Room 215	Door at Room 215A (four panel wood door) will be removed to provide the 32" opening for accessible route to the lift. The door stops will also be removed.	Door and hinges will be well documented and salvaged.
Second (north) door to Room 215	No	Design	No	Primary - Main Hall, Secondary - Room 215	Four panel door will be secured shut.	
Door 108C	No	Design	No	Secondary	Door 108C will be relocated to the new face of the opening in the shear wall. Door trim will also be removed and reinstalled or replaced at the adjusted opening.	

Table 1. Aspects of Integrity Impacted, Analysis, and Minimization or Avoidance Measures by Character-Defining Feature

Character-Defining Feature	Is the feature altered?	Aspect(s) of Integrity	Is Integrity lost or diminished?	HSR-Assigned Significance of Feature or Rm ^s	Analysis	Minimization or Avoidance Measures
Door 206A	No	Design	No	Secondary	Door 206A will be relocated to the new face of the opening in the shear wall. Door trim will also be removed and reinstalled or replaced at the adjusted opening.	
Other doors on accessible route	Yes, directly	Design	No	Primary - Main Hall	Door opening clear widths are mostly between 29" and 30". ABAAS clearance is 32". A few doors will require minor modifications to the openings by removing door stops and the doors to provide accessibility.	Door and hinges will be well documented and salvaged.
Muslin and "ticking" on wood Closet door in Room 115	Yes, directly	Design, Materials, Workmanship	Yes	Not significant	Door will be removed, well documented and salvaged.	Door will be removed, well documented and salvaged. The door can become part of an exhibit or interpretation of building fabric in a different room.
Closet door in Room 214	Yes, directly	Design, Materials, Workmanship	Yes	Secondary	Door will be removed, well documented and salvaged.	Door will be removed, well documented and salvaged. The door can become part of an exhibit or interpretation of building fabric in a different room.
Closet doors in Room 215A	No	Design, Materials, Workmanship	No	Secondary	The doors and trim will remain with the new restroom wall "floated" in front. The doors will be fixed in place so they are not operable (reversible action in future). Impact of new restroom is minimized by preservation of the doors. Closet in Room 216 is maintained behind new finished restroom wall.	
Wood flooring	Yes, directly	Materials, Workmanship	Yes	Varies	Tongue and groove pine boards will be removed and salvaged in Rooms 115 and 214. The floor boards will also be removed in the lift shaft at Rooms 116 and 215. For supply and return air distribution for the HVAC system, several small penetrations will be made in the wood floor. Floor registers will be utilized at the first floor and select locations at the second floor. Larger rooms will typically have two to three registers in the floor, while smaller rooms will have only one or two. The size of registers varies with the largest at 16x12.	The floor removal will be minimized by salvaging and reinstalling the wood floor from Rooms 115 and 214 onto the new landings in the egress stair. The floor penetrations for the new supply and return grilles will be minimized by consolidating vertical ductwork where possible; there will be no new chases visible in the rooms, only chases within closets. The grilles will be located at existing baseboard radiator locations since the floor will require patching upon the removal of the baseboard radiators.
Windows including transoms and colored glass	Yes	Design, Materials, Workmanship	Yes	Varies	The colored glass clerestory windows will be restored and colored glass will replace where Plexiglass has been inserted. Two clerestory windows at both the east and west elevations will be infilled to become shear wall panels. The transom above the Door to Room 115 will be replaced to match existing at the larger width. The light entering the atrium will be minimally diminished by losing four clerestory windows.	The infill clerestory windows (four total) are required for the lateral force resisting system. The infill panels are adjacent to others that have already been infilled and flashed over at the exterior. The interior wood finish will match those adjacent.
Cabinetry	No	Materials, Workmanship	No	Primary	The built-in cabinetry in Rooms 109, 111 (cupboard), and 112 (corner and wall cabinets) will be restored.	
Vault	No	Materials, Workmanship	No	Primary	The vault will receive limited repairs-in-kind and will be used for interpretation.	
Third floor penthouse	Yes, directly	Design, Materials, Workmanship	No	Secondary	Muslin will be removed and restored. This enables reinforcement of the roof and flagpole. Rooms 301 and 305 will each have a pair of visible posts with braces in the ceilings. Other structural upgrades within the floors and roof framing will be concealed from view.	Repairs will not be visible upon reinstallation of the muslin ceiling material.
Cultural Landscape of property						
Barton House, porch replacement and barrier-free ramp	Yes, directly	Location, Design, Materials	No	High	The proposed front porch replaces the existing symmetrical front porch (not period of significance) with the same extents from the east to west tower. Several components are severely deteriorated, as is the front wall siding, necessitating the removal of the porch to replace the rotted wood. Historic photographs and NPS drawings from c. 1978 will guide design of the new porch with compatible proportions for the railing and balusters.	

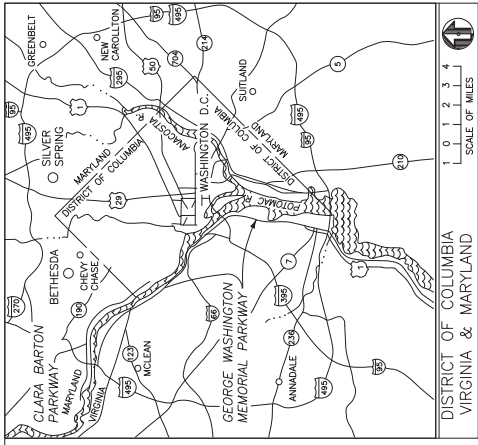
Table 1. Aspects of Integrity Impacted, Analysis, and Minimization or Avoidance Measures by Character-Defining Feature

Character-Defining Feature	Is the feature altered?	Aspect(s) of Integrity	Is Integrity lost or diminished?	HSR-Assigned Significance of Feature or Rm ¹	Analysis	Minimization or Avoidance Measures
South retaining wall	No	Design, Materials, Workmanship	No	Low	The proposed work avoids alteration of this feature.	
Circulation: Walk from Oxford Road, general pattern	Yes, directly	Design, Materials, Workmanship	No	Low	A new orthogonal walk will replace the existing, non-historic, curvilinear sidewalk. The grading will be altered slightly to make the entire path accessible. The new walk will more closely align to the layout of the historic boardwalks that were a circulation feature of the site during the period of significance.	
Circulation: Driveway loop, general pattern	No	Design, Setting	No	Low	Proposed work avoids alteration of the general pattern of this feature. Existing gravel loop will be maintained.	
Circulation: Oxford Road	No	Setting	No	Low	Proposed work avoids alteration of this feature.	
Natural Systems and Topography: Minnehaha Branch perennial stream	Yes, indirectly	Setting	No	Moderate	Construction activities including excavation, utility trenching, and stormwater management during construction may result in drainage to this adjacent waterway. Site protection will be put in place during construction to mitigate erosion and control silt and runoff.	
Natural Systems and Topography: Woodland and edge habitat supporting historic native species	Yes, indirectly	Setting	No	Moderate	Selective tree removal will begin to open up views between the house and its immediate surrounds. This helps to rehabilitate some of the historic visual relationships between the site, neighborhood, and Glen Echo Park that were characteristic of Clara Barton's occupancy.	
Natural Systems and Topography: Steep slope south toward	No	Setting	No	Moderate	Proposed work avoids alteration of this feature. Site protection will be put in place during construction to mitigate erosion and control silt and runoff.	
Spatial Organization: Elevated	No	Design, Setting	No	Moderate	Proposed work avoids alteration of this feature.	
Land Use: Arrival loop at end of Oxford Road	Yes, directly	Design, Setting	No	Low	Two new accessible parking spaces will be provided west of the arrival loop at the end of Oxford Road. A new gate will be located beyond the accessible parking spaces. Signage will be provided to limit access of the general public to the service loop and accessible parking spaces.	
Land Use: Memorial and service functions	No	Design, Setting	No	Low	Construction impacts temporary pause historic land use functions of the property. No lasting impacts to the cultural landscape.	
Views: Visual relationship between Barton House and adjacent north	Yes, directly	Setting	No	Low	Limited tree removal in historically open areas will be undertaken to remove invasive tree species and trees planted too close to house or walks.	
Views: Panoramic view south to Potomac River and beyond	Yes, directly	Setting	No	Low	Limited tree removal in historically open areas will be undertaken to remove invasive tree species and trees planted too close to house or walks.	
Vegetation: Lawn on ground plane near house	Yes, directly	Materials, Setting	No	Low	Limited grading and construction activities will require restoration of lawn on the ground plane as part of the site restoration after construction.	

¹ Level of significance is documented in the two HSRs, with the higher significance noted here where the two reports differ. Refer to Section 1 of the narrative for how significance was established.

Table 1. Aspects of Integrity Impacted, Analysis, and Minimization or Avoidance Measures by Character-Defining Feature

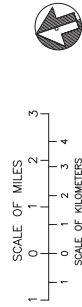
**APPENDIX C – CLARA BARTON NHS REHABILITATION PLANS – SELECTED
CONSTRUCTION DRAWINGS**



DISTRICT OF COLUMBIA
VIRGINIA & MARYLAND

REHABILITATE CLARA BARTON
NATIONAL HISTORIC SITE
CLBA 312325

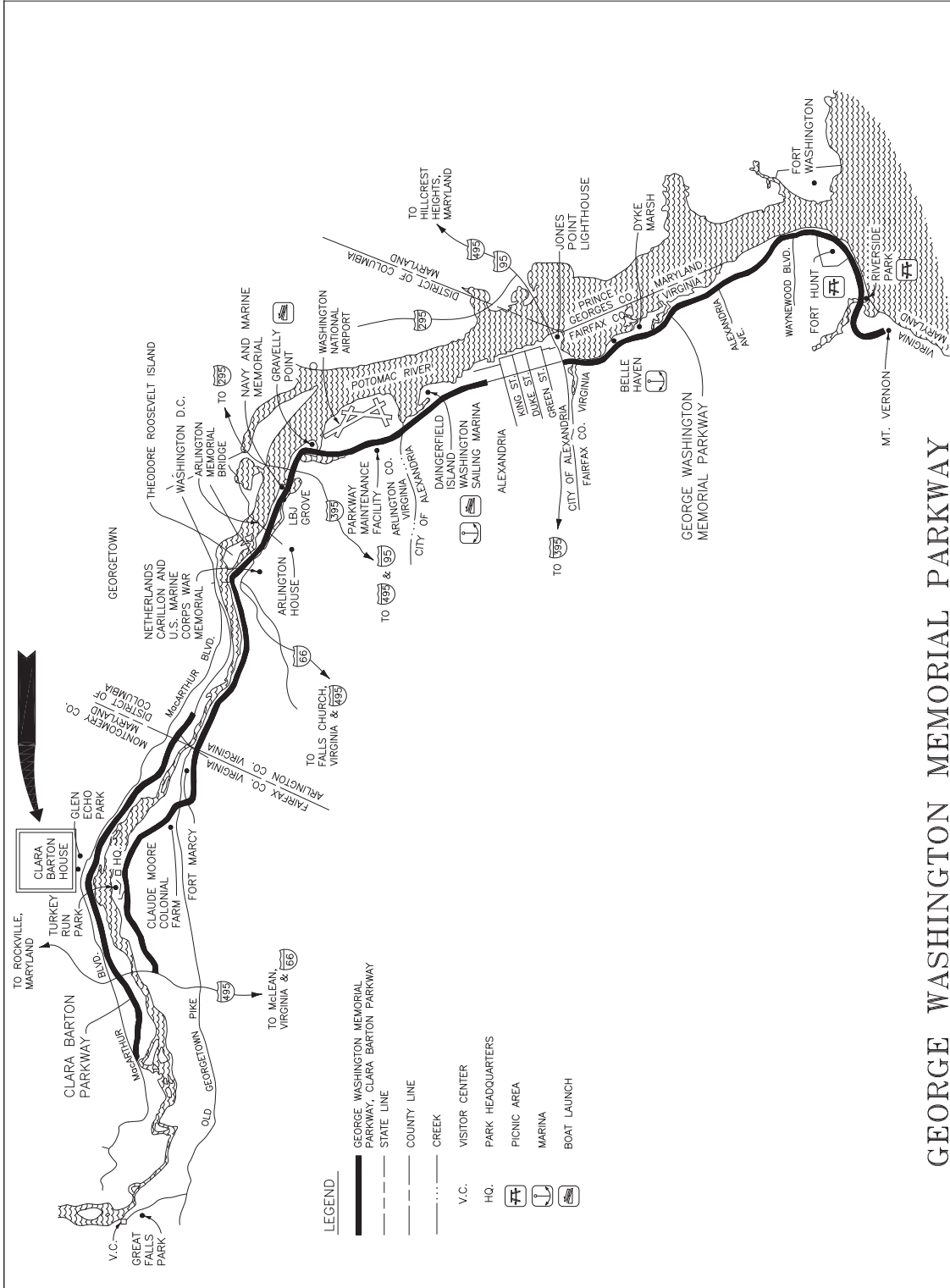
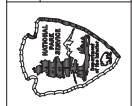
DESIGN DEVELOPMENT
DRAFT SUBMISSION
MAY 15TH, 2025



DRAWING NO. 895	TITLE OF DRAWING COVER SHEET
PKG. NO. 179603	LOCATION WITHIN PARK CLARA BARTON HOUSE
SHEET NO. 1	NAME OF PARK GEORGE WASHINGTON MEMORIAL PARKWAY
OF 235	REGION, STATE, COUNTY NAT'L CAPITAL STATE GLEN ECHO, MD

CONSTRUCTION DOCUMENTS DRAFT

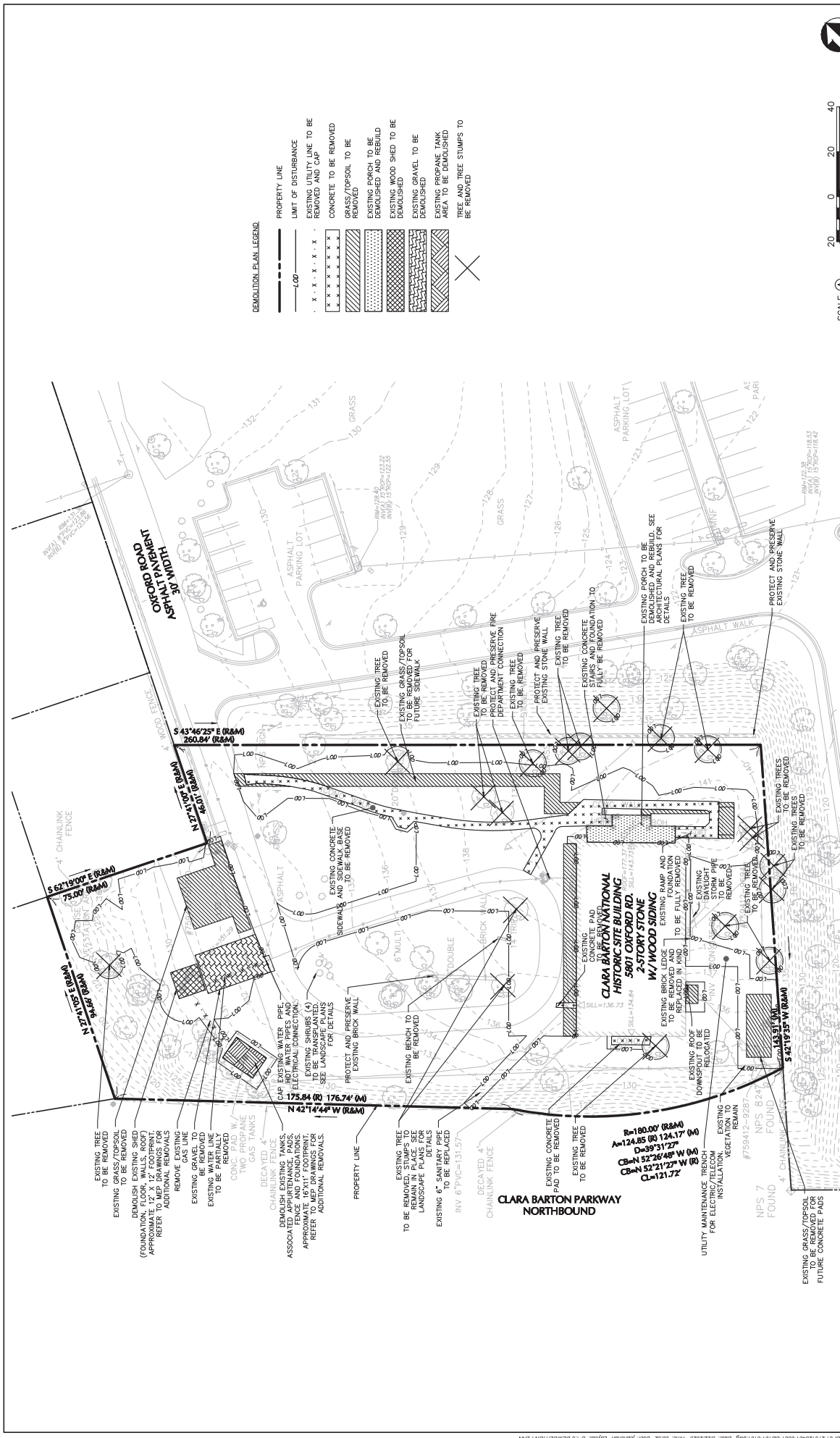
UNITED STATES
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
DENVER SERVICE CENTER



GEORGE WASHINGTON MEMORIAL PARKWAY

- LEGEND.**
- GEORGE WASHINGTON MEMORIAL PARKWAY, CLARA BARTON PARKWAY
 - STATE LINE
 - COUNTY LINE
 - CREEK
 - ... V.C.
 - HQ.
 - [Icon] PARK HEADQUARTERS
 - [Icon] PICNIC AREA
 - [Icon] MARINA
 - [Icon] BOAT LAUNCH

BASE DATA: 850/41,022 5/92; 850/20,014 11/88; COVER SHEET REVISED & REDRAWN 7/93. UPDATED 2/99. SCS.



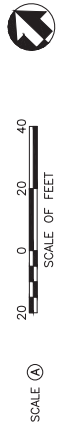
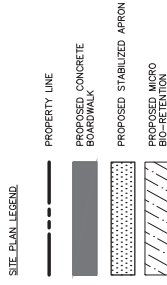
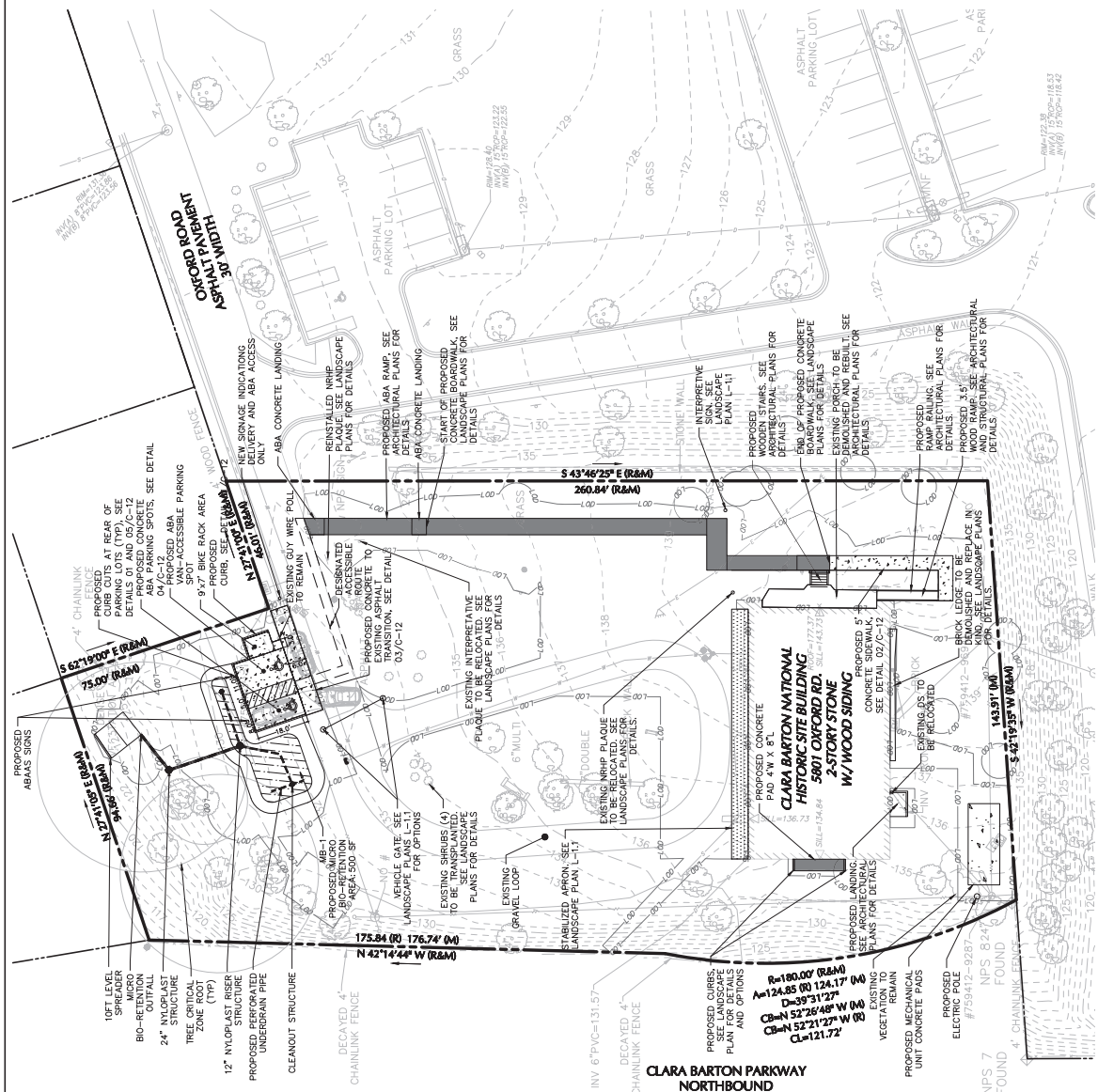
DEMOLITION PLAN LEGEND

	PROPERTY LINE
	LIMIT OF DISTURBANCE
	EXISTING UTILITY LINE TO BE REMOVED AND CAP
	CONCRETE TO BE REMOVED
	GRASS/TOPSOIL TO BE REMOVED
	EXISTING PORCH TO BE DEMOLISHED AND REBUILT
	EXISTING WOOD SHED TO BE DEMOLISHED
	EXISTING GRAVEL TO BE DEMOLISHED
	EXISTING PROPANE TANK AREA TO BE DEMOLISHED
	TREE AND TREE STUMPS TO BE REMOVED

SCALE 1" = 40'
 SCALE OF FEET
 0 20 40

DRAWING NO. 895 179603 PMSZ/PMSZ NO. 312325	TITLE OF SHEET DEMOLITION PLAN	SHEET 3 OF 16
CHECKED BY J. CANCHAN	DATE 5/15/2025	PROJECT ENGINEER RYAN LINTHICUM MARYLAND NO. 34097

1 DEMOLITION PLAN
 SCALE 1" = 40'



DRAWING NO. 895 179603	TITLE OF SHEET SITE PLAN	DESIGNED BY J. OSORIO	SUB SHEET NO. C-3.0	SCALE SCALE (A)	DATE 05/15/2025	DRAWN BY J. OSORIO	CHECKED BY J. CANCHAN	PROJECT NO. 05080/ANTHICUM	SHEET NO. 5 of 16

MDE #25-SF-0110

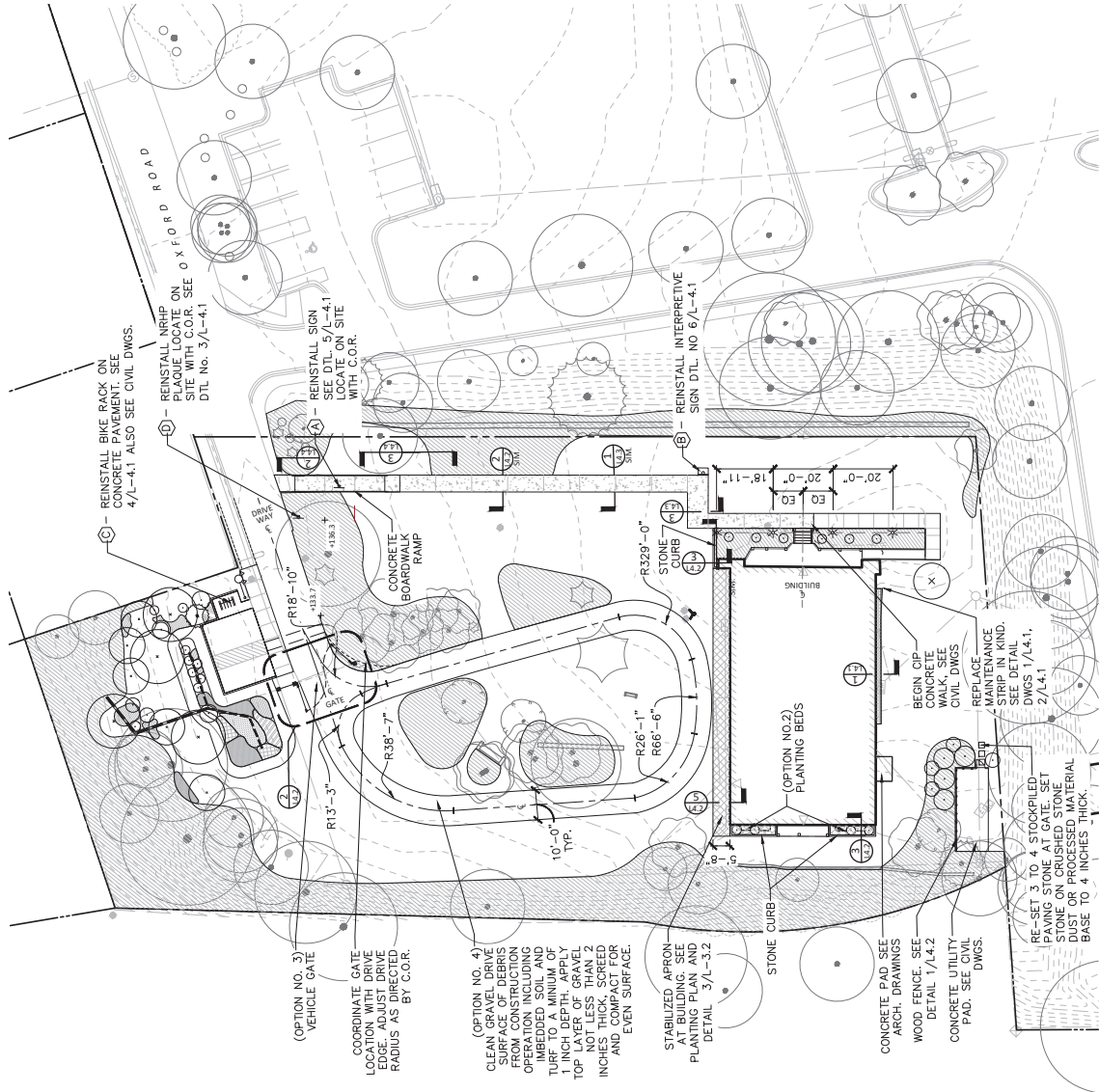
1 SITE PLAN
SCALE (A)

NOTES

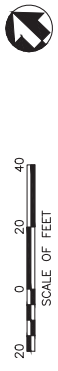
1. LAWN AREAS DISTURBED BY CONSTRUCTION ARE TO BE RESTORED. DECOMPACT SOIL AND ADD ORGANIC MATERIAL. SEE LAWN RESTORATION SPECIFICATION SECTION 329200.
2. RESTORE AND RESEED ALL AREAS DISTURBED BY INSTALLATION OF UTILITIES AND BY CONSTRUCTION.
3. REPAIR ANY DIVOTS OR UNEVEN SURFACES OF THE EXISTING GRAVEL DRIVE TO RESTORE GRADE TO THE EXISTING CONDITION WITHOUT DEPRESSIONS THAT COLLECT WATER.

GENERAL NOTES:

1. COORDINATE LANDSCAPE IMPROVEMENTS WITH SITE IMPROVEMENTS AS DETAILED ON CIVIL DRAWINGS C-3.0 SITE PLAN.
2. SEE CIVIL DWG C-4.0 GRADING AND DRAINAGE PLAN FOR SITE GRADING. SEE PLANTING DETAILS L4.2 FOR LANDSCAPE PLANTING SOIL DEPTHS AND AMENDMENT REQUIREMENTS
3. NOTIFY C.O.B. OF SITE CONDITIONS WHICH ARE NOT SUITABLE FOR THE PLACEMENT OR CONSTRUCTION OF LANDSCAPE IMPROVEMENTS. DO NOT PROCEED WITH WORK UNTIL SUITABLE CONDITIONS ARE ACHIEVED
4. CHECK SPECKS FOR STUMP GRINDING.



1 LAYOUT PLAN
SCALE ⑥



DESIGNED BY: CIVIL GABED	DATE: 5/15/2025	SUB SHEET NO. L-1.1	TITLE OF SHEET LANDSCAPE LAYOUT PLAN	DRAWING NO. 895	PMS/PKG NO. 179603	SHEET 312325	OF
TECH. REVIEW: PFY	CLARA BARTON NATIONAL HISTORIC SITE CLBA						

Filename: V:\IT\PL Projects\CLBA\CLBA\Barton\DC-DC\CLBA CD Drawings\CLBA L-1 Layout Plan.dwg, 2/15/2025 11:17 AM User: gabed Date: 5/22/2025 Title: L-1.1 LAYOUT PLAN

GENERAL PLANTING NOTES:

- DO NOT PROCEED WITH SOIL PLACEMENT/AMENDMENTS OR PLANTING OPERATIONS UNTIL SITE CONDITIONS AND FINAL GRADES ARE SATISFACTORY FOR PLANTING OPERATIONS. NOTIFY C.O.R. OF SITE CONDITIONS AND AWAIT DIRECTION.
- REVIEW SOIL PLACEMENT AND AMENDMENT PROCEDURES WITH C.O.R.
- SEE CIVIL ENGINEERING PLANS FOR BIO-RETENTION SOIL MIX.
- COORDINATE THE SCHEDULE FOR ROOT PRUNING AND TRANSPLANTING OPERATIONS WITH THE SCHEDULE FOR GRADING AND FINISHING. SITE CONSTRUCTION SCHEDULE. SHRUB MATERIALS SHALL BE REMOVED AND PLANTED WITHIN A 48 HOUR TIME SPAN. SHRUB ROOT BALLS SHALL BE KEPT WRAPPED AND WATER WHILE OUT OF GROUND. SEE SPECIFICATION SECTION 32800 TRANSPLANT.



PLANT MATERIALS LIST BASE CONTRACT WORK	QTY.	KEY SCIENTIFIC NAME	COMMON NAME	SIZE & NOTES
TREES				
1 Mv	1	Magnolia virginiana	Sweetbay magnolia	1"-1.5" cal.
2 lo	1	Ilex opaca	American holly	5'-6" ht. (branched to the ground)
2 Mc	1	Morella cerifera	Wax myrtle	36" B&B
SHRUBS				
2 Hp	427	Hydrangea paniculata 'Grandiflora'	Peegee hydrangea	427' B&B
4 Rc	3	Rosa Coral Knock Out®	Coral Knock Out® rose	3
4 Ds	3	Deutzia scabra	Fuzzy deutzia	Transplant
2 Cy	1	Calycanthus florida	Sweet shrub	Transplant
HERBACEOUS SPECIES				
220 Ec	1	Echinacea californica	California poppy	1 qt.
220 Lc	1	Limonium carolinianum	Carolinian sea holly	1 qt.
220 Wf	1	Waldsteinia fragarioides	Barren Strawberry	1 qt.
STORM WATER MITIGATION PLANT MATERIAL				
TREES				
1 Cc	1	Cornus coccinea	American hornbeam	1"-1.5" cal.
3 Cf	1	Cornus florida	'Appalachian Spring' Flowering dogwood	B&B
1 lo	1	Ilex opaca	American Holly	0.75"-1" cal.
2 Ny	1	Nyssa sylvatica	Black gum	5'-6" ht. (branched to the ground)
1 Qa	1	Quercus alba	White oak	37 1.5"-2" cal.
1 Qp	1	Quercus palustris	Pin oak	B&B
SHRUBS				
4 Ap	36"	Aesculus parviflora	Bottlebrush buckeye	B&B
4 Hv	36"	Hamelis virginiana	Witch-hazel	B&B
8 lg	36"	Ilex glabra	Inkberry	B&B
HERBACEOUS SPECIES				
31 Av	1	Andropogon virginicus	Broomsedge	1 gal.
46 Ep	1	Eupatorium purpurea	Joe Pye Weed	1 gal.
192 Dc	2	Osmunda cinnamomea	Cinnamon fern	2 1/4 "POT
65 Ri	1	Rudbeckia hirtella	Tall coneflower	1 gal.
84 Tn	2	Thelypteris noveboracensis	New York fern	2 1/4 "POT
52 Vn	1	Vernonia noveboracensis	New York ironweed	1 gal.
PLANT MATERIALS LIST (OPTION NO. 2)				
SHRUBS				
2 Rc	3	Rosa Coral Knock Out®	Coral Knock Out® rose	3 gal.
2 De	2	Deutzia Yucca Kobuki	Deutzia	2 gal.
HERBACEOUS SPECIES				
35 Dc	1	Dianthus caryophyllus 'La France'	Clove pink carnation	1 qt.
13 Gb	1	Geranium blokovo	Cranesbill 1qt.	1 qt.
13 Ns	1	Narcissus spp.	Herloom daffodil	1 bulb

DESIGNED: SUB SHEET NO. **L-3.1**

CONTRACTOR: CIVIL ENGINEERING

DATE: 5/15/2025

SCALE: 1" = 20'

TITLE: LANDSCAPE PLANTING PLAN

CLIENT: CLARA BARTON NATIONAL HISTORIC SITE

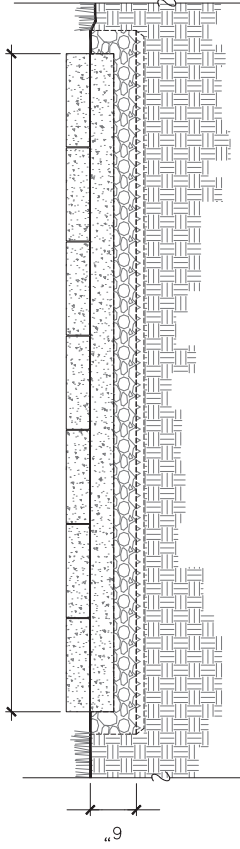
DRAWING NO.: 895

PROJECT NO.: 179603

SHEET NO.: 31/2325

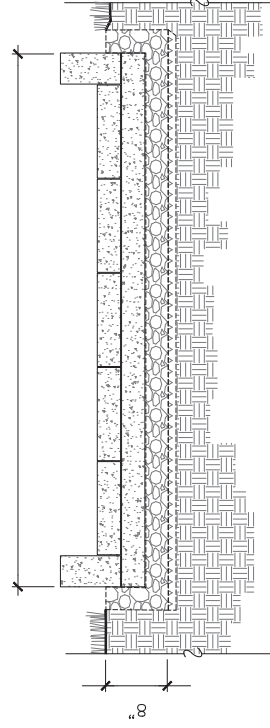
OF: 31

6'-11"



3 SECTION: CONCRETE BOARDWALK AT GRADE
SCALE: 1 1/2" = 1'-0"

5'-7 1/2"



2 SECTION: SUNKEN CONCRETE BOARDWALK
SCALE: 1 1/2" = 1'-0"

DEPTH OF CUT
OR FILL VARIES

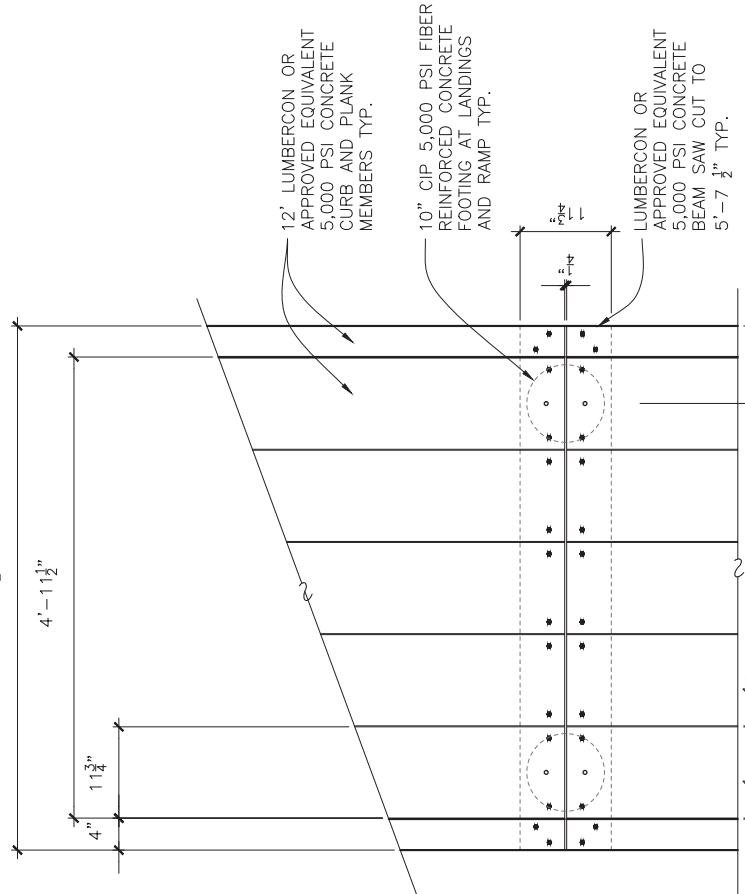
1/8 INCH GAP TYP.

3"x11.75" CUT TO LENGTH
CONCRETE BEAM
3"x11.75"x12"
CONCRETE PLANK
CONCRETE CURB
4"x7.75"x12"
CONCRETE CURB
UNDISTURBED
SUBGRADE
COMPACTED #57
STONE
COMPACTED
SUBGRADE

1 SECTION: ELEVATED CONCRETE BOARDWALK
SCALE: 1 1/2" = 1'-0"

5'-7 1/2"

4'-11 1/2"

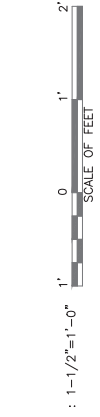


4 PLAN: CONCRETE BOARDWALK
SCALE: 1 1/2" = 1'-0"

12' LUMBERCON OR
APPROVED EQUIVALENT
5,000 PSI CONCRETE
CURB AND PLANK
MEMBERS TYP.

10" CIP 5,000 PSI FIBER
REINFORCED CONCRETE
FOOTING AT LANDINGS
AND RAMP TYP.

LUMBERCON OR
APPROVED EQUIVALENT
5,000 PSI CONCRETE
BEAM SAW CUT TO
5'-7 1/2" TYP.



1'-1/2"=1'-0"

DESIGNED:	GM
CIV	GM
TECH. REVIEW:	PFY
DATE:	5/15/2025

TITLE OF SHEET
BOARDWALK DETAILS
CLARA BARTON
NATIONAL HISTORIC SITE

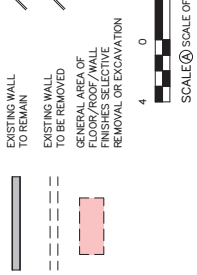
DRAWING NO.
895
179603
PMS/PKG NO.
312325
SHEET
OF

SUB SHEET NO.
L-4.3

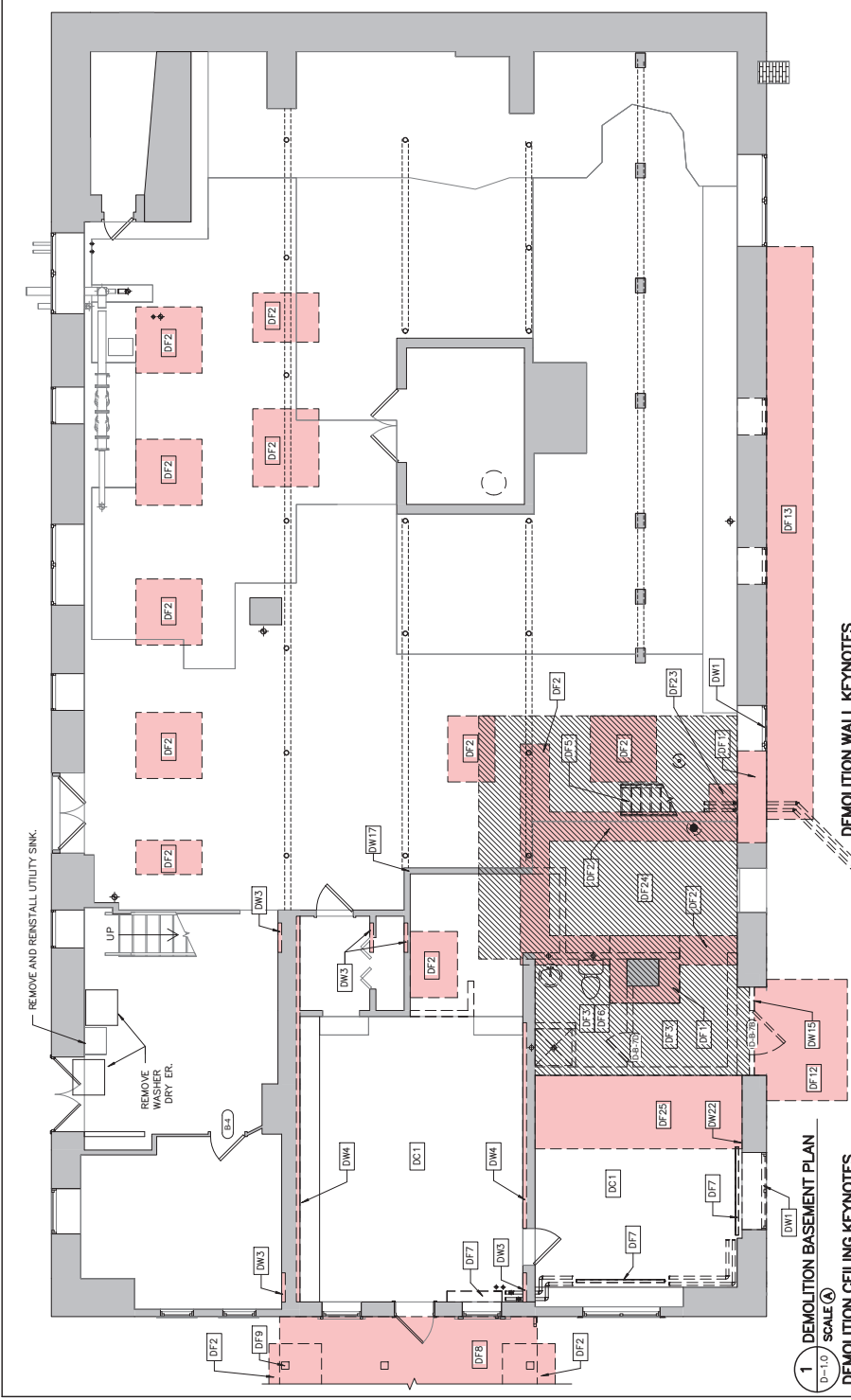
DEMOLITION FLOOR KEYNOTES

- DF1 EXCAVATE AS NECESSARY FOR UNDERPINNING. REFER TO STRUCTURAL DRAWINGS.
- DF2 EXCAVATE AS NECESSARY FOR INSTALLATION OF NEW CONCRETE FOOTER. REFER TO STRUCTURAL DRAWINGS FOR NEW COLUMN AND SHEAR WALL LOCATIONS.
- DF3 REMOVE FLOOR FINISHES DOWN TO EXISTING CONCRETE SLAB.
- DF4 REMOVE COUNTERTOPS, CABINETRY, SINK, AND REFRIGERATOR FROM THIS ROOM.
- DF5 REMOVE EXISTING STAIR AND RAILINGS.
- DF6 REMOVE EXISTING SHOWER, SINK, AND TOILET. REFER TO PLUMBING DRAWINGS FOR REMOVAL OF EXISTING TOILET ACCESSORIES.
- DF7 REMOVE EXISTING FAN COIL OR CONNECTION HEAT UNIT. REFER TO MECHANICAL DRAWINGS.
- DF8 REMOVE EXISTING CONCRETE SLAB AND BRICKWORK. PREPARE AS NECESSARY FOR NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
- DF9 REMOVE EXISTING (3) POSTS. TEMPORARILY SUPPORT BUILDING SYSTEM AND PRIOR TO INSTALLATION OF NEW POST AND BEAM SYSTEM.
- DF10 REMOVE PORTION OF EXISTING FLOOR AS NECESSARY TO INSTALL NEW FLOOR MOUNTED REGISTER. WITHIN THE MAIN HALL, CLOSSETS, PROPOSED FLOOR OPENINGS ARE FOR VERTICAL DUCT WORK. COORDINATE WITH MECHANICAL DRAWINGS.
- DF11 REMOVE FLOOR AS NECESSARY FOR INSTALLATION OF NEW STAIRWELL AND VERTICAL PLATFORM LIFT. SALVAGE ALL WOOD FOR REINSTALLATION AT NEW STAIRWELL LANDINGS.
- DF12 REMOVE EXISTING FLOOR FINISHES FROM LOCATION OF DAYLIGHTING, PREP GROUND FOR NEW SLAB.
- DF13 REMOVE AND SALVAGE PAVERS. REFER TO LANDSCAPE DRAWINGS.
- DF14 REMOVE EXISTING FRONT PORCH SYSTEM (DECK, APPROX. FRAMING, COLUMNS, PORT CO, FOUNDATIONS, RAMP, STAIR) TO PREPARE FOR INSTALLATION OF NEW PORCH.
- DF15 CAREFULLY REMOVE EXISTING ASBESTOS FLOORING LAYERS DOWN TO SUBSTRATE. REFER TO HAZARDOUS MATERIALS REPORT.
- DF16 REMOVE TEMPORARY SHORING AFTER COMPLETION OF STABILIZATION WORK.
- DF17 REMOVE EXISTING FLOORING OR ROOFING AREA FOR INSTALLATION OF NEW FIRE RATED SHAFT. REFER TO PARTITION TYPES AND STRUCTURAL DRAWINGS. REFER TO DETAIL 3/A-5.11 FOR ROOF DETAIL.
- DF18 REMOVE EXISTING PLUMBING FIXTURES FOR REPLACEMENT. REMOVE SPECIFIED VINYL FLOOR TILE. REFER TO RDM SURVEY.
- DF19 REMOVE EXISTING ASBESTOS MASTIC. REFER TO HAZARDOUS MATERIALS REPORT.
- DF20 REMOVE EXISTING CONCRETE AND REINFORCEMENT OF VERTICAL STRUCTURE. COIL AND SPRINKLER SYSTEMS. REFER TO VERTICAL DUCTWORK. REFER TO STRUCTURAL, FIRE PROTECTION, AND HVAC DRAWINGS.
- DF21 REMOVE EXISTING FLOORING AREA TO INSTALL FIRE BLOCKING BETWEEN JOISTS (TO PROTECT NEW EGRESSED STAIRWELL FROM ADJACENT ROOM). REFER TO PROPOSED FLOOR PLAN.
- DF22 REMOVE EXISTING BALCONY AND RAILING. TAKE CARE NOT TO REMOVE EXISTING STRUCTURE. REFER TO DETAIL POCKET 1. NOTIFY ARCHITECT TO OBSERVE CONDITIONS.
- DF23 CABINET PIPING EXCAVATE TO 3'-0" BELOW FLOOR.
- DF24 REMOVE EXISTING CONCRETE SLAB FOR REPLACEMENT AFTER UNDERPINNING. REFER TO DIAGONAL HATCHED LOCATION (APPROXIMATELY 280 SF).
- DF25 REMOVE WOOD FLOOR CONSTRUCTION FOR REPLACEMENT AFTER UNDERPINNING.
- DF26 REMOVE EXISTING FLOOR FINISH TO SECURE NEW POSTS TO EXISTING FLOOR FRAMING. REFER TO STRUCTURAL DRAWINGS.

DEMOLITION FLOOR PLAN LEGEND



TITLE OF SHEET
DEMOLITION BASEMENT PLAN
 895
 179603
 PMS/PAGE NO.
 3/12/25
 SHEET
 OF X



DEMOLITION WALL KEYNOTES

- DW1 REMOVE AND SALVAGE EXISTING WINDOW SASH IN PREPARATION FOR NEW LOWER INSTALLATION. REFER TO MECHANICAL DRAWINGS.
- DW2 REMOVE AND SALVAGE EXISTING SIDING LAYERS TO INSTALL NEW SHEAR LAYERS. REFER TO PARTITION TYPES, EXTERIOR ELEVATIONS, AND STRUCTURAL DRAWINGS.
- DW3 CAREFULLY DISMANTLE WOOD FINISH BELOW CEILING AND SALVAGE FOR REINSTALLATION. DO NOT REMOVE IF ACCESS IS NOT REQUIRED FOR STRUCTURAL WORK. NOTIFY ARCHITECT PRIOR TO REMOVING FINISH. REFER TO STRUCTURAL DRAWINGS AND INTERIOR ROOM ELEVATIONS.
- DW4 REMOVE AND SALVAGE EXISTING WALL FINISH TO INSTALL ADDITIONAL STUDS. REFER TO STRUCTURAL DRAWINGS.
- DW5 REMOVE AND SALVAGE EXISTING WALL FINISH TO ACCOMMODATE NEW TOILET ROOM DOOR AND FRAME.
- DW6 CAREFULLY CUT OPENING IN WALL TO ACCOMMODATE NEW TOILET ROOM DOOR AND FRAME.
- DW8 REMOVE EXISTING MUSLIN WALL AND CEILING FINISH (PREVIOUSLY RESTORED) TO MITIGATE ASBESTOS BACKING. REFER TO HAZARDOUS MATERIALS REPORT.
- DW9 REMOVE EXISTING MUSLIN WALL AND CEILING FINISH (PREVIOUSLY RESTORED) TO MITIGATE ASBESTOS BACKING. REFER TO HAZARDOUS MATERIALS REPORT.
- DW10 REMOVE EXISTING MUSLIN WALL FINISH TO INSTALL NEW INSULATION. SEE PROPOSED DRAWINGS AND FINISH SCHEDULE FOR NEW FINISH TO BE INSTALLED.
- DW11 REMOVE EXISTING CHASE PARTITIONS FOR INSTALLATION OF NEW SHEAR WALLS.
- DW12 REMOVE EXISTING PLASTER WALL FINISH BELOW CEILING FOR STRUCTURAL CONNECTIONS. DO NOT REMOVE IF ACCESS IS NOT REQUIRED FOR STRUCTURAL WORK. NOTIFY ARCHITECT PRIOR TO REMOVING FINISH. REFER TO INTERIOR ELEVATIONS AND STRUCTURAL DRAWINGS.
- DW15 MODIFY EXISTING WOOD PANELING AS NEEDED TO INTEGRATE NEW DOOR FOR EGRESS. REFER TO PROPOSED PLAN AND DOOR SCHEDULE.
- DW16 MODIFY EXISTING WOOD PANELING AS NEEDED TO INTEGRATE NEW DOOR FOR EGRESS. REFER TO PROPOSED PLAN AND DOOR SCHEDULE.
- DW17 REMOVE CORNER OF PARTITION INTERSECTION FOR STRUCTURAL BEAM INSTALLATION.
- DW18 REMOVE EXISTING WALL FINISH ABOVE DOOR FOR INSTALLATION OF HEADER SISTER. REFER TO STRUCTURAL DRAWINGS.
- DW19 CAREFULLY REMOVE CURIO CABINETS AND STORE FOR REINSTALLATION AFTER THE STRUCTURAL WORK. REMOVE OR PROTECT GLASS TO NOT BREAK DURING REMOVAL.
- DW20 REMOVE EXISTING WALL INFILL - HISTORIC WOOD TRIM AT ARCHES TO REMAIN. REMOVE TILE FINISH AT THIS WALL.
- DW21 REMOVE EXISTING WALL FINISH TO SECURE NEW POST TO EXISTING WALL STUDS. REFER TO STRUCTURAL DRAWINGS.
- DW22 CONDUCT EARLY MOCKUPS OF STRUCTURAL CONNECTION. REFER TO STRUCTURAL DRAWINGS FOR TYPE OF COLLECTOR. NOTIFY ARCHITECT PRIOR TO DEMOLITION OF FINISHES.
- DW23 DO NOT REMOVE EXISTING HISTORIC LIGHT SWITCH CONTROL PLATE.

DEMOLITION CEILING KEYNOTES

- DC1 REMOVE EXISTING GYPSUM BOARD CEILING TO INSTALL NEW STRUCTURAL FRAMING. REFER TO STRUCTURAL DRAWINGS.
- DC2 CAREFULLY REMOVE EXISTING MUSLIN CEILING (ORIGINAL) UNDER THE CARE OF A CONSERVATOR FOR OFF-SITE CLEANING, REPLACEMENT OF BACKING, AND REINSTALLATION AFTER STRUCTURAL WORK IS COMPLETE.
- DC3 REMOVE EXISTING GYPSUM BOARD CEILING WHERE REQUIRED TO COORDINATE WITH STRUCTURAL WORK.
- DC4 REMOVE EXISTING MUSLIN CEILING (PREVIOUSLY RESTORED) FOR REPLACEMENT AFTER STRUCTURAL WORK IS COMPLETE. CAREFULLY MITIGATE ASBESTOS BACKING. REVIEW HAZARDOUS MATERIALS REPORT.
- DC5 REMOVE EXISTING PLASTER CEILING WHERE REQUIRED TO COORDINATE WITH STRUCTURAL WORK.
- DC6 REFER TO REFLECTED CEILING PLANS FOR REPLACEMENT IN-KIND. REFER TO REFLECTED CEILING PLAN.
- DC7 REMOVE EXISTING GYPSUM BOARD CEILING FOR REPLACEMENT IN-KIND AFTER STRUCTURAL WORK IS COMPLETE. REMOVE PARTIAL PLASTER CEILING AND LATH BENEATH.
- DC8 REMOVE EXISTING GYPSUM BOARD CEILING FOR REPLACEMENT IN-KIND AFTER STRUCTURAL WORK IS COMPLETE. REMOVE PARTIAL PLASTER CEILING AND LATH BENEATH.
- DC9 CAREFULLY DISCONNECT AND SALVAGE HISTORIC LIGHT FIXTURE. OPTION 7 INCLU DES THE RESTORATION AND RELAMPING OF FIXTURES AND REINSTALLATION.

EARLY MOCKUP AND DEMOLITION NOTES

1. EARLY DEMOLITION MOCKUPS ARE REQUIRED PRIOR TO START OF DEMOLITION. EARLY MOCKUPS ARE TO BE PERFORMED TO DETERMINE THE EXTENT OF EXISTING MATERIALS WHICH MUST BE REMOVED FOR EXISTING CLOSETS WITHIN MAIN HALL 102. INSERT NEW METAL STUDS WITHOUT REMOVING THE FULL WALL WHERE REQUIRED. REMOVE FASTENERS AND/OR PARTIALLY DISMANTLE WALL ONLY AT POINT OF ATTACHMENT. RECONSTRUCT CLOSET WALLS AROUND NEW METAL JOISTS.
- 2.
3. REFER TO G-02 FOR OTHER GENERAL DEMOLITION NOTES.

1 DEMOLITION BASEMENT PLAN

SCALE 1/8" = 1'-0"

DESIGNED: J.A.
 CHECKED: S.S., A.W., C.B.
 TECH. REVIEW: J.M., M.S.
 DATE: 5/15/2025

REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE

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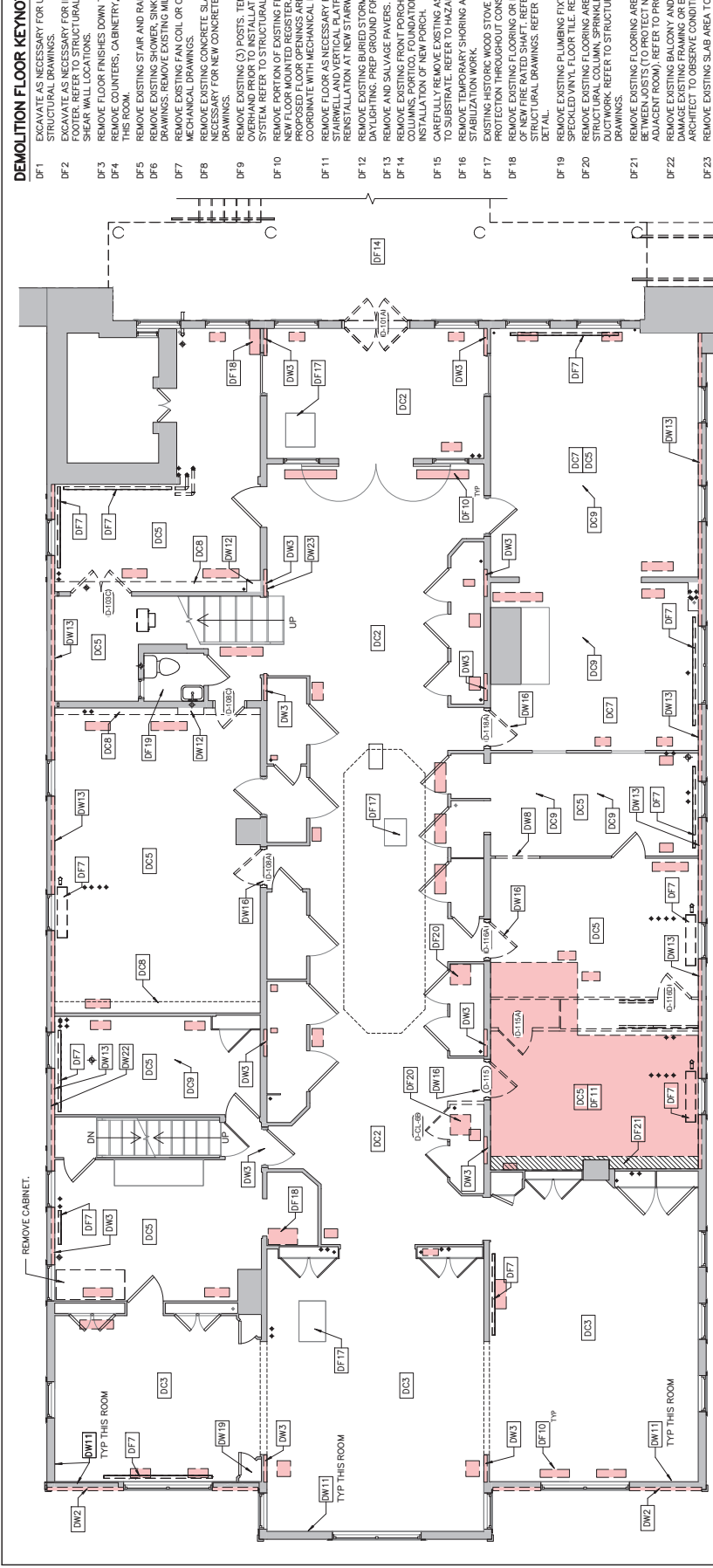
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REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE



DEMOLITION FLOOR KEYNOTES

- DF1 EXCAVATE AS NECESSARY FOR UNDERPINNING. REFER TO STRUCTURAL DRAWINGS.
- DF2 EXCAVATE AS NECESSARY FOR INSTALLATION OF NEW CONCRETE FOOTER. REFER TO STRUCTURAL DRAWINGS FOR NEW COLUMN AND SHEAR WALL LOCATIONS.
- DF3 REMOVE FLOOR FINISHES DOWN TO EXISTING CONCRETE SLAB.
- DF4 REMOVE COUNTERTOPS, CABINETRY, SINK, AND REFRIGERATOR FROM THIS ROOM.
- DF5 REMOVE EXISTING STAIR AND RAILINGS.
- DF6 REMOVE EXISTING STAIR AND RAILINGS.
- DF7 REMOVE EXISTING FAN COIL OR CONVECTION HEAT UNIT. REFER TO MECHANICAL DRAWINGS.
- DF8 REMOVE EXISTING CONCRETE SLAB AND BRICKWORK. PREPARE AS NECESSARY FOR NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
- DF9 REMOVE EXISTING (3) POSTS. TEMPORARILY SUPPORT BUILDING FROM EXISTING STRUCTURAL WALLS USING POST AND BEAM SYSTEM. REFER TO STRUCTURAL DRAWINGS.
- DF10 REMOVE PORTION OF EXISTING FLOOR AS NECESSARY TO INSTALL NEW FLOOR MOUNTED REGISTER. WITHIN THE MAIN HALL CLOSETS, PROPOSED FLOOR OPENINGS ARE FOR VERTICAL DUCTWORK. COORDINATE WITH MECHANICAL DRAWINGS.
- DF11 REMOVE FLOOR AS NECESSARY FOR INSTALLATION OF NEW STAIRWELL AND VERTICAL PLATFORM LIFT. SALVAGE ALL WOOD FOR REUSE IN NEW STAIRWELL FINISHES.
- DF12 REMOVE EXISTING BUILDING SYSTEMS. CONFIRM LOCATION OF DAYLIGHTING PREP GROUND FOR NEW SLAB.
- DF13 REMOVE AND SALVAGE PAVERS. REFER TO LANDSCAPE DRAWINGS.
- DF14 REMOVE EXISTING FRONT PORCH SYSTEM (DECK, APRON, FRAMING, COLUMNS, PORTICO, FOUNDATIONS, RAMP, STAIR) TO PREPARE FOR INSTALLATION OF NEW PORCH.
- DF15 CAREFULLY REMOVE EXISTING ASBESTOS FLOORING LAYERS DOWN TO SUBSTRATE. REFER TO HAZARDOUS MATERIALS REPORT.
- DF16 REMOVE TEMPORARY SHORING AFTER COMPLETION OF FINISHES.
- DF17 EXISTING HIGH RISE WOOD STONE. TO REMAIN. INSTALL TEMPORARY PROTECTION THROUGHOUT CONSTRUCTION.
- DF18 REMOVE EXISTING FLOORING OR ROOFING AREA FOR INSTALLATION OF NEW FIRE RATED SHAFT. REFER TO PARTITION TYPES AND STRUCTURAL DRAWINGS. REFER TO DETAIL 3/A-5.11 FOR ROOF DETAIL.
- DF19 REMOVE EXISTING PLUMBING FIXTURES FOR REPLACEMENT. REMOVE SPECKLED VINYL FLOOR TILE. REFER TO FORM SURVEY FOR NEW PLUMBING. REFER TO MECHANICAL DRAWINGS FOR NEW STRUCTURAL COLUMN, SPRINKLER STANDPIPE OR VERTICAL DUCTWORK. REFER TO STRUCTURAL, FIRE PROTECTION, AND HVAC DRAWINGS.
- DF20 REMOVE EXISTING FLOORING AREA TO INSTALL FIRE BLOCKING BETWEEN JOISTS TO PROTECT NEW EGRESS STAIRWELL FROM ADJACENT ROOM. REFER TO PROPOSED FLOOR PLAN.
- DF21 REMOVE EXISTING BRICKWORK AND BRACKET PORTALS. NOTIFY ARCHITECT TO OBSERVE CONDITIONS.
- DF22 REMOVE EXISTING SLAB AREA TO INSTALL NEW ELECTRICAL CABINET PIPING. EXCAVATE TO 3'-0" BELOW FLOOR.
- DF23 REMOVE CONCRETE SLAB FOR REPLACEMENT AFTER UNDERPINNING. REFER TO DIAGONAL HATCHED LOCATION (APPROXIMATELY 280 SF).
- DF24 REMOVE WOOD FLOOR CONSTRUCTION FOR REPLACEMENT AFTER REMOVE SHELVES.
- DF25 REMOVE EXISTING FLOOR FINISH TO SECURE NEW POSTS TO EXISTING FLOOR FRAMING. REFER TO STRUCTURAL DRAWINGS.

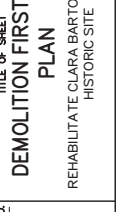
DEMOLITION WALL KEYNOTES

- DW1 REMOVE AND SALVAGE EXISTING WINDOW SASH IN PREPARATION FOR NEW LOWER INSTALLATION. REFER TO MECHANICAL DRAWINGS.
- DW2 REMOVE AND SALVAGE EXISTING SIDING LAYERS TO INSTALL NEW SHEAR LAYERS. REFER TO PARTITION TYPES, EXTERIOR ELEVATIONS, AND STRUCTURAL DRAWINGS.
- DW3 CAREFULLY DISMANTLE WOOD FINISH BELOW CEILING AND SALVAGE FOR REINSTALLATION. DO NOT REMOVE IF ACCESS IS NOT REQUIRED FOR STRUCTURAL WORK. NOTIFY ARCHITECT PRIOR TO REMOVING FINISH. REFER TO INTERIOR ELEVATIONS AND STRUCTURAL DRAWINGS.
- DW4 REMOVE AND SALVAGE EXISTING WALL FINISH TO INSTALL ADDITIONAL STUDS. REFER TO STRUCTURAL DRAWINGS.
- DW5 REMOVE WAINSCOT TILE.
- DW6 CAREFULLY CUT OPENINGS IN WALL TO ACCOMMODATE NEW TOILET ROOM DOOR AND FRAME.
- DW7 CAREFULLY REMOVE EXISTING WALL BASE COAT TO MITIGATE ASBESTOS MASTIC. REFER TO HAZARDOUS MATERIALS REPORT.
- DW8 CAREFULLY REMOVE EXISTING M/S LINEN WALL AND CEILING FINISH (PREVIOUSLY RESTORED) TO MITIGATE ASBESTOS BACKING. REFER TO HAZARDOUS MATERIALS REPORT.
- DW9 REMOVE EXISTING MUSLIN WALL FINISH TO INSTALL NEW INSULATION. SEE PROPOSED DRAWINGS AND FINISH SCHEDULE FOR NEW FINISH TO BE INSTALLED.
- DW10 REMOVE EXISTING CHASE PARTITIONS FOR INSTALLATION OF NEW SHEAR WALLS.
- DW11 REMOVE EXISTING PLASTER PARTITIONS FOR INSTALLATION OF NEW SHEAR WALLS.
- DW12 REMOVE EXISTING CHASE PARTITIONS FOR INSTALLATION OF NEW SHEAR WALLS.
- DW13 REMOVE EXISTING WOOD PANELING AS NEEDED TO INTEGRATE NEW DOOR FOR EGRESS. REFER TO PROPOSED PLAN AND DOOR SCHEDULE.
- DW14 MODIFY DOOR OPENING PER G-04 AND DETAILS 1.2,3/7 A-6.08. FOR NEW WORK AT DOORS 0-115 AND D-2-14 REFER TO DETAILS 2.4/A-5.09 AND 1.3/A-5.10.
- DW15 REMOVE CORNER OF PARTITION INTERSECTION FOR STRUCTURAL BEAM INSTALLATION.
- DW16 REMOVE EXISTING WALL FINISH ABOVE DOOR FOR INSTALLATION OF HEADER SISTER. REFER TO STRUCTURAL DRAWINGS.
- DW17 REMOVE EXISTING CURIO CABINETS AND STORE FOR REINSTALLATION AFTER THE STRUCTURAL WORK. REMOVE OR PROTECT GLASS TO NOT BREAK DURING REMOVAL.
- DW18 REMOVE EXISTING WALL INFILL. HISTORIC WOOD TRIM AT ARCHES TO REMAIN. REMOVE TILE FINISH AT THIS WALL.
- DW19 REMOVE EXISTING WALL FINISH TO SECURE NEW POST TO EXISTING WALL STUDS. REFER TO STRUCTURAL DRAWINGS.
- DW20 REMOVE EXISTING WOOD FINISHES TO EXPOSE STUDS FOR STRUCTURAL CONNECTION. REFER TO STRUCTURAL DRAWINGS FOR TYPE OF COLLECTOR. NOTIFY ARCHITECT PRIOR TO DEMOLITION OF FINISHES.
- DW21 DO NOT REMOVE EXISTING HISTORIC LIGHT SWITCH CONTROL PLATE.

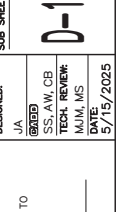
DEMOLITION CEILING KEYNOTES

- DC1 REMOVE EXISTING GYPSUM BOARD CEILING TO INSTALL NEW STRUCTURAL FRAMING. REFER TO STRUCTURAL DRAWINGS.
- DC2 CAREFULLY REMOVE EXISTING MUSLIN CEILING (ORIGINAL) UNDER THE CARE OF A CONSERVATOR WORK IS COMPLETE. FINISHING, REPLACEMENT OF BACKING, AND REINSTALLATION AFTER STRUCTURAL WORK IS COMPLETE.
- DC3 REMOVE EXISTING MUSLIN CEILING (PREVIOUSLY RESTORED) FOR REPLACEMENT AFTER STRUCTURAL WORK IS COMPLETE. REFER TO REFLECTED CEILING PLAN FOR REPLACEMENT SCOPE.
- DC4 REMOVE EXISTING MUSLIN CEILING (PREVIOUSLY RESTORED) FOR REPLACEMENT AFTER STRUCTURAL WORK IS COMPLETE. CAREFULLY MITIGATE ASBESTOS BACKING. REVIEW HAZARDOUS MATERIALS REPORT.
- DC5 REMOVE EXISTING PLASTER CEILING WHERE REQUIRED TO COORDINATE WITH STRUCTURAL WORK.
- DC6 REFER TO REFLECTED CEILING PLANS FOR REPLACEMENT SCOPE.
- DC7 REFER TO REFLECTED CEILING PLANS FOR REPLACEMENT IN-KIND. REFER TO REFLECTED CEILING PLAN.
- DC8 REMOVE EXISTING GYPSUM BOARD CEILING FOR REPLACEMENT IN-KIND AFTER STRUCTURAL WORK IS COMPLETE. ASSUME PARTIAL PLASTER CEILING AND LATH BENEATH.
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DEMOLITION CEILING PLAN LEGEND



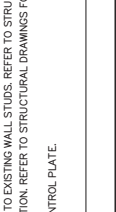
DEMOLITION FIRST FLOOR PLAN



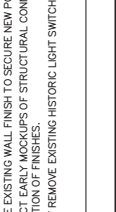
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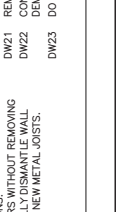
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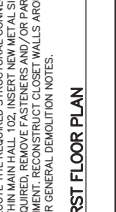
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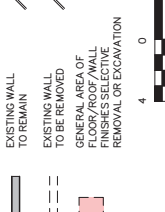


1 DEMOLITION FIRST FLOOR PLAN
D-1:1 SCALE

DEMOLITION FLOOR KEYNOTES

- DF1 EXCAVATE AS NECESSARY FOR UNDERPINNING. REFER TO STRUCTURAL DRAWINGS.
- DF2 EXCAVATE AS NECESSARY FOR INSTALLATION OF NEW CONCRETE FOOTER. REFER TO STRUCTURAL DRAWINGS FOR NEW COLUMN AND SHEAR WALL LOCATIONS.
- DF3 REMOVE FLOOR FINISHES DOWN TO EXISTING CONCRETE SLAB.
- DF4 REMOVE COUNTERS, CABINETRY, SINK, AND REFRIGERATOR FROM THIS ROOM.
- DF5 REMOVE EXISTING STAIR AND RAILINGS.
- DF6 REMOVE EXISTING SHOWER, SINK, AND TOILET. REFER TO PLUMBING DRAWINGS FOR REMOVAL OF TOILET AND TOILET ACCESSORIES.
- DF7 REMOVE EXISTING FAN COIL OR CONVECTION HEAT UNIT. REFER TO MECHANICAL DRAWINGS.
- DF8 REMOVE EXISTING CONCRETE SLAB AND BRICKWORK. PREPARE AS NECESSARY FOR NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
- DF9 REMOVE EXISTING (3) POSTS. TEMPORARILY SUPPORT BUILDING OVER EXISTING STRUCTURAL WALLS. REMOVE EXISTING POST AND BEAM SYSTEM. REFER TO STRUCTURAL DRAWINGS.
- DF10 REMOVE PORTION OF EXISTING FLOOR AS NECESSARY TO INSTALL NEW FLOOR MOUNTED REGISTER. WITHIN THE MAIN HALL CLOSETS, PROPOSED FLOOR OPENINGS ARE FOR VERTICAL DUCTWORK. COORDINATE WITH MECHANICAL DRAWINGS.
- DF11 REMOVE FLOOR AS NECESSARY FOR INSTALLATION OF NEW STAIRWELL AND VERTICAL PLATFORM LIFT. SALVAGE ALL WOOD FOR REUSE AT NEW STAIRWELL LANDING.
- DF12 REMOVE EXISTING FLOOR FINISHES TO REVEAL EXISTING FORM LOCATION OF DAYLIGHTING. PREP GROUND FOR NEW SLAB.
- DF13 REMOVE AND SALVAGE PAVERS. REFER TO LANDSCAPE DRAWINGS.
- DF14 REMOVE EXISTING FRONT PORCH SYSTEM (DECK, APRON, FRAMING, COLUMNS, PORTICO, FOUNDATIONS, RAMP, STAIR) TO PREPARE FOR INSTALLATION OF NEW PORCH.
- DF15 CAREFULLY REMOVE EXISTING ASBESTOS FLOORING LAYERS DOWN TO SUBSTRATE. REFER TO HAZARDOUS MATERIALS REPORT.
- DF16 REMOVE TEMPORARY SHORING AFTER COMPLETION OF SILLIATION WORK. WOOD STONE TO REMAIN. INSTALL TEMPORARY PROTECTION THROUGHOUT CONSTRUCTION.
- DF17 REMOVE EXISTING FLOORING OR ROOFING AREA FOR INSTALLATION OF NEW FIRE RATED SHAFT. REFER TO PARTITION TYPES AND STRUCTURAL DRAWINGS. REFER TO DETAIL 3/A-5.11 FOR ROOF DETAIL.
- DF18 REMOVE EXISTING PLUMBING FIXTURES FOR REPLACEMENT. REMOVE SPECKLED VINYL FLOOR TILE. REFER TO RBM SURVEY.
- DF19 REMOVE EXISTING FLOOR FINISHES TO REVEAL EXISTING NEW STRUCTURAL COLUMN, SPRINKLER STANDPIPE OR VERTICAL DUCTWORK. REFER TO STRUCTURAL, FIRE PROTECTION, AND HVAC DRAWINGS.
- DF20 REMOVE EXISTING FLOORING AREA TO INSTALL FIRE BLOCKING BETWEEN JOISTS TO PROTECT NEW EGRESS STAIRWELL FROM ADJACENT ROOM. REFER TO PROPOSED FLOOR PLAN.
- DF21 REMOVE EXISTING BALCONY AND RAILING. TAKE CARE NOT TO DAMAGE EXISTING STRUCTURAL JOISTS. NOTIFY ARCHITECT TO OBSERVE CONDITIONS.
- DF22 REMOVE EXISTING SLAB AREA TO INSTALL NEW ELECTRICAL CABINET PRNG. EXCAVATE TO 3'-0" BELOW FLOOR.
- DF23 REMOVE CONCRETE SLAB FOR REPLACEMENT AFTER UNDERPINNING. REFER TO DIAGONAL HATCHED LOCATION (APPROXIMATELY 280 SF).
- DF24 REMOVE WOOD FLOOR CONSTRUCTION FOR REPLACEMENT AFTER UNDERPINNING.
- DF25 REMOVE SHELVES.
- DF26 REMOVE EXISTING FLOOR FINISH TO SECURE NEW POSTS TO EXISTING FLOOR FRAMING. REFER TO STRUCTURAL DRAWINGS.
- DF27 REMOVE EXISTING FLOOR FINISH TO SECURE NEW POSTS TO EXISTING FLOOR FRAMING. REFER TO STRUCTURAL DRAWINGS.

DEMOLITION FLOOR PLAN LEGEND



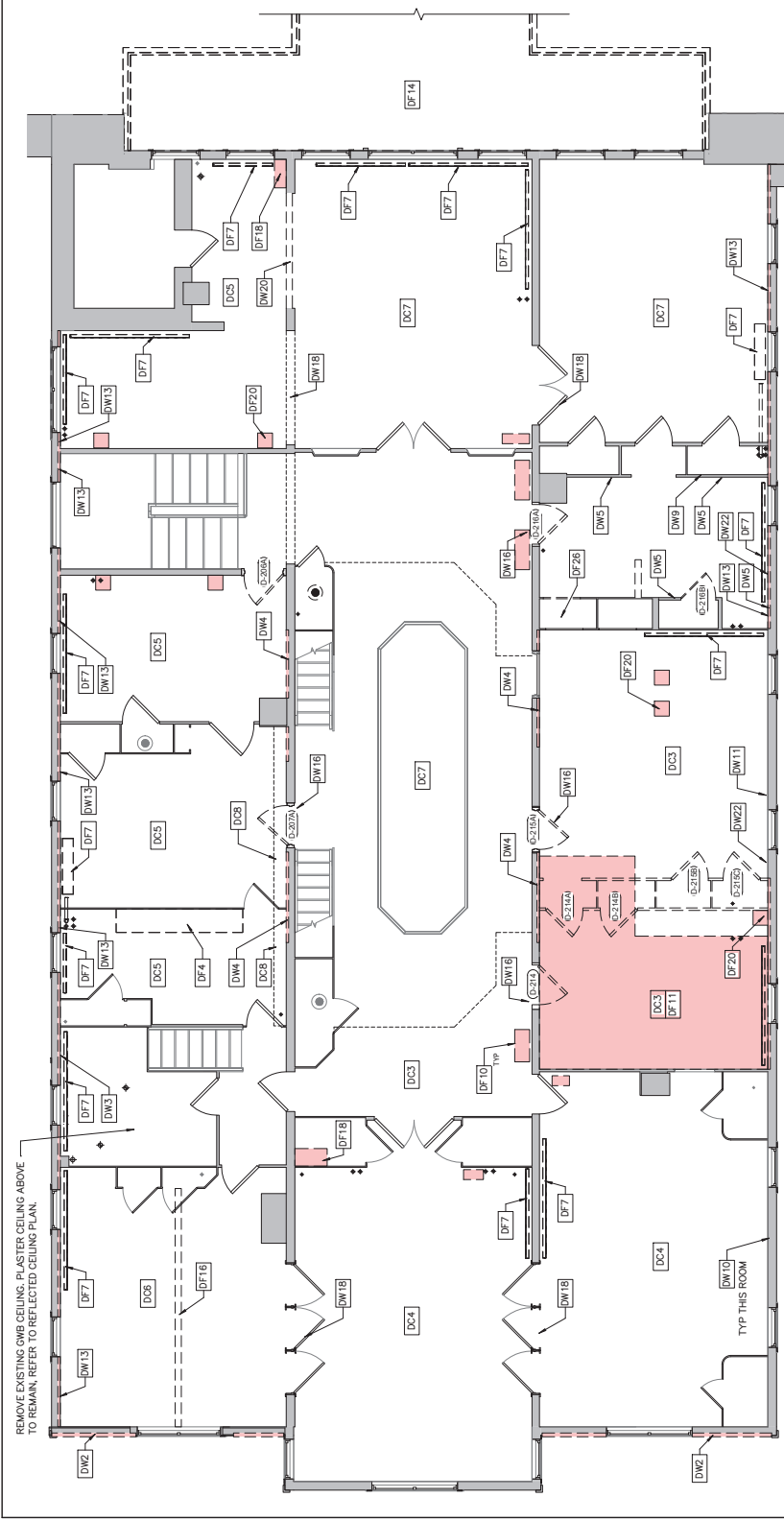
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DESIGNER:	J.A. GARDNER
SS, A.W, CB	
TECH. REVIEW:	M.J.M, MS
DATE:	5/15/2025

TITLE OF SHEET
DEMOLITION SECOND FLOOR PLAN

REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE

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DEMOLITION WALL KEYNOTES

- DW1 REMOVE AND SALVAGE EXISTING WINDOW SASH IN PREPARATION FOR NEW LOWER INSTALLATION. REFER TO MECHANICAL DRAWINGS.
- DW2 REMOVE AND SALVAGE EXISTING SIDING LAYERS TO INSTALL NEW SHEAR LAYERS. REFER TO PARTITION TYPES, EXTERIOR ELEVATIONS, AND STRUCTURAL DRAWINGS.
- DW3 CAREFULLY DISMANTLE WOOD FINISH BELOW CEILING AND SALVAGE FOR REINSTALLATION. DO NOT REMOVE IF ACCESS IS NOT REQUIRED FOR STRUCTURAL WORK. NOTIFY ARCHITECT PRIOR TO REMOVAL.
- DW4 REMOVE AND SALVAGE EXISTING WALL FINISH TO INSTALL ADDITIONAL STUDS. REFER TO STRUCTURAL DRAWINGS.
- DW5 REMOVE WAINSCOT TILE.
- DW6 CAREFULLY CUT OPENINGS IN WALL TO ACCOMMODATE NEW TOILET ROOM DOOR AND FRAME REPORT.
- DW7 CAREFULLY REMOVE EXISTING WALL, BASE CODE TO MITIGATE ASBESTOS MASTIC. REFER TO HAZARDOUS MATERIALS REPORT.
- DW8 CAREFULLY REMOVE EXISTING M/S IN WALL AND CEILING FINISH (PREVIOUSLY RESTORED) TO MITIGATE ASBESTOS MATERIALS REPORT.
- DW9 REMOVE EXISTING MUSLIN WALL FINISH TO INSTALL NEW INSULATION. SEE PROPOSED DRAWINGS AND FINISH SCHEDULE FOR NEW FINISH TO BE INSTALLED.
- DW10 REMOVE EXISTING CHASE PARTITIONS FOR INSTALLATION OF NEW SHEAR WALLS.
- DW11 REMOVE EXISTING PLASTER WALL FINISH BELOW CEILING FOR STRUCTURAL CONNECTIONS. DO NOT REMOVE IF ACCESS IS NOT REQUIRED FOR STRUCTURAL WORK. NOTIFY ARCHITECT PRIOR TO REMOVING FINISH. REFER TO INTERIOR ELEVATIONS AND STRUCTURAL DRAWINGS.
- DW12 MODIFY EXISTING WOOD PANELING AS NEEDED TO INTEGRATE NEW DOOR FOR EGRESS. REFER TO PROPOSED PLAN AND DOOR SCHEDULE.
- DW13 MODIFY DOOR OPENING PER G-04 AND DETAILS 1.2, 3/ A-6.08. FOR NEW WORK AT DOORS D-115 AND D-214 REFER TO DETAILS 2.4/A-5.09 AND 1.3/A-5.10.
- DW14 REMOVE CORNER OF PARTITION INTERSECTION FOR STRUCTURAL BEAM INSTALLATION.
- DW15 REMOVE EXISTING WALL FINISH ABOVE DOOR FOR INSTALLATION OF HEADER SISTER. REFER TO STRUCTURAL DRAWINGS.
- DW16 REMOVE EXISTING CURIO CABINETS AND STORE FOR REINSTALLATION AFTER THE STRUCTURAL WORK. REMOVE OR PROTECT GLASS TO NOT BREAK DURING REMOVAL.
- DW17 REMOVE EXISTING WALL INFILL. HISTORIC WOOD TRIM AT ARCHES TO REMAIN. REMOVE TILE FINISH AT THIS WALL.
- DW18 REMOVE EXISTING WALL FINISH TO SECURE NEW POST TO EXISTING WALL STUDS. REFER TO STRUCTURAL DRAWINGS.
- DW19 DEMOLITION OF FINISHES.
- DW20 DEMOLITION OF FINISHES.
- DW21 REMOVE EXISTING HISTORIC LIGHT SWITCH CONTROL PLATE.

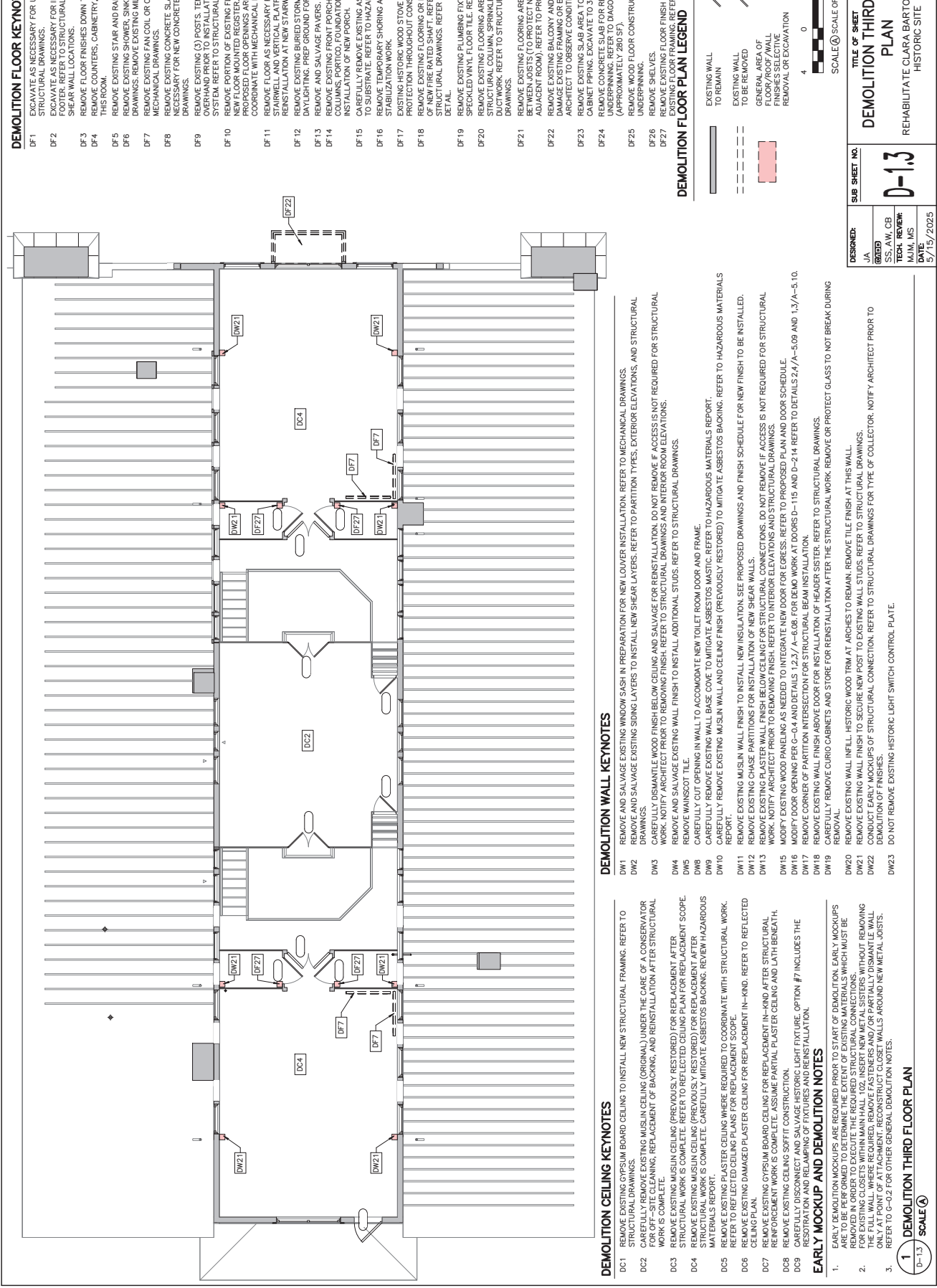
DEMOLITION CEILING KEYNOTES

- DC1 REMOVE EXISTING GYPSUM BOARD CEILING TO INSTALL NEW STRUCTURAL FRAMING. REFER TO STRUCTURAL DRAWINGS.
- DC2 CAREFULLY REMOVE EXISTING MUSLIN CEILING (ORIGINAL) UNDER THE CARE OF A CONSERVATOR TO PRESERVE ORIGINAL FINISHES, REPLACEMENT OF BACKING, AND REINSTALLATION AFTER STRUCTURAL WORK IS COMPLETE.
- DC3 REMOVE EXISTING MUSLIN CEILING (PREVIOUSLY RESTORED) FOR REPLACEMENT AFTER STRUCTURAL WORK IS COMPLETE. REFER TO REFLECTED CEILING PLAN FOR REPLACEMENT SCOPE.
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- DC5 REMOVE EXISTING PLASTER CEILING WHERE REQUIRED TO COORDINATE WITH STRUCTURAL WORK.
- DC6 REFER TO REFLECTED CEILING PLANS FOR REPLACEMENT SCOPE.
- DC7 REMOVE EXISTING DAMAGED PLASTER CEILING FOR REPLACEMENT IN-KIND. REFER TO REFLECTED CEILING PLAN.
- DC8 REMOVE EXISTING GYPSUM BOARD CEILING FOR REPLACEMENT IN-KIND AFTER STRUCTURAL RENOVEMENT WORK IS COMPLETE. ASSUME PARTIAL PLASTER CEILING AND LATH BENEATH.
- DC9 REMOVE EXISTING CEILING SOFFIT CONSTRUCTION.
- DC10 CAREFULLY DISCONNECT AND SALVAGE HISTORIC LIGHT FIXTURE. OPTION 7 INCLU DES THE RESOTRATION AND RELAMPING OF FIXTURES AND REINSTALLATION.

EARLY MOCKUP AND DEMOLITION NOTES

1. EARLY DEMOLITION MOCKUPS ARE REQUIRED PRIOR TO START OF DEMOLITION. EARLY MOCKUPS ARE TO BE PERFORMED TO DETERMINE THE EXTENT OF EXISTING MATERIALS WHICH MUST BE REMOVED IN ORDER TO EXECUTE THE REQUIRED STRUCTURAL CONNECTIONS.
2. FOR EXISTING CLOSETS WITHIN MAIN HALL, 102, INSERT NEW METAL SISTERS WITHOUT REMOVING EXISTING METAL SISTERS. REMOVE EXISTING METAL SISTERS FROM EXISTING WALL ONLY AT POINT OF ATTACHMENT. RECONSTRUCT CLOSET WALLS AROUND NEW METAL JOISTS.
3. REFER TO G-02 FOR OTHER GENERAL DEMOLITION NOTES.

1 DEMOLITION SECOND FLOOR PLAN
D-12 SCALE @



- DEMOLITION CEILING KEYNOTES**
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 - DC2 CAREFULLY REMOVE EXISTING MUSLIN CEILING (ORIGINAL) UNDER THE CARE OF A CONSERVATOR TO PRESERVE ORIGINAL FINISHES, REPLACEMENT OF BACKING, AND RENOVATION AFTER STRUCTURAL WORK IS COMPLETE.
 - DC3 REMOVE EXISTING MUSLIN CEILING (PREVIOUSLY RESTORED) FOR REPLACEMENT AFTER STRUCTURAL WORK IS COMPLETE. REFER TO REFLECTED CEILING PLAN FOR REPLACEMENT SCOPE.
 - DC4 REMOVE EXISTING MUSLIN CEILING (PREVIOUSLY RESTORED) FOR REPLACEMENT AFTER STRUCTURAL WORK IS COMPLETE. CAREFULLY MITIGATE ASBESTOS BACKING. REVIEW HAZARDOUS MATERIALS REPORT.
 - DC5 REMOVE EXISTING PLASTER CEILING WHERE REQUIRED TO COORDINATE WITH STRUCTURAL WORK. REFER TO REFLECTED CEILING PLANS FOR REPLACEMENT SCOPE.
 - DC6 REFER TO REFLECTED CEILING PLANS FOR REPLACEMENT IN-KIND. REFER TO REFLECTED CEILING PLAN FOR REPLACEMENT SCOPE.
 - DC7 REMOVE EXISTING GYPSUM BOARD CEILING FOR REPLACEMENT IN-KIND AFTER STRUCTURAL REINFORCEMENT WORK IS COMPLETE. ASSUME PARTIAL PLASTER CEILING AND LATH BENEATH.
 - DC8 REMOVE EXISTING CEILING SOFFIT CONSTRUCTION.
 - DC9 CAREFULLY DISCONNECT AND SALVAGE HISTORIC LIGHT FIXTURE. OPTION #7 INCLUDES THE RESOTRATION AND RELAMPING OF FIXTURES AND REINSTALLATION.

- DEMOLITION WALL KEYNOTES**
- DW1 REMOVE AND SALVAGE EXISTING WINDOW SASH IN PREPARATION FOR NEW LOWER INSTALLATION. REFER TO MECHANICAL DRAWINGS.
 - DW2 REMOVE AND SALVAGE EXISTING SIDING LAYERS TO INSTALL NEW SHEAR LAYERS. REFER TO PARTITION TYPES, EXTERIOR ELEVATIONS, AND STRUCTURAL DRAWINGS.
 - DW3 CAREFULLY DISMANTLE WOOD FINISH BELOW CEILING AND SALVAGE FOR REINSTALLATION. DO NOT REMOVE IF ACCESS IS NOT REQUIRED FOR STRUCTURAL WORK. NOTIFY ARCHITECT PRIOR TO REMOVING FINISH. REFER TO INTERIOR ELEVATIONS AND STRUCTURAL DRAWINGS.
 - DW4 REMOVE AND SALVAGE EXISTING WALL FINISH TO INSTALL ADDITIONAL STUDS. REFER TO STRUCTURAL DRAWINGS.
 - DW5 REMOVE WAINSCOT TILE.
 - DW6 CAREFULLY CUT OPENING IN WALL TO ACCOMMODATE NEW TOILET ROOM DOOR AND FRAME.
 - DW7 CAREFULLY REMOVE EXISTING WALL BASE COAT TO MITIGATE ASBESTOS MASTIC. REFER TO HAZARDOUS MATERIALS REPORT.
 - DW8 CAREFULLY REMOVE EXISTING M/S LIN WALL AND CEILING FINISH (PREVIOUSLY RESTORED) TO MITIGATE ASBESTOS BACKING. REFER TO HAZARDOUS MATERIALS REPORT.
 - DW9 REMOVE EXISTING MUSLIN WALL FINISH TO INSTALL NEW INSULATION. SEE PROPOSED DRAWINGS AND FINISH SCHEDULE FOR NEW FINISH TO BE INSTALLED.
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 - DW19 REMOVE EXISTING WALL FINISH TO SECURE NEW POST TO EXISTING WALL STUDS. REFER TO STRUCTURAL DRAWINGS.
 - DW20 DEMOLITION OF FINISHES.
 - DW21 DEMOLITION OF FINISHES.
 - DW22 DO NOT REMOVE EXISTING HISTORIC LIGHT SWITCH CONTROL PLATE.
 - DW23 DO NOT REMOVE EXISTING HISTORIC LIGHT SWITCH CONTROL PLATE.

- DEMOLITION FLOOR KEYNOTES**
- DF1 EXCAVATE AS NECESSARY FOR UNDERPINNING. REFER TO STRUCTURAL DRAWINGS.
 - DF2 EXCAVATE AS NECESSARY FOR INSTALLATION OF NEW CONCRETE FOOTER. REFER TO STRUCTURAL DRAWINGS FOR NEW COLUMN AND SHEAR WALL LOCATIONS.
 - DF3 REMOVE FLOOR FINISHES DOWN TO EXISTING CONCRETE SLAB.
 - DF4 REMOVE COUNTERS, CABINETRY, SINK, AND REFRIGERATOR FROM THIS ROOM.
 - DF5 REMOVE EXISTING STAIR AND RAILINGS.
 - DF6 REMOVE EXISTING SHOWER, SINK, AND TOILET. REFER TO PLUMBING DRAWINGS FOR EXISTING AND TOILET ACCESSORIES.
 - DF7 REMOVE EXISTING FAN COIL OR CONVECTION HEAT UNIT. REFER TO MECHANICAL DRAWINGS.
 - DF8 REMOVE EXISTING CONCRETE SLAB AND BRICKWORK. PREPARE AS NECESSARY FOR NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
 - DF9 REMOVE EXISTING (3) POSTS. TEMPORARILY SUPPORT BUILDING MATERIALS AND REMOVAL OF WALLS. REFER TO STRUCTURAL DRAWINGS.
 - DF10 REMOVE PORTION OF EXISTING FLOOR AS NECESSARY TO INSTALL NEW FLOOR MOUNTED REGISTER. WITHIN THE MAIN HALL CLOSETS, PROPOSED FLOOR OPENINGS ARE FOR VERTICAL DUCTWORK. COORDINATE WITH MECHANICAL DRAWINGS.
 - DF11 REMOVE FLOOR AS NECESSARY FOR INSTALLATION OF NEW STAIRWELL AND VERTICAL PLATFORM LIFT. SALVAGE ALL WOOD FOR REUSE. REFER TO NEW STAIRWELL DRAWINGS.
 - DF12 REMOVE EXISTING PLUMBING AND CONFIRM LOCATION OF DAYLIGHTING PREP GROUND FOR NEW SLAB.
 - DF13 REMOVE AND SALVAGE PAVERS. REFER TO LANDSCAPE DRAWINGS.
 - DF14 REMOVE EXISTING FRONT PORCH SYSTEM (DECK, APRON, FRAMING, COLUMNS, PORTICO, FOUNDATIONS, RAMP, STAIR) TO PREPARE FOR INSTALLATION OF NEW PORCH.
 - DF15 CAREFULLY REMOVE EXISTING ASBESTOS FLOORING LAYERS DOWN TO SUBSTRATE. REFER TO HAZARDOUS MATERIALS REPORT.
 - DF16 REMOVE TEMPORARY SHORING AFTER COMPLETION OF SILENT HIGH RISE WOOD STONE. TO REMAIN. INSTALL TEMPORARY PROTECTION THROUGHOUT CONSTRUCTION.
 - DF17 REMOVE EXISTING FLOORING OR ROOFING AREA FOR INSTALLATION OF NEW FIRE RATED SHAFT. REFER TO PARTITION TYPES AND STRUCTURAL DRAWINGS. REFER TO DETAIL 3/ A-5.11 FOR ROOF DETAIL.
 - DF18 REMOVE EXISTING PLUMBING FIXTURES FOR REPLACEMENT. REMOVE SPECIFIED VINYL FLOOR TILE. REFER TO FORM SURVEY.
 - DF19 REMOVE EXISTING FLOOR FINISH TO EXPOSE NEW CONCRETE. REFER TO STRUCTURAL COLUMN, SPRINKLER STANDPIPE OR VERTICAL DUCTWORK. REFER TO STRUCTURAL, FIRE PROTECTION, AND HVAC DRAWINGS.
 - DF20 REMOVE EXISTING FLOORING AREA TO INSTALL FIRE BLOCKING BETWEEN JOISTS TO PROTECT NEW EGRESS STAIRWELL FROM ADJACENT ROOM. REFER TO PROPOSED FLOOR PLAN.
 - DF21 REMOVE EXISTING BALCONY AND RAILING. TAKE CARE NOT TO DISTURB EXISTING CONCRETE FLOORING. NOTIFY ARCHITECT TO OBSERVE CONDITIONS.
 - DF22 REMOVE EXISTING SLAB AREA TO INSTALL NEW ELECTRICAL CABINET PIPING. EXCAVATE TO 3'-0" BELOW FLOOR.
 - DF23 REMOVE CONCRETE SLAB FOR REPLACEMENT AFTER UNDERPINNING. REFER TO DIAGONAL HATCHED LOCATION (APPROXIMATELY 7,280 SF).
 - DF24 REMOVE WOOD FLOOR CONSTRUCTION FOR REPLACEMENT AFTER REMOVE SHELVES.
 - DF25 REMOVE EXISTING FLOOR FINISH TO SECURE NEW POSTS TO EXISTING FLOOR FRAMING. REFER TO STRUCTURAL DRAWINGS.

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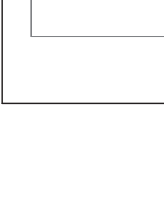
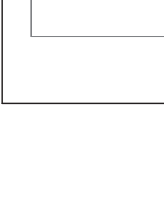
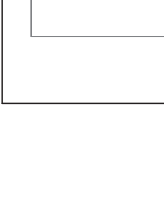
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 - DW16 REMOVE EXISTING WALL FINISH ABOVE DOOR FOR REINSTALLATION OF HEADER SISTER.
 - DW17 CAREFULLY REMOVE CURIO CABINETS AND STORE FOR REINSTALLATION AFTER THE STRUCTURAL WORK. REMOVE OR PROTECT GLASS TO NOT BREAK DURING REMOVAL.
 - DW18 REMOVE EXISTING WALL INFILL - HISTORIC WOOD TRIM AT ARCHES TO REMAIN. REMOVE TILE FINISH AT THIS WALL.
 - DW19 REMOVE EXISTING WALL FINISH TO SECURE NEW POST TO EXISTING WALL STUDS. REFER TO STRUCTURAL DRAWINGS.
 - DW20 DEMOLITION OF FINISHES.
 - DW21 DEMOLITION OF FINISHES.
 - DW22 DO NOT REMOVE EXISTING HISTORIC LIGHT SWITCH CONTROL PLATE.
 - DW23 DO NOT REMOVE EXISTING HISTORIC LIGHT SWITCH CONTROL PLATE.

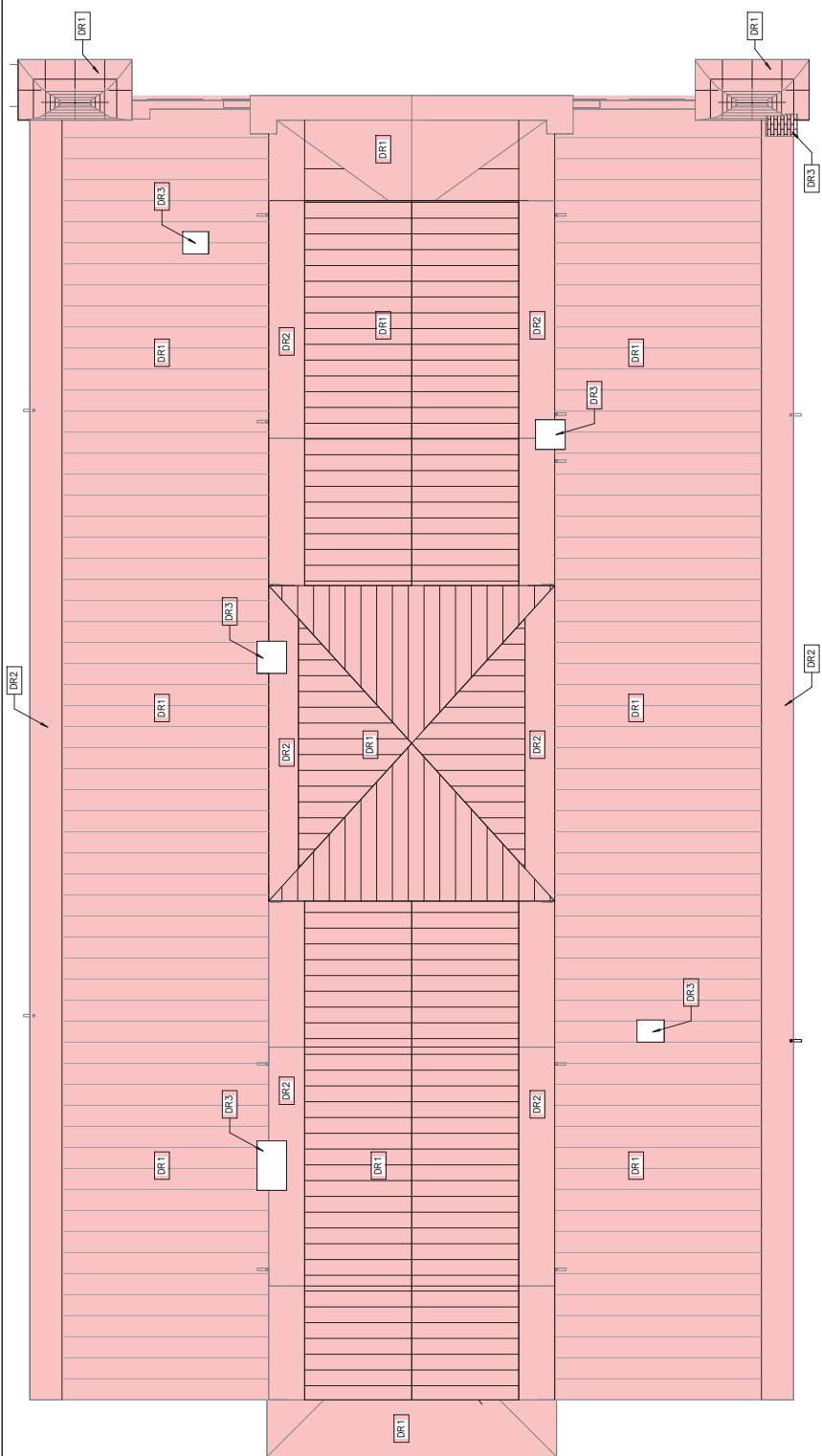
- DEMOLITION FLOOR KEYNOTES**
- DF1 EXCAVATE AS NECESSARY FOR UNDERPINNING. REFER TO STRUCTURAL DRAWINGS.
 - DF2 EXCAVATE AS NECESSARY FOR INSTALLATION OF NEW CONCRETE FOOTER. REFER TO STRUCTURAL DRAWINGS FOR NEW COLUMN AND SHEAR WALL LOCATIONS.
 - DF3 REMOVE FLOOR FINISHES DOWN TO EXISTING CONCRETE SLAB.
 - DF4 REMOVE COUNTERS, CABINETRY, SINK, AND REFRIGERATOR FROM THIS ROOM.
 - DF5 REMOVE EXISTING STAIR AND RAILINGS.
 - DF6 REMOVE EXISTING SHOWER, SINK, AND TOILET. REFER TO PLUMBING DRAWINGS FOR EXISTING AND TOILET ACCESSORIES.
 - DF7 REMOVE EXISTING FAN COIL OR CONVECTION HEAT UNIT. REFER TO MECHANICAL DRAWINGS.
 - DF8 REMOVE EXISTING CONCRETE SLAB AND BRICKWORK. PREPARE AS NECESSARY FOR NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
 - DF9 REMOVE EXISTING (3) POSTS. TEMPORARILY SUPPORT BUILDING MATERIALS AND REMOVAL OF WALLS. REFER TO STRUCTURAL DRAWINGS.
 - DF10 REMOVE PORTION OF EXISTING FLOOR AS NECESSARY TO INSTALL NEW FLOOR MOUNTED REGISTER. WITHIN THE MAIN HALL CLOSETS, PROPOSED FLOOR OPENINGS ARE FOR VERTICAL DUCTWORK. COORDINATE WITH MECHANICAL DRAWINGS.
 - DF11 REMOVE FLOOR AS NECESSARY FOR INSTALLATION OF NEW STAIRWELL AND VERTICAL PLATFORM LIFT. SALVAGE ALL WOOD FOR REUSE. REFER TO NEW STAIRWELL DRAWINGS.
 - DF12 REMOVE EXISTING PLUMBING AND CONFIRM LOCATION OF DAYLIGHTING PREP GROUND FOR NEW SLAB.
 - DF13 REMOVE AND SALVAGE PAVERS. REFER TO LANDSCAPE DRAWINGS.
 - DF14 REMOVE EXISTING FRONT PORCH SYSTEM (DECK, APRON, FRAMING, COLUMNS, PORTICO, FOUNDATIONS, RAMP, STAIR) TO PREPARE FOR INSTALLATION OF NEW PORCH.
 - DF15 CAREFULLY REMOVE EXISTING ASBESTOS FLOORING LAYERS DOWN TO SUBSTRATE. REFER TO HAZARDOUS MATERIALS REPORT.
 - DF16 REMOVE TEMPORARY SHORING AFTER COMPLETION OF SILENT HIGH RISE WOOD STONE. TO REMAIN. INSTALL TEMPORARY PROTECTION THROUGHOUT CONSTRUCTION.
 - DF17 REMOVE EXISTING FLOORING OR ROOFING AREA FOR INSTALLATION OF NEW FIRE RATED SHAFT. REFER TO PARTITION TYPES AND STRUCTURAL DRAWINGS. REFER TO DETAIL 3/ A-5.11 FOR ROOF DETAIL.
 - DF18 REMOVE EXISTING PLUMBING FIXTURES FOR REPLACEMENT. REMOVE SPECIFIED VINYL FLOOR TILE. REFER TO FORM SURVEY.
 - DF19 REMOVE EXISTING FLOOR FINISH TO EXPOSE NEW CONCRETE. REFER TO STRUCTURAL COLUMN, SPRINKLER STANDPIPE OR VERTICAL DUCTWORK. REFER TO STRUCTURAL, FIRE PROTECTION, AND HVAC DRAWINGS.
 - DF20 REMOVE EXISTING FLOORING AREA TO INSTALL FIRE BLOCKING BETWEEN JOISTS TO PROTECT NEW EGRESS STAIRWELL FROM ADJACENT ROOM. REFER TO PROPOSED FLOOR PLAN.
 - DF21 REMOVE EXISTING BALCONY AND RAILING. TAKE CARE NOT TO DISTURB EXISTING CONCRETE FLOORING. NOTIFY ARCHITECT TO OBSERVE CONDITIONS.
 - DF22 REMOVE EXISTING SLAB AREA TO INSTALL NEW ELECTRICAL CABINET PIPING. EXCAVATE TO 3'-0" BELOW FLOOR.
 - DF23 REMOVE CONCRETE SLAB FOR REPLACEMENT AFTER UNDERPINNING. REFER TO DIAGONAL HATCHED LOCATION (APPROXIMATELY 7,280 SF).
 - DF24 REMOVE WOOD FLOOR CONSTRUCTION FOR REPLACEMENT AFTER REMOVE SHELVES.
 - DF25 REMOVE EXISTING FLOOR FINISH TO SECURE NEW POSTS TO EXISTING FLOOR FRAMING. REFER TO STRUCTURAL DRAWINGS.



DESIGNER:	JIA
DATE:	5/15/2025
SS, A.W, CB	
TECH. REVIEW:	MJM, MS
SUB SHEET NO.	D-1.3
TITLE OF SHEET	DEMOLITION THIRD FLOOR PLAN
DRAWING NO.	895
PWS/PAGE NO.	179603
312325	
SHEET	OF X




REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE

1 DEMOLITION THIRD FLOOR PLAN
D-1.3 SCALE



1 DEMOLITION ROOF PLAN
D-14 SCALE 1/8" = 1'-0"

DEMOLITION FLOOR PLAN LEGEND

-  EXISTING WALL TO REMAIN
-  EXISTING WALL TO BE REMOVED
-  GENERAL AREA OF REMOVAL (FINISHES SELECTIVE REMOVAL OR EXCAVATION)
-  EXISTING DOOR TO REMAIN
-  EXISTING DOOR TO BE REMOVED/SALVAGED

DEMOLITION ROOF PLAN KEYNOTES

- DR1 REMOVE ROOFING. REFER TO RED HATCHED AREA ON PLAN. EXISTING SHEATHING BOARD TO REMAIN.
- DR2 REMOVE POLE CUTTERS.
- DR3 EXISTING CHIMNEY TO REMAIN. REFER TO REPAIR ELEVATION FOR BRICK REPORTING SCOPE.

DESIGNER: JIA GARETH SS, A.W., CB TECH. REVIEW: M.J.M., MS DATE: 5/15/2025	SUB SHEET NO. D-14	TITLE OF SHEET DEMOLITION ROOF PLAN REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	DRAWING NO. 895 179603 PMS/PKG. NO. 312325 SHEET OF X
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DEMOLITION DOOR SCHEDULE	
DOOR NUMBER	NOTES
D-101A	REMOVE EXISTING SCREEN DOORS. SALVAGE. THE MAIN FRONT DOUBLE DOORS WILL BE REMOVED AND HUNG TO SWING OUTWARDS. REFER TO A-6.1.0 FOR SCOPE.
D-101C	REMOVE EXISTING DOUBLE DOOR AND HARDWARE. SALVAGE.
D-108A	REMOVE EXISTING DOOR FOR MODIFICATIONS TO ACCOMMODATE ACCESSIBILITY. SALVAGE.
D-115	REMOVE EXISTING DOOR, HARDWARE, AND STOPS. SALVAGE.
D-115A	REMOVE EXISTING DOOR, HARDWARE, AND STOPS. SALVAGE.
D-116A	REMOVE EXISTING DOOR FROM HINGES. REMOVE STOPS SURROUNDING FRAME. SALVAGE.
D-116A	REMOVE EXISTING DOOR AND HARDWARE. SALVAGE.
D-118A	REMOVE EXISTING DOOR, HARDWARE, AND STOPS. SALVAGE.
D-207A	REMOVE EXISTING DOOR FOR WIDTH MODIFICATIONS TO ACCOMMODATE ACCESSIBILITY. SALVAGE.
D-214	REMOVE EXISTING DOOR, HARDWARE, AND STOPS. SALVAGE.
D-214A	REMOVE EXISTING DOOR AND HARDWARE. SALVAGE.
D-214B	REMOVE EXISTING DOOR AND HARDWARE. SALVAGE.
D-215A	REMOVE EXISTING DOOR FROM HINGES. REMOVE STOPS SURROUNDING FRAME. SALVAGE.
D-215B	REMOVE EXISTING DOOR AND HARDWARE. SALVAGE.
D-215C	REMOVE EXISTING DOOR AND HARDWARE. SALVAGE.
D-216B	REMOVE NON-HISTORIC DAMAGED DOOR FOR REPLACEMENT IN KIND. DO NOT SALVAGE.
D-B-7B	REMOVE EXISTING WOOD BOARD DOOR FOR HEIGHT MODIFICATIONS TO ACCOMMODATE EGRESS.
D-B-7D	REMOVE EXISTING DOOR AND HARDWARE. DO NOT SALVAGE.
D-CL-6B	REMOVE EXISTING DOOR AND HARDWARE. SALVAGE FOR REINSTALLATION. REFER TO PROPOSED FLOOR PLAN.

NOTES:

1. ALL DOORS MUST BE PHOTOGRAPHED IN PLACE PRIOR TO REMOVAL. THEY SHOULD BE DOCUMENTED ON A DRAWING PLAN, AS WELL AS MARKINGS ON THE DOOR.
2. VERIFY THE STORAGE LOCATION WITH OWNER FOR SALVAGE OF THE HISTORIC DOORS.
3. THREE DOORS CONTAIN MUSLIN FABRIC ON THE DOOR PANELS, WHICH WAS CHARACTERIC OF CLARA BARTON'S TREATMENT OF DOORS. THESE MUST BE HANDLED WITH EXTREME CARE AND TREATED AS ARTIFACTS OF THE HOUSE. THE OWNER WILL ADVISE IF ANY SPECIAL PREPARATION FOR STORAGE IS REQUIRED.

DESIGNER: JIA GAREB SS, A.W, CB TECH. REVIEW: MJM, MS DATE: 5/15/2025	SUB SHEET NO. D-6.0	TITLE OF SHEET DEMOLITION DOOR SCHEDULE REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	DRAWING NO. 895 179603 PMS/PKG. NO. 312325 SHEET OF X
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FLOOR PLAN LEGEND

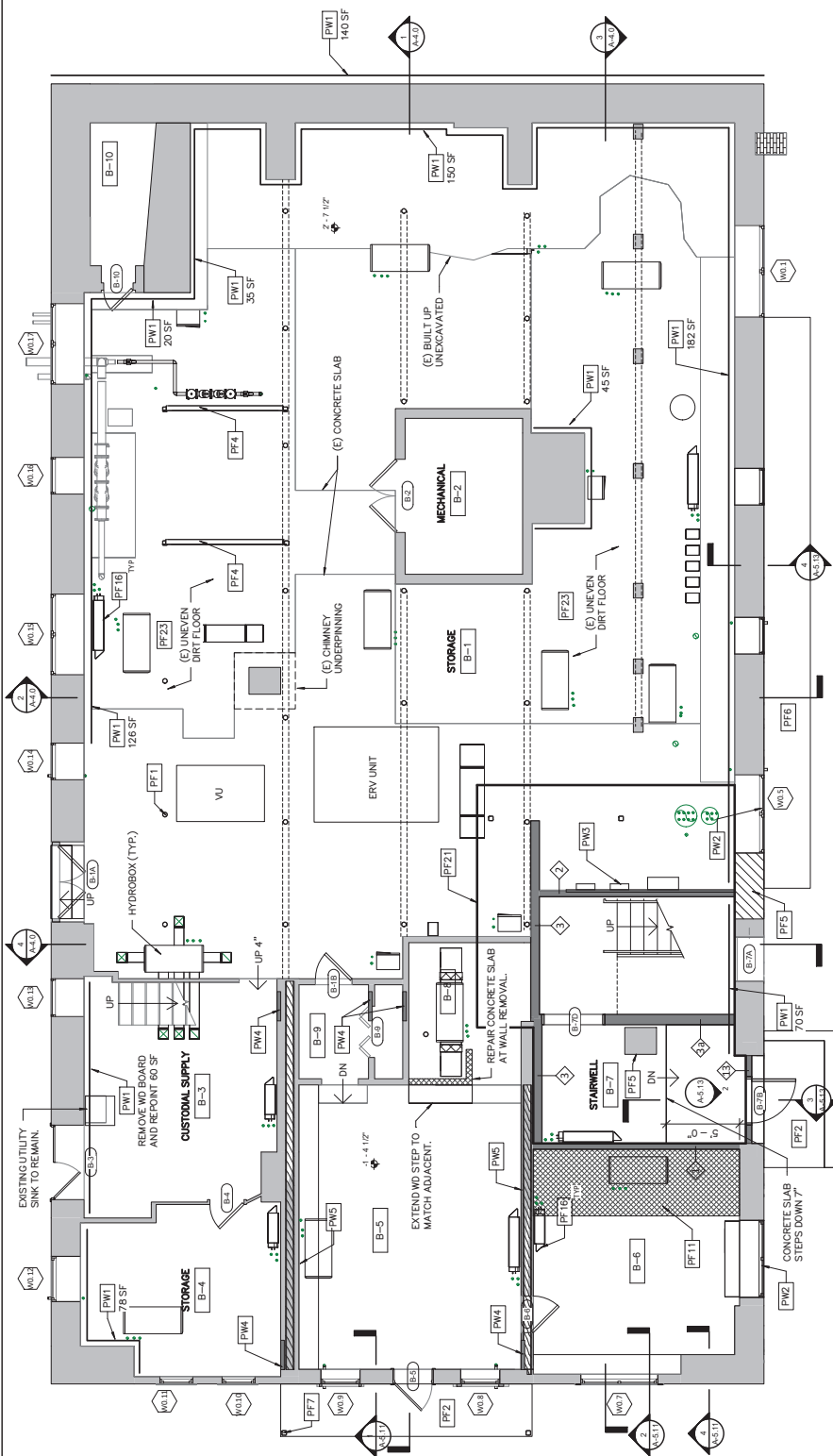
- NEW WALL
- EXISTING WALL TO REMAIN
- DOOR TYPE & TAG
- EXISTING DOOR & TAG
- EXISTING DOOR CLOSED
TA 9
- SLIDING DOOR & TAG
- FIRE EXTINGUISHER -
WALL MOUNTED
FE

INTERIOR TREATMENTS

REPOINT MASONRY
FOUNDATION WALLS

FLOOR PLAN GENERAL NOTES

1. THE NORTH (FRONT) SIDE OF BASEMENT CONTAINS A RAISED BANK OF DIRT WHICH HAS NOT BEEN REFINISHED. THE FINISH FLOOR SHALL BE INSTALLED AND FINISHED TO MATCH THE FINISH FLOOR IN THE VICINITY TO ACCESS THE FRONT WALL OF THE HOUSE MUST BE CAREFULLY EXECUTED TO MINIMIZE DISTURBANCE.
2. INSTALL CONCRETE MAINTENANCE PADS FOR MECHANICAL EQUIPMENT AS INDICATED IN HVAC AND STRUCTURAL DRAWINGS. SOME PADS WILL HAVE STEEL FRAME PLATFORMS TO RAISE THE EQUIPMENT FOR ALL VERTICAL PENETRATIONS (STEEL COLUMNS, DUCTWORK, PIPES, CONDUIT, ETC.). MINIMIZE EXTRA CUTTING OF HISTORIC FLOORBOARDS. CREATE OPENINGS WITH SNUG-FIT AROUND PENETRATING SIZE. CUT SALVAGE ANY PIECES THAT ARE NOT SCRAP-SIZE.
3. SEAL ALL PENETRATIONS BETWEEN THE BASEMENT AND FIRST FLOOR. REFER TO PENETRATION DETAILS. ALL PENETRATIONS THROUGH THE WALLS TO BE OPENED UP FOR STRUCTURAL SYSTEMS OF JOISTS, STRUTS, BRACES, ETC. REFER TO STRUCTURAL DRAWINGS. THE MATERIALS IN THE MAIN HALL ARE HISTORICALLY SIGNIFICANT AND MUST BE CAREFULLY HANDLED. REFER TO THE REFLECTED CEILING PLANS FOR PENETRATION DETAILS.
4. INSERT NEW METAL SISTER OVER THE CLOSET FACE BOARD WALL WITHOUT REMOVING THE WALL. WHERE REQUIRED, REMOVE OR CUT THE WALL TO ORIGINAL FINISH AND REPAIR TO ORIGINAL APPEARANCE.
5. AT THE REAR WALLS OF HALL CLOSETS WHERE REQUIRED, REMOVE ONLY THE WOOD PORTION OF THE WALL TO ORIGINAL FINISH AND REPAIR TO ORIGINAL APPEARANCE.
6. RESTORE WALL TO ORIGINAL APPEARANCE.
7. AT ALL WALLS, REFER TO INTERIOR ELEVATIONS AND DETAILS FOR FINISHES. PROVIDE FINISHES WHERE WALL OR CEILING IS OPEN FOR WORK. PROVIDE BLOCKING FOR ACCESSORIES, DEVICES, ETC. DO NOT REMOVE HISTORIC FINISHES EXCLUSIVELY TO PROVIDE BLOCKING. NOTIFY ARCHITECT IF UNCERTAIN.



FLOOR KEYNOTES

- PF1 NEW PTD STEEL COLUMN. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS OF NEW AND EXISTING COLUMNS THROUGHOUT BASEMENT.
- PF2 NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
- PF3 NEW PTD STEEL CROSS BRACING. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS.
- PF4 INSTALL NEW UNDERPINNING. REFER TO STRUCTURAL DRAWINGS AND DEMOLITION PLANS.
- PF5 INSTALL NEW BRICK PAVERS TO MATCH EXISTING IN KIND. REFER TO LANDSCAPE DRAWINGS.
- PF6 INSTALL (2) POSTS AND BEAM TO SUPPORT BAY. WRAP POSTS AND BEAMS IN PAINTED WOOD TRIM. REFER TO STRUCTURAL DRAWINGS.
- PF7 NEW VERTICAL PLATFORM LIFT. REFER TO ENLARGED PLANS AND SECTIONS IN THE A-5 SHEET SERIES. REFER TO STRUCTURAL DRAWINGS FOR NEW SUPPORT. (OPTION 1)
- PF8 IN-FILL FLOOR OPENINGS WITH WOOD FLOOR CONSTRUCTION TO MATCH EXISTING IN KIND. REFER TO FINISH PLANS (A-9 SERIES) AND STRUCTURAL DRAWINGS.
- PF9 REPLACE LOOSE BRICKS IN EXISTING HEARTH.
- PF10 NEW ACCESSIBLE STAIR AND ACCESSIBLE RAMP. REFER TO THE A-5 SHEET SERIES.
- PF11 NEW FAN COIL UNIT. REFER TO MECHANICAL DRAWINGS. NEW CUSTOM PTD WD ENCLOSURE FOR CONCEALING UNIT. REFER TO DETAILS AND SCHEDULE ON A-8.4 (OPTION 6).
- PF12 NEW UPPER BALCONY. REFER TO THE A-5 SHEET SERIES.
- PF13 NEW KITCHENETTE MILLWORK. REFER TO INTERIOR ELEVATIONS AND DETAILS. REFRIGERATOR BY OWNER. (OPTION 5)
- PF14 NEW WOOD POST. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS THROUGHOUT THIRD FLOOR.
- PF15 AREA OF NEW CONCRETE SLAB REPLACEMENT. REFER TO DARK OUTLINED AREA (APPROXIMATELY 280 SF). REFER TO STRUCTURAL DRAWINGS.
- PF16 BETWEEN 1 BAY OF EXISTING FLOOR JOISTS, INSTALL RATED HORIZONTAL ENCLOSURE (TYPE X GWB) FROM VERTICAL RATED SHAFT TO FAN COIL UNIT ON EAST SIDE OF ROOM. REFER TO MECHANICAL DRAWINGS FOR WRF PATH. INSTALL ENCLOSURE FROM UNDERSIDE OF FLOOR STRUCTURE.
- PF17 NEW PLASTIC VAPOR BARRIER ON DIRT FLOOR WITH NEW MAINTENANCE PADS.
- PF18 PROTECT EXISTING STOVE AND DUCT IN SITU DURING WORK. TYP.

WALL KEYNOTES

- PW1 REPOINT MASONRY FOUNDATION
- PW2 INSTALL LOWER WITHIN EXISTING OPENING. REFER TO MECHANICAL DRAWINGS.
- PW3 NEW ELECTRICAL COMPONENTS. REFER TO ELECTRICAL DRAWINGS.
- PW4 INSTALL SALVAGED FINISHES WHERE REMOVED AFTER STRUCTURAL COLLECTOR CONNECTIONS. REFER TO STRUCTURAL DRAWINGS AND INTERIOR ROOM ELEVATIONS.
- PW5 INSTALL NEW PLASTER WALL FINISH (TO MATCH EXISTING IN KIND) AFTER STRUCTURAL REPAIRS. REFER TO STRUCTURAL DRAWINGS.
- PW6 REPAIR EXISTING PLASTER WALLS. REFER TO INTERIOR ELEVATION DRAWINGS.
- PW7 INSTALL INTERIOR STORM WINDOW. REFER TO WINDOW SCHEDULE.
- PW8 REPLACE EXISTING, PREVIOUSLY RESTORED MULLIN IN DESIGNATED AREAS WITH NEW MULLIN WITH FIRE TARDANT TREATMENT ON NEW BACKING. ATTACH WITH TACKS TO MATCH EXISTING. PAINT ACCORDING TO FINISH SCHEDULE. REFER TO REMOVAL AND REINSTALLATION OF TRIM ON A-8.7.
- PW9 VIDEO SCREEN TO BE SUPPLIED BY OWNER. INSTALL BLOCKING, TO BE COORDINATED WITH STRUCTURAL.
- PW10 INSTALL DRINKING FOUNTAINS. REFER TO INTERIOR ELEVATIONS AND DETAILS.
- PW11 11.6 AND 21.6 REFER TO DETAILS 2.4/A-509 AND 1.3/A-510 FOR NEW WORK AT DOORS.
- PW12 SELECTIVELY REMOVE PAINT AT DESIGNATED AREAS TO CREATE EXPOSURE WINDOWS SHOWING HISTORIC WALLPAPER. COVER EXPOSURE WINDOWS WITH CLEAR POLYCARBONATE MATERIAL. SEE INTERIOR ELEVATIONS AND DETAILS ON A-8.5.

1 NEW WORK BASEMENT PLAN
SCALE 1/8"=1'-0"

DESIGNER: J.A. GIBB
SS, A.W, CB
TECH. REVIEW: M.J.M, MS
DATE: 5/15/2025

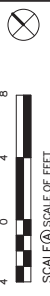
SUB SHEET NO. A-1.0

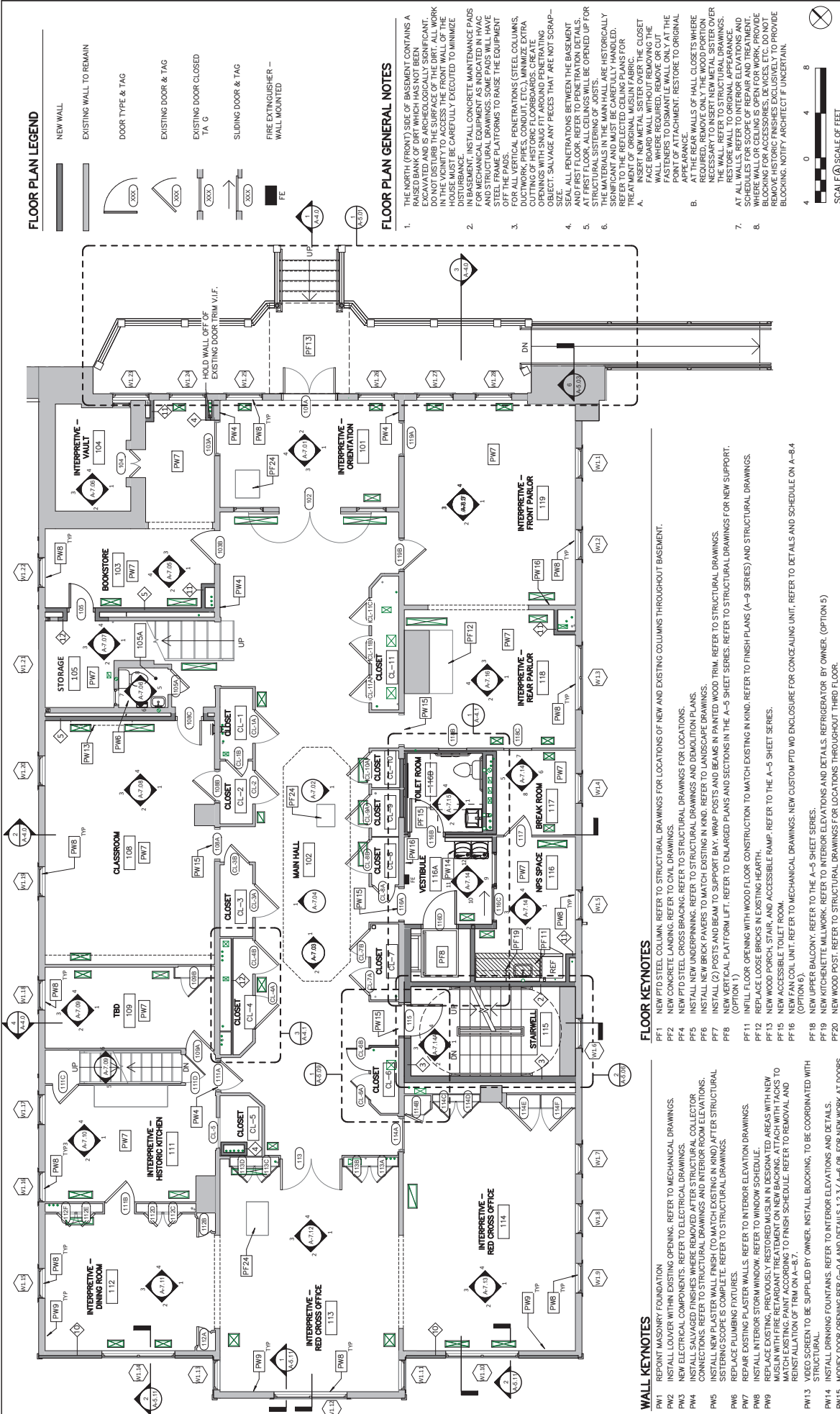
TITLE OF SHEET: NEW WORK BASEMENT PLAN

REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE

DRAWING NO. 895
PMS/PAGE NO. 179603
312325

SHEET OF X





FLOOR PLAN LEGEND

- NEW WALL
- EXISTING WALL TO REMAIN
- DOOR TYPE & TAG
- EXISTING DOOR & TAG
- EXISTING DOOR CLOSED
- EXISTING DOOR & TAG
- FIRE EXTINGUISHER - WALL MOUNTED

FLOOR PLAN GENERAL NOTES

1. THE NORTH (FRONT) SIDE OF BASEMENT CONTAINS A RAISED BANK OF DIRT WHICH HAS NOT BEEN REGRADED. THE DIRT BANK IS SIGNIFICANT AND SHOULD NOT BE REMOVED. THE DIRT ALL WORK IN THE VICINITY TO ACCESS THE FRONT WALL OF THE HOUSE MUST BE CAREFULLY EXECUTED TO MINIMIZE DISTURBANCE.
2. INSTALL CONCRETE MAINTENANCE PADS FOR MECHANICAL EQUIPMENT AS INDICATED IN HVAC AND STRUCTURAL DRAWINGS. SOME PADS WILL HAVE STEEL FRAME PLATFORMS TO RAISE THE EQUIPMENT FOR ALL VERTICAL PENETRATIONS (STEEL COLUMNS, DUCTWORK, PIPES, CONDUIT, ETC.). MINIMIZE EXTRA CUTTING OF HISTORIC FLOORBOARDS. CREATE OPENINGS WITH SMOG-FIT AROUND PENETRATING EQUIPMENT. SALVAGE ANY PIECES THAT ARE NOT SCRAP-SIZE.
3. SEAL ALL PENETRATIONS BETWEEN THE BASEMENT AND FIRST FLOOR. REFER TO PENETRATION DETAILS. ALL PENETRATIONS SHOULD BE OPENED UP FOR STRUCTURAL SISTERING OF JOISTS.
4. THE MATERIALS IN THE MAIN HALL ARE HISTORICALLY SIGNIFICANT AND MUST BE CAREFULLY HANDLED. REFER TO THE REFLECTED CEILING PLANS FOR DETAILS.
5. INSERT NEW METAL SISTER OVER THE CLOSET FACE BOARD WALL WITHOUT REMOVING THE WALL WHERE REQUIRED. REMOVE OR CUT THE METAL SISTER WHERE NECESSARY. RESTORE TO ORIGINAL APPEARANCE.
6. AT THE REAR WALLS OF HALL CLOSETS WHERE REQUIRED, REMOVE ONLY THE WOOD PORTION OF THE WALL. RESTORE TO ORIGINAL APPEARANCE. THE WALL REFER TO STRUCTURAL DRAWINGS. RESTORE WALL TO ORIGINAL APPEARANCE.
7. AT ALL WALLS, REFER TO INTERIOR ELEVATIONS AND FINISH PLANS FOR FINISHES. RESTORE WALLS WHERE WALL OR CEILING IS OPEN FOR WORK. PROVIDE BLOCKING FOR ACCESSORIES, DEVICES, ETC. DO NOT REMOVE HISTORIC FINISHES EXCLUSIVELY TO PROVIDE BLOCKING. NOTIFY ARCHITECT IF UNCERTAIN.

FLOOR KEYNOTES

- PF1 NEW PTD STEEL COLUMN. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS OF NEW AND EXISTING COLUMNS THROUGHOUT BASEMENT.
- PF2 NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
- PF3 INSTALL NEW UNDERPINNING. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS.
- PF4 INSTALL NEW BRICK PAVERS TO MATCH EXISTING IN KIND. REFER TO LANDSCAPE DRAWINGS.
- PF5 INSTALL (2) POSTS AND BEAM TO SUPPORT BAY. WRAP POSTS AND BEAMS IN PAINTED WOOD TRIM. REFER TO STRUCTURAL DRAWINGS. (OPTION 1)
- PF6 NEW VERTICAL PLATFORM LIFT. REFER TO ENLARGED PLANS AND SECTIONS IN THE A-5 SHEET SERIES. REFER TO STRUCTURAL DRAWINGS.
- PF7 ALL FLOOR OPENINGS WITH WOOD FLOOR CONSTRUCTION TO MATCH EXISTING IN KIND. REFER TO FINISH PLANS (A-9 SERIES) AND STRUCTURAL DRAWINGS.
- PF8 NEW WOOD PORCH STAIRS. ACCESSIBLE RAMP. REFER TO THE A-5 SHEET SERIES.
- PF9 NEW ACCESSIBLE TOILET ROOM.
- PF10 NEW FAN COIL UNIT. REFER TO MECHANICAL DRAWINGS. NEW CUSTOM PTD W/0 ENCLOSURE FOR CONCEALING UNIT. REFER TO DETAILS AND SCHEDULE ON A-8.4 (OPTION 6).
- PF11 NEW UPPER BALCONY. REFER TO THE A-3 SHEET SERIES.
- PF12 NEW KITCHENETTE MILLWORK. REFER TO INTERIOR ELEVATIONS AND DETAILS. REFRIGERATOR BY OWNER. (OPTION 5)
- PF13 NEW WOOD NEW CONCRETE SLAB REPLACEMENT. REFER TO DARK OUTLINED AREA (APPROXIMATELY 280 SF). REFER TO STRUCTURAL DRAWINGS.
- PF14 AREA OF EXISTING FLOOR JOISTS. INSTALL RATED HORIZONTAL ENCLOSURE (TYPE X MB) FROM VERTICAL RATED SHAFT TO FAN COIL UNIT ON EAST SIDE OF ROOM. REFER TO MECHANICAL DRAWINGS FOR VRF PATH. INSTALL ENCLOSURE FROM UNDERSIDE OF FLOOR STRUCTURE.
- PF15 NEW PLASTIC VAPOR BARRIER ON DIRT FLOOR WITH NEW MAINTENANCE PADS.
- PF16 PROTECT EXISTING STOVE AND DUCT IN SITU DURING WORK. TYP.

WALL KEYNOTES

- PW1 REPOINT MASONRY FOUNDATION
- PW2 INSTALL LOUVER WITHIN EXISTING OPENING. REFER TO MECHANICAL DRAWINGS.
- PW3 NEW ELECTRICAL COMPONENTS. REFER TO ELECTRICAL DRAWINGS.
- PW4 INSTALL SALVAGED FINISHES WHERE REMOVED AFTER STRUCTURAL CONNECTIONS. REFER TO STRUCTURAL DRAWINGS AND INTERIOR ROOM ELEVATIONS.
- PW5 ALL NEW PLASTER TO FINISH (TO MATCH EXISTING IN KIND) AFTER STRUCTURAL SISTERING IS COMPLETE. REFER TO STRUCTURAL DRAWINGS.
- PW6 REPLACE PLUMBING FIXTURES.
- PW7 REPAIR EXISTING PLASTER WALLS. REFER TO INTERIOR ELEVATION DRAWINGS.
- PW8 INSTALL INTERIOR STORM WINDOW. REFER TO WINDOW SCHEDULE
- PW9 REPAIR EXISTING PREVIOUSLY RESTORED M/LS IN DESIGNATED AREAS WITH NEW M/SLIN WITH FIRE RETARDANT TREATMENT ON NEW BACKING. ATTACH WITH TACKS TO MATCH EXISTING. PAINT ACCORDING TO FINISH SCHEDULE. REFER TO REMOVAL AND REINSTALLATION OF TRIM ON A-8.7.
- PW10 VIDEO SCREEN TO BE SUPPLIED BY OWNER. INSTALL BLOCKING. TO BE COORDINATED WITH STRUCTURAL.
- PW11 INSTALL DRINKING FOUNTAINS. REFER TO INTERIOR ELEVATIONS AND DETAILS.
- PW12 NEW WOOD NEW CONCRETE SLAB REPLACEMENT. REFER TO DARK OUTLINED AREA (APPROXIMATELY 280 SF). REFER TO STRUCTURAL DRAWINGS.
- PW13 AND 2.14 REFER TO DETAILS A-4.1-5.09 AND 1.3.1-5.10.
- PW14 SELECTIVELY REMOVE PAINT AT DESIGNATED AREAS TO CREATE EXPOSURE WINDOWS SHOWING HISTORIC WALLPAPER. COVER EXPOSURE WINDOWS WITH CLEAR POLYCARBONATE MATERIAL. SEE INTERIOR ELEVATIONS AND DETAILS ON A-8.5.

SCALE 1/8" = 1'-0"

TITLE OF SHEET: **NEW WORK FIRST FLOOR PLAN**

DRAWING NO. **895**

PWS/PWS NO. **179603**

SS, A.W, CB **312325**

TECH. REVIEW: **MJM, MS**

DATE: **5/15/2025**

SUB SHEET NO. **A-1.1**

DESIGNER: **JJA**

REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE

SHEET **OF X**

1 NEW WORK FIRST FLOOR PLAN

SCALE 1/8" = 1'-0"

FLOOR PLAN LEGEND

- NEW WALL
- EXISTING WALL TO REMAIN
- DOOR TYPE TA G
- EXISTING DOOR & TAG
- EXISTING DOOR CLOSED TA G
- SLIDING DOOR & TAG
- FIRE EXTINGUISHER - WALL MOUNTED FE

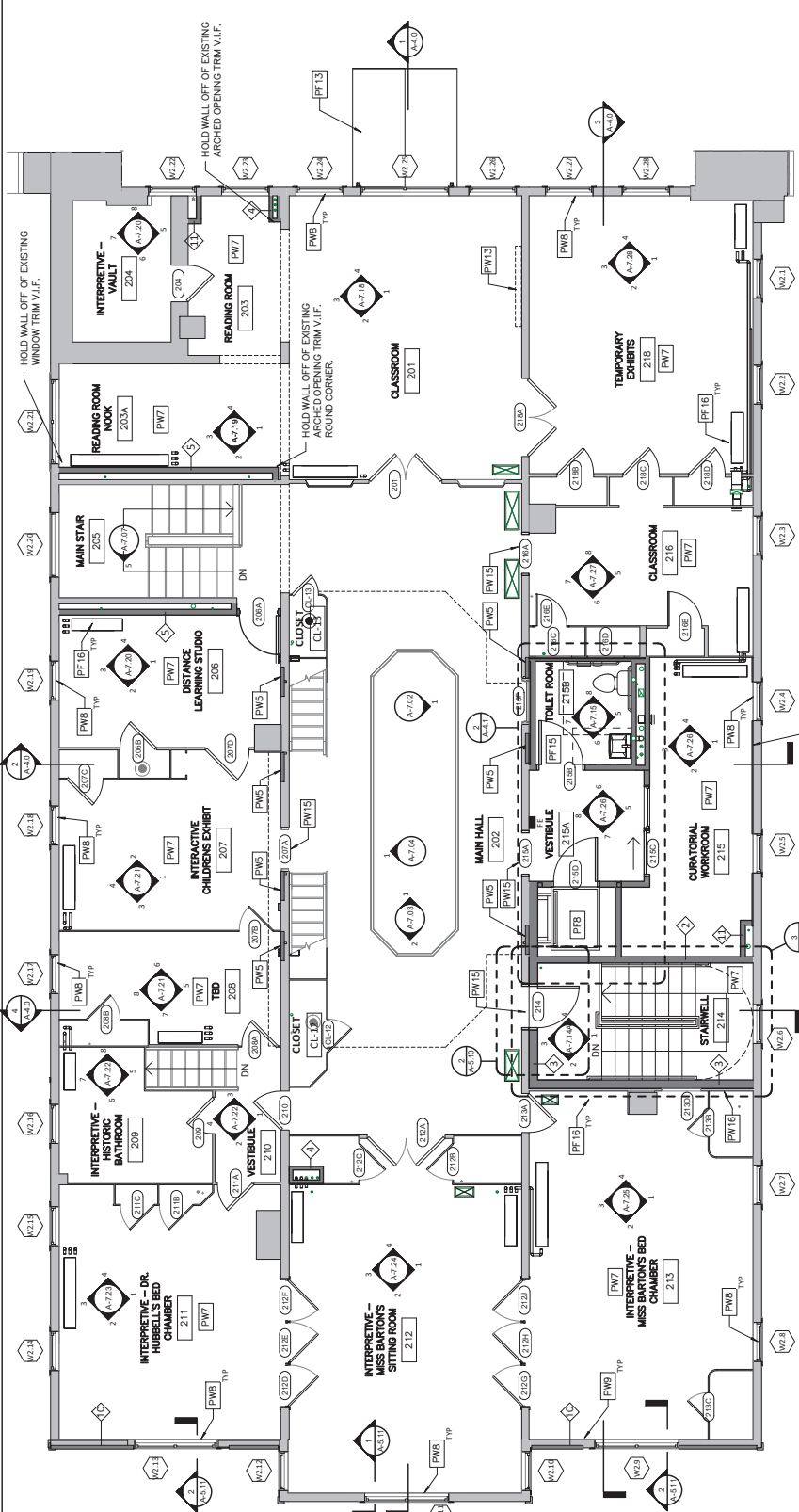
FLOOR PLAN GENERAL NOTES

1. THE NORTH (FRONT) SIDE OF BASEMENT CONTAINS A RAISED BANK OF DIRT WHICH HAS NOT BEEN REVEALED. CONTRACTOR SHALL BE RESPONSIBLE TO DO NOT DISTURB THE SURFACE OF THE DIRT ALL WORK IN THE VICINITY TO ACCESS THE FRONT WALL OF THE HOUSE MUST BE CAREFULLY EXECUTED TO MINIMIZE DISRUPTION.
2. CONTRACTOR SHALL INSTALL CONCRETE MAINTENANCE PADS FOR MECHANICAL EQUIPMENT AS INDICATED IN HVAC AND STRUCTURAL DRAWINGS. SOME PADS WILL HAVE STEEL FRAME PLATFORMS TO RAISE THE EQUIPMENT FOR ALL PIPES, PENETRATIONS (STEEL COLUMNS, DUCTWORK, PIPES, CONDUIT, ETC.), MINIMIZE EXTRA CUTTING OF HISTORIC FLOORBOARDS. CREATE OPENINGS WITH SMOG-FIT AROUND PENETRATING OPENINGS. CONTRACTOR SHALL BE RESPONSIBLE TO SEAL ALL PENETRATIONS THROUGH THE BASEMENT AND FIRST FLOOR. REFER TO PENETRATION DETAILS.
3. CONTRACTOR SHALL BE RESPONSIBLE TO OBTAIN ALL STRUCTURAL SYSTEMS OF JOISTS, BEAMS, TRUSSES, AND MATERIALS IN THE MAIN HALL ARE HISTORICALLY SIGNIFICANT AND MUST BE CAREFULLY HANDLED. REFER TO THE REFLECTED CEILING PLANS FOR PENETRATIONS.
4. CONTRACTOR SHALL BE RESPONSIBLE TO INSERT NEW METAL SISTER OVER THE CLOSET FACE BOARD WALL WITHOUT REMOVING THE WALL WHERE REQUIRED. REMOVE OR CUT THE WALL WHERE NOT REQUIRED. RESTORE TO ORIGINAL APPEARANCE.
5. AT THE REAR WALLS OF HALL CLOSETS WHERE REQUIRED, REMOVE ONLY THE WOOD PORTION OF THE WALL. RESTORE TO ORIGINAL APPEARANCE. THE WALL REFER TO STRUCTURAL DRAWINGS.
6. AT ALL WALLS REFER TO INTERIOR ELEVATIONS AND FINISH SCHEDULE. CONTRACTOR SHALL PROVIDE WHERE WALL OR CEILING IS OPEN FOR WORK PROVIDE BLOCKING FOR ACCESSORIES, DEVICES, ETC. DO NOT REMOVE HISTORIC FINISHES EXCLUSIVELY TO PROVIDE BLOCKING. NOTIFY ARCHITECT IF UNCERTAIN.

7. AT ALL WALLS REFER TO INTERIOR ELEVATIONS AND FINISH SCHEDULE. CONTRACTOR SHALL PROVIDE WHERE WALL OR CEILING IS OPEN FOR WORK PROVIDE BLOCKING FOR ACCESSORIES, DEVICES, ETC. DO NOT REMOVE HISTORIC FINISHES EXCLUSIVELY TO PROVIDE BLOCKING. NOTIFY ARCHITECT IF UNCERTAIN.
8. CONTRACTOR SHALL BE RESPONSIBLE TO INSERT NEW METAL SISTER OVER THE CLOSET FACE BOARD WALL WITHOUT REMOVING THE WALL WHERE REQUIRED. REMOVE OR CUT THE WALL WHERE NOT REQUIRED. RESTORE TO ORIGINAL APPEARANCE.
9. AT THE REAR WALLS OF HALL CLOSETS WHERE REQUIRED, REMOVE ONLY THE WOOD PORTION OF THE WALL. RESTORE TO ORIGINAL APPEARANCE. THE WALL REFER TO STRUCTURAL DRAWINGS.
10. AT ALL WALLS REFER TO INTERIOR ELEVATIONS AND FINISH SCHEDULE. CONTRACTOR SHALL PROVIDE WHERE WALL OR CEILING IS OPEN FOR WORK PROVIDE BLOCKING FOR ACCESSORIES, DEVICES, ETC. DO NOT REMOVE HISTORIC FINISHES EXCLUSIVELY TO PROVIDE BLOCKING. NOTIFY ARCHITECT IF UNCERTAIN.



DRAWING NO.	895
PWS/PAGE NO.	179603
312325	
TITLE OF SHEET	NEW WORK SECOND FLOOR PLAN
DESIGNED BY	SS, A.W, CB
TECH. REVIEW	M/M, MS
DATE	5/15/2025
REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	
SUB SHEET NO.	A-12
SHEET	OF X



FLOOR KEYNOTES

- PF1 NEW PTD STEEL COLUMN. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS OF NEW AND EXISTING COLUMNS THROUGHOUT BASEMENT.
- PF2 NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
- PF3 NEW PTD STEEL CROSS BRACING. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS.
- PF4 INSTALL NEW UNDERPINNING. REFER TO STRUCTURAL DRAWINGS AND DEMOLITION PLANS.
- PF5 INSTALL NEW BRICK PAVERS TO MATCH EXISTING IN KIND. REFER TO LANDSCAPE DRAWINGS.
- PF6 INSTALL (2) POSTS AND BEAM TO SUPPORT BAY. WRAP POSTS AND BEAM IN PAINTED WOOD TRIM. REFER TO STRUCTURAL DRAWINGS.
- PF7 NEW VERTICAL PLATFORM LIFT. REFER TO ENLARGED PLANS AND SECTIONS IN THE A-5 SHEET SERIES. REFER TO STRUCTURAL DRAWINGS FOR NEW SUPPORT. (OPTION 1).
- PF8 ALL FLOOR OPENINGS WITH WOOD FLOOR CONSTRUCTION TO MATCH EXISTING IN KIND. REFER TO FINISH PLANS (A-9 SERIES) AND STRUCTURAL DRAWINGS.
- PF9 NEW WOOD PORCHES AND STAIRS. ACCESSIBLE RAMP. REFER TO THE A-5 SHEET SERIES.
- PF10 NEW ACCESSIBLE TOILET ROOM.
- PF11 NEW FAN COIL UNIT. REFER TO MECHANICAL DRAWINGS. NEW CUSTOM PFD NO ENCLOSURE FOR CONCEALING UNIT. REFER TO DETAILS AND SCHEDULE ON A-8.4 (OPTION 6).
- PF12 NEW UPPER BALCONY. REFER TO THE A-5 SHEET SERIES.
- PF13 NEW KITCHENETTE MILLWORK. REFER TO INTERIOR ELEVATIONS AND DETAILS. REFRIGERATOR BY OWNER. (OPTION 5)
- PF14 NEW WOOD POST. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS THROUGHOUT THIRD FLOOR.
- PF15 AREA OF NEW CONCRETE SLAB REPLACEMENT. REFER TO DARK OUTLINED AREA (APPROXIMATELY 280 SF). REFER TO STRUCTURAL DRAWINGS.
- PF16 BETWEEN 1 BAY OF EXISTING FLOOR JOISTS, INSTALL RATED HORIZONTAL ENCLOSURE (TYPE X 0MB) FROM VERTICAL RATED SHAFT TO FAN COIL UNIT ON EAST SIDE OF ROOM. REFER TO MECHANICAL DRAWINGS FOR VRF PATH. INSTALL ENCLOSURE FROM UNDERSIDE OF FLOOR STRUCTURE.
- PF17 NEW PLASTIC VAPOR BARRIER ON DIRT FLOOR DURING WORK. TYP.
- PF18 PROTECT EXISTING STOVE AND DUCT IN SITU DURING WORK. TYP.

WALL KEYNOTES

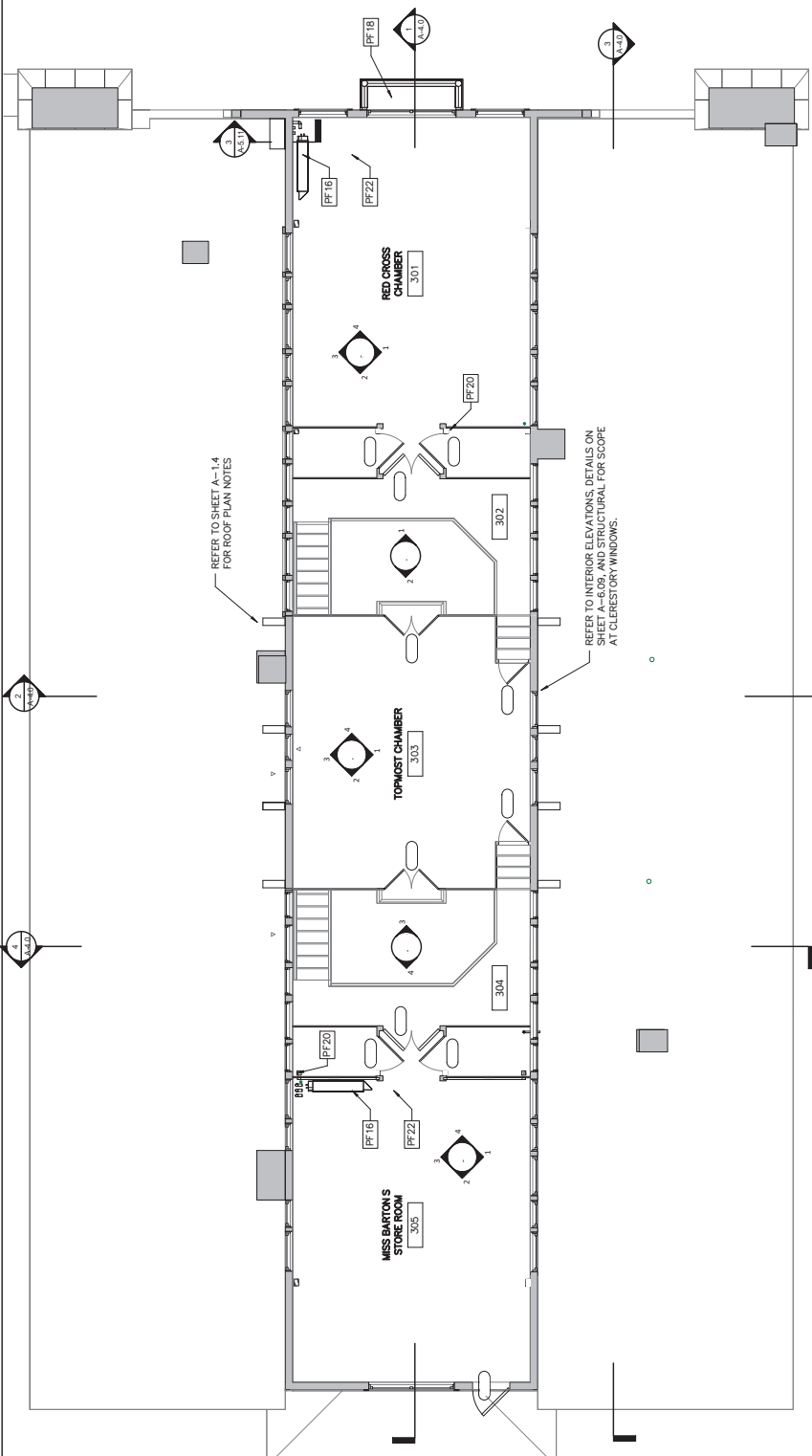
- PW1 REPOINT MASONRY FOUNDATION.
- PW2 INSTALL LOUVER WITHIN EXISTING OPENING. REFER TO MECHANICAL DRAWINGS.
- PW3 NEW ELECTRICAL COMPONENTS. REFER TO ELECTRICAL DRAWINGS.
- PW4 INSTALL SALVAGED FINISHES WHERE REMOVED AFTER STRUCTURAL COLLECTOR CONNECTIONS. REFER TO STRUCTURAL DRAWINGS AND INTERIOR ROOM ELEVATIONS.
- PW5 INSTALL NEW PLASTER FINISH (TO MATCH EXISTING IN KIND) AFTER STRUCTURAL SYSTEM IS COMPLETE. REFER TO STRUCTURAL DRAWINGS.
- PW6 REPLACE PLUMBING FIXTURES.
- PW7 REPAIR EXISTING PLASTER WALLS. REFER TO INTERIOR ELEVATION DRAWINGS.
- PW8 INSTALL INTERIOR STORM WINDOW. REFER TO WINDOW SCHEDULE.
- PW9 REPLACE EXISTING PREVIOUSLY RESTORED MJS IN DESIGNATED AREAS WITH NEW MJS WITH FIRE RETARDANT TREATMENT ON NEW BACKING. ATTACH WITH TACKS TO MATCH EXISTING. PAINT ACCORDING TO FINISH SCHEDULE. REFER TO REMOVAL AND REINSTALLATION OF TRIM ON A-8.7.
- PW10 VIDEO SCREEN TO BE SUPPLIED BY OWNER. INSTALL BLOCKING. TO BE COORDINATED WITH STRUCTURAL.
- PW11 INSTALL DRINKING FOUNTAINS. REFER TO INTERIOR ELEVATIONS AND DETAILS.
- PW12 NEW WOOD PORCHES AND STAIRS. ACCESSIBLE RAMP. REFER TO THE A-5 SHEET SERIES.
- PW13 AND 24 REFER TO DETAILS A/A-509 AND 13/A-510.
- PW14 SELECTIVELY REMOVE PAINT AT DESIGNATED AREAS TO CREATE EXPOSURE WINDOWS SHOWING HISTORIC WALLPAPER COVER EXPOSURE WINDOWS WITH CLEAR POLYCARBONATE MATERIAL. SEE INTERIOR ELEVATIONS AND DETAILS ON A-8.5.

1 NEW WORK SECOND FLOOR PLAN

A-12 SCALE

FLOOR PLAN LEGEND

- NEW WALL
- EXISTING WALL TO REMAIN
- DOOR TYPE & TAG
- EXISTING DOOR & TAG
- EXISTING DOOR CLOSED & TAG
- SLIDING DOOR TAG
- FIRE EXTINGUISHER - WALL MOUNTED



FLOOR PLAN GENERAL NOTES

1. THE NORTH (FRONT) SIDE OF BASEMENT CONTAINS A RAISED BANK OF DIRT WHICH HAS NOT BEEN MOVED OR REGRADED. CONTRACTOR SHALL NOT DISTURB THE SURFACE OF THE DIRT. ALL WORK IN THE VICINITY TO ACCESS THE FRONT WALL OF THE HOUSE MUST BE CAREFULLY EXECUTED TO MINIMIZE DISRUPTANCE. INSTALL CONCRETE MAINTENANCE PADS FOR MECHANICAL EQUIPMENT AS INDICATED IN HVAC AND STRUCTURAL DRAWINGS. SOME PADS WILL HAVE STEEL FRAME PLATFORMS TO RAISE THE EQUIPMENT FOR ALL VERTICAL PENETRATIONS (STEEL COLUMNS, DUCTWORK, PIPES, CONDUIT, ETC.). MINIMIZE EXTRA CUTTING OF HISTORIC FLOORBOARDS. CREATE OPENINGS WITH SNUG FIT AROUND PENETRATING OBJECT. SALVAGE ANY PIECES THAT ARE NOT SCRAP-SIZE.
2. SEAL ALL PENETRATIONS BETWEEN THE BASEMENT AND FIRST FLOOR. REFER TO PENETRATION DETAILS, STRUCTURAL DRAWINGS AND SCHEDULE FOR PENETRATION STRUCTURAL SYSTEMS OF JOISTS.
3. THE MATERIALS IN THE MAIN HALL ARE HISTORICALLY SIGNIFICANT AND MUST BE CAREFULLY HANDLED. REFER TO THE REFLECTED CEILING PLANS FOR PENETRATION DETAILS.
4. INSERT NEW METAL SISTER OVER THE CLOSET FACE BOARD WALL WITHOUT REMOVING THE WALL. WHERE REQUIRED, REMOVE OR CUT THE EXISTING METAL SISTER AT THE POINT OF ATTACHMENT. RESTORE TO ORIGINAL APPEARANCE.
5. AT THE REAR WALLS OF HALL CLOSETS WHERE REQUIRED, REMOVE ONLY THE WOOD PORTION OF THE WALL. REFER TO STRUCTURAL DRAWINGS. RESTORE WALL TO ORIGINAL APPEARANCE.
6. AT ALL WALLS, REFER TO INTERIOR ELEVATIONS AND DETAILS FOR FINISHES AND MATERIALS. WHERE WALL OR CEILING IS OPEN FOR WORK, PROVIDE BLOCKING FOR ACCESSORIES, DEVICES, ETC. DO NOT REMOVE HISTORIC FINISHES EXCLUSIVELY TO PROVIDE BLOCKING. NOTIFY ARCHITECT IF UNCERTAIN.

FLOOR KEYNOTES

- PF1 NEW PTD STEEL COLUMN. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS OF NEW AND EXISTING COLUMNS THROUGHOUT BASEMENT.
- PF2 NEW CONCRETE LANDING. REFER TO CIVIL DRAWINGS.
- PF3 NEW PTD STEEL CROSS BRACING. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS.
- PF4 INSTALL NEW UNDERPINNING. REFER TO STRUCTURAL DRAWINGS AND DEMOLITION PLANS.
- PF5 INSTALL NEW BRICK PAVERS TO MATCH EXISTING IN KIND. REFER TO LANDSCAPE DRAWINGS.
- PF6 INSTALL (2) POSTS AND BEAM TO SUPPORT BAY. WRAP POSTS AND BEAM IN PAINTED WOOD TRIM. REFER TO STRUCTURAL DRAWINGS.
- PF7 NEW VERTICAL PLATFORM LIFT. REFER TO ENLARGED PLANS AND SECTIONS IN THE A-5 SHEET SERIES. REFER TO STRUCTURAL DRAWINGS FOR NEW SUPPORT. (OPTION 1)
- PF8 ALL FLOOR OPENING WITH WOOD FLOOR CONSTRUCTION TO MATCH EXISTING IN KIND. REFER TO FINISH PLANS (A-9 SERIES) AND STRUCTURAL DRAWINGS.
- PF9 REPAIR EXISTING WOOD FLOORING IN EXISTING REAR STAIR ACCESSIBLE RAMP. REFER TO THE A-5 SHEET SERIES.
- PF10 NEW WOOD PORCH STAIR ACCESSIBLE RAMP. REFER TO THE A-5 SHEET SERIES.
- PF11 NEW ACCESSIBLE TOILET ROOM.
- PF12 NEW FAN COIL UNIT. REFER TO MECHANICAL DRAWINGS. NEW CUSTOM PFD WD ENCLOSURE FOR CONCEALING UNIT. REFER TO DETAILS AND SCHEDULE ON A-8.4 (OPTION 6).
- PF13 NEW UPPER BALCONY. REFER TO THE A-5 SHEET SERIES.
- PF14 NEW KITCHENETTE MILLWORK. REFER TO INTERIOR ELEVATIONS AND DETAILS. REFRIGERATOR BY OWNER. (OPTION 5)
- PF15 NEW WOOD POST. REFER TO STRUCTURAL DRAWINGS FOR LOCATIONS THROUGHOUT THIRD FLOOR.
- PF16 AREA OF NEW CONCRETE SLAB REPLACEMENT. REFER TO DARK OUTLINED AREA (APPROXIMATELY 280 SF). REFER TO STRUCTURAL DRAWINGS.
- PF17 BETWEEN 1 BAY OF EXISTING FLOOR JOISTS. INSTALL RATED HORIZONTAL ENCLOSURE (TYPE X GWB) FROM VERTICAL RATED SHAFT TO FAN COIL UNIT ON EAST SIDE OF ROOM. REFER TO MECHANICAL DRAWINGS FOR VRF PATH. INSTALL ENCLOSURE FROM UNDERSIDE OF FLOOR STRUCTURE.
- PF18 NEW PLASTIC VAPOR BARRIER ON DIRT FLOOR WITH NEW MAINT ENANCE PADS.
- PF19 PROTECT EXISTING STOVE AND DUCT IN SITU DURING WORK, TYP.

WALL KEYNOTES

- PW1 REPOINT MASONRY FOUNDATION
- PW2 INSTALL LAUNDRY WITHIN EXISTING OPENING. REFER TO MECHANICAL DRAWINGS.
- PW3 NEW ELECTRICAL COMPONENTS. REFER TO ELECTRICAL DRAWINGS.
- PW4 INSTALL SALVAGED FINISHES WHERE REMOVED AFTER STRUCTURAL COLLECTOR CONNECTIONS. REFER TO STRUCTURAL DRAWINGS AND INTERIOR ROOM ELEVATIONS.
- PW5 INSTALL NEW PLASTER FINISH (TO MATCH EXISTING IN KIND) AFTER STRUCTURAL CONNECTIONS COMPLETE. REFER TO STRUCTURAL DRAWINGS.
- PW6 REPLACE PLUMBING FIXTURES.
- PW7 REPAIR EXISTING PLASTER WALLS. REFER TO INTERIOR ELEVATION DRAWINGS.
- PW8 INSTALL INTERIOR STORM WINDOW. REFER TO WINDOW SCHEDULE
- PW9 REPLACE EXISTING, PREVIOUSLY RESTORED MJS IN DESIGNATED AREAS WITH NEW MJSLW WITH FIRE RETARDANT TREATMENT ON NEW BACKING. ATTACH WITH TACKS TO MATCH EXISTING. PAINT ACCORDING TO FINISH SCHEDULE. REFER TO REMOVAL AND REINSTALLATION OF TRIM ON A-8.7.
- PW10 VIDEO SCREEN TO BE SUPPLIED BY OWNER. INSTALL BLOCKING. TO BE COORDINATED WITH STRUCTURAL.
- PW11 INSTALL DRINKING FOUNTAINS. REFER TO INTERIOR ELEVATIONS AND DETAILS.
- PW12 AND 214 REFER TO DET A-1.4/A-5.09 AND A-1.4/A-5.10.
- PW13 SELECTIVELY REMOVE PAINT AT DESIGNATED AREAS TO CREATE EXPOSURE WINDOWS SHOWING HISTORIC WALLPAPER. COVER EXPOSURE WINDOWS WITH CLEAR POLYCARBONATE MATERIAL. SEE INTERIOR ELEVATIONS AND DETAILS ON A-8.5.

1 NEW WORK THIRD FLOOR PLAN
A-1.3 SCALE

DESIGNER: J.A. GARDNER
 SS, A.W, CB
 TECH. REVIEW: M.J.M, MS
 DATE: 5/15/2025

SUB SHEET NO. A-1.3

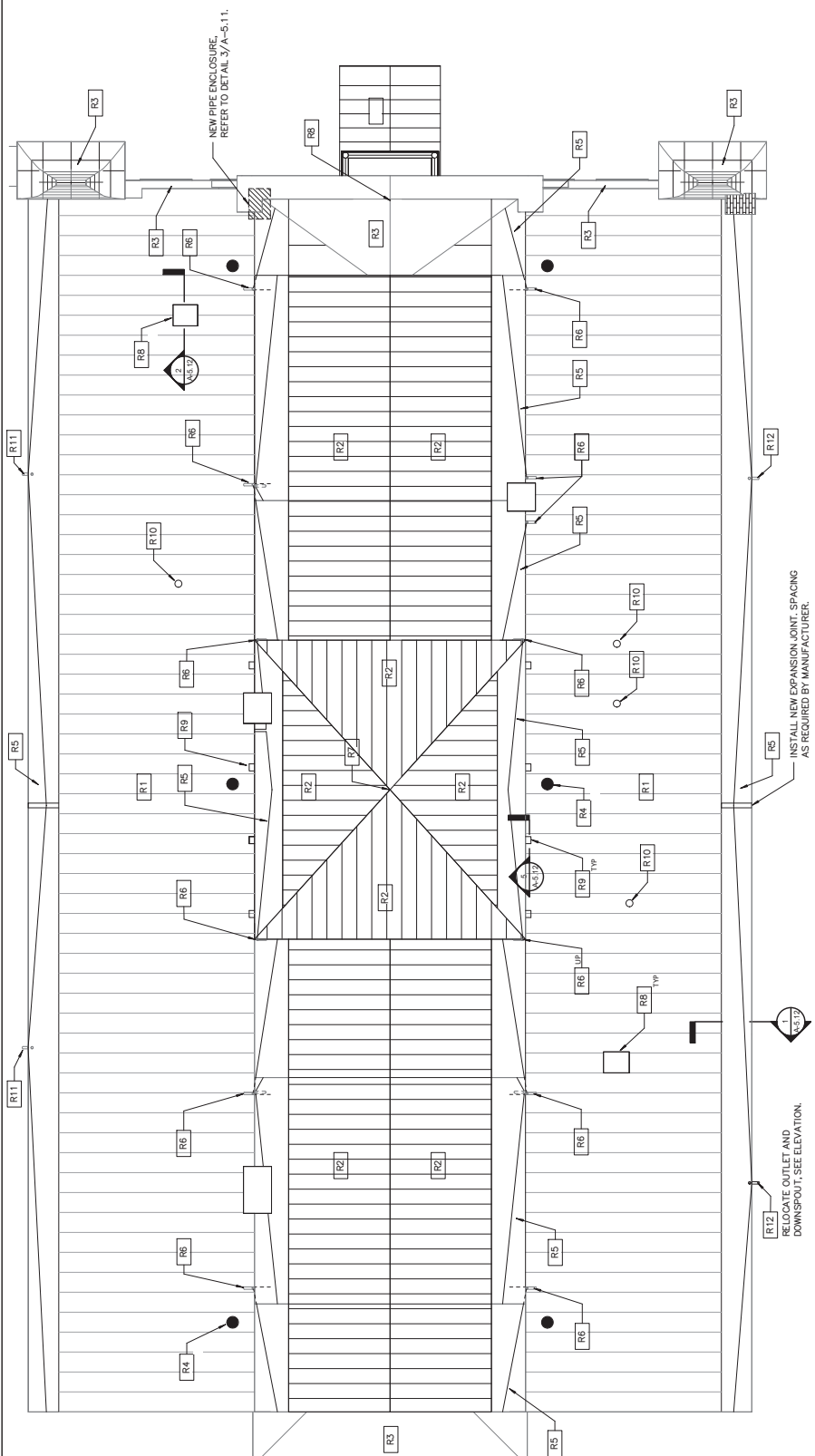
TITLE OF SHEET: NEW WORK THIRD FLOOR PLAN

DRAWING NO. 895
 PMS/PAGE NO. 179603
 312325

REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE

SHEET 5 OF X





SCALE 1/4" = 1'-0"
SCALE OF FEET

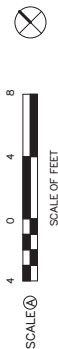
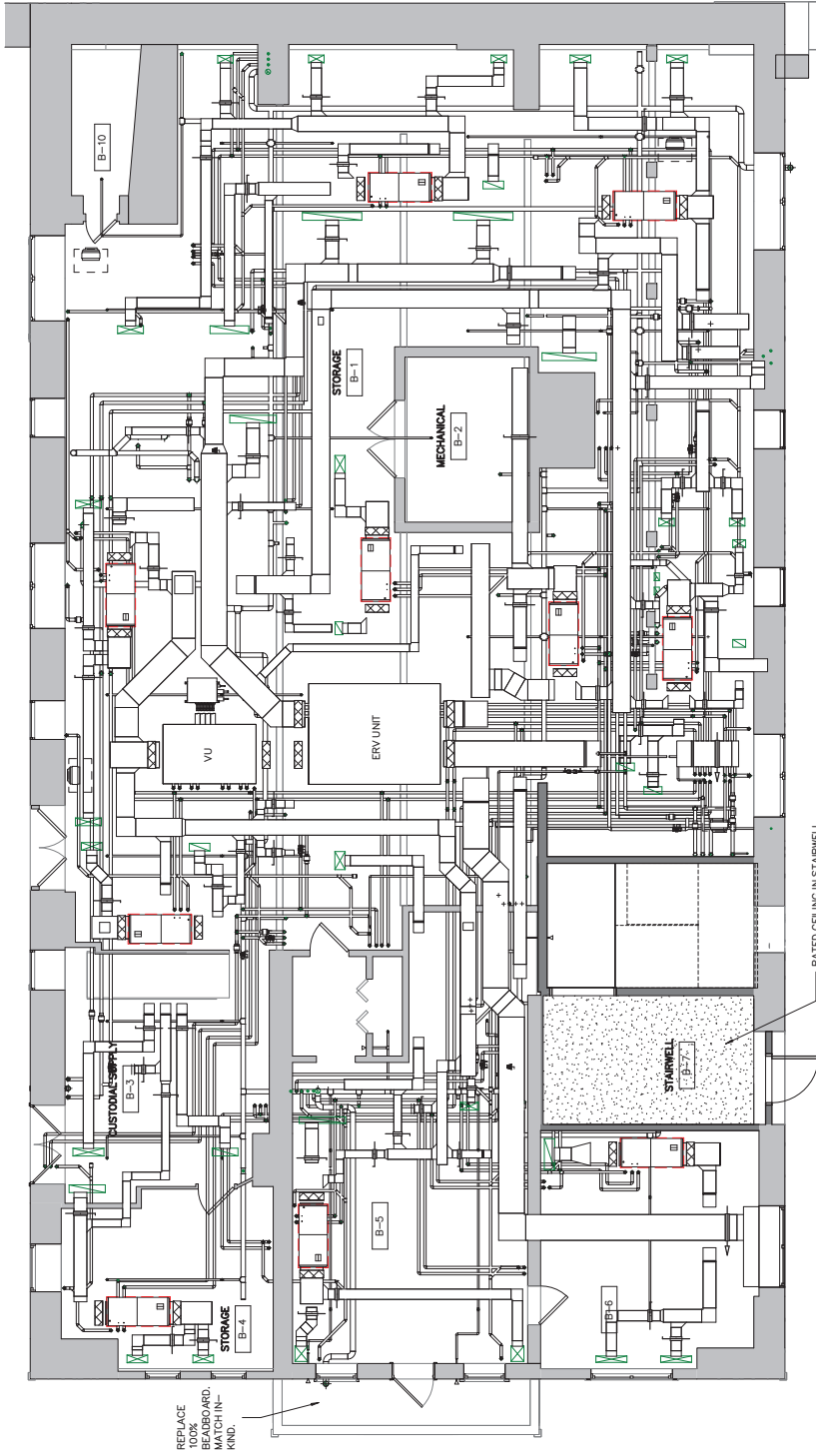
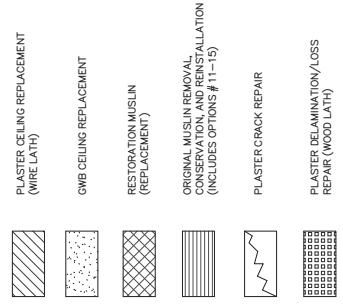
1 NEW WORK ROOF PLAN
SCALE 1/4" = 1'-0"

ROOF PLAN KEYNOTES

- R1 INSTALL NEW PTD STANDING SEAM COPPER ROOFING TO MATCH EXISTING. INSTALL ADDITIONAL LAYER OF PLYWOOD SHEATHING OVER EXISTING SHEATHING. REFER TO STRUCTURAL AND ROOF DETAILS ON A-5.12.
- R2 INSTALL NEW PTD STANDING SEAM COPPER ROOFING TO MATCH EXISTING. EXISTING SHEATHING BOARDS TO REMAIN. ASSUME 10% REPLACEMENT OF BOARD SHEATHING.
- R3 INSTALL REPLACEMENT COPPER FLAT SEAM SHEET METAL TO MATCH EXISTING. EXISTING SHEATHING BOARD TO REMAIN.
- R4 NEW FALL PROTECTION COMPONENTS. REFER TO FALL DRAWINGS.
- R5 INSTALL REPLACEMENT COPPER-ROOFED POLE GUTTER TO MATCH EXISTING. REFER TO DETAILS ON A-5.12.
- R6 INSTALL SALVAGED OR NEW COPPER DOWNSPOUT TO MATCH EXISTING. ASSUME 25% REPLACEMENT V.I.F. REFER TO EXTERIOR ELEVATIONS.
- R7 INSTALL NEW COPPER FLASHING AND GUTTER UPON VERTICAL ACCESS NOTIF ARCHITECT TO EXAMINE CONDITION OF FLAGPOLE. ASSUME THAT FLAGPOLE SHAFT IS REMOVED FOR REPAIR. REFER TO EXTERIOR ELEVATIONS FOR BRCKY REPORTING SCOPE. INSTALL NEW COPPER STEP FLASHING. REFER TO DETAIL 2/A-5.12.
- R8 EXISTING CHIMNEY TO REMAIN. REFER TO EXTERIOR ELEVATIONS FOR BRCKY REPORTING SCOPE. INSTALL NEW COPPER STEP FLASHING. REFER TO DETAIL 2/A-5.12.
- R9 NEW EXTERIOR PLYWOOD GUSSETS TO ALIGN WITH EXISTING MULLIONS. FINISH WITH FLAT SEAM METAL TO MATCH ROOFING. REFER TO STRUCTURAL AND DETAILS ON A-6.09 AND 5/A-5.12.
- R10 PIPE PENETRATOR. INSTALL NEW COPPER PIPE FLASHING. REFER TO 3/A-5.12.
- R11 REMOVE AND REINSTALL PAINTED METAL DOWNSPOUT AFTER WORK IS COMPLETE. CONNECT TO SUBGRADE DRAINAGE.
- R12 REMOVE AND REINSTALL PAINTED METAL DOWNSPOUT AFTER WORK IS COMPLETE. PROVIDE CONCRETE SPLASH BLACK AT GRADE.

DESIGNER: JIA GABED	SS: A.W. CB TECH. REVIEW: M/J.M. MS DATE: 5/15/2025	SUB SHEET NO. A-1.4	TITLE OF SHEET NEW WORK ROOF PLAN REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	DRAWING NO. 895 179603 PMS/PKG. NO. 312325 SHEET OF X
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CEILING PLAN LEGEND



1 BASEMENT REFLECTED CEILING PLAN
SCALE 1/8" = 1'-0"

REFLECTED CEILING PLAN KEYNOTES







- C1 REPLACE EXISTING MUSLIN (PREVIOUSLY RESTORED) WITH NEW MUSLIN WITH FIRE RETARDANT TREATMENT ON NEW BACKING. ATTACH WITH TACKS TO MATCH EXISTING. REFER TO FINISH SCHEDULE FOR PAINT. REFER TO DETAILS ON A-8.7.
- C2 CAREFULLY REINSTALL HISTORIC MUSLIN (ORIGINAL) ON NEW BACK WITH TACKS TO MATCH EXISTING. SEE DETAILS ON A-8.7 AND REFER TO SPEC SECTION 097723. SEE OPTIONS # 11-15.
- C3 REPLACE PLASTER CEILING IN KIND.
- C4 REPAIR EXISTING PLASTER CEILING.
- C5 CAREFULLY REMOVE HISTORIC MUSLIN AND SALVAGE FOR ARCHIVAL STORAGE. INSTALL REPLACEMENT MUSLIN. SEE OPTIONS 11-15.
- C6 REPLACE EXISTING GWB CEILING WITH NEW PTD GWB CEILING.
- C7 EXISTING CEILING TO REMAIN.
- C8 REPLACE EXISTING PREVIOUSLY RESTORED MUSLIN WITH PTD GWB CEILING.
- C9 CRACK WITH PLASTER MATCHING HISTORIC MATERIAL AND TEXTURE, PRIME AND PAINT; OR CRACKS IN PLASTER 1/32" INCH WIDE OR NARROWER, FILL WITH PATCHING COMPOUND AND SAND TO CREATE A LEVEL, SMOOTH SURFACE. PRIME AND PAINT.
- C10 INSTALL NEW PLASTER AT DESIGNATED AREAS TO MATCH MATERIAL AND TEXTURE OF HISTORIC.
- C11 RE-ADHERE DETACHED/DELAMINATED PLASTER. USE TEMPORARY SUPPORTS TO RETURN DISPLACED PLASTER INTO PLANE WHERE POSSIBLE WITHOUT CRACKING. INJECT CONSERVATION ADHESIVE THROUGH PORTHOLE DRILLED INTO PLASTER AND/OR EXISTING CRACKS AND VOIDS. FILL CRACKS AND PORTHOLE WITH PLASTER.
- C12 GENTLY REMOVE LOOSELY ADHERING PAINT OR SCRAPE FEELING/CRACKING PAINT. DO NOT DAMAGE UNDERLYING PLASTER OR WALL SURFACE. PAINT REMOVAL MUST BE PERFORMED BY PERSONNEL PROPERLY TRAINED IN LEAD SAFE WORK PRACTICES.
- C13 CAREFULLY REMOVE WOOD CEILING TRIM FOR MUSLIN CONSERVATION AND REINSTALL. ASSUME 200% REPLACEMENT TO MATCH EXISTING. SEE DETAILS ON SHEET A-8.7.
- C14 RECONSTRUCT CEILING SOFFIT TO CONCEAL SYSTEMS.

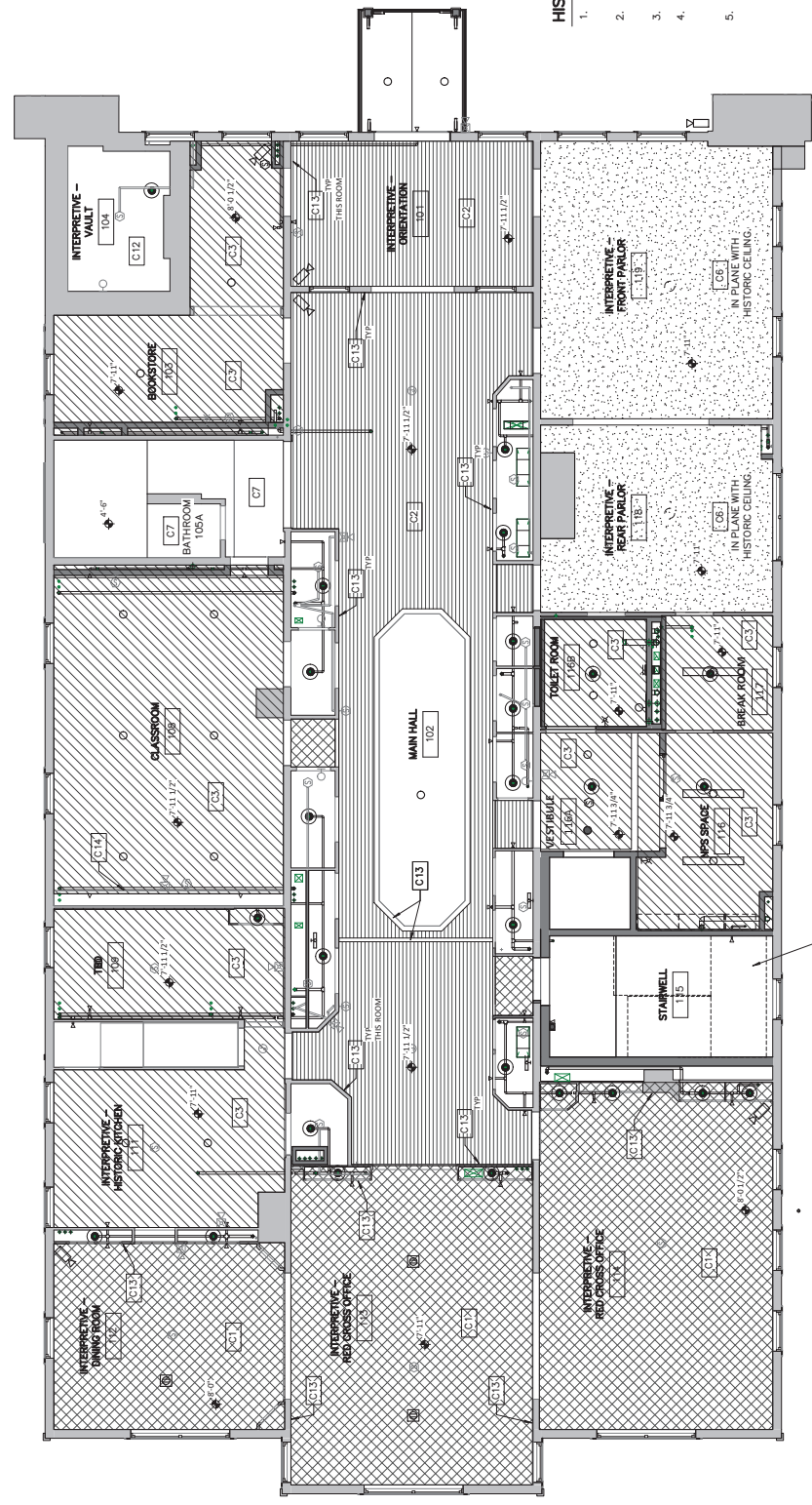
CEILING PLAN GENERAL NOTES

1. MECHANICAL & ELECTRICAL DEVICES, LIGHTING, FIRE ALARM DEVICES, AND SPRINKLER HEADS ARE SHOWN FOR PLACEMENT ONLY. REFER TO OTHER DRAWINGS FOR SCHEDULES AND NOTES FOR THESE DEVICES. PROVIDE GWB RETURN AT ALL GWB SOFFITS.
2. CENTER ALL DEVICES IN CENTER OF CEILING UNLESS OTHERWISE NOTED.
3. EXISTING PAINTED WOOD BOARD CEILINGS IN CLOSETS TO REMAIN.
4. PATCH ALL HOLES LEFT BY THE REMOVAL OF THE FOLLOWING:
 - A. DETACHED PLASTER, PLASTER CRACKS, FIRE EXTINGUISHERS, MOTION DETECTORS, STICKERS & ADHESIVES.
 - B. GENTLY REMOVE LOOSELY ADHERING PAINT OR SCRAPE FEELING/CRACKING PAINT. DO NOT DAMAGE UNDERLYING PLASTER OR WALL SURFACE. PAINT REMOVAL MUST BE PERFORMED BY PERSONNEL PROPERLY TRAINED IN LEAD SAFE WORK PRACTICES.

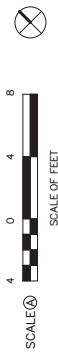
DESIGNER: JIA GABED	SUB SHEET NO. A-2.0	TITLE OF SHEET BASEMENT REFLECTED CEILING PLAN	DRAWING NO. 895
TECH. REVIEW: M/J, MS		REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	PMS/PAGE NO. 312325
DATE: 5/15/2025			SHEET OF X

CILING PLAN LEGEND

-  PLASTER CEILING REPLACEMENT (WIRE LATH)
-  GWB CEILING REPLACEMENT
-  RESTORATION MUSLIN (REPLACEMENT)
-  ORIGINAL MUSLIN REMOVAL, CONSERVATION, AND REINSTALLATION (INCLUDES OPTIONS # 11-15)
-  PLASTER CRACK REPAIR
-  PLASTER DELAMINATION/LOSS REPAIR (WOOD LATH)



REMOVE PLASTER CEILING FOR NEW EGRESS STAIR. REPAIR WOOD BOARD AT UNDERSIDE OF STAIRS AND LANDINGS.



1 FIRST FLOOR REFLECTED CEILING PLAN
A-2.1 SCALE ①

HISTORIC MUSLIN TREATMENT GENERAL NOTES

1. CAREFULLY REMOVE DESIGNATED HISTORIC WOOD TRIM AT MUSLIN PANEL PERIMETERS. CAREFULLY REMOVE EXISTING HISTORIC MUSLIN CEILING PANELS, PAPER BACKING, AND EXISTING FASTENERS.
2. SALVAGE AND PERFORM CONSERVATION TREATMENTS INCLUDING REPAIRS OF DAMAGE SUCH AS TEARS AND TEAKS, AND LINING MUSLIN.
3. SALVAGE HISTORIC WOOD TRIM AND STORE FOR REINSTALLATION. INSTALL NEW PAPER BACKING, REINSTALL EXISTING CONSERVED MUSLIN PANELS WITH TACKS TO MATCH EXISTING. SEE FINISH SCHEDULE FOR ADDITIONAL FINISH TREATMENTS.
4. 3RD FLOOR MUSLIN CEILING: REMOVE DESIGNATED HISTORIC WOOD TRIM AT MUSLIN PANEL PERIMETERS. CAREFULLY REMOVE EXISTING HISTORIC MUSLIN CEILING PANELS, PAPER BACKING, AND EXISTING FASTENERS.
5. ARCHIVAL PACKAGING OF MUSLIN PANEL FOR LONG-TERM STORAGE.
6. REINSTALL HISTORIC WOOD TRIM IN THEIR ORIGINAL LOCATIONS. ATTACH MUSLIN WITH TACKS TO MATCH EXISTING. SEE FINISH SCHEDULE FOR ADDITIONAL FINISH TREATMENTS.
7. OPTIONS FOR HISTORIC MUSLIN CEILING CONSERVATION OF 3RD FLOOR MUSLIN CEILING: STICKERS, DRY CLEANING, SOLVENT CLEANING, STITCH LINING. SEE SPECIFICATION SECTION 09723 FOR A DETAILED EXPLANATION OF MUSLIN CEILING TREATMENT OPTIONS.

CEILING PLAN GENERAL NOTES







1. MECHANICAL & ELECTRICAL DEVICES, LIGHTING, FIRE ALARM DEVICES, AND SPRINKLER HEADS ARE SHOWN FOR PLACEMENT ONLY. REFER TO MECHANICAL, ELECTRICAL, AND FIRE ALARM SCHEDULES FOR DETAILS.
2. PROVIDE GWB RETURN AT ALL GWB SOFFITS.
3. CENTER ALL DEVICES IN CENTER OF CEILING UNLESS OTHERWISE NOTED.
4. EXISTING PAINTED WOOD BOARD CEILING IN CLOSETS TO REMAIN.
5. PATCH ALL HOLES LEFT BY THE REMOVAL OF THE FOLLOWING:
 - A. DETECTORS, STICKERS & ADHESIVES
 - B. DETECTORS, STICKERS & ADHESIVES
 - C. GENTLY REMOVE LOOSELY ADHERING PAINT OR SCRAPE PEELING/CRACKING PAINT. DO NOT DAMAGE UNDERLYING PLASTER OR GYP. REPAIRS TO BE MADE BY PERSONNEL PROPERLY TRAINED IN LEAD SAFE WORK PRACTICES.

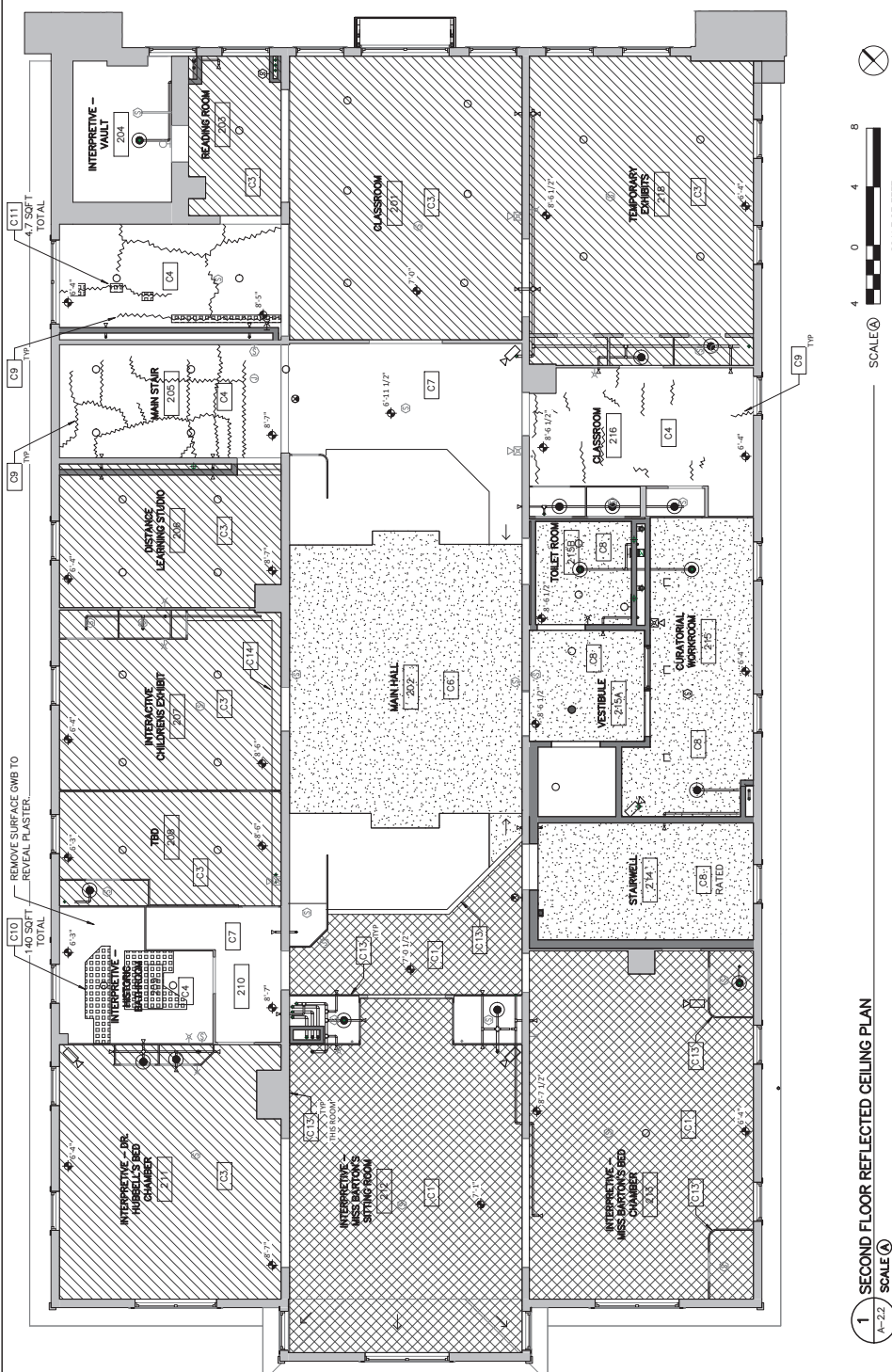
REFLECTED CEILING PLAN KEYNOTES

- C11 REPLACE EXISTING MUSLIN (PREVIOUSLY RESTORED) WITH NEW MUSLIN WITH FIRE RETARDANT TREATMENT ON NEW BACKING. ATTACH WITH TACKS TO MATCH EXISTING. REFER TO FINISH SCHEDULE FOR PAINT. REFER TO DETAILS ON A-8.7.
- C12 CAREFULLY REINSTALL HISTORIC MUSLIN (ORIGINAL) ON NEW BACK WITH TACKS TO MATCH EXISTING. SEE DETAILS ON A-8.7 AND REFER TO SPEC SECTION 09723.23. SEE OPTIONS # 11-15.
- C13 REPLACE PLASTER CEILING IN KIND.
- C14 CAREFULLY REMOVE HISTORIC MUSLIN AND SALVAGE FOR ARCHIVAL STORAGE. INSTALL REPLACEMENT MUSLIN. SEE OPTIONS 11-15.
- C15 REPLACE EXISTING GWB CEILING WITH NEW PTD GWB CEILING.
- C16 REPLACE EXISTING PREVIOUSLY RESTORED MUSLIN WITH PTD GWB CEILING.
- C17 REPLACE EXISTING PLASTER WITH GREATER STRENGTH PLASTER. PATCH CRACKS WITH PLASTER MATCHING HISTORIC MATERIAL AND TEXTURE. PRIME AND PAINT. FOR CRACKS IN PLASTER 1/32 INCH WIDE OR NARROWER, FILL WITH PATCHING COMPOUND AND SAND TO CREATE A LEVEL, SMOOTH SURFACE. PRIME AND PAINT.
- C18 INSTALL NEW PLASTER AT DESIGNATED AREAS TO MATCH MATERIAL AND TEXTURE OF HISTORIC.
- C19 RE-ADHERE DETACHED/DELAMINATED PLASTER. USE TEMPORARY SUPPORTS TO RETURN DISPLACED PLASTER INTO PLANE WHERE POSSIBLE WITHOUT CRACKING. INJECT CONSERVATION ADHESIVE THROUGH PORTHOLES DRILLED INTO PLASTER AND/OR EXISTING CRACKS AND VOIDS. FILL CRACKS AND PORTHOLES AND PAINT.
- C20 GENTLY REMOVE LOOSELY ADHERING PAINT OR SCRAPE PEELING/CRACKING PAINT. DO NOT DAMAGE UNDERLYING PLASTER OR WALL SURFACE. PAINT REMOVAL MUST BE PERFORMED BY PERSONNEL PROPERLY TRAINED IN LEAD SAFE WORK PRACTICES.
- C21 CAREFULLY REMOVE WOOD CEILING TRIM FOR MUSLIN CONSERVATION AND REINSTALL. ASSUME 20% REPLACEMENT TO MATCH EXISTING. SEE DETAILS ON SHEET A-8.7.
- C22 RECONSTRUCT CEILING SOFFIT TO CONCEAL SYSTEMS.

DESIGNER: J/A GATED	SUB SHEET NO. A-2.1	TITLE OF SHEET FIRST FLOOR REFLECTED CEILING PLAN	DRAWING NO. 895
TECH. REVIEW: M/M, MS	DATE: 5/15/2025	REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	PMS/PAGE NO. 179603
			312325
			SHEET OF X

CEILING PLAN LEGEND

-  PLASTER CEILING REPLACEMENT (WIRE LATH)
-  GWB CEILING REPLACEMENT
-  RESTORATION MUSLIN (REPLACEMENT)
-  ORIGINAL MUSLIN REMOVAL, CONSERVATION, AND REINSTALLATION (INCLUDES OPTIONS # 11-15)
-  PLASTER CRACK REPAIR
-  PLASTER DELAMINATION/LOSS REPAIR (WOOD LATH)



1 SECOND FLOOR REFLECTED CEILING PLAN
SCALE 1/8" = 1'-0"

REFLECTED CEILING PLAN KEYNOTES

- C1 REPLACE EXISTING MUSLIN (PREVIOUSLY RESTORED) WITH NEW MUSLIN WITH FIRE RETARDANT TREATMENT ON NEW BACKING. ATTACH WITH TACKS TO MATCH EXISTING. REFER TO FINISH SCHEDULE FOR PAINT. REFER TO DETAILS ON A-8-7.
- C2 CAREFULLY REINSTALL HISTORIC MUSLIN (ORIGINAL) ON NEW BACK WITH TACKS TO MATCH EXISTING. SEE DETAILS ON A-8-7 AND REFER TO SPEC SECTION 097723. SEE OPTIONS # 11-15.
- C3 REPLACE PLASTER CEILING IN KIND.
- C4 REPAIR EXISTING PLASTER CEILING.
- C5 CAREFULLY REMOVE HISTORIC MUSLIN AND SALVAGE FOR ARCHIVAL STORAGE. INSTALL REPLACEMENT MUSLIN. SEE OPTIONS 11-15.
- C6 REPLACE EXISTING GWB CEILING WITH NEW PTD GWB CEILING.
- C7 EXISTING CEILING TO REMAIN.
- C8 REPLACE EXISTING PREVIOUSLY RESTORED MUSLIN WITH PTD GWB CEILING.
- C9 CRACK WITH PLASTER MATCHING HISTORIC MATERIAL AND TEXTURE, PRIME AND PAINT; OR CRACKS IN PLASTER 1/32 INCH WIDE OR NARROWER, FILL WITH PATCHING COMPOUND AND SAND TO CREATE A LEVEL, SMOOTH SURFACE. PRIME AND PAINT.
- C10 INSTALL NEW PLASTER AT DESIGNATED AREAS TO MATCH MATERIAL AND TEXTURE OF HISTORIC.
- C11 RE-ADHERE DETACHED/DELAMINATED PLASTER. USE TEMPORARY SUPPORTS TO RETURN DISPLACED PLASTER INTO PLANE WHERE POSSIBLE WITHOUT CRACKING. INJECT CONSERVATION ADHESIVE THROUGH PORTHOLES DRILLED INTO PLASTER AND/OR EXISTING CRACKS AND VOIDS. FILL CRACKS AND PORTHOLES AND PAINT.
- C12 GENTLY REMOVE LOOSELY ADHERING PAINT OR SCRAPE FEELING/CRACKING PAINT. DO NOT DAMAGE UNDERLYING PLASTER OR WALL SURFACE. PAINT REMOVAL MUST BE PERFORMED BY PERSONNEL PROPERLY TRAINED IN LEAD SAFE WORK PRACTICES.
- C13 CAREFULLY REMOVE WOOD CEILING TRIM FOR MUSLIN CONSERVATION AND REINSTALL. ASSUME 20% REPLACEMENT TO MATCH EXISTING. SEE DETAILS ON SHEET A-8-7.
- C14 RECONSTRUCT CEILING SOFFIT TO CONCEAL SYSTEMS.

HISTORIC MUSLIN TREATMENT GENERAL NOTES

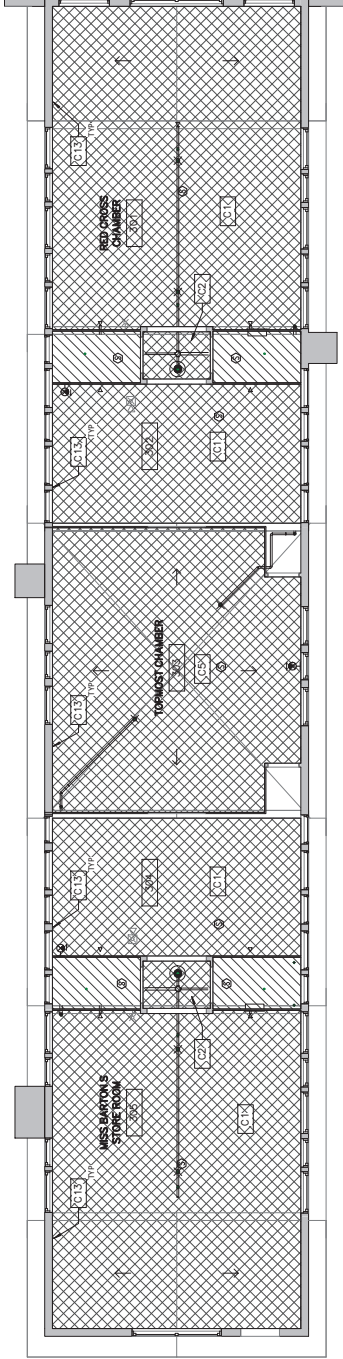
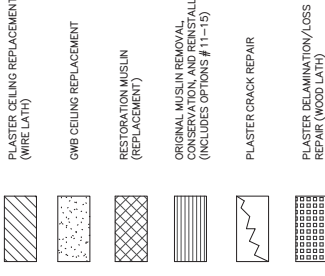
1. CAREFULLY REMOVE DESIGNATED HISTORIC WOOD TRIM AT MUSLIN PANEL PERIMETERS. CAREFULLY REMOVE EXISTING HISTORIC MUSLIN CEILING PANELS, PAPER BACKING, AND EXISTING FASTENERS.
2. SALVAGE AND PERFORM CONSERVATION TREATMENTS INCLUDING REPAIRS OF DAMAGE SUCH AS RIPS AND TEARS, AND LINING MUSLIN.
3. SALVAGE HISTORIC WOOD TRIM AND STORE FOR REINSTALLATION. ASSUME 20% REPLACEMENT TO MATCH EXISTING.
4. INSTALL NEW PAPER BACKING, REINSTALL CONSERVED MUSLIN PANELS WITH TACKS TO MATCH EXISTING. SEE FINISH SCHEDULE FOR ADDITIONAL FINISH TREATMENTS.
5. 3RD FLOOR MUSLIN CEILING:
 - A. REMOVE EXISTING PLASTER AND REINSTALL HISTORIC MUSLIN CEILING PANELS, PAPER BACKING, AND EXISTING FASTENERS.
 - B. ARCHIVAL PACKAGING OF MUSLIN PANEL FOR LONG-TERM STORAGE.
 - C. REINSTALL HISTORIC WOOD TRIM IN THEIR ORIGINAL LOCATIONS. ATTACH MUSLIN WITH TACKS TO MATCH EXISTING. SEE FINISH SCHEDULE FOR ADDITIONAL FINISH TREATMENTS.
6. OPTIONS FOR HISTORIC MUSLIN CEILING CONSERVATION OF 3RD FLOOR MUSLIN CEILING:
 1. 3RD FLOOR MUSLIN CEILING WITH TACKS TO MATCH EXISTING. SEE FINISH SCHEDULE FOR ADDITIONAL FINISH TREATMENTS.
 2. SOLVENT CLEANING, STITCH LINING. SEE SPECIFICATION SECTION 097723 FOR A DETAILED EXPLANATION OF MUSLIN CEILING TREATMENT OPTIONS.

CEILING PLAN GENERAL NOTES

1. MECHANICAL & ELECTRICAL DEVICES, LIGHTING, FIRE ALARM DEVICES, AND SPRINKLER HEADS ARE SHOWN FOR PLACEMENT ONLY. REFER TO MECHANICAL, ELECTRICAL, AND FIRE ALARM SCHEDULES FOR DETAILS. PROVIDE GWB RETURN AT ALL GWB SOFFITS.
2. CENTER ALL DEVICES IN CENTER OF CEILING UNLESS OTHERWISE NOTED.
3. EXISTING PAINTED WOOD BOARD CEILING IN CLOSETS TO REMAIN.
4. PATCH ALL HOLES LEFT BY THE REMOVAL OF THE FOLLOWING:
 - A. DETECTORS, STICKERS, AND ADHESIVES.
 - B. DETECTORS, STICKERS, AND ADHESIVES.
5. GENTLY REMOVE LOOSELY ADHERING PAINT OR SCRAPE FEELING/CRACKING PAINT. DO NOT DAMAGE UNDERLYING PLASTER OR WALL SURFACE. PAINT REMOVAL MUST BE PERFORMED BY PERSONNEL PROPERLY TRAINED IN LEAD SAFE WORK PRACTICES.

DESIGNER: J/A GATED	SUB SHEET NO. A-2.2	TITLE OF SHEET SECOND FLOOR REFLECTED CEILING PLAN	DRAWING NO. 895
TECH. REVIEW: M/M, MS	DATE: 5/15/2025	REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	PMS/PAGE NO. 179603
			SHEET OF X

CEILING PLAN LEGEND



1 THIRD FLOOR REFLECTED CEILING PLAN
SCALE (A)

HISTORIC MUSLIN TREATMENT GENERAL NOTES

- CAREFULLY REMOVE DESIGNATED HISTORIC WOOD TRIM AT MUSLIN PANEL PERIMETERS. CAREFULLY REMOVE EXISTING HISTORIC MUSLIN CEILING PANELS, PAPER BACKING, AND EXISTING FASTENERS.
- SALVAGE AND PERFORM CONSERVATION TREATMENTS INCLUDING REPAIRS OF DAMAGE SUCH AS RIPS, TEARS, AND LINING MUSLIN.
- SALVAGE HISTORIC WOOD TRIM AND STORE FOR REINSTALLATION. INSTALL NEW PAPER BACKING, REINSTALL CONSERVED MUSLIN PANELS TO MATCH EXISTING. REPAIR CRACKS AND HOLLOW SPOTS WITH TAGS TO MATCH EXISTING. SEE FINISH SCHEDULE FOR ADDITIONAL FINISH TREATMENTS.
- 3RD FLOOR MUSLIN CEILINGS:
 - REMOVE DESIGNATED HISTORIC WOOD TRIM AT MUSLIN PANEL PERIMETERS. CAREFULLY REMOVE EXISTING HISTORIC MUSLIN CEILING PANELS, PAPER BACKING, AND EXISTING FASTENERS.
 - ARCHIVAL PACKAGING OF MUSLIN PANEL FOR LONG-TERM STORAGE.
 - INSTALL NEW PAPER BACKING AND NEW MUSLIN PANELS. REINSTALL HISTORIC WOOD TRIM IN THEIR ORIGINAL LOCATIONS. ATTACH MUSLIN WITH TAGS TO MATCH EXISTING. SEE FINISH SCHEDULE FOR ADDITIONAL FINISH TREATMENTS.
- OPTIONS THROUGH 15 AT HISTORIC MUSLIN CEILINGS: CONSERVATION OF 3RD FLOOR MUSLIN CEILINGS WHICH INVOLVE WOOD TRIM, GROUND FLOOR MUSLIN CEILINGS WHICH INVOLVE MOCKUPS, DRY CLEANING, SOLVENT CLEANING, STITCH LINING. SEE SPECIFICATION SECTION 097723 FOR A DETAILED EXPLANATION OF MUSLIN CEILING TREATMENT OPTIONS.

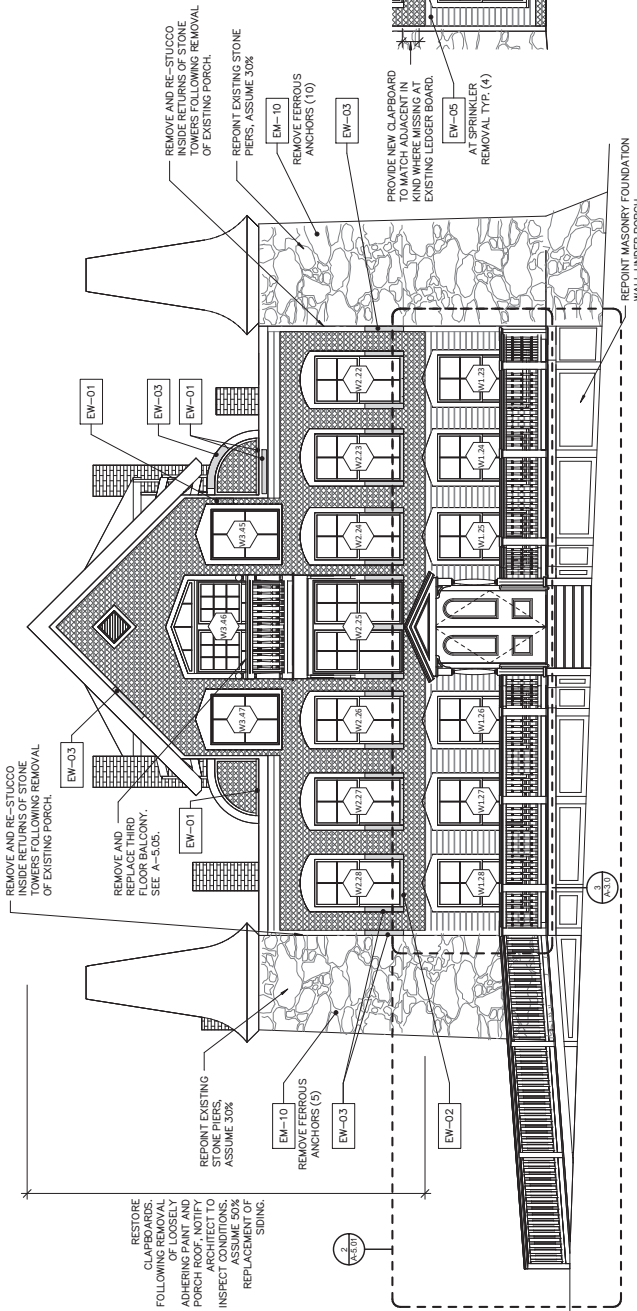
CEILING PLAN GENERAL NOTES

- MECHANICAL & ELECTRICAL DEVICES, LIGHTING, FIRE ALARM DEVICES, AND SPRINKLER HEADS ARE SHOWN FOR PLACEMENT ONLY. REFER TO SPECIFICATION SECTION 097723 FOR ADDITIONAL INFORMATION ON THESE DEVICES. PROVIDE GWB RETURN AT ALL GWB SOFFITS.
- CENTER ALL DEVICES IN CENTER OF CEILING UNLESS OTHERWISE NOTED.
- EXISTING PAINTED WOOD BOARD CEILINGS IN CLOSETS TO REMAIN.
- PATCH ALL HOLES LEFT BY THE REMOVAL OF THE FOLLOWING:
 - DETECTORS, STICKERS, FIRE EXTINGUISHERS, MOTION DETECTORS.
 - GENTLY REMOVE LOOSELY ADHERING PAINT OR SCRAPE PEELING/CRACKING PAINT. DO NOT DAMAGE UNDERLYING PLASTER OR Gypsum BOARD. REPAIRS SHALL BE PERFORMED BY PERSONNEL PROPERLY TRAINED IN LEAD SAFE WORK PRACTICES.

REFLECTED CEILING PLAN KEYNOTES

- REPLACE EXISTING MUSLIN (PREVIOUSLY RESTORED) WITH NEW MUSLIN WITH FIRE RETARDANT TREATMENT ON NEW BACKING. ATTACH WITH TAGS TO MATCH EXISTING. REFER TO FINISH SCHEDULE FOR PAINT. REFER TO DETAILS ON A-8-7.
- CAREFULLY REINSTALL HISTORIC MUSLIN (ORIGINAL) ON NEW BACK WITH TAGS TO MATCH EXISTING. SEE DETAILS ON A-8-7 AND REFER TO SPEC SECTION 097723. SEE OPTIONS # 11-15.
- REPLACE PLASTER CEILING IN KIND.
- REPAIR EXISTING PLASTER CEILING.
- CAREFULLY REMOVE HISTORIC MUSLIN AND SALVAGE FOR ARCHIVAL STORAGE. INSTALL REPLACEMENT MUSLIN. SEE OPTIONS 11-15.
- EXISTING CEILING TO REMAIN.
- REPLACE EXISTING PREVIOUSLY RESTORED MUSLIN WITH PTD GWB CEILING.
- CRACKS WITH PLASTER MATCHING HISTORIC MATERIAL AND TEXTURE, PRIME AND PAINT; OR CRACKS IN PLASTER 1/32 INCH WIDE OR NARROWER, FILL WITH PATCHING COMPOUND AND SAND TO CREATE A LEVEL, SMOOTH SURFACE. PRIME AND PAINT.
- INSTALL NEW PLASTER AT DESIGNATED AREAS TO MATCH MATERIAL AND TEXTURE OF HISTORIC.
- RE-ADHERE DETACHED/DELAMINATED PLASTER. USE TEMPORARY SUPPORTS TO RETURN DISPLACED PLASTER INTO PLANE WHERE POSSIBLE WITHOUT CRACKING. INJECT CONSERVATION ADHESIVE THROUGH PORTHOLES DRILLED INTO PLASTER AND/OR EXISTING CRACKS AND VOIDS. FILL CRACKS AND PORTHOLES AND PAINT.
- GENTLY REMOVE LOOSELY ADHERING PAINT OR SCRAPE PEELING/CRACKING PAINT. DO NOT DAMAGE UNDERLYING PLASTER OR WALL SURFACE. PAINT REMOVAL MUST BE PERFORMED BY PERSONNEL PROPERLY TRAINED IN LEAD SAFE WORK PRACTICES.
- CAREFULLY REMOVE WOOD CEILING TRIM FOR MUSLIN CONSERVATION AND REINSTALL. ASSUME 20% REPLACEMENT TO MATCH EXISTING. SEE DETAILS ON SHEET A-8-7.
- RECONSTRUCT CEILING SOFFIT TO CONCEAL SYSTEMS.

DESIGNER: J/A GABED	SUB SHEET NO. A-2.3	TITLE OF SHEET THIRD FLOOR REFLECTED CEILING PLAN	DRAWING NO. 895
TECH. REVIEW: M/M, MS	DATE: 5/15/2025	REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	PMS/PAGE NO. 312325
			SHEET OF X



1 NORTH ELEVATION
SCALE: 1/4" = 1'-0"

3 NORTH ELEVATION - REPAIR WORK AT FIRST FLOOR
SCALE: 1/4" = 1'-0"

EXTERIOR TREATMENTS

- REPOINTING
- UNIT REPLACEMENT OF CLAPBOARDS WITH NEW OR SALVAGED TO MATCH EXISTING.
- REPLACE WOOD TRIM OR VERTICAL BOARD AND BATTEN WITH NEW TO MATCH EXISTING.
- CLEAN SURFACE OF SOILING OR BIOLOGICAL GROWTH.
- TYPES OF GERMAN SIDING (CLAPBOARD SIDING), AS DESCRIBED IN HISTORIC STRUCTURES REPORT'S
- GERMAN SIDING WITH 4 1/2" TO 5" EXPOSURE AND 3/4" UNDERCUT
- GERMAN SIDING WITH 5" EXPOSURE AND 1 3/4" UNDERCUT
- GERMAN SIDING WITH 1" EXPOSURE AND 3/4" UNDERCUT (LIKELY REPLACED AT SAME TIME AS SIDING ON THE SOUTHWEST ELEVATION)

NOTE: NORTH ELEVATION HAS 5" EXPOSURE AND 1" UNDERCUT.

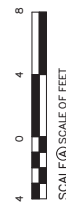
GENERAL EXTERIOR TREATMENT NOTES

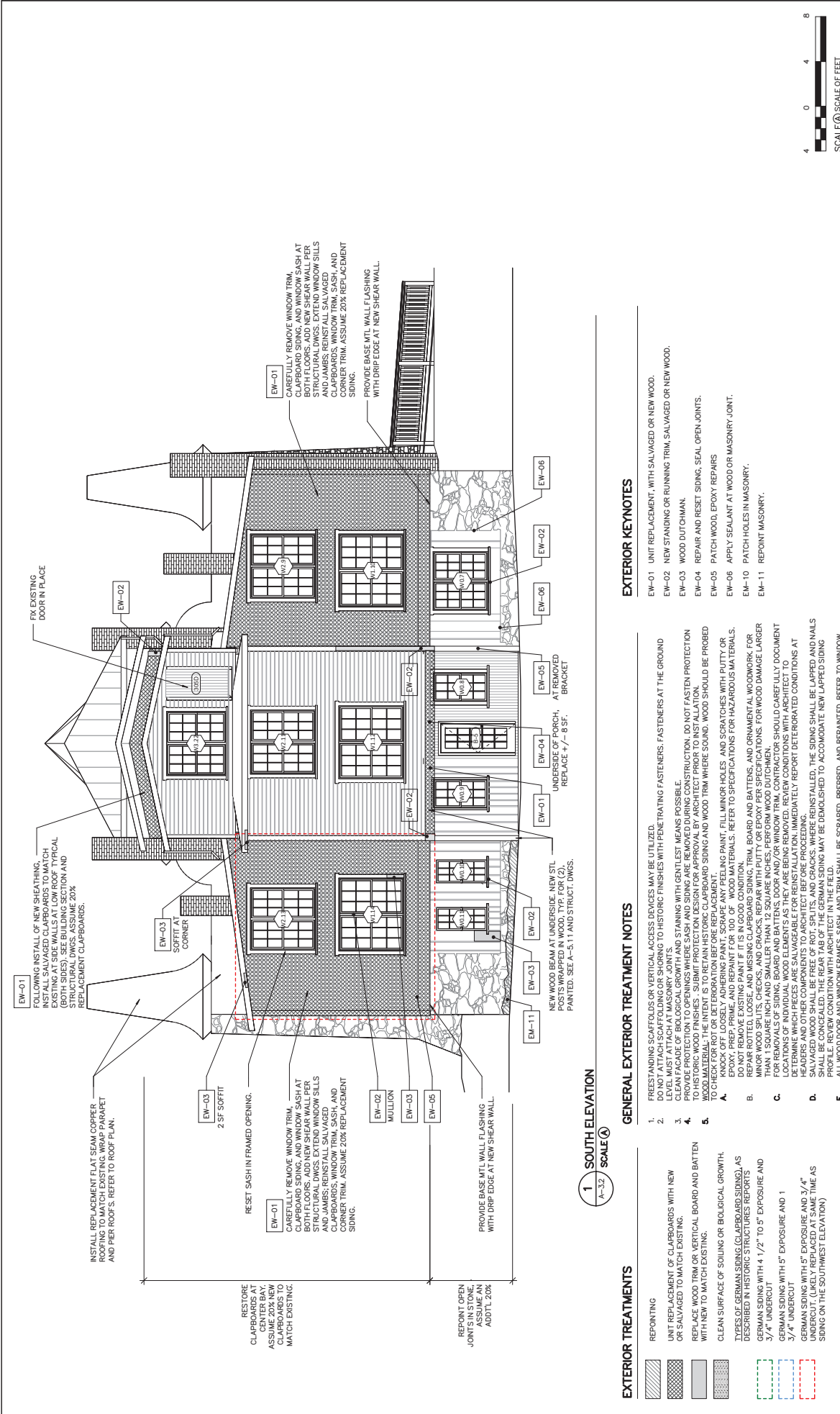
1. FREESTANDING SCAFFOLDS OR VERTICAL ACCESS DEVICES MAY BE UTILIZED.
2. DO NOT ATTACH SCAFFOLD OR JOINTS TO HISTORIC FINISHES WITH PENETRATING FASTENERS AT THE GROUND LEVEL. MUST ATTACH AT MASONRY JOINTS.
3. STAINING WITH SOLUBLE MEANS POSSIBLE.
4. PROVIDE PROTECTION TO OPENINGS WHERE SASH AND SIDING ARE REMOVED DURING CONSTRUCTION. DO NOT FASTEN PROTECTION TO HISTORIC WOOD FINISHES. SUBMIT PROTECTION DESIGN FOR APPROVAL BY ARCHITECT PRIOR TO INSTALLATION.
5. WOOD MATERIAL: THE INTENT IS TO RETAIN HISTORIC CLAPBOARD SIDING AND WOOD TRIM WHERE SOUND. WOOD SHOULD BE PROBED TO CHECK FOR ROT OR DETERIORATION BEFORE RE-INSTALLATION.
 - A. REPAIR ROTTED, LOOSE, AND MISSING CLAPBOARD SIDING, TRIM, BOARD AND BATTENS, AND ORNAMENTAL WOODWORK FOR REPAIRS TO MATCH EXISTING. REPAIRS TO MATCH EXISTING. REPAIRS TO MATCH EXISTING. REPAIRS TO MATCH EXISTING.
 - B. DO NOT REMOVE EXISTING PAINT IF IT IS IN GOOD CONDITION.
 - C. FOR REMOVALS OF SIDING, BOARD AND BATTENS, DOOR AND/OR WINDOW TRIM, CONTRACTOR SHOULD CAREFULLY DOCUMENT LOCATIONS OF INDIVIDUAL WOOD ELEMENTS AS THEY ARE BEING REMOVED. REVIEW CONDITIONS WITH ARCHITECT TO DETERMINE WHICH PIECES ARE SALVAGEABLE FOR REINSTALLATION. IMMEDIATELY REPORT DETERIORATED CONDITIONS AT SALVAGED WOOD SHALL BE FREE OF ROT, SPLITS, AND CRACKS. WHERE REINSTALLED, THE SIDING SHALL BE LAPPED AND NAILS SHALL BE CONCEALED. THE REAR TAB OF THE GERMAN SIDING MAY BE DEMOLISHED TO ACCOMMODATE NEW LAPPED SIDING PROFILE. REVIEW CONDITION WITH ARCHITECT IN THE FIELD.
 - D. REPAIR AND REPAINT FOR 100% OF WOOD MATERIALS. REFER TO SPECIFICATIONS FOR HAZARDOUS MATERIALS.
 - E. REPAIR AND REPAINT FOR 100% OF WOOD MATERIALS. REFER TO SPECIFICATIONS FOR HAZARDOUS MATERIALS.
 - F. BACKPRIME ALL NEW WOOD ELEMENTS.
6. MASONRY: THE INTENT IS TO REPOINT ONLY THOSE OPEN JOINTS NOTED ON THE DRAWINGS AND AT ASSUMED PERCENTAGES FOR OTHER AREAS SHOWN. SHOULD REPOINT CONDITIONS TO ARCHITECT IMMEDIATELY IF DETERIORATED MASONRY IS UNCOVERED DURING GROUND EXCAVATION OR REMOVAL OF WINDOWS.
 - A. APPLY CEMENTITIOUS MATERIAL BELOW ALL VERTICAL BOARD AND BATTENS BENEATH AND AROUND WINDOW OPENINGS.
 - B. COORDINATE INSTALLATION OF SHEET METAL FLASHING WITH WOODWORK AND MASONRY WORK.
 7. REPLACE ALL SEALANT JOINTS 100% AT ALL MATERIALS.

EXTERIOR KEYNOTES

- EW-01 UNIT REPLACEMENT, WITH SALVAGED OR NEW WOOD.
- EW-02 NEW STANDING OR RUNNING TRIM, SALVAGED OR NEW WOOD.
- EW-03 WOOD DUTCHMAN.
- EW-04 REPAIR AND RESET SIDING, SEAL OPEN JOINTS.
- EW-05 PATCH WOOD, EPOXY REPAIRS
- EW-06 APPLY SEALANT AT WOOD OR MASONRY JOINT.
- EM-10 PATCH HOLES IN MASONRY.
- EM-11 REPOINT MASONRY.

DESIGNER: JIA GABED	SUB SHEET NO. A-3.0	TITLE OF SHEET EXTERIOR ELEVATIONS	DRAWING NO. 895
TECH. REVIEW: M/JM, MS	DATE: 5/15/2025	REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE	PMS/PKG. NO. 312325
		SHEET OF X	





EXTERIOR TREATMENTS

- REPOINTING
- UNIT REPLACEMENT OF CLAPBOARDS WITH NEW OR SALVAGED TO MATCH EXISTING.
- REPLACE WOOD TRIM OR VERTICAL BOARD AND BATTEN WITH NEW TO MATCH EXISTING.
- CLEAN SURFACE OF SOILING OR BIOLOGICAL GROWTH.
- TYPES OF GERMAN SIDING (CLAPBOARD SIDING), AS DESCRIBED IN HISTORIC STRUCTURES REPORT'S:
 - GERMAN SIDING WITH 4 1/2" TO 5" EXPOSURE AND 3/4" UNDERCUT
 - GERMAN SIDING WITH 5" EXPOSURE AND 1 3/4" UNDERCUT
 - GERMAN SIDING WITH 4" EXPOSURE AND 3/4" UNDERCUT (LIKELY REPLACED AT SAME TIME AS SIDING ON THE SOUTHWEST ELEVATION)

GENERAL EXTERIOR TREATMENT NOTES

1. FREESTANDING SCAFFOLDS OR VERTICAL ACCESS DEVICES MAY BE UTILIZED. DO NOT ATTACH SCAFFOLDING OR JOINING TO HISTORIC FINISHES WITH PENETRATING FASTENERS AT THE GROUND LEVEL. MUST ATTACH TO MASONRY JOINTS.
2. STAINING WITH SOFTEST MEANS POSSIBLE.
3. PROVIDE PROTECTION TO OPENINGS WHERE SASH AND SIDING ARE REMOVED DURING CONSTRUCTION. DO NOT FASTEN PROTECTION TO HISTORIC WOOD FINISHES. SUBMIT PROTECTION DESIGN FOR APPROVAL BY ARCHITECT PRIOR TO INSTALLATION.
4. WOOD MATERIAL: THE INTENT IS TO RETAIN HISTORIC CLAPBOARD SIDING AND WOOD TRIM WHERE SOUND. WOOD SHOULD BE PROBED TO CHECK FOR ROT OR DETERIORATION BEFORE REPLACEMENT.
5. A. EPOXY, PREP, PRIME, AND REPAINT FOR 100% OF WOOD MATERIALS. REFER TO SPECIFICATIONS FOR HAZARDOUS MATERIALS. DO NOT REMOVE EXISTING PAINT IF IT IS IN GOOD CONDITION. REPAIR ROTTED, LOOSE, AND MISSING CLAPBOARD SIDING, TRIM, BOARD AND BATTENS, AND ORNAMENTAL WOODWORK FOR REMOVALS OF SIDING, BOARD AND BATTENS, DOOR AND/OR WINDOW TRIM. CONTRACTOR SHOULD CAREFULLY DOCUMENT LOCATIONS OF INDIVIDUAL WOOD ELEMENTS AS THEY ARE BEING REMOVED. REVIEW CONDITIONS WITH ARCHITECT TO DETERMINE WHICH PIECES ARE SALVAGEABLE FOR REINSTALLATION. IMMEDIATELY REPORT DETERIORATED CONDITIONS AT SALVAGED WOOD SHALL BE FREE OF ROT, SPLITS, AND CRACKS. WHERE REINSTALLED, THE SIDING SHALL BE LAPPED AND NAILS SHALL BE CONCEALED. THE REAR TAB OF THE GERMAN SIDING MAY BE DEMOLISHED TO ACCOMMODATE NEW LAPPED SIDING PROFILE. REVIEW CONDITION WITH ARCHITECT IN THE FIELD.
6. A. ALL EXISTING WOOD TRIM SHALL BE SCRAPED, PREPPED, AND REPAINTED. REFER TO WINDOW SCHEDULE FOR ADDITIONAL REPAIRS AND NOTES. B. BACKPRIME ALL NEW WOOD ELEMENTS. C. MASONRY: THE INTENT IS TO REPOINT ONLY THOSE OPEN JOINTS NOTED ON THE DRAWINGS AND AT ASSUMED PERCENTAGES FOR OTHER AREAS SHOWN. SHOULD REPORT CONDITIONS TO ARCHITECT IMMEDIATELY IF DETERIORATED MASONRY IS UNCOVERED DURING GROUND EXCAVATION OR REMOVAL OF WINDOWS. D. APPLY GEMENTALIOUS MATERIAL BELOW ALL VERTICAL BOARD AND BATTENS BENEATH AND AROUND WINDOW OPENINGS. E. COORDINATE INSTALLATION OF SHEET METAL FLASHING WITH WOODWORK AND MASONRY WORK. F. REPLACE ALL SEALANT JOINTS 100% AT ALL MATERIALS.

EXTERIOR KEYNOTES

- EW-01 UNIT REPLACEMENT WITH SALVAGED OR NEW WOOD.
- EW-02 NEW STANDING OR RUNNING TRIM, SALVAGED OR NEW WOOD.
- EW-03 WOOD DUTCHMAN.
- EW-04 REPAIR AND RESET SIDING, SEAL OPEN JOINTS.
- EW-05 PATCH WOOD, EPOXY REPAIRS
- EW-06 APPLY SEALANT AT WOOD OR MASONRY JOINT.
- EW-10 PATCH HOLES IN MASONRY.
- EW-11 REPOINT MASONRY.

EXTERIOR KEYNOTES

- EW-01 UNIT REPLACEMENT WITH SALVAGED OR NEW WOOD.
- EW-02 NEW STANDING OR RUNNING TRIM, SALVAGED OR NEW WOOD.
- EW-03 WOOD DUTCHMAN.
- EW-04 REPAIR AND RESET SIDING, SEAL OPEN JOINTS.
- EW-05 PATCH WOOD, EPOXY REPAIRS
- EW-06 APPLY SEALANT AT WOOD OR MASONRY JOINT.
- EW-10 PATCH HOLES IN MASONRY.
- EW-11 REPOINT MASONRY.

1 SOUTH ELEVATION
A-32 SCALE 1/8" = 1'-0"

EXTERIOR ELEVATIONS

REHABILITATE CLARA BARTON NATIONAL HISTORIC SITE

DESIGNER: JIA
SS, A.W, CB
TECH. REVIEW: M/J, MS
DATE: 5/15/2025

DRAWING NO. 895
179603
PMS/PKG NO. 312325
SHEET OF X

ATTACHMENT C: TRIBAL CORRESPONDENCE



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

IN REPLY REFER TO:
GWMP 1.A.2 CLBA Rehab

October 18, 2022

SUBJECT: National Historic Preservation Act-Section 106 Consulting Parties Invitation for the Proposed Rehabilitation of the Clara Barton National Historic Site, George Washington Memorial Parkway, Glen Echo, Maryland

Dear Potential Tribal Consulting Party:

The National Park Service (NPS) is proposing to rehabilitate the Clara Barton National Historic Site (CLBA NHS), a historic property located in Glen Echo, Montgomery County, Maryland that is under the administration of the George Washington Memorial Parkway (GWMP). The CLBA NHS became a NPS unit in 1975 following the 1974 Congressional authorization of its establishment, and the house was originally constructed in 1891. CLBA NHS consists of the house and immediate grounds and is listed in the National Register of Historic Places (NRHP) and as a National Historic Landmark (NHL) for its association with the life of Clara Barton and the operation headquarters of the Red Cross as well as for the unique vernacular architectural style of the house reminiscent of Ms. Barton's Johnstown Flood Relief warehouses and its modifications as her residence.

As a part of the planning process, the NPS considered a range of preliminary concepts for the use of the house in partnership with another organization to assist in the management and upkeep of the building and grounds. Adaptive re-use of some of the less significant historic spaces and areas of the site that have been altered from the original may require upgrades for current fire, health, safety and accessibility codes. Preliminary information is available on this project in the Clara Barton Request For Expression of Interest (RFEI) at the NPS Planning, Environment, and Public Comment (PEPC) web site for GWMP at <http://parkplanning.nps.gov/gwmp>

In accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 and implementing regulations (36 CFR Part 800), federal agencies are required to consider the effects of their actions on historic properties listed or eligible for listing on the NRHP. The NPS has initiated consultation under Section 106 with the Maryland Historical Trust (MHT)/Maryland State Historic Preservation Office (MD SHPO) and, depending on a rehabilitation alternative selected and its effects on the property, may need to include the Advisory Council on Historic Preservation (ACHP) and the National Historic Landmark Program under the Secretary of the Interior. The NPS has continued background research and studies to help refine concepts and develop alternative treatment options; early versions had concentrated on architectural alterations to the historic house.

The NPS originally recruited consulting parties to provide input on the potential alternatives affecting the historic structure and held an initial consulting parties meeting on September 12. Discussions at the meeting and a follow-up NPS Value Analysis (VA) Workshop have now favored alternatives likely to also affect the surrounding grounds.

Attached for your information are five files:

- 1 - VA summary of key points
- 2A & 2B – VA workshop slides (Day 1 and 2)
- 3 – Existing floor plans – building integrity and significance
- 4 - Consulting parties meeting_20220912

Once the VA document is drafted it will be available for 30-day review and comment.

With the realization that the surrounding grounds of the CLBA NHS may be impacted to a greater degree than initially considered, the NPS has now identified Native American Indian tribal groups as possible consulting parties due to the potential for effects to archeological resources that may include pre-contact Native American Indian sites. If you desire to participate as a consulting party for the Section 106 review of the proposed CLBA NHS rehabilitation, please reply in writing via letter or email with your complete contact information, no later than November 1, 2022, to the GWMP Superintendent at gwmp_superintendent@nps.gov and Matthew Virta at matthew_virta@nps.gov.

Those who become a consulting party will be sent an invitation from the NPS to attend a meeting using the MS Teams virtual meeting platform, tentatively set for the afternoon of November 16, 2022 from 1:30 pm to 3:00 pm Eastern Time. This second consulting parties meeting will discuss the VA and provide the latest information on the proposed rehabilitation project, including the potential alternatives to be further analyzed in an Environmental Assessment (EA).

For further explanation of consulting parties, and their role in this process, please reference the ACHP's *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available at <http://www.achp.gov/citizensguide.pdf>. If you have any questions concerning the proposed

CLBA NHS rehabilitation, or the role of consulting parities, please contact Mr. Matt Virta, Cultural Resources Program Manager for the GWMP, at (703) 289-2535 or Matthew_Virta@nps.gov.

Sincerely,

Charles Cuvelier
Superintendent

Attachments

cc:

Ms. Becky Roman Preservation Officer
Maryland Historical Trust
Becky.roman@maryland.gov



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

July 24, 2023

Delaware Nation
Ms. Katelyn Lucas
Tribal Historic Preservation Department
31064 State Highway 281
Anadarko, OK 73005
Sent by email to klucas@delawarenation-nsn.gov

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Continuation of National Historic Preservation Act of 1966 Section 106 Compliance

Dear Ms. Lucas:

The George Washington Memorial Parkway (GWMP) of the National Park Service (NPS) is continuing the Section 106 process for the proposed subject undertaking to rehabilitate the Clara Barton National Historic Site (CLBA NHS), a National Historic Landmark (NHL) administered by GWMP.

The CLBA NHS is a historic property noted for its association with Clara Barton and the American Red Cross which she founded. The site served variously as a supply warehouse, administrative office / Red Cross Headquarters, and Ms. Barton's residence between 1891 and 1912 when she passed away. Currently closed to the public, the NPS-GWMP previously operated the building as a historic house museum.

The NPS-GWMP is developing a rehabilitation project which will make preservation maintenance repairs, improvements to building systems for health and safety codes, and structural upgrades to accommodate visitor use and accessibility. The project will be designed to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties for Rehabilitation. It will be planned to minimize harm to the site's special NHL status as per NHPA Section 110(f). Should Adverse Effects be determined, the Advisory Council on Historic Preservation and the Secretary of Interior (through the NHL program) will be invited to comment.

With this letter, the NPS-GWMP is submitting for your review our proposed Schematic Design Alternatives for the Clara Barton NHS Rehabilitation, which you can access and download from our public project page linked [here](#). The materials for review include:

- Schematic Design Alternatives Drawings
- Schematic Design Alternatives Report

Please review these documents and provide any comments within 30 days of receipt of this letter.

A consulting parties meeting (#4) has been scheduled during the 30-day review period to present these design alternatives and respond to any questions or comments you may have. You are invited to attend this meeting on **Monday, July 31, 2023** at 3:00pm at the George Washington Memorial Parkway Headquarters at 700 George Washington Memorial Parkway, McLean, VA 22101. A virtual link through

the Microsoft Teams platform has been provided via email for those that cannot attend in person. Your feedback is important to informing a Value Analysis that is scheduled for mid-September to weigh the revised proposed alterations with historic preservation.

With regard to NHPA Section 106, please see the attached proposed Area of Potential Effect (APE)-one for the cultural landscape of the house, immediate grounds, and viewsheds, and one for the limits of proposed ground disturbance defined for the purpose of evaluating project impacts on archeological resources.

If you have any questions or comments regarding this project, please contact me at gwmp_superintendent@nps.gov and cc Megan Bailey (megan_bailey@nps.gov) and Elias “Sonny” Lozano (elias_lozano@nps.gov).

Sincerely,



Charles Cuvelier
Superintendent

Cc:

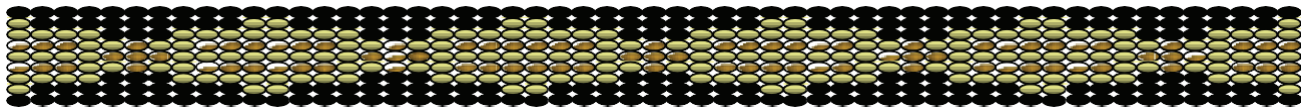
Beth Cole, MHT
Becky Roman, MHT
Kathryn Smith, NPS-NHL-NCR
Megan Baily, NPS-GWMP
Maureen Joseph, NPS-GWMP
Susan Hall, NPS-GWMP
Elias Lozano, NPS-GWMP

Attachments:

APE Map
Limits of Proposed Ground Disturbance Map (Archeology)

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427



July 12, 2024

Attention: Charles Cuvelier
USDI NPS
George Washington Memorial Parkway
McLean, VA 22101

Re. THPO #	TCNS #	Project Description
2024-384-27		Clara Barton National Historic Site Proposed Rehabilitation, Glen Echo, Montgomery Co.

Dear Mr. Cuvelier,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions, please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail Caitlin.Rogers@catawba.com.

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

August 29, 2024

Accohannock Indian Tribe
Chief Clarence Lone Wolf Tyler
28380 Crisfield Marion Rd
Marion Station, MD 21838
Sent by email to Accohannock@verizon.net

Dear Chief Tyler:

The National Park Service - George Washington Memorial Parkway (NPS-GWMP) is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 and Section 110 of the National Historic Preservation Act, NPS-GWMP conducted a Phase IB archeological investigation on the grounds of CLBA NHS. We are sharing the draft Phase IB technical report for your review prior to finalizing the report.

Previously, NPS-GWMP initiated Section 106 consultation with the Accohannock Indian Tribe on June 3, 2024, with correspondence that shared the Area of Potential Effects and the identification of historic properties and Assessment of Effects. The proposed undertaking takes place within a documented archeological site, 18MO154 (Clara Barton I), which has not yet been evaluated for National Register eligibility. However, NPS-GWMP is treating the site as an eligible historic property for the purpose of Section 106 consultation. There is the potential for impacts to archeological resources as a result of ground disturbance during the rehabilitation project. Proposed ground disturbing activities include the construction of a new concrete sidewalk, regrading of accessible ramps, modifications to the front porch, and installation of new foundations and steel columns in the basement, installation of a concrete pad for a new HVAC unit, and installation of a proposed stormwater management facility.

In April 2024, a total of 74 shovel tests were excavated at CLBA NHS as part of the Phase IB survey to identify archeological resources within the Area of Potential Effects and contribute information for our Assessment of Effects for the proposed rehabilitation. The survey confirmed that both precontact and historic archeological components are present within the project's Area of Potential Effects.

Precontact artifacts recovered during the field investigations largely consist of debitage and fire-cracked rock. The debitage is primarily quartzite and quartz with small amounts of chert and argillite. The only formal tools recovered are a large sandstone unifacial tool (possibly a knife), a quartzite

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Please review the [linked report](#) and provide any comments within 30 days of receipt of this correspondence. When the report has been finalized, we will send you a copy for your records. In addition, NPS-GWMP invites the Accohannock Indian Tribe to consult regarding the next steps for archeological survey and fulfillment of Section 106 of the NHPA. A Phase II investigation of this site is recommended to determine the extent, character, National Register eligibility, and integrity of the archeological resources, and to determine whether the rehabilitation project will have an adverse effect on the resources. We will reach out to you in the coming weeks to confirm whether you are interested in continuing consultation and, if so, we will schedule a consultation meeting where we can discuss these steps and how they will be incorporated into the Programmatic Agreement that we are currently drafting.

Should you have any questions regarding the Phase IB report or the rehabilitation project, please contact Megan Bailey, GWMP Cultural Resources Program Manager, at megan_bailey@nps.gov or 202-438-6641.

We look forward to your response, and we thank you for your time and assistance.

Sincerely,

CHRISTINE E
SMITH

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CHRISTINE SMITH
Date: 2024.08.28
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Christine M. Smith
Acting Superintendent



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

August 28, 2024

Chief Mark Tayac
Piscataway Indian Nation
8105 Zachary Road
Port Tobacco, MD 20677
Sent by email to tayac1@aol.com

Dear Chief Tayac:

The National Park Service - George Washington Memorial Parkway (NPS-GWMP) is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 and Section 110 of the National Historic Preservation Act, NPS-GWMP conducted a Phase IB archeological investigation on the grounds of CLBA NHS. We are sharing the draft Phase IB technical report for your review prior to finalizing the report.

On June 5, 2024, NPS-GWMP submitted to the Eastern Shawnee of Oklahoma the Area of Potential Effects, identification of historic properties, and Assessment of Effects for this project. The proposed undertaking takes place within a documented archeological site, 18MO154 (Clara Barton I), which has not yet been evaluated for National Register eligibility. However, NPS-GWMP is treating the site as an eligible historic property for the purpose of Section 106 consultation. There is the potential for impacts to archeological resources as a result of ground disturbance during the rehabilitation project. Proposed ground disturbing activities include the construction of a new concrete sidewalk, regrading of ramps, modifications to the front porch, and installation of new foundations and steel columns in the basement, installation of a concrete pad for a new HVAC unit, and installation of a proposed stormwater management facility.

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Should you have any questions regarding the Phase IB report or the rehabilitation project, please contact Megan Bailey, GWMP Cultural Resources Program Manager, at megan_bailey@nps.gov or 202-438-6641.

We look forward to your response, and we thank you for your time and assistance.

Sincerely,

**CHRISTINE
SMITH**

Christine M. Smith
Acting Superintendent

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Date: 2024.08.28 19:20:04 -04'00'



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

August 29, 2024

Katelyn Lucas
Delaware Nation Tribal Historic Preservation Officer
31064 State Highway 281
Anadarko, OK 73005

Dear Ms. Lucas:

The National Park Service - George Washington Memorial Parkway (NPS-GWMP) is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 and Section 110 of the National Historic Preservation Act, NPS-GWMP conducted a Phase IB archeological investigation on the grounds of CLBA NHS. We are sharing the draft Phase IB technical report for your review prior to finalizing the report.

Previously, NPS-GWMP initiated Section 106 consultation with the Delaware Nation on October 18, 2022, followed by correspondence sharing the Area of Potential Effects, identification of historic properties, Assessment of Effects (June 3, 2024). The proposed undertaking takes place within a documented archeological site, 18MO154 (Clara Barton I), which has not yet been evaluated for National Register eligibility. However, NPS-GWMP is treating the site as an eligible historic property for the purpose of Section 106 consultation. There is the potential for impacts to archeological resources as a result of ground disturbance during the rehabilitation project. Proposed ground disturbing activities include the construction of a new concrete sidewalk, regrading of ramps, modifications to the front porch, and installation of new foundations and steel columns in the basement, installation of a concrete pad for a new HVAC unit, and installation of a proposed stormwater management facility.

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Should you have any questions regarding the Phase IB report or the rehabilitation project, please contact Megan Bailey, GWMP Cultural Resources Program Manager, at megan_bailey@nps.gov or 202-438-6641.

We look forward to your response, and we thank you for your continued assistance.

Sincerely,

**CHRISTINE
SMITH**

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Christine M. Smith
Acting Superintendent



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

August 29, 2024

Eastern Shawnee of Oklahoma
Mr. Paul Barton
Tribal Historic Preservation Officer
70500 E 128 Rd.
Wyandotte, OK 74370
Sent by email to pbarton@estoo.net

Dear Mr. Barton:

The National Park Service - George Washington Memorial Parkway (NPS-GWMP) is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 and Section 110 of the National Historic Preservation Act, NPS-GWMP conducted a Phase IB archeological investigation on the grounds of CLBA NHS. We are sharing the draft Phase IB technical report for your review prior to finalizing the report.

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We look forward to your response, and we thank you for your time and assistance.

Sincerely,

CHRISTINE SMITH

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Date: 2024.08.28 19:17:57 -04'00'

Christine M. Smith
Acting Superintendent,



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

August 29, 2024

Pamunkey Indian Tribe
Chief Robert Gray
1054 Pocahontas Trail
King William, VA 23086
Sent by email to robert.gray@pamunkey.org

Dear Chief Gray:

The National Park Service - George Washington Memorial Parkway (NPS-GWMP) is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 and Section 110 of the National Historic Preservation Act, NPS-GWMP conducted a Phase IB archeological investigation on the grounds of CLBA NHS. We are sharing the draft Phase IB technical report for your review prior to finalizing the report.

Previously, NPS-GWMP initiated Section 106 consultation with the Pamunkey Indian Tribe on October 18, 2022, followed by correspondence sharing the Area of Potential Effects, identification of historic properties, and Assessment of Effects (June 3, 2024). The proposed undertaking takes place within a documented archeological site, 18MO154 (Clara Barton I), which has not yet been evaluated for National Register eligibility. However, NPS-GWMP is treating the site as an eligible historic property for the purpose of Section 106 consultation. There is the potential for impacts to archeological resources as a result of ground disturbance during the rehabilitation project. Proposed ground disturbing activities include the construction of a new concrete sidewalk, regrading of ramps, modifications to the front porch, and installation of new foundations and steel columns in the basement, installation of a concrete pad for a new HVAC unit, and installation of a proposed stormwater management facility.

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We look forward to your response, and we thank you for your time and assistance.

Sincerely,

CHRISTINE SMITH Digitally signed by CHRISTINE
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Date: 2024.08.28 19:18:43 -04'00'

Christine M. Smith
Acting Superintendent



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

August 29, 2024

Piscataway Conoy Tribe
Tribal Chair Francis Gray
P.O. Box 638
Bryans Road, MD. 20616
Sent by email to piscatawayconoycouncil@gmail.com

Dear Mr. Gray:

The National Park Service - George Washington Memorial Parkway (NPS-GWMP) is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 and Section 110 of the National Historic Preservation Act, NPS-GWMP conducted a Phase IB archeological investigation on the grounds of CLBA NHS. We are sharing the draft Phase IB technical report for your review prior to finalizing the report.

On June 5, 2024, NPS-GWMP submitted to the Piscataway Conoy Tribe the Area of Potential Effects, identification of historic properties, and Assessment of Effects for this project. The proposed undertaking takes place within a documented archeological site, 18MO154 (Clara Barton I), which has not yet been evaluated for National Register eligibility. However, NPS-GWMP is treating the site as an eligible historic property for the purpose of Section 106 consultation. There is the potential for impacts to archeological resources as a result of ground disturbance during the rehabilitation project. Proposed ground disturbing activities include the construction of a new concrete sidewalk, regrading of accessible ramps, modifications to the front porch, and installation of new foundations and steel columns in the basement, installation of a concrete pad for a new HVAC unit, and installation of a proposed stormwater management facility.

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We look forward to your response, and we thank you for your time and assistance.

Sincerely,

**CHRISTINE
SMITH**

Christine M. Smith
Acting Superintendent

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Date: 2024.08.28 19:21:39 -04'00'



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

August 29, 2024

Rappahannock Indian Tribe
Chief Anne Richardson
5036 Indian Neck Road
Indian Neck, VA 23148
Sent by email to chiefannerich@aol.com

Dear Chief Richardson:

The National Park Service - George Washington Memorial Parkway (NPS-GWMP) is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 and Section 110 of the National Historic Preservation Act, NPS-GWMP conducted a Phase IB archeological investigation on the grounds of CLBA NHS. We are sharing the draft Phase IB technical report for your review prior to finalizing the report.

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We look forward to your response, and we thank you for your time and assistance.

Sincerely,

CHRISTINE SMITH

Digitally signed by CHRISTINE

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Date: 2024.08.28 19:20:43 -04'00'

Christine M. Smith
Acting Superintendent



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

August 29, 2024

Seneca Cayuga Nation
Mr. William Tarrant
Tribal Historic Preservation Officer
P.O. Box 453220
Grove, OK 74345
Sent by email to wtarrant@sctribe.com

Dear Mr. Tarrant:

The National Park Service - George Washington Memorial Parkway (NPS-GWMP) is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 and Section 110 of the National Historic Preservation Act, NPS-GWMP conducted a Phase IB archeological investigation on the grounds of CLBA NHS. We are sharing the draft Phase IB technical report for your review prior to finalizing the report.

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In April 2024, a total of 74 shovel tests were excavated at CLBA NHS as part of the Phase IB survey to identify archeological resources within the Area of Potential Effects and contribute information for our Assessment of Effects for the proposed rehabilitation. The survey confirmed that both precontact and historic archeological components are present within the project's Area of Potential Effects.

Precontact artifacts recovered during the field investigations largely consist of debitage and fire-cracked rock. The debitage is primarily quartzite and quartz with small amounts of chert and argillite. The only formal tools recovered are a large sandstone unifacial tool (possibly a knife), a quartzite hammerstone, and an Otter Creek-type projectile point made of a gray quartzite and datable to the Middle to Late Archaic periods (roughly 4,000 to 3,000 years B.C.). A fire-cracked rock hearth was identified; it contains 15 pieces of prehistoric debitage, four fire-cracked rocks, and flecks of charcoal.

Please review the [linked report](#) and provide any comments within 30 days of receipt of this correspondence. When the report has been finalized, we will send you a copy for your records. In addition, NPS-GWMP invites the Seneca Cayuga Nation to consult regarding the next steps for archeological survey and fulfillment of Section 106 of the NHPA. A Phase II investigation of this site is recommended to determine the extent, character, National Register eligibility, and integrity of the archeological resources, and to determine whether the rehabilitation project will have an adverse effect on the resources. We will reach out to you **in** the coming weeks to confirm whether you are interested in continuing consultation and, if so, we will schedule a consultation meeting where we can discuss these steps and how they will be incorporated into the Programmatic Agreement that we are currently drafting.

Should you have any questions regarding the Phase IB report or the rehabilitation project, please contact Megan Bailey, GWMP Cultural Resources Program Manager, at megan_bailey@nps.gov or 202-438-6641.

We look forward to your response, and we thank you for your time and assistance.

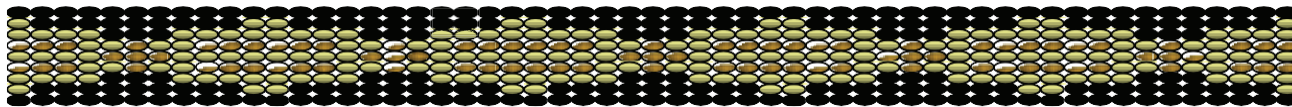
Sincerely,

CHRISTINE SMITH Digitally signed by CHRISTINE SMITH
Date: 2024.08.28 19:22:18 -04'00'

Christine M. Smith
Acting Superintendent

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791



October 15, 2024

Attention: Megan Bailey
USDI NOS
George Washington Memorial Parkway
McLean, VA 22101

Re. THPO #	TCNS #	Project Description
2024-384-70		Proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland

Dear Ms. Bailey,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail Caitlin.Rogers@catawba.com.

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer

ATTACHMENT D: SECTION 7 CONSULTATION



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Chesapeake Bay Ecological Services Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401-7307
Phone: (410) 573-4599 Fax: (410) 266-9127

In Reply Refer To:

05/13/2025 18:11:35 UTC

Project Code: 2025-0096091

Project Name: Clara Barton National Historic Site Rehabilitation Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Chesapeake Bay Ecological Services Field Office

177 Admiral Cochrane Drive

Annapolis, MD 21401-7307

(410) 573-4599

PROJECT SUMMARY

Project Code: 2025-0096091

Project Name: Clara Barton National Historic Site Rehabilitation Project

Project Type: Provide Technical Assistance

Project Description: The project site is located at the Clara Barton National Historic Site located at 5801 Oxford Rd, Glen Echo, Maryland and is a unit of the GWMP, which manages lands in The District of Columbia, Maryland, and Virginia. This project will repair and rehabilitate the 130-year-old Clara Barton House. The project will build upon information developed by the Clara Barton Historic Structure Report (Volume 2) by Oehrlein and Associates Architects (1997) and the Conditions Assessment by AECOM (2018). Overall, the work will address the failing building envelope and the deteriorated building systems including the mechanical, plumbing, and electrical systems which are over 40 years old. The work will make the building safe by egress and other code improvements, accessible through the development of new restrooms and lift access, and comfortability and health with new building heating and cooling systems. All work will be executed in a manner that minimizes impacts and preserves the historic fabric of the building. Site work will include demolition of a utility shed, construction of two accessible parking spaces, a new concrete sidewalk, and removal of non-historic vegetation. There are no culverts in the project area. Pending contract award, construction is expected to begin in the fall of 2025 and continue through the spring of 2027.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@38.96734325,-77.14084835230017,14z>



Counties: Montgomery County, Maryland

ENDANGERED SPECIES ACT SPECIES

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: National Park Service

Name: Brent Steury

Address: 700 George Washington Memorial Parkway

City: McLean

State: VA

Zip: 22101

Email: brent_steury@nps.gov

Phone: 7022892541



DEMOLITION PLAN

SCALE ①

SUB SHEET NO. **C-10**

DESIGNED BY: J. OSCORIO
 DRAWN BY: J. CANCHAN
 TECH. REVIEW: OSCORIO/LINTHICUM
 DATE: 02/05/2025

RYAN LINTHICUM
 PROFESSIONAL ENGINEER
 MARYLAND NO. 34097

CLARA BARTON
 NATIONAL HISTORIC SITE
 CIBA

DRAWING NO. **895**
 179603
 PMS (PMS NO.) 312325

SHEET **3** OF **16**



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, Maryland 21401
<http://www.fws.gov/chesapeakebay>

June 9, 2025

Brent Steury
Natural Resources Program Manager
George Washington Memorial Parkway
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

RE: Section 7 determination for Clara Barton National Historic Site Rehabilitation Project in Montgomery County, MD

Dear Mr. Steury:

The U.S. Fish and Wildlife Service has reviewed your project information from your email sent May 28, 2025. The comments provided below are in accordance with Section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*; ESA).

The purpose of the proposed project is to repair and rehabilitate the historic Clara Baron House. In addition to upgrades to the building, the site work includes demolition of a utility shed, construction of parking spaces, installation of a sidewalk, and removal of non-historic vegetation. Work will begin fall 2025 through spring 2027. The federally endangered northern long-eared bat (*Myotis septentrionalis*); the proposed endangered tricolored bat (*Perimyotis subflavus*); and the proposed threatened monarch butterfly (*Danaus plexippus*) may be present within the action area.

As described in your letter, minimal tree removal will occur as part of this work, and all work will adhere to an active season time of year restriction, with no tree removal occurring between April 1- Nov 15. Noise levels may reach 70-100 dBA, however this noise will be intermittent, and no night-time work will be allowed on site. The house being rehabbed, and the shed being removed were both examined for signs of bats, and none were found. If any wildlife is found during construction, it will be reported to the parks natural resource management team. The site was surveyed for milkweed species, none were found and no monarch butterflies were observed during the breeding and migratory period.

Based on these conditions, this project is “not likely to adversely affect” northern long-eared bat, and is not likely to jeopardize the continued existence of the tricolored bat or the monarch butterfly.



We appreciate the opportunity to provide information relative to fish and wildlife issues. Thank you for your interest in these resources. If you have any questions or need further assistance, please contact Kathleen Cullen of my staff at kathleen_cullen@fws.gov.

Sincerely,

Julie Slacum,
Acting for Genevieve LaRouche
Field Supervisor



United States Department of the Interior



NATIONAL PARK SERVICE
George Washington Memorial Parkway
700 George Washington Memorial Parkway
McLean, VA 22101

IN REPLY REFER TO:

May 28, 2025

Genevieve LaRouche, Field Supervisor
Chesapeake Bay Field Office
U.S. Fish & Wildlife Service
177 Admiral Cochrane Drive
Annapolis, MD 21401

Project Code: 2025-0096091

RE: Section 7 Consultation for the endangered northern long-eared bat (*Myotis septentrionalis*), the proposed endangered tricolored bat (*Perimyotis subflavus*), and the proposed threatened Monarch butterfly (*Danaus plexippus*) – Clara Barton National Historic Site Rehabilitation Project, 2025, Clara Barton Parkway, Maryland, a unit of the George Washington Memorial Parkway (GWMP), which includes land in The District of Columbia, Maryland, and Virginia.

Dear Ms. LaRouche:

The GWMP is requesting to initiate Endangered Species Act (ESA) Section 7 consultation for the endangered northern long-eared bat (*Myotis septentrionalis*), the proposed endangered tricolored bat (*Perimyotis subflavus*), and proposed threatened Monarch butterfly (*Danaus plexippus*) in preparation for rehabilitation of the 130-year-old structure at the Clara Barton National Historic Site in Glen Echo, Maryland. There is no designated critical habitat for these species at the historic site and surveys for the species by park staff during the summer of 2025 did not render any evidence of their presence at the site.

The federal discretionary action would be the issuance of a contract for rehabilitation to the historic structure and grounds.

We have made the determination that the proposed activity will have no effect on any species listed as threatened or endangered under the ESA of 1973, as amended 1982. Our supporting analysis is provided below.

Project Description and Action Area

The project site is located at the Clara Barton National Historic Site located at 5801 Oxford Rd, Glen Echo, Maryland and is a unit of the GWMP, which manages lands in The District of Columbia, Maryland, and Virginia. This project will repair and rehabilitate the 130-year-old Clara Barton House. The project will build upon information developed by the Clara Barton Historic Structure Report (Volume 2) by Oehrlein and Associates Architects (1997) and the Conditions Assessment by AECOM (2018). Overall, the work will address the failing building envelope and the deteriorated building systems including the mechanical, plumbing, and electrical systems which are over 40 years old. The work will make the building safe by egress and other code improvements, accessible through the development of new restrooms and lift access, and comfortability and health with new building heating and cooling systems. All work will be executed in a manner that minimizes impacts and preserves the historic fabric of the building. Site work will include demolition of a utility shed, construction of two accessible parking spaces, a new concrete sidewalk, and removal of non-historic vegetation. There are no culverts in the project area. Pending contract award, construction is expected to begin in the fall of 2025 and continue through the spring of 2027.

Potential Listed Species in the Action Area (as determined through IPaC)

Endangered Northern Long-eared Bat

Researchers have determined that the northern long-eared bat is primarily an interior forest species (Lausen, 2009). It roosts and forages within the understory of forested areas during the summer season (USFWS, 2015). The species has never been captured in GWMP (Deeley et al., 2021). Mean ecolocation calls from 15 August 2016–14 May 2017 and 15 August 2017 – 14 May 2018 in the park were 0.024, the fourth lowest out of the six parks surveyed in our region (Deeley et al., 2021). These few echolocation sonograms were recorded on the Virginia side of the Potomac River approximately 6.5 miles northwest of the project site at Glen Echo, Maryland.

Proposed Endangered Tricolored Bat

The tricolored bat (*Perimyotis subflavus*) is a species once common in the eastern United States (USFWS, 2024). Among the smallest native North American bats, it is found in forested habitats, normally roosting in the leaves of trees. Hibernacula includes mines and caves, and in the absence of these landscape features, in roadside culverts. The species has not been captured in GWMP since 2004 (Deeley et al., 2021; Table 2) and mist netting efforts in the same areas in 2016–2018 fail to capture any Tricolored Bats. Mean ecolocation calls from 15 August 2016–14 May 2017 and 15 August 2017–14 May 2018 in the park were 0.166, the fifth lowest out of the six parks surveyed in our region (Deeley et al., 2021).

Proposed threatened Monarch Butterfly (*Danaus plexippus*)

Monarch butterflies are present in GWMP in low numbers during migration and larvae and chrysalises have been found in areas where milkweed (*Asclepias* spp.) are present.

Mitigation Measures and Survey Results

Twenty-seven trees and shrubs will be removed on the project site. These trees are spread over an area of approximately 0.4 acres (see attached map of project area) in a sparsely vegetated urban landscape. The trees to be removed are between 48 and 2 inches DBH (See Table 1

below). GWMP understands that the active period for Northern Long-eared Bat and Tricolored Bat is April 1st to November 15. Thus, the park will have all vegetation removed after November 15, 2025, and will conclude with all vegetation disturbance before March 31, 2026.

Anticipated noise levels during the project range from 70 to 100 dBA. This includes the structural rehabilitation work to the house (nail guns, power saws, and compressors used intermittently at 70-90 dBA), utility trenching (backhoe used short term at 75-85 dBA), parking space construction, two spaces (backhoe, roller, plate compactor used short term at 75-85 dBA), and tree removals (chainsaws and woodchipper used intermittently at 85–100 dBA).

No night-time work will be allowed on the site.

On 9 April and 27 May 2025, the park's Natural Resources Program Manager, Brent Steury, examined the Clara Barton House for signs of bats. The 130 year-old house does not have an attic or crawl space. All rooms of the house were searched during daylight hours. No bats or signs of bats (guano) were observed in the house. The utility shed slated for demolition was also searched and no bats or signs of bats were observed. The contract will specify that any wildlife found in the house during construction will be immediately reported to the park's natural resource management team.

The project site was surveyed for the presence of *Asclepias* spp. by Brent Steury, on 27 May 2025. *Asclepias* spp. are the host plants of the monarch butterfly. Brent is also the author of two papers documenting the park's flora which include over 1,300 species of vascular plants (Steury et al., 2008, Steury, 2011). No *Asclepias* spp. were found in the project area and no monarchs were observed.

Table 1
Trees and Shrubs to be Removed for Clara Barton National Historic Site Rehabilitation Project

<i>Acer negundo</i>	Box elder	5"
<i>Carya glabra</i>	Pignut hickory	22"
<i>Carya glabra</i>	Pignut hickory	18"
<i>Carya glabra</i>	Pignut hickory	18"
<i>Carya</i> sp.	Hickory, unspecified	3"
<i>Quercus alba</i>	White oak	48"
<i>Robinia pseudoacacia</i>	Black locust (standing snag)	15"
<i>Robinia pseudoacacia</i>	Black locust (stnading snag)	18"
<i>Ilex opaca</i>	American holly	14"
<i>Ilex opaca</i>	American holly	7"
<i>Ilex opaca</i>	American holly	6"
<i>Ilex opaca</i>	American holly	5"
<i>Ilex opaca</i>	American holly	15"
<i>Magnolia grandiflora</i>	Southern magnolia	34

Taxus baccata	English Yew	5"
Taxus baccata	English Yew	5"
Albizia julibrissin	Mimosa	8"
Albizia julibrissin	Mimosa	7"
Cercis canadensis	Eastern redbud	12"
Cercis canadensis	Eastern redbud	26"
Cercis canadensis	Eastern redbud	7"
Cercis canadensis	Eastern redbud	6"
Cornus sp.	Dogwood unspecified	4"
Ficus carica	Common fig	2"
Ficus carica	Common fig	2"
Berberis thunbergii	Japanese Barberry	5'
Lonicera maackii	Amur Honeysuckle	8'

Conclusions

Based on our surveys, the unlikely presence of these three species in the project area, and the proposed mitigation measures to minimize impacts, the National Park Service has determined that the proposed action will have no effect on the northern long-eared bat, the tricolored bat, or the Monarch butterfly.

We certify that we have used the best scientific data available to complete this assessment. We request your concurrence with this determination.

Literature Cited

AECOM. 2018. Clara Barton National Historic Site Conditions Assessment and Feasibility Study, Volumes 1, 2, & 3. Prepared for National Park Service, George Washington Memorial Parkway.

Deeley, S., S. Freeze, and L. Rohrbaugh. 2021. Post-white-nose syndrome bat communities in the National Capital Region: Part 1—final report. Natural Resource Report NPS/NCRO/NRR—2021/2319. National Park Service, Fort Collins, Colorado.

Lausen, C. 2009. Status of the Northern Myotis (*Myotis septentrionalis*) in Alberta, Alberta, Wildlife Status Report No. 3 (Update 2009).

Oehrlein and Associates Architects. 1997. Clara Barton National Historic Site Historic Structure Report, Volume 2, Part I: Physical History and Condition Assessment. Historic Architecture Program, National Capital Region, National Park Service. Washington, D.C.

Steury, B.W., G.P. Fleming, & M.T. Strong. 2008. An emendation of the vascular flora of Great Falls Park, Fairfax County, Virginia. *Castanea* 73(2): 123-149.

Steury, B.W. 2011. Additions to the vascular flora of the George Washington Memorial Parkway, Virginia, Maryland, and the District of Columbia. *Banisteria* 37(1): 35-52.

USFWS (U.S. Fish and Wildlife Service). 2015. Northern Long-Eared Bat (*Myotis septentrionalis*). USFWS Fact sheet.

USFWS (U.S. Fish and Wildlife Service). 2024. FWS Focus: Tricolored Bat. Tricolored Bat (*Perimyotis subflavus*) | U.S. Fish & Wildlife Service (fws.gov).

Sincerely,

Brent Steury
Natural Resources Program Manager
George Washington Memorial Parkway

Cc: Maureen Joseph, NPS-GWMP
Susan Hall, NPS-GWMP

ATTACHMENT E: AGENCY CORRESPONDENCE



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, Virginia 22101

IN REPLY REFER TO:

1.A.2 CLBA NHS Rehab

June 3, 2022

Ms. Elizabeth Hughes, Director &
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place, Third Floor
Crownsville, MD 21032-2023

Attn: Ms. Beth Cole and Ms. Becky Roman

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed
Rehabilitation, Glen Echo, Montgomery County, Maryland, Initiate National
Historic Preservation Act of 1966 Section 106 Compliance

Dear Ms. Hughes:

This correspondence serves to notify and inform the Maryland Historical Trust (MHT), the Maryland State Historic Preservation Office (SHPO), that the George Washington Memorial Parkway (GWMP) of the National Park Service (NPS) is proposing the subject undertaking to rehabilitate Clara Barton National Historic Site (CLBA NHS), a National Historic Landmark (NHL) administered by GWMP, and officially initiating the compliance process with your office in accordance with Section 106 of the National Historic Preservation Act (NHPA Section 106), as amended. The NPS GWMP has also invited MHT staff members/SHPO representatives Beth Cole and Becky Roman and NPS NHL – National Capital Region Coordinator Kathryn Smith, to attend a CLBA NHS site tour and to provide an overview of our upcoming project on June 29, 2022.

The CLBA NHS is a historic property noted for its association with Clara Barton and the American Red Cross which she founded. The house served variously as a supplies warehouse, administrative office/Red Cross Headquarters, and Ms. Barton's residence between 1891 and 1912 when she passed away. Currently closed to public, the NPS-GWMP previously operated the building as a historic house museum. The NPS-GWMP is excited to embark on a major rehabilitation project to make preservation maintenance repairs, upgrades for health and safety codes, modernizing exhibits, and potential alterations for compatible uses of the structure by a partner organization. Keeping in mind the special NHL status, the project will be designed to conform with the Secretary of Interior's Standards for the Treatment of Historic Properties, will be planned to the maximum extent possible to minimize harm to the NHL as per NHPA Section

110(f). Should Adverse Effects be determined, the Advisory Council on Historic Preservation and the Secretary of Interior (through the NHL Program) will be invited to comment.


At this point, the NPS is progressing with its early planning/pre-design activities to examine egress, fire code compliance, facilities accessibility, utilities/systems, potential shared use, and preservation maintenance needs. A Value Analysis Workshop is scheduled for late summer to weigh proposed alterations with historic preservation. Preliminary discussion of the developing project and NHPA Section 106 compliance strategies is expected to take place with MHT staff at the June 29, 2022 meeting.

With regard to NHPA Section 106, please see the attached proposed area of potential effect (APE) which has been drawn to include the house and immediate grounds. For official Consulting Parties, we initially propose to invite following entities: the NPS Regional NHL Office, the Town of Glen Echo, the American Red Cross, and the Preservation Office of the Montgomery County Planning Department. The NPS hereby requests your comments or concurrence in the APE and list of any additional Consulting Parties.

If there are any questions or you require additional information, please contact Maureen Joseph, GWMP Resource Management Division Manager, at 703-289-2512 or maureen_joseph@nps.gov or Matthew Virta, GWMP Cultural Resources Program Manager, at 703-289-2535 or matthew_virta@nps.gov.

Sincerely,

Charles
Cuvelier

 Date: 2022.06.03
16:36:45 -04'00'

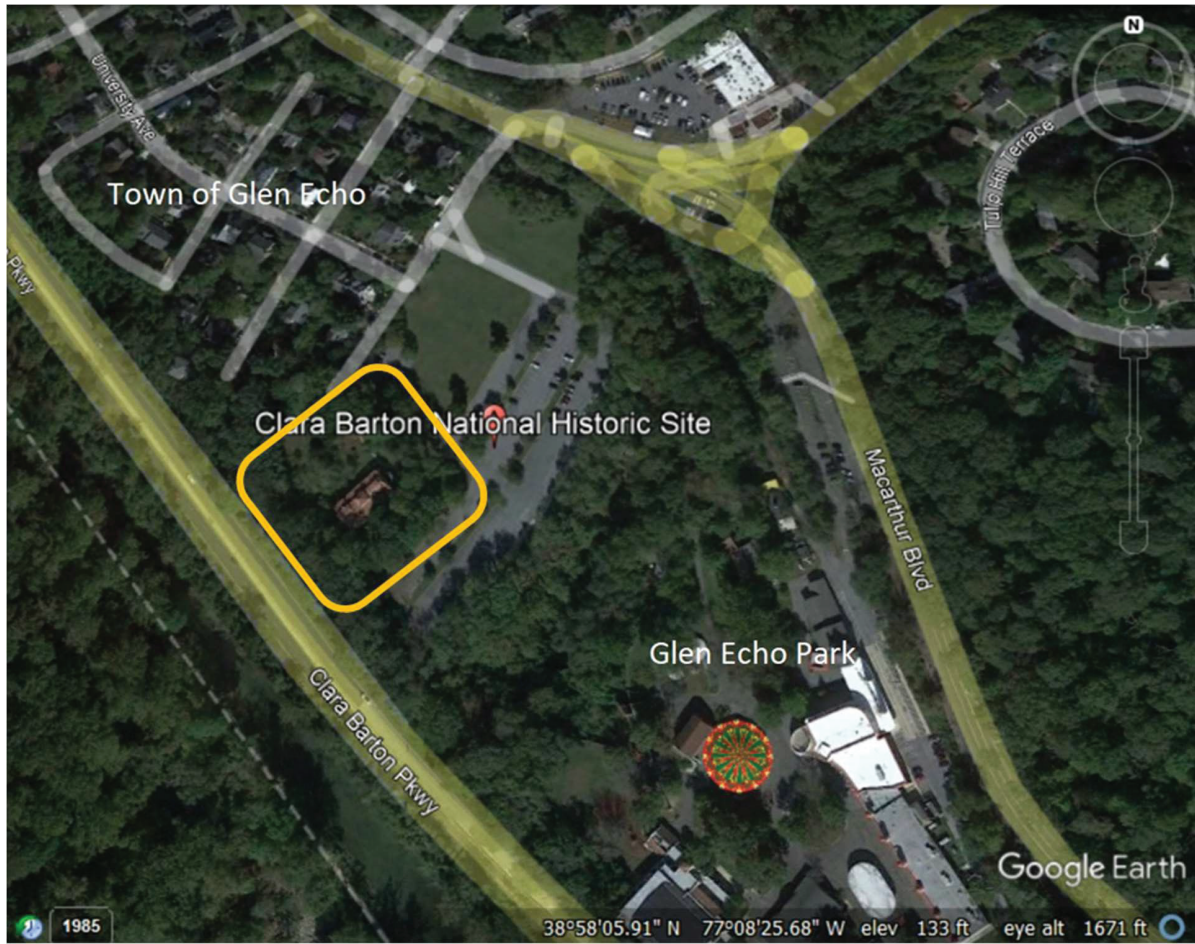
Charles Cuvelier
Superintendent

Attachment A: Proposed Draft Area of Potential Effect

cc:

Beth Cole, MHT
Becky Roman, MHT
Kathryn Smith, NPS-NHL-NCR
Matthew Virta, NPS-GWMP
Megan Bailey, NPS-GWMP
Maureen Joseph, NPS-GWMP
Susan Hall, NPS-GWMP

Attachment A: Proposed Draft Area of Potential Effect



[EXTERNAL] Clara Barton NHS, Proposed Rehabilitation, Section 106 Compliance

From Becky Roman -MDP- <becky.roman@maryland.gov>

Date Thu 7/7/2022 1:16 PM

To Virta, Matthew <Matthew_Virta@nps.gov>

Cc Joseph, Maureen <Maureen_Joseph@nps.gov>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Beth Cole <beth.cole@maryland.gov>

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Matt Virta
Cultural Resources Program Manager
George Washington Memorial Parkway (GWMP)
National Park Service (NPS)

Good afternoon Matt,

Thank you for your recent letter, sent by Superintendent Charles Cuvelier and received on June 7, 2022, initiating consultation with the Maryland Historical Trust (Trust) pursuant to Section 106 of the National Historic Preservation Act for the above-referenced undertaking, involving rehabilitation of the Clara Barton National Historic Site, a National Historic Landmark, that is administered by GWMP. We concur with the limits of your proposed area of potential effect (APE) which encompass the building and surrounding landscape. As noted in your letter, an on-site meeting was held on June 29, 2022, with Trust, NPS, and NHL staff, to go over the history of the building and its proposed rehabilitation.

Based on details of the project provided in your letter and discussed during the on-site meeting, the building has been closed to the public for two decades and is in need of extensive repairs. The proposed rehabilitation will involve alterations to the building to allow for it to be reopened to the public, for site interpretation by NPS and partner use of the building for classroom, office, and event space. The Glen Echo Park Partnership for the Arts and Culture, who partner with the NPS and Montgomery County to run adjoining Glen Echo Park, have expressed interest in partnering on this rehabilitation project. Their desired uses of the building are being considered by NPS during early planning for this undertaking.

We understand that NPS is conducting early studies and structural analysis of the building and an inventory of the surrounding cultural landscape to develop feasible rehabilitation alternatives that will

allow for its adaptive reuse. The results of these studies will be provided to the consulting when available later this year. It is our opinion that careful consideration of the period of significance of the property (building and landscape) will be critical in determining how the rehabilitation can proceed while avoiding possible adverse effects to this NHL property.

Your recent letter provided a proposed list of consulting parties for this undertaking. We suggest that you also invite the following organizations to participate as consulting parties: Heritage Montgomery, as the state heritage area in Montgomery County; Montgomery Preservation, as the county preservation organization; and Glen Echo Park Partnership for the Arts and Culture, as the project partner. We also suggest that you specify the Historic Preservation Office of the Montgomery County Planning Department; Rebecca Ballo is the contact.

We appreciate NPS's early coordination on this undertaking to ensure the appropriate consideration of the proposed undertaking's potential to affect this NHL property through its rehabilitation with partial adaptive reuse. We look forward to further coordination with NPS and other consulting parties to complete the Section 106 review of this undertaking. If you have questions or need further assistance, please contact me at becky.roman@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,
Becky



Becky Roman

Preservation Office, Project Review and
Compliance

Maryland Historical Trust

Maryland Department of Planning
100 Community Place, 3rd Floor, Cr
ownsville, MD 21032

becky.roman@maryland.gov

P. 410.697.9587

MHT.Maryland.gov

[Please take our customer service survey.](#)

CLBA Invitation to Consult on Proposed Rehabilitation

From Bailey, Megan M <megan_bailey@nps.gov>

Date Wed 7/2/2025 8:55 AM

To Bailey, Megan M <megan_bailey@nps.gov>

From: Smith, Kathryn G <Kathryn_Smith@nps.gov>

Sent: Thursday, August 11, 2022 4:20 PM

To: Virta, Matthew <Matthew_Virta@nps.gov>; GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>

Cc: Gossett, Tanya <Tanya_Gossett@nps.gov>

Subject: CLBA Invitation to Consult on Proposed Rehabilitation

Superintendent Cuvelier:

Thank you for the invitation to consult on the proposed rehabilitation of the Clara Barton House National Historic Site and National Historic Landmark. I appreciated the preliminary site visit organized by your staff on June 29, 2022 and will participate in the consultation as the National Park Service continues its planning.

As you are aware, as federal stewards of this National Historic Landmark (NHL), the National Park Service is required under the National Historic Preservation Act [Title 54, United States Code, Section 306107 -- commonly known as Section 110(f)] and its implementing regulations “to the maximum extent possible undertake such planning and actions as may be necessary to minimize harm to the landmark” and to invite the National Historic Landmarks Program (acting for the Secretary of the Interior) to consult on any projects that may result in adverse effects to an NHL.

I will consult on behalf of the Secretary to insure that we avoid of adverse effects to the NHL.

Thank you and I look forward to working with you and your staff to protect this special resource.

Best,
Kathryn

Kathryn G. Smith (she/her)
National Historic Landmarks & National Register Coordinator
National Park Service
National Capital Region
202.619.7180
202.913.3859 mobile

Fw: [EXTERNAL] Clara Barton National Historic Site Consulting Party

From Virta, Matthew <Matthew_Virta@nps.gov>
Date Mon 8/15/2022 2:10 PM
To Joseph, Maureen <Maureen_Joseph@nps.gov>
Cc Bailey, Megan M <megan_bailey@nps.gov>

FYI

Matt Virta

Cultural Resources Program Manager/Archeologist
National Park Service - George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

(Tel) 703-289-2535

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From: Dia Costello <MayorCostello@glenecho.org>
Sent: Thursday, August 11, 2022 12:11 PM
To: GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>; Virta, Matthew <Matthew_Virta@nps.gov>;
Town Hall <townhall@glenecho.org>
Subject: [EXTERNAL] Clara Barton National Historic Site Consulting Party

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As Mayor of Glen Echo, it is imperative that we participate as members of the consulting party for the Clara Barton National Historic Site in Glen Echo as it directly effects our town and residents. Please include me for all discussions and events as well as our Town Manager, Elizabeth Stickler at

townhall@glenecho.org.

Thank you very much,
Mayor Dia Costello

MayorCostello@glenecho.org

(301) 538-7784

[https://gcc02.safelinks.protection.outlook.com/?](https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.glenecho.org%2F&data=05%7C01%7Cmatthew_virta%40nps.gov%7Cf38d0dd124704b68099608da7bb423ed%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637958310873806310%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=dE6vtWV5juHskWzSeenl7q5UeqGMuZMUuwZdfETxsNY%3D&reserved=0)

[url=http%3A%2F%2Fwww.glenecho.org%2F&data=05%7C01%7Cmatthew_virta%40nps.gov%7Cf38d0dd124704b68099608da7bb423ed%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637958310873806310%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=dE6vtWV5juHskWzSeenl7q5UeqGMuZMUuwZdfETxsNY%3D&reserved=0](https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.glenecho.org%2F&data=05%7C01%7Cmatthew_virta%40nps.gov%7Cf38d0dd124704b68099608da7bb423ed%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637958310873806310%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=dE6vtWV5juHskWzSeenl7q5UeqGMuZMUuwZdfETxsNY%3D&reserved=0)

Fw: [EXTERNAL] FW: National Historic Preservation Act-Section 106 Consulting Parties Invitation

From Virta, Matthew <Matthew_Virta@nps.gov>
Date Wed 8/17/2022 2:23 PM
To Joseph, Maureen <Maureen_Joseph@nps.gov>
Cc Bailey, Megan M <megan_bailey@nps.gov>

■ 1 attachment (227 KB)
Signed - CLBA Rehab Consultin Parties Letter_20220810.pdf;

Another party heard from re CLBA Rehab.....

Matt Virta

Cultural Resources Program Manager/Archeologist
National Park Service - George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

(Tel) 703-289-2535

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From: Dise, David E. <David.Dise@montgomerycountymd.gov>
Sent: Wednesday, August 17, 2022 1:29 PM
To: qwmp_superintendent@nps.gov <qwmp_superintendent@nps.gov>; Virta, Matthew <Matthew_Virta@nps.gov>
Cc: Hartman, Ken <Ken.Hartman@montgomerycountymd.gov>; Katharine Boerner <kboerner@glenechopark.org>; Emily Rogers <erogers@glenechopark.org>; Omidvar, Hamid <Hamid.Omidvar@montgomerycountymd.gov>; Ossont, Greg <Greg.Ossont@montgomerycountymd.gov>; Cooke, Jamie P. <Jamie.Cooke@montgomerycountymd.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>
Subject: [EXTERNAL] FW: National Historic Preservation Act-Section 106 Consulting Parties Invitation

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In response to your letter of August 10, 2022, regarding the referenced subject, please accept this as commitment from Montgomery County government to participate as a consulting party for the Section 106 review of the proposed CLBA NHS rehabilitation of the Clara Barton National Historic Site. The Montgomery County Department of General Services (DGS) will represent the County and include myself and Mr. Hamid Omidvar, Chief of DGS' Division of Building Design and Construction, as principal points of contact.

David E. Dise, Director
Department of General Services
Montgomery County, MD
O: 240-777-6191
M: 240-672-4786
david.dise@montgomerycountymd.gov

From: Morales, Brendaliz <brendaliz_morales@nps.gov> **On Behalf Of** GWMP Superintendent, NPS

Sent: Thursday, August 11, 2022 8:34 AM

To: becky.romand@maryland.gov; Elizabeth Hughes <elizabeth.hughes@maryland.gov>; Omidvar, Hamid <Hamid.Omidvar@montgomerycountymd.gov>; Dise, David E. <David.Dise@montgomerycountymd.gov>; rebeccah.ballo@montgomeryplanning.org; townhall@glenecho.org; beth.cole@marylnad.gov; mayorcostello@glenecho.org; Weil, Michael <michael.weil@ncpc.gov>; lee.webb@ncpc.gov; cwilson@achp.gov; Smith, Kathryn G <Kathryn_Smith@nps.gov>; Katharine Boerner <kboerner@glenechopark.org>; riggsjan@yahoo.com; alicia.weiner@gmail.com; guildaydoris@yahoo.com; tapwhitedove@gmail.com; akumaldreams@gmail.com; bararahowe3@gmail.com; timlowry@bellsouth.net; cbills@revels.dc.org; luciennebeard@gmail.com; swansonkem@gmail.com; cmorris@savingplaces.org; pelevere@linkedlegacy.net; contacts@ethanvendinggroup.com; huyckclapper@earthlink.net; kjudd@washingtonconservatory.org; susan.watson@redcross.org; julie.manes@redcross.org; mpi@montgomerypreservation.org; Director@HeritageMontgomery.org

Subject: National Historic Preservation Act-Section 106 Consulting Parties Invitation

[EXTERNAL EMAIL]

Good morning,

Please see the attached memo concerning the National Historic Preservation Act-Section 106 Consulting Parties Invitation for the Proposed Rehabilitation of the Clara Barton National Historic Site, George Washington Memorial Parkway, Glen Echo, Maryland.

Superintendent
George Washington Memorial Parkway



[EXTERNAL] Fwd: National Historic Preservation Act-Section 106 Consulting Parties Invitation

From Bailey, Megan M <megan_bailey@nps.gov>

Date Wed 7/2/2025 8:58 AM

To Bailey, Megan M <megan_bailey@nps.gov>

■ 1 attachment (227 KB)

Signed - CLBA Rehab Consultin Parties Letter_20220810.pdf;

From: Katey Boerner <kboerner@glenechopark.org>

Sent: Wednesday, August 17, 2022 6:36 PM

To: GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>; Virta, Matthew <Matthew_Virta@nps.gov>

Cc: Emily Mah Rogers <erogers@glenechopark.org>; Montgomery Svcs.

<david.dise@montgomerycountymd.gov>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>

Subject: [EXTERNAL] Fwd: National Historic Preservation Act-Section 106 Consulting Parties Invitation

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In response to your letter of August 10, 2022, regarding the referenced subject, please accept this as commitment from the Glen Echo Park Partnership for Arts and Culture to participate as a consulting party for the Section 106 review of the proposed CLBA NHS rehabilitation of the Clara Barton National Historic Site.

Please use the following two contacts as the POC for our organization:

Katey Boerner

Executive Director

kboerner@glenechopark.org

Emily Rogers

Site Operations Manager

erogers@glenechopark.org

mailing address:

Glen Echo Park Partnership for Arts and Culture
7300 MacArthur Blvd.

Glen Echo, MD 20812

----- Forwarded message -----

From: **GWMP Superintendent, NPS** <GWMP_Superintendent@nps.gov>

Date: Thu, Aug 11, 2022 at 8:34 AM

Subject: National Historic Preservation Act-Section 106 Consulting Parties Invitation

To: becky.romand@maryland.gov <becky.romand@maryland.gov>, Elizabeth Hughes <elizabeth.hughes@maryland.gov>,

hamid.omidvar@montgomerycountymd.gov <hamid.omidvar@montgomerycountymd.gov>,

david.dise@montgomerycountymd.gov <david.dise@montgomerycountymd.gov>,

rebeccah.ballo@montgomeryplanning.org <rebeccah.ballo@montgomeryplanning.org>, GE Town Hall <townhall@glenecho.org>, beth.cole@marylnad.gov <beth.cole@marylnad.gov>, Dia Costello <mayorcostello@glenecho.org>,

Weil, Michael <michael.weil@ncpc.gov>,

lee.webb@ncpc.gov <lee.webb@ncpc.gov>, cwilson@achp.gov <cwilson@achp.gov>, Smith, Kathryn

G <Kathryn_Smith@nps.gov>, kboerner@glenechopark.org <kboerner@glenechopark.org>,

riggsjan@yahoo.com <riggsjan@yahoo.com>, alicia.weiner@gmail.com <alicia.weiner@gmail.com>,

guildaydoris@yahoo.com <guildaydoris@yahoo.com>,

tapwhitedove@gmail.com <tapwhitedove@gmail.com>,

akumaldreams@gmail.com <akumaldreams@gmail.com>,

barbarahowe3@gmail.com <barbarahowe3@gmail.com>,

timlowry@bellsouth.net <timlowry@bellsouth.net>, cbills@revels.dc.org <cbills@revels.dc.org>,

luciennebeard@gmail.com <luciennebeard@gmail.com>,

swansonkem@gmail.com <swansonkem@gmail.com>,

cmorris@savingplaces.org <cmorris@savingplaces.org>,

pelevere@linkedlegacy.net <pelevere@linkedlegacy.net>,

contacts@ethanvendinggroup.com <contacts@ethanvendinggroup.com>,

huyckclapper@earthlink.net <huyckclapper@earthlink.net>,

kjudd@washingtonconservatory.org <kjudd@washingtonconservatory.org>,

susan.watson@redcross.org <susan.watson@redcross.org>,

julie.manes@redcross.org <julie.manes@redcross.org>,

mpi@montgomerypreservation.org <mpi@montgomerypreservation.org>,

Director@HeritageMontgomery.org <Director@heritagemontgomery.org>.

Good morning,

Please see the attached memo concerning the National Historic Preservation Act-Section 106 Consulting Parties Invitation for the Proposed Rehabilitation of the Clara Barton National Historic Site, George Washington Memorial Parkway, Glen Echo, Maryland.

Superintendent

George Washington Memorial Parkway

--

Katey Boerner

she/her ([why is this important?](#))

Executive Director

Glen Echo Park Partnership for Arts and Culture
7300 MacArthur Blvd | Glen Echo, MD 20812
(301) 634-2225 | lkboerner@glenchopark.org
www.glenchopark.org



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[EXTERNAL] Clara Barton

From Bailey, Megan M <megan_bailey@nps.gov>
Date Wed 7/2/2025 9:01 AM
To Bailey, Megan M <megan_bailey@nps.gov>

From: Pamela Goddard <PGoddard@npca.org>
Sent: Wednesday, August 24, 2022 2:10 PM
To: Cuvelier, Charles J <Charles_Cuvelier@nps.gov>
Cc: Christina Morris <CMorris@savingplaces.org>; Christopher Cody <CCody@savingplaces.org>
Subject: [EXTERNAL] Clara Barton

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Dear Charles,

Thank you very much for your time to discuss the exciting plans for the Clara Barton National Historic Site, the RFEI, and the proposed Section 106 Consultation. I look forward to participating in the consultation and hope to add value to the conversation.

I want to introduce you to two colleagues (copied here) from the National Trust for Historic Preservation who have been engaged in these discussions with Aaron LaRocca. Chris Morris is Senior Field Director for Preservation and is located in LA. Christopher Cody is located in the Trust's DC office. I know they would like to speak with someone at the parkway about this endeavor.

Thank you once again, Charles. We all are eager to see the Clara Barton House returned to its previous glory (minus the train tracks) and look forward to working with you on this.

Sincerely,
Pam



Pamela E. Goddard (she/her)
Mid-Atlantic Region Senior Program Director

National Parks Conservation Association
C: 202.604.3781 | pgoddard@npca.org | npca.org

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**National Trust *for*
Historic Preservation**

Save the past. Enrich the future.™

SENT VIA E-MAIL

August 31, 2022

Charles Cuvelier
Superintendent
National Park Service
700 George Washington Memorial Parkway,
McLean, VA 22101

**Re: Clara Barton National Historic Site Rehabilitation Project – Request
for Consulting Party Status**

Dear Mr. Cuvelier:

The National Trust for Historic Preservation (the “National Trust”) hereby requests to participate in the Section 106 review process for the rehabilitation of the Clara Barton National Historic Site as a “consulting party” pursuant to 36 C.F.R. §§ 800.2(c)(5) and 800.3(f)(3). Congress chartered the National Trust in 1949 as a private, nonprofit membership organization to “facilitate public participation” in historic preservation, and to further the purposes of federal historic preservation laws. 54 U.S.C. § 312102. With the strong support of almost one million members and supporters nationwide, the National Trust works to protect significant places representing our diverse cultural experience by taking direct action and inspiring broad public support. In addition, the Chairman of the National Trust has been designated by Congress as a member of the federal Advisory Council on Historic Preservation (ACHP), *id.* § 304101(8), and thus we have a strong interest in helping to achieve successful compliance with Section 106 of the National Historic Preservation Act.

The National Trust has a particular interest in the rehabilitation of the Clara Barton House because it is one of the few National Park units explicitly designated for significance in women’s history. The National Trust is committed to advocating for the preservation of women’s history, doing so through our successful program Where Women Made History and other advocacy actions like participation in Section 106 consultations. We have appreciated our past relationships with National Park Service staff at the George Washington Memorial Parkway and the current dialogue that you are engaged in with us, and we are very hopeful that this rehabilitation will be an exemplary project.

Please include the following contacts in your distribution list for notices of meetings and for the circulation of any documents for comments. All correspondence should be sent to:

Christopher Cody
Associate General Counsel
National Trust for Historic
Preservation
E: ccody@savingplaces.org
P: 214-734-8952

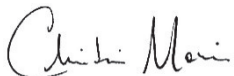
Christina Morris
Senior Field Director
National Trust for Historic
Preservation
E: cmorris@savingplaces.org
P: 213-705-7122

We look forward to hopefully participating in this consultation and thank you for your consideration of our request.

Sincerely,



Christopher Cody
Associate General Counsel



Christina Morris
Senior Field Director

Cc: Lucienne Beard and Marsha Weinstein, National Collaborative on Women's History
Sites
Pam Goddard, NPCA



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

IN REPLY REFER TO:
GWMP 1.A.2 CLBA Rehab

October 18, 2022

SUBJECT: National Historic Preservation Act-Section 106 Consulting Parties Meeting for the Proposed Rehabilitation of the Clara Barton National Historic Site, George Washington Memorial Parkway, Glen Echo, Maryland

Dear Consulting Party:

As you are aware, the National Park Service (NPS) is proposing to rehabilitate the Clara Barton National Historic Site (CLBA NHS), a historic property located in Glen Echo, Montgomery County, Maryland that is under the administration of the George Washington Memorial Parkway (GWMP). You were invited to an initial consulting parties meeting on September 12, 2022 where the history and significance of the CLBA NHS were presented, concepts were offered for the use of the house in partnership with another organization to assist in the management and upkeep of the building and grounds, and potential rehabilitation treatments and a project schedule were proposed. Adaptive re-use of some of the less significant historic spaces and areas of the site that have been altered from the original may require upgrades for current fire, health, safety and accessibility codes. The NPS was able to listen to concerns as consulting parties provided comment during the meeting and afterward through email. Notes from that initial consulting parties meeting had been circulated and the feedback from the meeting was taken into consideration as the NPS entered into a Value Analysis (VA) Workshop to rate and rank aspects of various treatment alternatives.

Attached for your information are four files:

- 1 - VA summary of key points
- 2A & 2B – VA workshop slides (Day 1 and 2)
- 3 – Existing floor plans – building integrity and significance

Once the VA document is drafted it will be available for 30-day review and comment.

A second consulting parties meeting using the MS Teams virtual meeting platform has been tentatively set for the afternoon of November 16, 2022 from 1:30 pm to 3:00 pm Eastern Time and invitations will follow. This second consulting parties meeting will discuss the VA and provide the latest information on the proposed rehabilitation project, including the potential alternatives to be further analyzed in an Environmental Assessment (EA).

If you have any questions concerning the proposed CLBA NHS rehabilitation, or the role of consulting parties, please contact Mr. Matt Virta, Cultural Resources Program Manager for the GWMP, at (703) 289-2535 or Matthew_Virta@nps.gov.

Sincerely,

Charles Cuvelier
Superintendent

Attachments



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

IN REPLY REFER TO:
GWMP 1.A.2 CLBA Rehab

October 31, 2022

SUBJECT: National Historic Preservation Act-Section 106 Consulting Parties Meeting #2 for the Proposed Rehabilitation of the Clara Barton National Historic Site, George Washington Memorial Parkway, Glen Echo, Maryland

Dear Consulting and Interested Parties,

The National Park Service (NPS) recently provided for your information/review a synopsis summary of the Value Analysis Workshop held by the NPS and a collection of graphical illustrations explaining the pre-design process that led the NPS to consider a narrowing range of alternatives for the rehabilitation of the Clara Barton National Historic Site (CLBA NHS). As a reminder, in order for the George Washington Memorial Parkway (GWMP), which administers the site, to promote the continued stewardship and use of this important National Historic Landmark (NHL), certain preservation/rehabilitation treatments and site management strategies have been proposed for CLBA NHS and are being examined with input being provided by technical experts, managers, a potential partner, and our Section 106 consulting parties.

With this communication, we are providing a formal calendar invitation for the second Section 106 Consulting Parties meeting to be held on November 16 from 1:30 to 3:00 pm at Glen Echo Park. A pre-meeting site tour will be offered of CLBA NHS, on November 16, from 12:00 to 1:00 pm. We will attempt to offer an MS Teams Virtual option, but recommend attending in-person. Please consider bringing your lunch because food options are limited in the area. During the site tour, GWMP staff will collect all questions and share the answers to all the consulting parties.

The NPS is also providing for your information and review the **Draft Value Analysis Workshop Report**. We are awaiting the **Schematic Design Drawing Set**, which will be sent to you once it is available. Both these documents will be concurrently reviewed by the NPS. *(Please note: Due to file size, these documents will be offered via a MS Teams document sharing platform that will be provided by GWMP Cultural Resource Specialist Megan Bailey (or will be provided in hard copy)).* We hope to discuss these documents and answer preliminary questions during your 30-day review period at the November 16 meeting to obtain additional comment and feedback; with formal comment provided by consulting parties expected in writing by December 1, 2022.

With a refined purpose and need for the rehabilitation, and a focusing of the range of alternatives for examination, the NPS is also launching an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) to further analyze the proposed rehabilitation undertaking. While the Section 106 process of the National Historic Preservation Act concentrates on the cultural resource values/historic preservation concerns associated with an undertaking and its impacts, a NEPA EA analysis considers this topic area amongst others to examine in a broader environmental context. Public scoping for the EA, in which consulting parties are also encouraged to take part, is expected to begin shortly after the second consulting parties meeting.

Lastly, we would like to remind the consulting parties that the CLBA NHS has been closed for several years due to a series of emergency repair projects. If you are unable to attend the pre-meeting tour, the site is now open for guided tours of the first floor Fridays through Sundays at 1:00 pm, 2:00 pm, 3:00 pm, and 4:00 pm. The house is unfurnished, and the 2nd and 3rd floors remain closed to the public tours.

The NPS looks forward to your participation at the second consulting parties meeting and appreciates the comments made so far during meetings, via emails, in correspondence or by other means. Further comment may be addressed to GWMP Superintendent Charles Cuvelier (GWMP_Superintendent@nps.gov) or GWMP Cultural Resources Program Manager Matt Virta (matthew_virta@nps.gov).

Sincerely,

Charles Cuvelier
Superintendent

CLBA NHS Rehab Consulting Parties Meeting Preliminary Follow-up Information

From Bailey, Megan M <megan_bailey@nps.gov>

Date Tue 11/22/2022 12:12 PM

To Smith, Kathryn G <Kathryn_Smith@nps.gov>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebeccah <rebeccah.ballo@montgomeryplanning.org>; david.dise <david.dise@montgomerycountymd.gov>; pgoddard <pgoddard@npca.org>; Christopher Cody <ccody@savingplaces.org>; Luciennebeard <luciennebeard@gmail.com>; susan.watson <susan.watson@redcross.org>; timlowry <timlowry@bellsouth.net>; huyckclapper <huyckclapper@earthlink.net>; mwhcdiana <mwhcdiana@gmail.com>; Julia Irwin <juliai@usf.edu>; jacob.remes <jacob.remes@nyu.edu>; bgoldman1 <bgoldman1@comcast.net>; bgoldman1 <bgoldman1@comcast.net>; kksklar <kksklar@binghamton.edu>; historicalnewyork <historicalnewyork@me.com>; cgood <cgood@marymount.edu>; joanz10 <joanz10@verizon.net>; Young, Pearl Joy <youngp@uhcl.edu>; rosst <rosst@sunyocc.edu>; rosst <rosst@sunyocc.edu>; chiefannerich <chiefannerich@aol.com>; Gray, Robert <robert.gray@pamunkey.org>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; cspeck <cspeck@delawarenation-nsn.gov>

Cc Hall, Susan G <susan_hall@nps.gov>; Virta, Matthew <Matthew_Virta@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>

Dear Consulting and Interested Parties,

The NPS would like to provide the Clara Barton National Historic Site Rehabilitation project Section 106 consulting parties with some preliminary follow-up information and data following our most recent consulting parties meeting on November 16 which many of you were able to attend. Information is available at the MS Teams file sharing platform, which is linked here: [☐ General](#)

The NPS thanks you in advance for providing by December 9, 2022 any written questions, comments, and suggestions on the project and the draft Value Analysis and 30% Schematic Design documents.

As it becomes available, additional information will be forthcoming as we continue consultation on the undertaking.

Best,
Megan

--

Megan Bailey
Cultural Resources Specialist
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)



PRESERVATION MARYLAND

December 2, 2022

Charles Cuvelier, Superintendent
George Washington Memorial Parkway,
National Park Service
700 George Washington Memorial Parkway,
McLean, VA 22101

Re: Clara Barton National Historic Site Rehabilitation Project – Request for Consulting Party Status

Dear Mr. Cuvelier:

I hereby request to participate in the Section 106 review process for the “rehabilitation of the Clara Barton National Historic Site” as a “consulting party” pursuant to 36 CFR 36 C.F.R. §§ 800.2(c)(5) and 800.3(f)(3). I am **Nicholas Redding, President and CEO of Preservation Maryland, the largest and oldest preservation organization dedicated to protecting the state’s irreplaceable heritage.**

We desire to work with and help N.P.S. find the best partnership that serves to help interpret the story of Clara Barton. The Clara Barton N.H.S. was established almost 50 years ago in 1974 and is one of only nine sites dedicated to women so it is imperative that site remains focused on telling the story of Clara Barton and the American Red Cross.

I would like to attend any upcoming consultation meetings and receive all communications regarding the project. I also would like to receive any documents and presentations that were previously shared with consulting parties to date.

I understand the comment period deadline is December 9, 2022. I request that you extend the deadline to January 27, 2023, to allow my organization and others to receive and analyze the information on the proposed project. Given the busy holiday schedule and the number of materials to review, a deadline extension is a reasonable request.

Please include the following contacts in your distribution list for notices of meetings and for the circulation of any documents for comments. All correspondence should be sent to:

Nicholas Redding
President & CEO
PRESERVATION MARYLAND
3600 Clipper Mill Road, Suite 248
Baltimore, Maryland 21211
nredding@presmd.org

We look forward to hopefully participating in this consultation and thank you for your consideration of our request.

Sincerely,

A handwritten signature in blue ink that reads "Nicholas Redding". The signature is written in a cursive style with a large, prominent "N" and "R".

Nicholas A. Redding
President & CEO, Preservation Maryland



**National Trust for
Historic Preservation**

Save the past. Enrich the future.

October 24, 2022

Charles Cuvelier
Superintendent
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Re: Clara Barton National Historic Site Section 106 Consultation

Dear Mr. Cuvelier,

The National Trust for Historic Preservation (“National Trust”) is pleased to participate as a consulting party in the Section 106 consultation for the rehabilitation of the Clara Barton National Historic Site (CBNHS). We are highly supportive of this project and are eager to see this important historic site reopened to the public. The National Trust considers Clara Barton National Historic Site to be exceptionally important because of its status as one of less than ten sites operated by the National Park Service (“NPS”) interpreting women’s history. The National Trust is deeply committed to advocating for the preservation of women’s history, doing so through our successful program Where Women Made History and other advocacy actions such as engaging in Section 106 consultations.

While we are fully supportive of the rehabilitation of the Clara Barton National Historic Site, after reviewing the documents provided to consulting parties on October 18, 2022 we have some questions and concerns. Our most significant concern is NPS’s proposal to transfer the majority of the usable square-footage of the building to a partner for operation as “multi-use space”. All three proposed alternatives would result in NPS operating a minority of the building’s space for the interpretation of Clara Barton’s life and women’s history. Alternative Three in fact proposes that a partner operate more than twice as much square footage within the building as multi-purpose space than NPS would for interpretation: 2,520 sq. ft. (NPS) vs. 5,160 sq. ft. (partner).

The National Trust is concerned that this proposed change in the dominant use of the CBNHS is a potential adverse effect per 36 CFR § 800.5(a)(2)(iv), which identifies “change of the character of the property’s use” as an adverse effect. In order to opine on this important issue the National Trust requests additional information, including proposed interpretative plans, partnership agreement documents, and any other documents pertaining to proposed uses for the CBNHS. If upon review of those documents the National Trust believes that the proposed change in use does constitute an adverse effect, we would be eager to work with NPS to avoid or minimize that effect per 36 CFR § 800.6(b)(2)(i). The National Trust anticipates that any potential adverse effects associated with the proposed

rehabilitation could easily be avoided or minimized through mere changes in use, and should not affect the physical rehabilitation of the building.

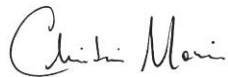
Lastly, the National Trust would like to note that multiple consulting parties are organizations and individuals with expertise in the interpretation of women's history. The National Trust encourages NPS to leverage their participation in this consultation process to help ensure that the rehabilitation of the CBNHS site results in it being a nationwide model for the interpretation of women's history. The National Trust believes that was the intent of Congress in designating CBNHS, and that CBNHS's status as one of less than ten sites operated by NPS interpreting women's history demands that accomplishment.

We thank you for your consideration of our comments, and look forward to continuing to participate in this Section 106 consultation.

Sincerely,

A handwritten signature in cursive script that reads "Chris Cody".

Chris Cody
Associate General Counsel

A handwritten signature in cursive script that reads "Chris Morris".

Chris Morris
Senior Field Director
Manager, Where Women Made History



December 5, 2022

Superintendent Charles Cuvelier
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

RE: *Clara Barton National Historic Site Section 106 Consultation*

Dear Superintendent Cuvelier:

Thank you for the opportunity to participate as a consulting party in the Section 106 consultation ongoing for the proposed rehabilitation of the Clara Barton National Historic Site. On behalf of the National Parks Conservation Association and our 1.7 million members and supporters across the country, we are pleased the National Park Service will rehabilitate and reopen to the public this important national park. The National Parks Conservation Association worked for years with Congress to ensure passage of the Great American Outdoors Act (GAOA) and we are thrilled to see this funding used to tackle the long-standing deferred maintenance backlog the NPS has faced. We are happy to work with you and your staff on the Barton Historic Site rehabilitation.

Significance of Clara Barton National Historic Site

As you know, the Clara Barton National Historic Site was established by Congress in 1974 and was the very first national park site dedicated to a woman's contribution to our country's history. Of the 424 sites in the national park system, there are only nine commemorating women. The Barton Site is a National Historic Landmark and is on the National Register of Historic Places. The park site honors Barton's personal history including her work to provide care on the battlefield to soldiers of the American Civil War, her creation of the Office of Missing Soldiers to help families find their loved ones, her creation and expansion of the American Red Cross, her critical role promoting the United States to sign the Geneva Convention, and her invention of what became known now as First Aid. The site was Barton's last home before her death in 1912.

The Barton site also commemorates the history of the American Red Cross as it served as the ARC's headquarter, contained offices and living space for many ARC officers and staff, and was a storage area for much needed medical supplies. The site contained an office for Clara Barton and for Dr. Julian B. Hubbell who was first the ARC's field agent and eventually its president.

And the building itself was built with supplies from the ARC Johnstown Flood hotel and repaired with muslin and other medical materials.

Proposed Rehabilitation

We support the expenditure of GAOA funding to rehabilitate and reopen the Clara Barton National Historic Site. We support the repair of the roof, exterior wood siding and windows; the structural stabilization of the second and third floors; replacing the third-floor balcony; restoring the original front porch; and repairing interior floors, walls, and ceilings. We appreciate the need to comply with the Americans with Disabilities Act by improving accessibility to bathrooms and the need for an elevator. We urge the NPS to build the new external elevator toward the rear of the property to minimize a visual intrusion on the historic site. And we support replacing the heating, ventilation, and air conditioning equipment; upgrading inadequate electrical and plumbing systems; and addressing fire and life safety code deficiencies. We understand that many of these repairs must be completed to make the building code compliant before the NPS can reopen the site to the public.

We have many questions regarding the rehabilitation plans to alter interior rooms, move walls, and lower the basement floor as these proposed changes appear to be generated solely for partner uses that have nothing to do with the building's history or safety issues. The many rooms and closets in the Barton site served important purposes and are critical to its historic integrity. These rooms existed to serve as offices and living space while the many closets in the building stored emergency supplies for the ARC's relief efforts. Why is the NPS considering changing the historic structure simply to accommodate a partner and how do these proposed changes reflect the congressional intent that created this national park site? We urge NPS to revisit these proposed changes and to ensure that significant rooms in the building are protected and rehabilitated to allow their use in future interpretation of the site.

Proposed Partnership

We understand that in 2021, as part of the rehabilitation plan, GWMP offered use of the Barton Historic Site in partnership with another organization to assist in the management and upkeep of the building. You have chosen the Glen Echo Park Partnership for Arts and Culture (GEPPAC) who currently manages an adjacent NPS site, Glen Echo Park, and whose mission is to present artistic and cultural activities through art classes, festivals, theater, and music. It appears that this proposed partnership is driving the rehabilitation plan for the Clara Barton National Historic Site with partner preference taking precedent over protection of the history of Clara Barton and the American Red Cross. Under the current proposal, nearly 75% of the Barton site would be given to the partner for their use. It appears that GWMP staff are working with your architect

to design the space specifically for GEPPAC activities including multi-purpose rooms for classrooms and workshops for arts and crafts, music rehearsal rooms, costume and instrument storage, and a catering prep kitchen. Of the 9800 square feet of the building, GWMP plans to dedicate 4650 square feet to the partner and 1200 to storage, with only 1900 to interpretation of Clara Barton and the American Red Cross. The partner activities proposed have no connection to Barton, the ARC, or the site's historic significance.

There are numerous national parks in the Mid-Atlantic region that commemorate the historic contributions of individuals like Mary McLeod Bethune, Alice Paul, and Maggie Walker. Their homes and workplaces are part of the national park system, and their stories are interpreted and shared at these national parks. Clara Barton deserves no less. We strongly believe relegating the contribution of Barton to our nation's history to a few rooms while a partner with no connection to Barton is given precedence in this space will result in adverse effects to the site.

The Clara Barton National Historic Site was established by the Congress to focus on Barton's life and contributions, and the American Red Cross. This partnership proposal diminishes and distorts the legislated national historic significance of the Clara Barton NHS and her fundamental role in the ARC. The NPS plan severely limits the space to interpret Barton and the ARC's purpose and value to just a handful of rooms. Historically significant spaces would become rooms for partner uses and programming.

We request additional information on the proposed partnership including partnership agreements, proposed interpretive plans, and GWMP criteria for potential partners for this site. We appreciate you sharing the partnership agreement between GEPPAC and GWMP for Glen Echo Park but would like to see the proposed agreement for the Barton site. We understand that NPS is seeking partnerships to leverage building maintenance and management needs. But we are deeply concerned that this proposed partnership could lead to fundamental changes that would change the character of the property's use.

Adverse Effects

The current plan fails to reflect congressional intent that created this national park as a national historic site with national significance for a national audience as reinforced in the 1989 Congressional designation of the Clara Barton Parkway. The site currently has reduced visitation due to its closure, deteriorated condition, minimal programming, and the pandemic. However, the infusion of GAOA funding would rehabilitate the site and attract new visitation, in person and virtually, for those interested in the story of a woman who so improved American public health responses. Unfortunately, the current plan proposes changing the character of the property's use rather than center on the rich history of Clara Barton and the American Red Cross. The proposed plan assigns a majority of the property's use to a partner that does not support the mission of the Clara Barton National Historic Site in its enabling legislation while

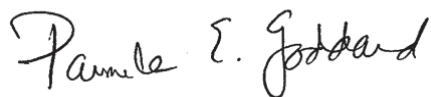
diminishing the historic significance of Barton and the American Red Cross to our nation. These fundamental changes would lead to adverse effects to the site's historic resources.

Need to Extend Comment Period

We respectfully request that the National Park Service extend the consulting party comment period deadline to 1/27/23 to allow all current and new interested parties and experts the time to read, analyze, and prepare comments on the large number of documents distributed. The current 30-day comment period is unreasonable for this undertaking. We also ask that NPS hosts another consulting party meeting to walk us through the documents, to answer questions about partnership criteria, the proposed partner programming, the proposed use of each room, and which rooms are proposed to be removed. We request a building walk through with the architect or design team so they can share how they imagine redesigning the building's interior. We request that these meetings occur before the comment period is over so the information shared can inform our comments.

The Mission of the National Park Service is to preserve unimpaired natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. The stated goal of this rehabilitation project is to "convey the story of Clara Barton's life and humanitarian activities to local, national and international visitors". When the rehabilitation is completed and a visitor comes to the site, we want to ensure that they will know exactly why this building became a national park - to honor and commemorate Clara Barton and the ARC. We do not want them to think they are visiting a multi-use community center that holds a few rooms dedicated to Barton. We are eager to work with you at this early stage to ensure that the history of Barton is not diminished and that the NPS chooses an alternative that celebrates the rich contribution Barton made to our country's history.

Sincerely,



Pamela E. Goddard
Senior Program Director
Mid-Atlantic Region
pgoddard@npca.org
202.604.3781

Headquarters
777 6th Street, NW, Suite 700
Washington, DC 20001
NPCA.ORG

CLBA NHS Rehab Consulting Parties Meeting – Second Extension and Meeting Notes

From Morales, Brendaliz <brendaliz_morales@nps.gov>

on behalf of

GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>

Date Wed 12/7/2022 9:40 AM

To Smith, Kathryn G <Kathryn_Smith@nps.gov>; becky.roman <becky.roman@maryland.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebeccah.ballo@montgomeryplanning.org>; david.dise <david.dise@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; NRedding <NRedding@presmd.org>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; luciennebeard <luciennebeard@gmail.com>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; curtis.luthye <curtis.luthye@redcross.org>; bgoldman1 <bgoldman1@comcast.net>; Diana Bailey <mwhcdiana@gmail.com>; Ross, Tara <rosst@sunyocc.edu>; ljgordon1 <ljgordon1@ua.edu>

Cc Hall, Susan G <susan_hall@nps.gov>; Virta, Matthew <Matthew_Virta@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Gossett, Tanya <Tanya_Gossett@nps.gov>; Mendelson, Lisa <Lisa_Mendelson-lellini@nps.gov>; Porter, Beth <Beth_Porter@nps.gov>; Hall, Kym A <Kym_Hall@nps.gov>; shelby_prettiman@vanhollen.senate.gov <shelby_prettiman@vanhollen.senate.gov>; sung_chung@vanhollen.senate.gov <sung_chung@vanhollen.senate.gov>; shannon_frede@cardin.senate.gov <shannon_frede@cardin.senate.gov>; katie_corr@cardin.senate.gov <katie_corr@cardin.senate.gov>; lucy.shaw@mail.house.gov <lucy.shaw@mail.house.gov>; Bailey, Megan M <megan_bailey@nps.gov>

 4 attachments (3 MB)

1_Section 106 Consulting Parties Meeting_Meeting Notes_DRAFT_20221116.pdf; 2_UseAnnotationsGWMP-CLBA_ConsultingPartiesMtnng2_11-21-2022.pdf; 3A_GWMP MEMO CLBA RFEI CLOSE FINAL.pdf; 3B_GWMP CLBA NHS Request For Expression Of Interest Proposals Final 3_25_22.pdf;

Dear Consulting and Interested Parties,

The NPS would like to provide the Clara Barton National Historic Site Rehabilitation project Section 106 consulting parties with additional information from the November 16, 2022 meeting.

- Meeting Notes, in-person Meeting Participants, Participant pre-meeting questions and NPS answers
- Graphic NPS interpretation spaces 2015 (pre-rehab) and 2022 (proposed post rehab)
- Summary of results from RFEI and proposals

The above information will also be posted on the MS Teams file sharing platform which is linked here: [General](#)

The NPS is in receipt of requests to extend the amount of time to review documents and provide comments. In consideration of the request and review of the overall schedule, we are providing an

additional 30-day review of the materials (draft Value Analysis and draft 100% Schematic Design documents) to **January 9, 2023**.

To facilitate the requested extension, future reviews for the Assessment of Effect report and subsequent design phases may be received with overlapping review periods, to maintain NPS contracting and funding reporting deadlines. The project team will continue to refine designs and conduct internal reviews and briefings. These are important actions that support our efforts to receive FY23 funding for the rehabilitation.

If you have any questions on the proposed CLBA NHS Rehabilitation, please direct your correspondence to our new park contact, Ms. Megan Bailey, Acting Cultural Resource Program Manager for the GWMP. All comments should be addressed to GWMP Superintendent Charles Cuvelier (GWMP_Superintendent@nps.gov) and Megan Bailey (megan_bailey@nps.gov).

Thank you for your continued involvement and interest in this nationally significant property.

Superintendent
George Washington Memorial Parkway

December 9, 2022

Dear Superintendent Charles Cuvelier:

We are a group concerned with the future of the Clara Barton National Historic Site. Many of us are professional historians of the United States with considerable expertise in women's history, public history, U.S. history from before the Civil War to its aftermath to the Progressive Era, the history of nursing, the history of the American Red Cross, and the histories of humanitarian organizations and disaster responses, and the National Park Service and other historical organizations. Others of us have volunteered to be consulting parties in the Section 106 compliance process for the proposed rehabilitation of the Clara Barton National Historic Site, and still other signatories are interested parties affiliated with organizations concerned with the preservation and interpretation of national historic sites and cultural resources.

As historians and people interested in preserving and interpreting historic sites, we thank you for engaging with us as consulting parties. We look forward to continuing to work with the Park, Maryland State Historic Preservation Office (MDSHPO), and other consulting parties to ensure that this undertaking recognizes and reflects the significance of Clara Barton's life and legacy to the history of the United States, avoids adverse effects, and fulfills the Park's mission.

Thank you for extending the deadline by one month to January 9. We are submitting these comments now, but we recognize that further careful study of the documents may necessitate our submitting an addendum in January. We are submitting our comments by the earlier December 9, 2022, deadline. We have found it a challenge to examine this extensive set of project documents with the minimal explanations that accompanied them and to prepare our comments. We are sending in these comments now to give the NPS more time to review our concerns. We still ask that the George Washington Memorial Parkway extend the comment deadline to January 27, 2023, so that we can provide an even more comprehensive response to the project plan and documents, a reasonable request. Given the busy holiday season, such an extension will give all parties time to review the many documents more thoroughly to support a thoughtful dialogue between the NPS and the Clara Barton NHS consulting parties.

As strong supporters of the National Park Service and its mission to preserve and interpret our nation's natural and cultural resources, we offer our expertise, time, and resources. We commend GWMP for successfully obtaining the Great American Outdoors Act Legacy Restoration funding to restore this property and are pleased to be part of its planning process. We especially thank you because for years this park has not received the attention or support it has long needed. We are excited about the possibility of a vibrant future for the Clara Barton NHS, with a whole host of appropriate programming. We want to help the NPS develop appropriate programs for public education about Clara Barton's life and times, including her legacy to humanitarian relief work, the impact of her public work on broadening the acceptance of women's political lobbying, and the accompanying growth of women's inclusion in partisan and electoral politics. Additionally, public education programs on the American Red Cross, and the larger historical context will inform students, educators, and the public about the American and international development of humanitarian aid and relief work in times of war and peace.

Historians and others concerned about CLBA

We look forward to working with NPS to ensure the histories and legacies of Clara Barton and American Red Cross remain the focus of this important national park site. We also want to work with the NPS to support greater public attention and more public programming, both in-person and virtual, to greatly increase its visibility and ability to convey its inherent significance to the American public.

The Clara Barton National Historic Site was established by the U.S. Congress in 1974 under Public Law 93-486, Title I §101(a)(1), Oct. 26, 1974; its legislative history clearly recognizes its importance as one of the few parks that focus on American women's history; it is one of only nine in the entire National Park system to do so. Clara Barton NHS also significantly connects Clara Barton and the Red Cross to humanitarian and disaster relief, subjects of increasing importance today. Its National Historic Landmark status and the more recent Congressional recognition of Clara Barton's significance by naming the adjacent Clara Barton Parkway for her further demonstrate the significance of this historic site.

The legislative history of the Clara Barton National Historic Site clearly focuses on Barton's life and contributions, the American Red Cross, and women's history. **A partnership with Glen Echo Park Partnership for Arts and Culture (GEPPAC) that shifts the primary use of the building to community art programming is a major change from the site's enabling 1974 legislation and would constitute an adverse effect. We ask that you explain how this would not be an adverse action.**

Based on our understanding of the materials provided to date, we believe that the proposed undertaking has the potential to result in adverse effects by diminishing the property's integrity of feel, by changing the character of the property's use (36 CFR 800.5 (a)(2)(iv)), and/or through the introduction of visual, atmospheric, or audible elements (36 CFR 800.5 (a)(2)(v)). We also believe that future adverse effects are reasonably foreseeable should the park transfer significant control of the property through lease or any other agreement without adequate and legally enforceable restrictions or conditions that ensure its long-term preservation (36 CFR 800.5(a)(2)(vii)). Each of these adverse effects can be avoided through proper planning and subsequent implementation.

In order to best participate in the consultation process, it is important that we have an accurate understanding of the proposed undertaking. Based on the discussions that several signatories herein have participated in with the park, we understand that this is a Legacy Restoration Fund project to complete a comprehensive rehabilitation of the property. Based on the "Rehabilitate Clara Barton National Historic Site CLBA 312325 100% Draft Schematic Design" document, we also understand that you intend to enter into an agreement with a third-party organization that would alter the future use of a substantial proportion of the property and transfer future maintenance responsibilities away from the NPS. The currently proposed changes in its dominant uses and the high percentage of the Clara Barton NHS space that would be devoted to a partner are activities tangential to the Park's enabling legislation. This plan proposes a potential adverse effect because it would diminish the Park's legislated purpose and character.

After initiating consultation, the second step in the Section 106 process is for the agency to define the Area of Potential Effect (APE) and to identify historic properties within the

Historians and others concerned about CLBA

APE. While we look forward to receiving the formal APE definition, it is clear that the structure that housed both Barton and the American Red Cross is a historic property within the APE. Because a proper assessment of this proposal's effects on the historic property depends on a clear understanding of the characteristics that make the property significant, the historic property identification step is one of the most critical stages of the Section 106 process. As a group of historians with expertise in the large array of events and forces that comprise the life and legacy of Barton and the American Red Cross, we believe that we can provide necessary and valuable input in this critical identification step.

As outlined in 36 CFR 800.4(a), the historic property identification stage should rely on existing documents and consultation with groups such as ours. As of the November 16, 2022, public meeting, we now know that no historians were previously involved in this process, although the Park and its contractor included other cultural resource management professionals. The exclusion of historians with clearly relevant expertise is grievous.

Historians have deep knowledge and expertise that should inform the historic property identification in the APE. The existing documents relevant to this project include *Clara Barton House National Survey of Historic Sites and Buildings* (1964), *The Clara Barton House National Register of Historic Places Inventory - Nomination Form* (1979), and the *Clara Barton National Historic Site Historic Structures Report* (2004). The decades-old nomination forms are deficient in accurately identifying all the criteria under which the Clara Barton National Historic Site is National Register eligible. Before moving beyond the consultation process, the park should reevaluate the Clara Barton National Historic Site for additional National Register eligibility (36 CFR 800.4(c)(1)). This will ensure an accurate understanding of all of the characteristics that make the property eligible for National Register listing. Moreover, the 2004 *Historic Structures Report* recommends that the National Register Nomination be revised to evaluate the property for eligibility under Criteria C.

Additionally, the National Register of Historic Places Inventory/Nomination Form (1979) marks the site as significant to social/humanitarian history and acknowledges Barton's achievements as a pioneering woman well before much of the outpouring of women's history scholarship.

We recognize that the process of reevaluating the property could be both costly and time consuming. Neither of these need be the case. We are ready, willing, and able to work with the National Park Service and specifically the George Washington Memorial Parkway, the MDSHPO, and other consulting parties to produce a document that reflects current scholarship on Clara Barton, women's history, the history of the American Red Cross, the history of disaster and disaster relief, and the history of humanitarian organizations to accurately and comprehensively capture the significance of the Clara Barton National Historic Site, and that tethers these important stories to the existing resource. **The attached list of historians and their work reveals Barton's wide ranging and lasting impact on U.S. history.**

We request that the Park provide the MDSHPO and other consulting parties with a summary of the Park's efforts to comply with 36 CFR 800.4(a), including a bibliography of all existing documents reviewed in that process.

Historians and others concerned about CLBA

Once the historic property identification effort is completed, the park will move to an assessment of adverse effects as outlined in 36 CFR 800.5. As the undertaking involves potential changes to the use of interior spaces, we anticipate that the park will rely on the 2004 *Historic Structures Report* (HSR) to evaluate effects as this document identifies both significant and less significant rooms.

Based in part on our review of the *HSR* and the "Architectural Program" outlined in the "Basis of Design Report" in the "Rehabilitate Clara Barton National Historic Site CLBA 312325 100% Draft Schematic Design" (Mills + Schnoering Architects LLC, Princeton NJ for the National Park Service, Denver Service Center, October 28, 2022), we see considerable potential that the proposed undertaking would result in adverse effects through changes of use of spaces that the NPS itself identified as significant in Volumes I and II of the *HSR*. Specific areas of concern include: the proposed use changes for rooms B4, B5, 111, 112, 209, and 211, which the *HSR* identifies as being of primary significance; proposed excavation of rooms B4 and B5; and proposed use changes for rooms 103, 108, 109, 116, 117, and 204, which the *HSR* identifies as being of secondary significance. There is also need for clarity regarding the significance level of rooms 201, 203, 203A. Page 133 of Volume II of the *HSR* states that the building is divided into three zones; Primary Significance, Secondary Significance, and Not Significant. Each of these zones is then defined. The *HSR* subsequently categorizes rooms 201, 203, and 203A (as well as rooms on the third floor) as Significant. **Please provide clarity regarding the level of significance for these rooms so that any adverse effects can be properly assessed. We also request that the Park provide any additional reports or documents that define the significance level of interior space that the Park referenced in its development of all alternatives.**

The "100% Draft Schematic Design" prepared for the NPS provides the Architectural Program on page 13, explaining that the Park (George Washington Memorial Parkway) met in 2021 with "the partner... identified as Montgomery County and their sub-partner, the Glen Echo Park Partnership for Arts and Culture (GEPPAC), whose mission is to promote arts and culture programming" in the context of the historic and environmentally significant site of Glen Echo Park." the "100% Draft Schematic Design" proposal, NPS museum spaces will include furnished rooms and space for interpretation and exhibits with collections items dispersed in climate-controlled display cases on the first and second floor. As the "100% Draft Schematic Design" states, "period interpretation rooms will include the Front Parlor (Room 119), Rear Parlor (room 118), Red Cross Office (Room 113), Red Cross Office (Room 114), Clara Barton's Sitting Room (Room 212), Clara Barton's Chamber Room (Room 213) and Red Cross Chamber Room (Room 301) and a Demonstration Closet." Page 14 shows office space for three NPS staff, a breakroom to be shared with the partner, a conference room to be shared with the partner and visitor orientation space to hold 20+ persons. The GEPPAC Program, according to the "100% Draft Schematic Design", would focus on supporting the health and wellness of the community through the arts, "in keeping with Clara Barton's philosophy of providing emotional support and care for the health and wellbeing of people." This statement seems only thinly related to the legislated purpose of the site. The report indicates that spaces might include "multipurpose rooms for classrooms and workshops for arts and crafts or private music rooms or rehearsal rooms, a catering prep pantry to support events, offices, storage for instruments, costumes, props, and event storage" (p. 14).

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As prior NPS reports and documents (including the 2004 *HSR*) have indicated, the building itself is a document through which to interpret Barton's life and legacy and the history of the American Red Cross. Therefore, the rehabilitation plan must respect the building's integrity. For example, when the Baltzley Brothers invited Clara Barton to move to Glen Echo, she insisted that they use wood from the Red Cross's Johnstown, Pennsylvania's flood relief hotel to construct the headquarters/home. Barton clearly found significant meaning in using those recycled building materials.

This building was constructed as the headquarters for the American Red Cross, housing for Barton and her ARC staff, and a warehouse to store disaster relief supplies. This multipurpose character is central to the structure's historical interpretation. The internal layout of the headquarters/house is also important to its historic integrity. For example, the building has 36 rooms and 38 closets, including unusually large walk-in closets. Those closets stored substantial quantities of emergency supplies when the American Red Cross used this building as its headquarters. We are not certain from our review of the Park's plans how many closets might be removed to house structural supports and HVAC systems, but we strongly urge the Park to preserve many for interpretive purposes to preserve the building's connection to the American Red Cross. Preservation of the dining room where historic photographs show the ARC community gathered and second-floor bedrooms, especially that of Dr. Julian Hubbell, are also essential for visitors to understand Barton's forced retirement from the Red Cross. Her opponents called attention to the distinctive headquarters/house to insinuate that she was improperly mixing then-unorthodox personal relationships into Red Cross business. In fact, Clara Barton was part of a generation of activist women who intermixed their personal and professional lives as portrayed in Alice Paul's Belmont-Paul Women's Equality NM, the Mary McLeod Bethune National Council House NHS, and Jane Addams' Hull-House.

The Clara Barton NHS once housed-an organizational community of people, "volunteers" in Red Cross terms, who worked and lived in this building, too long dismissed as simply a "house." The current rehabilitation proposal would distort this history of the American Red Cross. These concerns are directly relevant to any proposed rehabilitation of the interior of the building regardless of any partnership. They cannot be postponed for consideration until some later time, such as interpretive planning stages.

In addition to our concerns regarding adverse effects caused by diminishing the property's integrity of feel, we are also concerned about future adverse effects that could occur if management of the property would be delegated to a non-federal organization without legally enforceable protections against such effects.

Our group also strongly encourages the Park to incorporate legally enforceable language in any lease or other agreement documents that clearly define which types of uses would be appropriate or inappropriate based on the historic significance of the property. Any document should provide clear guidelines on when and how the partner organization could submit a request to the NPS to change the use of the property and provide the criteria that the NPS would use to approve or deny such a request. Furthermore, any lease or agreement must document the process by which the NPS would review and approve maintenance activities or physical changes that the partner

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might propose to undertake. **We request that the NPS provide the MDSHPO and other consulting parties with drafts of any lease or other agreement document(s) with a third party regarding future management of the property.**

We commend the Park for its success in acquiring the Legacy Restoration Funds to carry out the rehabilitation of this National Historic Site. We also appreciate the challenges the Park faces in properly maintaining the site. We look forward to working with the Park through the Section 106 consultation process to develop a plan that avoids adverse effects to this important historic property. We hope that this consultation serves as a starting point for an ongoing and fruitful collaborative relationship with the Park.

Sincerely, Signatories, Historians & Colleagues Concerned about Clara Barton N.H.S.

Diana	Bailey§	Maryland Women’s Hist. Ctr.	mwhcdiana@gmail.com
Lucienne	Beard§	Natl. Collab. Women’s Hist. Sites	luciennebeard@gmail.com
Rosie	Click§	Georgetown U., Grad Student	vrc10@georgetown.edu
Susan	Ferentinos*	Independent PhD Historian	susan@susanferentinos.com
Bonnie	Goldman§	Clara Barton Schoolhouse, Bordentown NJ	bgoldman1@comcast.net
Cassandra	Good*	Mary Mount University, Virginia	cgood@marymount.edu
Melanie	Gustafson*	University of Vermont	mgustafs@uvm.edu
Donald J.	Hellman	Vice Chair, Coalition to Protect America’s National Parks	dhellman@aol.com
Nancy	Hewitt*	Rutgers University emerita	nhewitt@scarletmail.rutgers.edu
Heather	Huyck*§	Natl Collab. Women’s Hist. Sites/Res. & Interp/(NPS ret.)	huyckclapper@earthlink.net
Julia	Irwin*§	University of South Florida	juliafirwin@gmail.com
Marian Moser	Jones*	Ohio State University	jones.7849@osu.edu
Ida	Jones	Co-President, NCWHS, Vice President of the Association for the Study of African American Life and History.	ida.jones@morgan.edu>
Chandra	Manning*§	Georgetown University	cmm97@georgetown.edu
Ann	McCleary*	University of West Georgia	amcclear@westga.edu
Marla	Miller*	U Massachusetts- Amherst	marlamiller09@gmail.com
Jacob	Remes*§	New York University	jacob.remes@nyu.edu
Stephanie,	Rowe*	Indiana University–Purdue University Indianapolis	stephanie.lehner@gmail.com
Kathryn	Sklar*§	SUNY Binghamton	kksklar@binghamton.edu
John	Sprinkle*	NPS Bureau Hist. (ret);	jsprinkl@umd.edu
Judith	Wellman*§	Natl Collaborative for Women’s History Sites; H NY	historicalnewyork@me.com
Anne Mitchell	Whisnant*	Duke University, North Carolina	anne.whisnant@duke.edu
Jessica	Wilkerson*	jessica.wilkerson@mail.wvu.edu	West Virginia University
Patricia	Zelman*	Tarleton University, Texas	pzelman64@gmail.com>
Joan	Zenzen*§	Independent PhD Historian	Joanz10@verizon.net

*PhD historians

§ Consulting Parties, Clara Barton NHS

Historians and others concerned about CLBA

Expertise that signatories can contribute on the life and legacy of Clara Barton and the Clara Barton National Historic Site

Clara Barton and the Legacy of the Civil War

Chandra Manning, PhD Professor of History, Georgetown University

Important elements of the humanitarian work that Barton undertook and institutionalized in the American Red Cross had roots in her Civil War innovations and strategies to aid those injured by and fleeing from the war's lethal impact. The humanitarian relief on the battlefield for which she is most famous is of obvious importance to both the development of wartime medicine and her own attunement to suffering and how to alleviate it. Her work among freed people in Sea Island contraband camps plagued by smallpox alerted her to the reality of human suffering beyond battlefields, a recognition carried into the American Red Cross's provision of humanitarian relief not just in war zones but brought about by other types of disasters, as well. Her creation of the Office of Missing Soldiers, 1865-1868, marked a turning point in the treatment of families as part of the process of modern warfare. In sum, Barton's aid work on the and with freed people in Sea Island contraband camps and her efforts to locate the remains of missing soldiers all alerted her to the need for humanitarian relief efforts so conspicuously absent from the Civil War, and the upheaval of war created opportunities for her to do something about those realizations. The Clara Barton National Historic Site—which was the American Red Cross headquarters in the late 19th and early 20th centuries—represents a legacy of the Civil War that is not evident at battlefield parks, memorialized in Civil War monuments, or represented anywhere else in the national landscape.

Clara Barton and the American Red Cross as an Institution of National and International Significance

Julia Irwin, PhD, Associate Professor of History, University of South Florida

Marian Moser Jones, PhD Associate Professor of History, Ohio State University

Jacob Remes, PhD Clinical Associate Professor of History, New York University

Rosie Click, MA; Graduate Student, Georgetown University

Beginning in the 1870s, Barton became a leading advocate for American international humanitarianism. While traveling in Europe after the U.S. Civil War, she learned about a new humanitarian organization that had been established in 1863: the International Committee of the Red Cross (ICRC). Barton volunteered with the ICRC during the Franco-Prussian War, delivering medical and sanitary supplies to European battlefronts, just as she had in the U.S. Civil War. Upon her return to the United States in 1873, she began lobbying for the United States to become a signatory to the Geneva Convention, to join the International Red Cross Movement, and to establish an American Red Cross Society.

In the early 1880s, Barton's advocacy efforts finally paid off. Armed with a letter from the ICRC's President, Gustave Moynier, Barton waged a tenacious campaign, meeting with newly elected

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President James Garfield, Secretary of State James G. Blaine, and Secretary of War Robert Lincoln to curry their support. These politicians eventually yielded to Barton's efforts, agreeing to ratify the Geneva Convention and to endorse the Red Cross Movement. In May 1881, buoyed by this official support, Barton and fifty-one others drafted the charter that created the American Association of the Red Cross. Roughly a year later, in the spring of 1882, the U.S. Senate voted to ratify the Geneva Treaty and subsequently authorized the ARC to act as its official relief agency in times of war.

Over the next two decades, while building up the American Red Cross at home, Barton maintained her ties with the International Red Cross Movement. She traveled to Europe as an official representative of the United States at International Red Cross Congresses in Geneva in 1884, Karlsruhe in 1887, in Vienna in 1897, and in St. Petersburg in 1902. In the 1890s, Barton also launched the ARC's first overseas relief operations. In 1891 and 1892, she helped provide aid to famine victims in Russia, while in 1896, she worked to assist Armenians persecuted by factions within the Ottoman Empire.

Finally, in early 1898, she traveled to Havana to distribute food and medical supplies to civilians affected by the civil war for independence from Spain, including *reconcentrados* imprisoned in Spanish camps. She also established orphan asylums for children who had lost their families in the war. After the United States declared war on Spain in April 1898, Barton and her staff tried to continue their aid towards Cuban civilians and wounded combatants.

Upon her return to the United States in November 1898, Barton maintained her commitment to non-combatants, lobbying for funds to support some Cuban 50,000 orphans. These experiences in Cuba solidified the ARC's national reputation for international civilian relief, leading Congress to grant the organization its first federal charter, in 1900. Afterwards, even as rival factions sought her removal from the helm of the ARC, Barton introduced First Aid instruction to the United States and established it as part of the ARC's portfolio.

Through the ARC, Barton played a key role in shaping our contemporary ideas about disaster and our expectations and structures of disaster response in several ways. First was Barton's contribution to the very concept of "disaster." Because American politicians did not see the U.S. as a "military power," they were unwilling to ratify a treaty that created the Red Cross solely as a military auxiliary. So Barton made a double move. First, she reimagined the American Red Cross as a disaster response agency in addition to an auxiliary that would care for war casualties. Second, she helped build a category of "national calamity" around U.S. political exigencies. In order to appeal to politicians from around the country, she built a category that included many hazards including the fires of the industrial north, the hurricanes of the southeast, the "insects and droughts" of the plains. These hazards are not intrinsically alike, but they continue to hold together our imagined category of disaster partially because of the work Clara Barton did in the late nineteenth century to encourage Congress to ratify the Geneva Convention. Notably, this conception of "national calamity" placed disasters outside the bounds of "normal time"; these events were departures from how things should be and were ordinarily, not just extensions of the every day. It both relied on and reified settler colonial ideas about society's relationship to nature as an object of control and subjugation. This idea of disasters as separate from the "ordinary," and as subject to technocratic control, continues to pervade our ideas of disaster.

Second, Barton worked to make relevant Red Cross ideals of battlefield neutrality to disaster relief. What she settled on was that Red Cross disaster relief should respect and not challenge the political status quo, and that Red Cross officials should work closely with local elites and power brokers and funnel aid and decision-making through them. What this meant in practice was that Red Cross disaster relief in the American South did not challenge—and indeed buttressed—Jim Crow. It also meant favoring employers, for instance by denying aid to able-bodied men in order to force them into the labor market. That is, there is no such thing as apolitical disaster relief, and Barton’s ideas of “neutrality” ended up supporting the status quo, itself a political choice. Like the category of national calamity, Barton’s ideas about political neutrality and the primacy of local elites continue to shape disaster relief into the present day.

Clara Barton, Women’s History, and Social Movements

Melanie Gustafson, PhD Professor of History, University of Vermont

Kathryn Kish Sklar, PhD Distinguished Professor of History, Emerita,
State University of New York, Binghamton

Jessica Wilkerson, PhD Associate Professor of History, University of West Virginia

Cassandra Good, PhD Associate Professor of History, Marymount University

Patricia Zelman, Professor Emerita of History, Tarleton State University, Stephenville, Texas

Frequent references in both past and present to Clara Barton as an “angel” who used her innately feminine qualities of compassion and care to tend to those in need obscure what and who Barton truly was: a powerful organizer, reformer, and political activist. Her benevolent work of aiding soldiers and of disaster relief required government financial and legislative support. Barton secured these through considerable political acumen and lobbying that made her unusual but not unique in nineteenth-century America. She was one of a cadre of influential women who carved new paths to power and influence despite their inability to vote or serve in elected office and admonitions that women should stay in their “sphere” at home. Barton was a career woman who had her first job as a teacher at eighteen; lobbied several local governments to reshape their school systems and then took a leading role in the reforms; served as one of the earliest female employees of the federal government and earned the same salary as her male counterparts; organized supplies for and treated wounded soldiers in the heat of battle; and was one of if not *the* first woman to testify before the U.S. Congress. All of this came before, at age sixty, she took her most famous role as the founding president of the American Red Cross.

While women’s activism in the nineteenth century was often painted as nonpartisan and even apolitical, Barton had strongly held political beliefs and belied the image of the meek woman doing good behind the scenes. When in Washington, DC, she regularly met with cabinet secretaries, congressmen, and several presidents, as well as relying on friendships with politicians to press her influence on numerous fronts. She supported women’s rights and regularly spoke at women’s rights conventions, maintaining long friendships with Elizabeth Cady Stanton and Susan B. Anthony. Through both her words and actions, Barton was a pathbreaking force for both women’s equality and their ability to serve as leaders. As such, her story has an essential place in American women’s history—and American history in general.

Historians and others concerned about CLBA

Expertise in Clara Barton NHS, Histories of American Women, and the National Park Service

Joan M. Zenzen, PhD Independent Public Historian

Heather Huyck, PhD, Co-Chair Research & Interpretation, National Collaborative for Women's History Sites; NPS (ret).

Susan Ferentinos, PhD, Public History Consultant

Marla R. Miller, PhD, Distinguished Professor of History, University of Massachusetts Amherst

Anne Whisnant, PhD, Director of Graduate Liberal Studies, Duke University.

Nancy Hewitt, PhD, Distinguished Professor Emerita, Gender & Women's History, Rutgers University

Clara Barton NHS is one of only nine US national park sites (of well over 420) dedicated to women's history. It is significant as one of the first sites designated and specifically preserved as a resource associated with women's history. CLBA is also significant to the history of the NPS itself, with a story to tell about how the NPS in the 1970s responded to the opportunities of the Bicentennial. This NPS support for an expanded American history will be as important to some CLBA visitors as that of Barton's urgent work during her lifetime including the important organization she founded. This status within the US National Park System heightens the need to fully tell the site's story and situate it within the larger US National Park Service narrative. NPS evaluates national park sites for the national themes that can be told. The public, through visits to all national park sites, thus gains a rich and complex understanding of our nation's past. CLBA fills an important role in that overall commitment.

Public historians, like Joan Zenzen, PhD, has published six books about the development of the NPS through park administrative histories including on Fort Stanwix NM and Manassas National Battlefield Park. She has conducted more than 250 oral history interviews, often with park managers and elected officials, giving her insights into the challenges facing national park sites. Her expertise would provide NPS managers with valuable information for contextualizing this park. See joanzenzen.com. Heather Huyck, PhD. has decades of researching, preserving, managing, interpreting, and teaching public and women's history within the NPS, as a House of Representatives professional staffer and at William & Mary. She has visited 325 NPS units and authored *Doing Women's History in Public: A Handbook for Museums and Historic Sites* (2020).

Nancy Hewitt taught at Rutgers University for many years and has published key books in women's political and organizational history *Women's Activism and Social Change: Rochester, New York, 1822–1872* (1984) and *Southern Discomfort: Women's Activism in Tampa, Florida, 1880s-1920s* (2001). She co-edited the major reference book, *A Companion to American Women's History* (2020). Susan Ferentinos who has researched and consulted with many NPS parks and historic sites first as the OAH public history manager provides many professional services. See susanferentinos.com. She authored the award-winning *Interpreting LGBT History at Museums and Historic Sites* (2014). Marla Miller at U. Massachusetts-Amherst (*Entangled Lives: Labor, Livelihood, and Landscapes of Change in Rural Massachusetts* (2019) and Anne Mitchell Whisnant at Duke University (*Super-Scenic Motorway: A Blue Ridge Parkway History* (2006)) are each distinguished professors and authors of NPS and women's histories. They co-authored

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Imperiled Promise: The State of History in the National Park (2011) which reviewed the status of history in the National Park Service and made key recommendations for future action, many of which are relevant to the Clara Barton NHS.

Re: CLBA NHS Rehab Consulting Parties Meeting – Second Extension and Meeting Notes

From Smith, Kathryn G <Kathryn_Smith@nps.gov>

Date Wed 12/14/2022 12:11 PM

To GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>; becky.roman <becky.roman@maryland.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; david.dise <david.dise@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; NRedding <NRedding@presmd.org>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; luciennebeard <luciennebeard@gmail.com>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; Luthye, Curtis <curtis.luthye@redcross.org>; bgoldman1 <bgoldman1@comcast.net>; Diana Bailey <mwhcdiana@gmail.com>; Ross, Tara <rosst@sunyocc.edu>; ljgordon1 <ljgordon1@ua.edu>

Cc Virta, Matthew <Matthew_Virta@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Gossett, Tanya <Tanya_Gossett@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>

Superintendent Cuvelier:

Thank you for providing the National Historic Landmarks Program the opportunity to review and comment on the Schematic Design, Value Analysis Report, and other project documentation for the Clara Barton National Historic Site (CLBA NHS) Rehabilitation Project. I also appreciate being invited to participate in the later planning phases of the project, and the site visits and tours that were made available to me. The following comments are offered as the NHL Program's technical advice on how best to protect the National Historic Landmark Clara Barton House (and American Red Cross Headquarters), and to complete a productive consultation.

As you know, the National Historic Preservation Act (NHPA) provides heightened protection for National Historic Landmarks (NHL) like CLBA NHS through Section 110(f) (codified at 54 USC 306107) and the NHPA's implementing regulations (36 CFR 800.10). The Clara Barton House was designated a National Historic Landmark (NHL) in 1965 for its connection to acclaimed humanitarian Clara Barton, founder of the American Red Cross, which was headquartered in the house until 1904. Clara Barton NHS was established on October 26, 1974, making it the first national park system unit dedicated to a woman.

Section 110(f) of the NHPA requires that federal agencies, to the maximum extent possible, undertake planning and actions necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking. This is a heightened level of stewardship beyond what is required for National Register-listed properties. In addition, the regulations require the agency to notify and invite the Advisory Council on Historic Preservation and the NPS National Historic Landmarks Program (acting for the Secretary of the Interior) to consult.

National Historic Landmarks are designated because they are associated with nationally significant trends, events, or people; and because they possess a high degree of physical integrity reflecting the period of their national significance. Alterations can jeopardize an NHL's high integrity such that it may no longer meet the NHL criteria.

The proposed program (which drives design) may be incompatible with preserving the NHL. The Rehabilitation Standards require that you select a reuse that is compatible and avoids removal of character defining features. Likewise, the NPS's Level 1 policy guidance, *Management Policies 2006*, which prescribes parameters for making management decisions, prioritizes historic integrity above reuse and modifications that may adversely affect or impair historic properties:

5.3.2 Physical Access for Persons with Disabilities

The National Park Service will provide persons with disabilities the highest feasible level of physical access to historic properties that is reasonable, consistent with the preservation of each property's significant historical features. Access modifications for persons with disabilities will be designed and installed to least affect the features of a property that contribute to its significance. Modifications to some features may be acceptable in providing access once a review of options for the highest level of access has been completed. *However, if it is determined that modification of particular features would impair a property's integrity and character in terms of the Advisory Council's regulations at 36 CFR 800.9 [sic 800.5], such modifications will not be made.* [emphasis added]

5.3.3 Historic Property Leases and Cooperative Agreements

Proposed uses must not unduly limit public appreciation of the property; interfere with visitor use and enjoyment of the park;

5.3.5 Treatment of Cultural Resources

Decisions regarding which treatments will best ensure the preservation and public enjoyment of particular cultural resources will be reached through the planning and compliance process, taking into account

- the nature and significance of a resource and its condition and interpretive value
- the research potential of the resource
- the level of intervention required by treatment alternatives
- the availability of data and the terms of any binding restrictions
- the concerns of traditionally associated peoples and other groups and individuals

The preservation of cultural resources in their existing states will always receive first consideration [emphasis added]. Treatments entailing greater intervention will not proceed without the consideration of interpretive alternatives.

5.3.5.4.7 Use of Historic Structures

All uses of historic structures are subject to preservation and public safety requirements. No administrative or public use will be permitted that would threaten the stability or character of a structure, the museum objects within it, or the safety of its users, or that would entail alterations that would significantly compromise its integrity.

The NHL Program's main concern is that key decisions made prior to the Section 106 consultation process have determined the path of the design requirements, prohibiting consideration of alternatives that would have less impact on the historic property. One fundamental question is: What functions can responsibly be housed in the building while avoiding adverse effects? I urge the Park to consider how NPS has treated other National Historic Sites and National Historic Landmarks associated with important persons or organizations of similar type in the National Capital Region and throughout the NPS, and to carefully review whether the current use proposal can be accommodated without loss of historic character defining features. Also consider if application of the Existing Building Code can accommodate creative adaptations that avoid loss of historic fabric and introduction of out-of-character features.

When considering the project's effects on the NHL, it's important to keep in mind why the building is important and what types of activities were associated with that importance. The park should aim to

preserve all aspects of the significance including the building's storage, residential, office, and workspace functions so that the full range of Barton's [and the American Red Cross's] activities at the property can be understood and interpreted.

While it's clear that there are interventions needed for life-safety and accessibility, it would be useful for consulting parties to understand what interventions are needed to reopen the building to the public versus what work is required to accommodate the proposed new uses. The type of light-weight construction of the building and the high degree of integrity that it retains make it particularly difficult to integrate modern infrastructure without compromising the integrity.

Finally, the May 2023 date for completed construction documents seems ambitious considering the number of questions and concerns voiced by the consulting parties. In addition, while it appears that alternatives were considered internally, the consulting parties were not invited to provide input as the preferred alternative was developed. The NHL would benefit from an extended timeline that allows for meaningful input from consulting parties.

Below are some specific comments and questions on the Schematic Design set and other documents that the park has provided.

Thank you for the opportunity to comment. Please reach out if you have questions.

Best,
Kathryn

Specific Comments on Documents Presented as Park of the Value Analysis and Schematic Design:

General Comments:

General – The Schematic Design does not include any indication of what sort of work is needed to install the new HVAC and mechanical systems. This work could have a large impact and options, including high velocity systems with compact ductwork should be considered. The impacts of this work need to be considered in the assessment of effect.

General - Are bathrooms required on all floors for this size structure or are the bathrooms required by the new uses?

Plans coded with significance levels for spaces: From my initial read of the Historic Structure Report and my site visits, the building appears to retain a very high degree of integrity to the 1897-1912 period when Clara Barton is associated with it. While the 1996 HSR seemed to discount certain spaces as not significant, the justifications were weak in my estimation since the significance evaluations for some spaces relied mainly upon the interpretive value of the spaces rather than on their intrinsic physical integrity and historic significance. The 2002 update corrected some of these evaluations, using updated research, but please confirm that the color-coded floor plans showing the levels of significance of various spaces are based on the most recent research and evaluations of significance or list the sources used to develop the color coding.

Schematic Design Sheets:

1. General Project Note 1.: On the drawings, please add a point of contact for questions regarding the Secretary of the Interior's Treatment Standards and Guidelines.
2. General Project Note 9.: Please discuss a procedure for consulting with Consulting Parties when a change in scope or design could result in adverse effects or additional or intensified adverse effects.

3. General Project Notes: I recommend the park require that the contractor have a Historic Architect who meets the Secretary of the Interior's Historic Preservation Qualification Standards (62 Federal Register § 33708 as amended on June 20, 1997) oversee all work.
4. General Project Notes: Include a note about unanticipated archeological discoveries.
5. G-0.2 - 0.3 - 4 doorways on the 1st floor and 3 on the 2nd floor require modification for accessibility. How will these be altered. This has the potential to cause an adverse effect to the NHL.
6. G-0.4-0.5 - Can you explain the floor load capacity categories in plain language? For example, what use does Business Concentrated indicate or Assembly Unconcentrated? Also, what total square footage is devoted to partner use vs. NPS use and are the load capacity ratings different for the different uses?
7. G-1.0 - add a note about unanticipated archeological discoveries and archeological sensitivity.
8. C-1.0 - Has tree removal been coordinated with the in-progress Cultural Landscape Report?
9. C-1.0 - will the magnolia tree on the east side be retained as screening for the stair/elevator addition?
10. C-3.0 - Should the main entrance stairs up to the porch be reconstructed as they were in 1897 – Photos suggest that the stairs were wood, not concrete.
11. D- 1.0 - Demolition at B-4 will cause an adverse effect because this is a historic apartment that is identified as significant in the HSR and dates to Barton's occupancy.
12. D-1.1 - The area where the rear stair is being removed was also identified as a significant space in the HSR. Demolition/reconfiguration will cause an adverse effect.
13. D-1.1 - Why is door DF-12 being removed and not reinstated? Could it instead be fixed open?
14. A-0.1 - The addition of the "wings" that project north at either end of the "reconstructed" 1897 front porch alters the character of the feature as originally designed and thus doesn't meet the Secretary's Standards for Reconstruction which is what the Park indicated was its intent for the porch. NPS needs to be careful about reconstructing historic elements. Reconstructions need to be very accurate and not introduce speculative design or new design elements that will be assumed to be historic. If modifications need to be made to the historic layout, they should be done as a clearly new, separate piece that is distinguishable from the historic reconstruction. I understand the "wings" are being added so that the ramp connection can happen at the east end. I'd like more clarification on how good our physical documentation is of the 1897 porch. Also, is it necessary to have the ramp to the front porch if we provide an accessible entrance through the elevator tower? I understand that this was the approach taken at the MLK Birth Home and at Belmont-Paul NM, along with at other historic buildings in the NPS.
15. What use does the ramp and areaway at the southwest corner serve? Is it necessary for life/safety or egress? If not, this addition should be avoided to maintain the integrity of this elevation which was the historic vehicle approach area.
16. A1.1 - Are the reconstructed porch steps wood or concrete? Documentation (historic photos) suggests that they were wood and thus a reconstruction should be done in the same material.
17. A1.1 - Note P13 - removal of historic circulation (stairs) may alters the understanding of how the house/office operated during Barton's occupancy. Need clarification of whether the stair in this location is historic (to the period of significance). P12 - reinstalling the historic kitchen cabinet in a new location; room is reconfigured. This alters a historic space and could cause an adverse effect.
18. A1.1 - P19 - does this modify the door width itself?
19. A1.1 - can you reduce the size of the stair/elevator addition by sliding the stair south, eliminating the vestibule (121), and stacking the bathrooms next to the elevator (to the east)? Can the egress stair be an open, exterior steel stair?
20. A1.1 - Is there any code exception that can be made to adding panic hardware on the historic doors? This may result in an adverse effect since this is a primary entrance with historic doors.

21. A1.1 - The elevations of the addition are incompatible with the historic building. It's length along the east side wall obscures views out of the building and the windows appear out of scale. I'd like to see a version of the addition with less "weighty" materials. The stone makes it feel like it's more massive and permanent. Glass and wood siding or even board & batten may make it seem more secondary to the house. Windows should be scaled to align with those on the existing building or be smaller to indicate this is a "secondary" building.
22. A3.0 - I don't think the ramp railing needs to be as dramatically differentiated from the "historic" railing. Perhaps just a simplified version of the historic rail? Or can we eliminate the ramp and provide access via the addition?
23. S1.1 - Is there a reason why the structural column that sits in the west end of the vestibule can't be located on the opposite side of that wall? Why were columns not integrated into the existing walls? What sort of damage does that entail?

Kathryn G. Smith (she/her)

National Historic Landmarks & National Register Coordinator

National Park Service

National Capital Region

202.619.7180

202.913.3859 mobile

1100 Ohio Drive, SW

Washington, DC 20242

kathryn_smith@nps.gov

NCR Website <https://www.nps.gov/RESSNCR>

NHL Website <http://www.nps.gov/nhl>

Facebook [National Historic Landmark Program - NPS](#)

Instagram [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

From: Morales, Brendaliz <brendaliz_morales@nps.gov> on behalf of GWMP Superintendent, NPS
<GWMP_Superintendent@nps.gov>

Sent: Wednesday, December 7, 2022 9:40 AM

To: Smith, Kathryn G <Kathryn_Smith@nps.gov>; becky.roman <becky.roman@maryland.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; david.dise <david.dise@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; NRedding <NRedding@presmd.org>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; Luciennebeard <luciennebeard@gmail.com>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; curtis.luthye <curtis.luthye@redcross.org>; bgoldman1 <bgoldman1@comcast.net>; Diana Bailey <mwhcdiana@gmail.com>; Ross, Tara <rosst@sunyocc.edu>; ljgordon1 <ljgordon1@ua.edu>; TIM LOWRY <timlowry@bellsouth.net>; huyckclapper <huyckclapper@earthlink.net>; Julia Irwin <juliai@usf.edu>; jacob.remes <jacob.remes@nyu.edu>; Chandra M Manning <cmm97@georgetown.edu>; kksklar <kksklar@binghamton.edu>; Judith Wellman <historicalnewyork@me.com>; cgood <cgood@marymount.edu>; joanz10 <joanz10@verizon.net>; Young, Pearl Joy <youngp@uhcl.edu>; Rosie Click <vrc10@georgetown.edu>

Cc: Hall, Susan G <susan_hall@nps.gov>; Virta, Matthew <Matthew_Virta@nps.gov>; Joseph, Maureen

<Maureen_Joseph@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Gossett, Tanya <Tanya_Gossett@nps.gov>; Mendelson, Lisa <Lisa_Mendelson-Ielmini@nps.gov>; Porter, Beth <Beth_Porter@nps.gov>; Hall, Kym A <Kym_Hall@nps.gov>; shelby_prettiman@vanhollen.senate.gov <shelby_prettiman@vanhollen.senate.gov>; sung_chung@vanhollen.senate.gov <sung_chung@vanhollen.senate.gov>; shannon_frede@cardin.senate.gov <shannon_frede@cardin.senate.gov>; katie_corr@cardin.senate.gov <katie_corr@cardin.senate.gov>; lucy.shaw@mail.house.gov <lucy.shaw@mail.house.gov>; Bailey, Megan M <megan_bailey@nps.gov>
Subject: CLBA NHS Rehab Consulting Parties Meeting – Second Extension and Meeting Notes

Dear Consulting and Interested Parties,

The NPS would like to provide the Clara Barton National Historic Site Rehabilitation project Section 106 consulting parties with additional information from the November 16, 2022 meeting.

- Meeting Notes, in-person Meeting Participants, Participant pre-meeting questions and NPS answers
- Graphic NPS interpretation spaces 2015 (pre-rehab) and 2022 (proposed post rehab)
- Summary of results from RFEI and proposals

The above information will also be posted on the MS Teams file sharing platform which is linked here: [General](#)

The NPS is in receipt of requests to extend the amount of time to review documents and provide comments. In consideration of the request and review of the overall schedule, we are providing an additional 30-day review of the materials (draft Value Analysis and draft 100% Schematic Design documents) to **January 9, 2023**.

To facilitate the requested extension, future reviews for the Assessment of Effect report and subsequent design phases may be received with overlapping review periods, to maintain NPS contracting and funding reporting deadlines. The project team will continue to refine designs and conduct internal reviews and briefings. These are important actions that support our efforts to receive FY23 funding for the rehabilitation.

If you have any questions on the proposed CLBA NHS Rehabilitation, please direct your correspondence to our new park contact, Ms. Megan Bailey, Acting Cultural Resource Program Manager for the GWMP. All comments should be addressed to GWMP Superintendent Charles Cuvelier (GWMP_Superintendent@nps.gov) and Megan Bailey (megan_bailey@nps.gov).

Thank you for your continued involvement and interest in this nationally significant property.

Superintendent
George Washington Memorial Parkway



December 20, 2022

Mr. Charles Cuvelier, Superintendent
George Washington Memorial Parkway
U.S. Department of the Interior, National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Ref: *Proposed Rehabilitation and Reuse of the Clara Barton National Historical Site
Glen Echo, Montgomery County, Maryland
ACHP Project Number: 019014*

Dear Mr. Cuvelier:

On October 17, 2022, the Advisory Council on Historic Preservation (ACHP) received an e-mail from Ms. Pamela Goddard, Mid-Atlantic Region senior program director, National Parks Conservation Association regarding the U.S. Department of the Interior, National Park Service's (NPS) review of the referenced undertaking occurring pursuant to Section 106 of the National Historic Preservation Act, (NHPA, 54 U.S.C. § 306108), and its implementing regulations "Protection of Historic Properties" (36 CFR Part 800). The review was initiated on June 3, 2022 and is being administered by the NPS, George Washington Memorial Parkway (GWMP), which has jurisdiction over the Clara Barton National Historic Site, a National Historic Landmark (NHL).

On November 8, 2022, Ms. Maureen Joseph, manager, Resource Management Division, GWMP, contacted ACHP's NPS liaison, Ms. Kirsten Kulis, to discuss the proposed undertaking and consultation plans for the review. During a virtual meeting the following day with you, Ms. Joseph, and others from NPS including Ms. Allison Young, regional Section 106 coordinator, Ms. Kulis learned more about the proposed undertaking and provided general technical advice.

In response to a November 21, 2022 e-mail from Mr. Christopher Cody, associate general counsel, National Trust for Historic Preservation, Ms Kulis also met virtually with him, to discuss his concern that a broad range of alternatives is not being considered, in consultation, for the undertaking. Mr. Cody also expressed particular concern with regard to the purpose, need, and terms of a proposed partnership which would allow for various community uses at the NHL.

Participants in the Section 106 review may seek advice, guidance, and assistance of the ACHP if they so choose, regardless of whether ACHP is formally participating in consultation. In response to these various inquiries, we are pleased to offer technical assistance, including the following, for consideration.

Undertaking

The initiation letter from you to the Maryland Historical Trust, state historic preservation officer, provided to Ms. Kulis by Ms. Joseph, states that NPS is proposing to rehabilitate the NHL in accordance with the *Secretary of the Interior's Standards*, but does not specify which treatment is being selected and

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

per the *Standards*, “One set of standards - preservation, rehabilitation, restoration or reconstruction - will apply to a property undergoing treatment, depending upon the property's significance, existing physical condition, the extent of documentation available and interpretive goals, when applicable. The standards will be applied taking into consideration the economic and technical feasibility of each project.” As the undertaking includes a proposed partnership with a non-federal entity, the relationship between the selected treatment and the partnership goals, if any, should be explained. Such an explanation will inform the forthcoming assessment of effects.

Assessment of Adverse Effects

The Section 106 regulations do not require an agency to have certitude that adverse effects will occur but rather they state (emphasis added):

“An adverse effect is found when an undertaking **may** alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.” (36 CFR § 800.5(a)(1))

The draft terms of the agreement associated with the aforementioned partnership are critical to the forthcoming assessment of adverse effects because the regulations provide, as examples of adverse effects:

“Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance” [...] Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.” (36 CFR § 800.5(a)(2))

The ACHP’s related *Guidance on Use of Real Property Restrictions or Conditions in the Section 106 Process to Avoid Adverse Effects* (<https://www.achp.gov/digital-library-section-106-landing/guidance-use-real-property-restrictions-or-conditions-section>, 2016), may be a helpful resource.

National Historic Landmarks

The NPS is held to a higher standard of review, based on both the statutory language of the NHPA and the Section 106 regulations, because the property is an NHL. The agency official must, “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking” (54 U.S.C. § 306107; 36 CFR § 800.10(a)). The ACHP’s website includes additional information on this topic, which may also be of use: *Section 106 Consultation Involving National Historic Landmarks* (<https://www.achp.gov/digital-library-section-106-landing/section-106-consultation-involving-national-historic-landmarks>, 2002).

To facilitate the ACHP’s participation in consultation in this technical and informal capacity, as consultation proceeds we request you provide more information on the undertaking including the rationale for the selected treatment under the *Secretary of the Interior’s Standards*, and an annotated area of potential effects document listing the characteristics of the historic properties that have been identified therein. We also request NPS provide an updated detailed consultation schedule that includes any plans to coordinate the Section 106 review with NPS’ compliance with the National Environmental Policy Act (NEPA, 42 U.S.C. §§ 4321 et. seq.), and recommend this publication, which we developed with the White House’s Council on Environmental Quality, which provides helpful information on that topic:

“NEPA and NHPA: A Handbook for Integrating NEPA and Section 106” (https://www.achp.gov/integrating_nepa_106). Finally, we request to be added to NPS’ Section 106 consultation and NEPA e-mail lists and note that your points of contact at the ACHP will be Ms. Kulis (202.517.0217, kkulis@achp.gov) and Mr. Christopher Wilson, program analyst (202.517.0229, cwilson@achp.gov).

We appreciate NPS’ ongoing Section 106 compliance and stewardship efforts, and consideration of the advice and information in this letter. We look forward to working with you and the consulting parties as consultation proceeds.

Sincerely,

A handwritten signature in black ink that reads "Christopher Koeppe". The signature is written in a cursive, slightly slanted style.

Christopher Koeppe
Assistant Director
Office of Federal Agency Programs
Federal Property Management Section

Historical New York Research Associates

Judith Wellman, Principal Investigator
Discovering Extraordinary People and Places in Time



2 Harris Hill Road, Fulton, New York
www.historicalnewyork.org
historicalnewyork@me.net, 315-529-7808

January 9, 2023

Charles Cuvelier, Superintendent
George Washington Memorial Parkway,
National Park Service
700 George Washington Memorial Parkway,
McLean, VA 22101

Re: Clara Barton National Historic Site Rehabilitation Project

Dear Superintendent Cuvelier:

Many thanks for your willingness to give an extension of the deadline for consultation. It is much appreciated!

I remain extremely concerned that the proposed changes to the Clara Barton National Historic Site will have an adverse effect on the historic importance of this property. Founded in 1974, this site remains one of less than a dozen National Park Service units that specifically recognize the national importance of women. As the national headquarters of the Red Cross, it commemorates not only Clara Barton's work but also the international importance of this organization. Barton was instrumental not only in recording names of missing Civil War soldiers but of changing the Red Cross from a military to a much broader humanitarian organization, focused on disaster relief. She also helped get the United States to sign the Geneva Convention. Her work illustrates the national importance of a whole generation of women who worked in the later nineteenth and early twentieth centuries to expand social services, education, labor rights, and voting rights to a nation made up of people of a wide variety of colors. Ethnicities, and religious backgrounds, including an increasing number of immigrants.

Proposed changes to the historic fabric of this building (including installation of an elevator, bathrooms, and commercial catering facilities) threaten the site's historic character. These changes leave very little space for historic interpretation, turning this nationally important site into an extension of local recreational facilities.

As a concerned citizen, historian, and historic preservationist, I have been working with an informal group of like-minded people nationally who are aware of the importance of the Clara Barton National Historic Site, as well as of the challenges that it faces. We look forward to working with you to preserve the historic spaces in this building, with appropriate interpretive programs and exhibits that highlight the importance both of Clara Barton and the American Red Cross.

We look forward to discussing further ideas about appropriate partners to ensure the viability and public accessibility of this nationally significant site.

Sincerely,



Judith Wellman

Principal Investigator, Historical New York Research Associates
Vice-president, National Collaborative of Women's History Sites
Secretary, Women's Rights Alliance of New York State
President, 1816 Farmington Quaker Meetinghouse Museum

Cc: Chris Cody
Pam Goddard

The Town of

GLEN ECHO

Chartered 1904

Town Hall · 6106 Harvard Avenue · Glen Echo · Maryland 20812 · (301) 320-4041

townhall@glenecho.org

The Town of Glen Echo supports the renovation project of the Clara Barton House. Renovating and preserving the site honors Clara Barton's distinguished history and immeasurable contribution to our country.

Glen Echo is immediately adjacent to the historic house on Oxford Road, thus, our residents will be the most affected in the short and long term by this process. We have concerns regarding project planning and construction for our residents. We are a small community with homes very close to one another so issues regarding construction noise, lighting, traffic flow and parking are paramount to the health and welfare of our unique town.

PROJECT / CONSTRUCTION PLANNING: This letter was created in collaboration with our engineering consultant, Oyster, Imus, Petzold and Associates LLC, the Glen Echo Town Manager, Mayor of Glen Echo, Town Council members and resident comments. The town has the following concerns.

The town urges NPS to ensure that the placement of the HVAC system will be on the east side of the house and not on the side abutting Oxford Road. This will avoid long term noise issues from the HVAC system affecting the immediate residents. For your reference, there is currently a small unit placed there now.

We have had previous problems with the house alarm system. If a new system is installed, we request there is careful consideration about what system to purchase regarding noise to our residents who could be negatively affected. This was an important issue that finally was resolved in 2020 by switching the alarm system from an audible one to one that now goes directly to the Park Police center. Senator Van Hollen helped the town with this effort.

The proposed lighting (Sheet A 0.1) is unclear and may impact adjacent homeowners by shining light into their homes. We would like a plan and be assured the lighting system is not on continuously and / or disruptive both during the construction process and in the final renovation.

The two new ADA parking spaces need to be more thoroughly considered regarding potential traffic flow in that area. They are proposed to be in a space that fortunately has additional NPS land adjacent to it. The addition of a turn-around area for those exiting the ADA spaces is a possible solution. Associated grading will also be needed as the parking spaces have to be flat. Instead of merely patching in front of the new parking spaces, please consider repaving the width of the street in order to provide a cleaner finished driving surface. The spaces should not be used after hours, therefore, a barrier should be constructed to indicate after hours

limitations. The accessible path should extend to the striped aisle between the two parking spaces. It also appears that a guy wire from the existing utility pole may conflict with the proposed parking area. We would like to be assured that an ADA specialist was consulted on these specific access plans.

We ask that NPS conduct a traffic study along Oxford Road and the ADA parking area to see if there are any other options - both for the ADA parking area location and for all vehicular access to the house.

Also, ensure the new driveway approaching the house is sufficient for fire truck /emergency vehicle access to the building in the event of an emergency.

There is no stabilized construction entrance and no construction access route is shown (for example, how are concrete trucks going to get to the new addition). Oxford Road is the truck route in town, we require that all construction vehicles use Oxford Road and not other town roads when arriving or leaving the work site. How will this be communicated to the drivers throughout the process?

No staging plan was provided in the plans. The town urges that staging take place in the far parking lot to the east, not in the lot abutting Oxford Road. Construction vehicle parking is not shown, including worker's personal vehicles. We ask that they park in the lot to the east of the building. This is especially important as some residents on Oxford Road do not have driveways so they need to park by their homes for the project's duration.

CONSTRUCTION PROCESS: In regards to the construction process, we would like confirmation that NPS will ensure contractors follow the Montgomery County guidelines on work hours and noise levels. Oxford Road is narrow and well traveled by residents and park visitors. Many of the park visitors are children due to their classes and camps. How will issues regarding pedestrian safety be handled during construction? Additionally, the Town will require an MOU (memorandum of understanding) with NPS for fixing damage to Oxford Road and other Town roads used to access the project after construction is finished.

NPS needs to keep the town informed on the construction timeline and with weekly written progress reports. The town will require a meeting with NPS representatives and the onsite identified manager team prior to construction. The town will provide consistent feedback to NPS during construction with a resident committee led by the Town Manager and / or Mayor of Glen Echo. We need contact information for all related project and site managers.

We wholeheartedly support this project once these points are all addressed. Please respond to our concerns, questions, and requests in writing.

Sincerely,

Dia Costello

Mayor

Town of Glen Echo

CC:

Town of Glen Echo Council Members

Senator Chris Van Hollen

Rep. Jamie Raskin

County Council Member Andrew Friedson

Del. Marc Korman

Del. Sarah Love

Del Susan Lee

Del Ariana Kelly



January 9, 2023

Charles Cuvelier
Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

RE: National Historic Preservation Act Section 106 Consultation for the Proposed Rehabilitation of the Clara Barton National Historic Site, George Washington Memorial Parkway, Glen Echo, Maryland

Dear Superintendent Cuvelier:

Thank you for extending the comment period for the Section 106 Consultation for the rehabilitation of the Clara Barton National Historic Site. As you know, I submitted comments on 12.5.22 and am now submitting additional comments here.

The National Parks Conservation Association is pleased that the National Park Service is undertaking the renovation and reopening of this important national park. We wish to work with you in partnership to ensure the site is rehabilitated while remaining true to enabling legislation to honor Clara Barton and the American Red Cross.

We are deeply concerned that the current plan will result in adverse impacts to the Clara Barton National Historic site because it would harm the historic structure by removing critical components of the site; would physically turn over a majority of the site to a partner and programming that have no relationship to Barton, the ARC, or the site's historic significance; and proposes changes not needed to safely reopen the site to the public.

In the 12.20.22 letter sent to you by Christopher Koepfel, Assistant Director of the Office of Federal Agency Programs of the Advisory Council on Historic Preservation, Koepfel cites Section 106 regulations stating that "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify for inclusion in National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association." He also states that an example of an adverse effect is a "change of the character of the property's use or of physical features within the property's setting that contributes to its historic significance"[...]Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance."

Mr. Koepfel goes on to state that National Historic Landmarks are held to a higher standard of review and that an agency official must "to the maximum extent possible, undertake such planning and actions

as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.”

Kathryn G. Smith, National Park Service National Historic Landmarks & National Register Coordinator, sent a letter to you on 12.14.22 stating that the proposed program for the Barton site “may be incompatible with preserving the NHL. The Rehabilitation Standards require that you select a reuse that is compatible and avoids removal of character defining features.” Smith continued by stating, “The NHL Program’s main concern is that key decisions made prior to the Section 106 consultation process have determined the path of the design requirements, prohibiting consideration of alternatives that would have less impact on the historic property” and that “The park should aim to preserve all aspects of the significance including the building’s storage, residential, office, and workspace functions so that the full range of Barton’s [and the American red Cross’s] activities at the property can be understood and interpreted.”

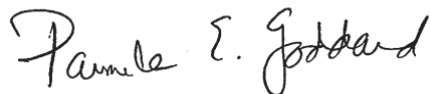
Unfortunately, it appears that the current plan proposed for the rehabilitation of the Barton site is being driven by the needs of the proposed partner, not guided by the enabling legislation that created this national park. As you know, physical changes must be necessary and avoid adverse impacts to the greatest extent possible. Under the current plan, it is unclear what interventions are needed to open the building versus what is being proposed to accommodate new uses. The National Parks Conservation Association opposes physical alterations to the Barton site beyond what is reasonably required to reopen the building to public access for visitation, education, and interpretation. We strongly urge NPS to enlist an historic architect to work with your team on any plan moving forward to protect the integrity of the site during rehabilitation.

We are also concerned over the lack of clarity regarding the decision to choose a partner and the proposed partner’s programming for the site. The purpose, need, and terms of the proposed partnership are unclear and not reflective of the reason the Clara Barton National Historic Site was established, hence leading to an adverse impact. The percentage of the building to be turned over to a partner and the uses proposed are not aligned with Barton’s history nor that of the American Red Cross.

We wish to work together with the National Park Service on the restoration and reopening of the Barton Site and will work with you to ensure any rehabilitation will avoid adverse impacts. If NPS is considering bringing a partner into the site, we reiterate our previous questions including what is the purpose of a partnership? Is NPS seeking a partner to occupy the building, to contribute financially to the building’s maintenance, or to design and conduct relevant programming for visitors? These questions must be answered to enable consulting parties and federal and state agencies to accurately engage in the Section 106 process.

Thank you for considering our views.

Sincerely,

A handwritten signature in cursive script that reads "Pamela E. Goddard". The signature is written in black ink on a white background.

Senior Program Director, Mid-Atlantic Region
National Parks Conservation Association



**National Collaborative for Women's History Sites
P.O. Box 1376, Mount Laurel, NJ 08054**

9 January 2023

Superintendent Charles Cuvelier
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Dear Superintendent Cuvelier,

On behalf of the National Collaborative for Women's History Sites (NCWHS) members and board of directors, a consulting party to the Section 106 Review of the planned rehabilitation of the Clara Barton National Historic Site, we offer the following comments:

NCWHS members and leadership support NPS' efforts to restore the Clara Barton NHS with long-deferred repairs and upgrades to meet current safety codes and ADA compliance. The physical restoration work funded by the Great American Outdoors Act grant is vital to ensure that the building will stand for another century as an historic resource that tells an important chapter in America's history and present. It should be done in a manner that reflects Barton's life and work and the NPS' original intention when declaring the site an NHS.

NCWHS recognizes both the advantages and challenges of partnering with outside organizations to integrate an historic site into the local community. We listened carefully at the September consulting parties meeting and, frankly, were surprised that Glen Echo, the proposed community partner, had no plans to incorporate women's history into their programming that would take place in the rehabbed CLBA building. We assumed that they would address this in the November meeting, but see from the meeting notes that they did not. We also see from the design plans that well over half – almost three quarters - of the rehabbed space will accommodate Glen Echo's arts programs. The fact that so little space will be devoted to educating the public about a woman as consequential as Clara Barton convinces us that *this proposed use poses an adverse effect on the site and is a significant derogation of its values.*

NPS' first historic park that honors a woman should, and can, do more to explore Clara Barton, her impact on America and the ways in which her work impacts America to this day. When so few NPS sites are dedicated to telling women's stories, why diminish that capacity to the extent that this plan proposes to do?

The National Collaborative for Women's History Sites urges you, as GWMP Superintendent, to consider alternatives to this plan. NPS' traditionally offers true quality interpretation at its historic sites, providing many visitors with their best history education. We support that continuing at Clara Barton National Historic Park, but not with the wrong partner dominating the space.

NCWHS has made significant contributions to American women's history at public sites across the country. Our most recent and ongoing activity, the National Votes for Women Trail (www.nvwt.org), touches thousands of communities. NCWHS has collaborated with the NPS on several projects, including publications (*Revealing Women's History: Best Practices at Historic Sites*), conferences, webinar series, and the successful nomination of four new NHLs that commemorate women (Mary Baker Eddy, Pauli Murray, Annie Wauneka and Marjorie Stoneman Douglass). We value an ongoing relationship and the opportunity to work with NPS on all issues of inclusive historical interpretation.

NCWHS offers our expertise and our national connections to the academic and public history communities to devise a new interpretive plan that makes the Clara Barton NHS a vibrant – and visited – women's historic site. We look forward to working with you on this and other projects.

Thank you for this opportunity to comment.

With regards,

Lucienne Beard

For the Board of Directors, National Collaborative for Women's History Sites

Lucienne Beard, Co-President, New Jersey

Judith Wellman, Vice President, New York

Andrea Malcomb, Treasurer, Colorado

Lesley Barker, Director, Kentucky

Erica Buell, Director, New York

Sehila Mota Casper, Director, Texas

Joanne Goodwin, Director, Nevada

Lillian Heidenreich, Director, Washington

Lillian Williams, Director, New York

Ida Jones, Co-President, Washington, D.C.

Robyn Young, Secretary, Pennsylvania

Elizabeth Almlie, Director, South Dakota

Nancy Baird Brown, Director, New York

Paula Casey, Director, Tennessee

Joanie DiMartino, Director, Connecticut

Cheryl Harned, Director, Maryland

Barbara Lau, Director, North Carolina

CC: Pamela Goddard, National Parks Conservation Association

Christina Morris, Senior Field Officer, National Trust for Historic Preservation

Christopher Cody, Assoc. General Counsel, National Trust for Historic Preservation

Joan M. Zenzen, Ph.D.
609 Blossom Drive
Rockville, MD 20850
joanz10@verizon.net
January 9, 2023

Dear Superintendent Cuvelier:

I am writing to express my deep concerns about the current plans for renovating the Clara Barton National Historic Site (CLBA). I have multiple connections to this park. I am a Consulting Party for the Section 106 process; I am a historian of US history with a specialty in US national park history; I am the historian doing the administrative record-keeping for the Great American Outdoors Act (GAOA); and I am silversmith who learned the trade at Glen Echo and have been selling my pieces there at the Labor Day and Holiday sales. I live in Montgomery County, Maryland, and have long been an active member of the Montgomery County Historical Society.

My concerns are that the George Washington Memorial Parkway (GWMP), which administers CLBA, is trying too hard to meet perceived requirements under GAOA: GWMP has all but accepted an incongruent partner, Glen Echo Park, to use and maintain this historic park. This proposed partnership would effectively turn CLBA into an arts building for Glen Echo Park. The proposed partnership would severely minimize and even damage the significant history for which CLBA was established as a National Historic Site (and thus a national park administered under the National Park Service with all the pertinent laws) and as a National Historic Landmark.

I applaud GWMP in obtaining much-needed GAOA funding to complete essential preservation work on the historic building which Clara Barton designed, used as the headquarters of the American Red Cross, and lived in with fellow Red Cross workers until the end of her life. This entire building speaks to her frugality (using wood from one of the Johnstown flood buildings built to help survivors), her innovative spirit (using every nook and cranny to hide closets to hold Red Cross supplies), and her commitment to fellowship and connection (with the grand hall where people can look up three stories and talk with folks above, with the dining room which could house two to twenty and more people, with the multiple bedrooms to accommodate Red Cross workers and supporters).

This entire building deserves renovation, preservation, and interpretation as the premier site for understanding and celebrating Clara Barton's remarkable life and her essential contributions to American and international history. She was the American Red Cross. She changed forever medical practices for caring for those injured through war and catastrophic events. She fostered a worldwide movement in care and compassion for less fortunate people suffering from unimaginable trauma. She—a woman in the United States before women had the vote—was a mover and shaker who swayed men to vote for and work behind the scenes to support her work because she could not practice her essential right to vote.

The National Park Service (NPS) holds a precious gem of a place in the building and grounds of CLBA. The agency has a legal responsibility to fulfill its duty to preserve and protect unimpaired for future generations all of the properties under its jurisdiction. Every NPS property

deserves careful attention to ensure its preservation while also allowing for its use—language established under the Yellowstone National Park 1872 legislation and the guidepost for every NPS site since, from the NPS Organic Act to today.

I fear that GWMP has allowed perceived requirements under GAOA to cloud its mandate to preserve and protect CLBA. When I attended the Consulting Parties meeting in November 2022, you and other staff members emphasized that you wanted visitors to be immersed in CLBA's building and grounds, to not wall visitors off from experiencing the site with velvet ropes barring entry into the rooms. You and your staff also noted that you had put out a call for potential partners and that none responded with any reasonable proposals except Glen Echo Park, which is the site next door to CLBA and is run through a partnership which includes Montgomery County and NPS. You and your staff also noted that GEWA had an urgent five-year time limit to use GAOA funds and that you had to find a partner, presumably to keep the GAOA funds already allocated for this work.

Using my professional contacts while serving as the historian responsible for compiling the administrative record-keeping for GAOA, I have asked and checked about any requirements for GAOA funds. My sources have assured me that the GAOA legislation does not have specific requirements for a partner, nor does GAOA have a definite timeline for completion of its projects. Instead, there is the hope—not legislated and not set as a requirement for obtaining the funds or keeping them—that GAOA projects proceed within a reasonable amount of time. In addition, a partnership is one of several ways that a potential GAOA project can strengthen eligibility for funds. It is not essential to have a partner. If it is to have a partner, it needs to be the most appropriate one possible, one that furthers the congressional intention when this park was established in 1974.

I know from writing about six national park sites, including an administrative history of Rock Creek Park, that partnerships can be quite valuable to national parks. I fully understand that GWMP would like to identify a suitable partner for using, interpreting, and helping to maintain CLBA. Partners can enhance a site through programming, bring visitors in, and help keep the site at its best in terms of repair and long-term care. I saw this particularly with Peirce Mill in Rock Creek Park, where over time a small group of committed individuals grew the Friends of Peirce Mill and drove the restoration of the mill from a closed inoperable site to a vibrant working mill with year-round programming, careful maintenance, and funding to support such things as an adjacent apple orchard that directly supports interpretation and historic site preservation.

Glen Echo Park is a wonderful arts and community site. I have used this site since moving to Montgomery County in 1988. I have taken my kids to ride the carousel and play on the playground. I have enjoyed dancing in the Spanish Ballroom and seen puppet shows. I learned to silversmith with Blair Anderson in her Silverworks gallery. I now sell my jewelry at Glen Echo Park Labor Day and Holiday shows. I love Glen Echo Park, but I do not think it is an appropriate partner for interpreting and maintaining CLBA.

When we sat in the November Consulting Parties meeting, one of your staff members happily said that the room we were in—with its paint splashed chairs and tables and art supplies

randomly packed in plastic containers strewn around the room, was exactly what GWMP envisioned for CLBA. My horror at such a desecration of Clara Barton's life work continues to this day. I wonder how you and your staff could consider such a partnership that would relegate the essential history of Clara Barton to a few rooms so that Glen Echo Park could hold art classes and, according to the current plans, have private music lessons and a catering kitchen to support outside events, which I assume would involve weddings or other money-makers. I am astounded that any National Park Service site would so flagrantly reject its legal and administrative responsibilities—its core values—to damage this site. But that is exactly what GWMP is currently proposing. Please do not do this! Please work with the assembled group of park-lovers who want the best for NPS and who have already spent many hours working through the many documents and plans to understand your approach and to request better alternatives. I know they want to work with you as do I. As a historian I have expertise that the NPS needs.

I am sending this letter to you, Superintendent Cuvelier, but also copying Mike Caldwell, NPS Associate Director, Park Planning, Facilities, and Lands, and a key GAOA administrator. I do so because I am concerned that what is happening at CLBA may be happening at other NPS sites receiving GAOA funds. I hope that NPS is doing everything it can to address the significant deferred maintenance situation across the system while following its legal requirements and NPS values to ensure the continued protection and compatible use of the sites under its responsibility.

Thank you for your attention and care for Clara Barton National Historic Site.

Joan M. Zenzen



January 9, 2022

Mr. Charles Cuvelier
Superintendent
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Re: Clara Barton National Historic Site Section 106 Consultation

Dear Superintendent Cuvelier:

The National Trust for Historic Preservation (“National Trust”) thanks you for the opportunity to participate as a consulting party under Section 106 of the National Historic Preservation Act (“NHPA”), for purposes of reviewing the proposed rehabilitation of the Clara Barton National Historic Site (“CBNHS”). We hereby submit the following comments:

I. The National Trust supports the rehabilitation and reopening of Clara Barton National Historic Site.

The National Trust is conceptually supportive of this project and eager to see this important historic site reopened to the public. CBNHS was the first National Park Service (“NPS”) site established to interpret women’s history, and today it is 1 of only 9 of the 424 NPS units dedicated to women and/or women’s history. As such, it is of paramount significance to our nation and crucial to telling the full history of America.

The National Trust is deeply committed to advocating for the preservation and promotion of women’s history, doing so through our successful initiative, *Where Women Made History*, our grant making, prioritizing women’s history at our own collection of historic sites, and numerous other advocacy actions. This Section 106 consultation for the rehabilitation of CBNHS is a high priority for our organization. We are eager to share our deep expertise in the rehabilitation, creative reuse, and interpretation of a wide range of historic sites, and work together with NPS to help accomplish the stated goal of rehabilitating and reopening CBNHS to the public for the purpose of presenting the life and work of Clara Barton and the history of the American Red Cross (“Red Cross”).

II. The project as currently proposed would result in significant adverse effects.

While we are fully supportive of the rehabilitation and reopening of CBNHS, what is presently proposed by NPS goes beyond those actions and would result in significant adverse effects. As proposed, this project would cause both direct physical adverse effects to CBNHS and adverse effects resulting from the lease/transfer of the majority of the site’s

square footage to a partner for new uses that NPS acknowledges are unrelated to Clara Barton or the Red Cross.

The direct physical adverse effects proposed are primarily physical alterations to CBNHS, the majority of which are for the purposes of reopening the building to the public and achieving ADA compliance. While the National Trust supports both of those goals, we are unable to ascertain from the materials provided by NPS which alterations are required to reopen the building to the public, as opposed to the alterations that are designed to enable future uses by Montgomery County and their partners. In their December 14, 2022, email NPS's National Historic Landmark ("NHL") program also expressed this same concern: "While it's clear that there are interventions needed for life-safety and accessibility, it would be useful for consulting parties to understand what interventions are needed to reopen the building to the public versus what work is required to accommodate the proposed new uses."¹

The National Trust is opposed to physical alterations to CBNHS beyond what is reasonably required to reopen the building to public access for visitation, education, and interpretation. In our October 24, 2022, letter the National Trust noted that CBNHS is protected by Section 110(f) of the NHPA. 54 U.S.C. § 306107. In their December 14, 2022, email, NPS's NHL program also noted this and recited the evaluative standard required by Section 110(f): "Section 110(f) of the NHPA requires that federal agencies, to the maximum extent possible, undertake planning and actions necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking. This is a heightened level of stewardship beyond what is required for National Register-listed properties."² Section 110(a) of the NHPA also imposes a heightened requirement on the NPS to give "special consideration" to the preservation of the property's historic, architectural, and cultural values, in light of its national significance. *Id.* § 306102(b)(2). In our view, the current proposal fails to satisfy these important stewardship requirements.

Given the heightened standard of protection required for CBNHS, NPS must demonstrate that any proposed direct physical adverse effects to CBNHS are absolutely necessary and that their avoidance has been implemented "to the maximum extent possible." In their December 14, 2022, email, NPS's NHL program additionally noted that "the NPS's Level 1 policy guidance, Management Policies 2006, which prescribes parameters for making management decisions, prioritizes historic integrity above reuse and modifications that may adversely affect or impair historic properties."³ In the same email, NPS's NHL program also questioned whether or not ADA accessibility is even an appropriate goal given the importance of CBNHS. These conversations reflect a fundamental need for this consultation to be reoriented around what preservation treatments are best for CBNHS, with a focus on the avoidance of adverse effects.

In addition to the project's proposed direct physical adverse effects, NPS's proposed transfer of the majority of CBNHS to Montgomery County and their partner for new uses

¹ Email from Kathryn Smith to Charles Cuvelier, Dec. 14, 2022.

² *Id.*

³ *Id.*

unrelated to Clara Barton and the Red Cross would also result in adverse effects under 36 C.F.R. §§ 800.5(a)(2)(vii) and 800.5(a)(2)(iv). As proposed, NPS would transfer 4,650 sq. ft. to the private partner and retain only 1,910 sq. ft. for the interpretation of Clara Barton and the Red Cross. In total, NPS currently proposes to dedicate only 23% of the usable space in CBNHS to the interpretation of Clara Barton and the Red Cross. This constitutes both a “[c]hange of the character of the property’s use,” per 36 C.F.R. § 800.5(a)(2)(iv), and a “transfer ... without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property’s historic significance,” per 36 C.F.R. § 800.5(a)(2)(vii). As proposed, this transfer would fundamentally change the use and nature of CBNHS from a historic site dedicated to interpreting the history of Clara Barton and the Red Cross to a multipurpose community center.

The clear legislative intent of Congress in designating the Clara Barton House as a National Historic Site in 1974 was for the site to interpret the life of Clara Barton and the history of the Red Cross. Since its designation, that has been the primary purpose of this nationally important site. It is also the stated purpose of NPS’s current proposed project. NPS’s proposal to instead allow the majority of CBNHS to be transferred to a partner for unrelated uses is contrary to the fundamental purpose of this National Historic Site, and it would undermine the Site’s ability to convey its historic significance and to help tell the stories of underrepresented aspects of our nation’s history.

III. The National Trust seeks to consult with NPS to avoid or minimize all potential adverse effects.

There is ample opportunity for NPS to avoid or minimize these potential adverse effects. Many of the proposed physical alterations to CBNHS are appropriate, needed, and in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (“SOI Standards”). The National Trust seeks to consult with NPS to ensure that these positive actions are not compromised by the proposed inappropriate transfer of the majority of CBNHS, or by the inclusion of unnecessary building alterations in the scope of work. We do not want to see this otherwise worthy project undermined by readily correctable issues.

In our October 24, 2022, letter, the National Trust requested further information from NPS, “including proposed interpretative plans, partnership agreement documents, and any other documents pertaining to proposed uses for the CBNHS.” We reiterated this request during the November 16, 2022, Consulting Parties meeting, and received an affirmative response from NPS during that meeting. Our goal in requesting this information is to better understand the constraints that NPS is operating under, so that we may be a more productive partner and help identify opportunities for NPS to avoid and minimize adverse effects. It is our sincere desire to consult with NPS to help avoid all adverse effects associated with the rehabilitation and reopening of CBNHS, and we believe that is an achievable goal.

IV. NPS should leverage the expertise of the Consulting Parties to ensure that the rehabilitation plan creates meaningful, substantive opportunities for interpretation and education.

During the November 16, 2022, consultation meeting NPS stated that the Consulting Parties would be invited to attend a separate Section 106 consultation in spring of 2023 for the development and implementation of a new interpretation plan for CBNHS. The National Trust looks forward to participating in that consultation. However, the viability of that consultation and any interpretation plan for CBNHS is dependent on decisions associated with the current consultation. Without adequate space within the CBNHS devoted to opportunities for public interpretation and education, an adequate interpretation plan cannot be developed.

We encourage NPS to leverage the expertise of the Consulting Parties, especially those with deep experience in interpreting women’s history and the histories of Clara Barton and the Red Cross, to develop the basic parameters of an adequate interpretation plan for CBNHS. Those parameters should then inform future decisions about the proposed building uses and any associated building alterations. Multiple Consulting Parties have expressed their eagerness to contribute to such an effort, and the National Trust encourages NPS to make use of their considerable expertise.

V. The National Trust offers the following specific comments and questions based on the documents provided.

The National Trust has multiple specific questions and comments concerning the materials provided to the Consulting Parties. We offer them here with page number references to both the final package submitted to the Consulting Parties and the earlier Value Analysis (“VA”) report:

- Vertical Circulation
 - Elevator Tower (Pg. 40/pg. 12 VA report) – The design team identified six additional recommendations to improve the preferred vertical transportation alternative VT2, which included moving the tower further to the south. Please indicate if NPS is considering any of these recommendations for the alternative as a means to reduce the visual or physical impact of the proposed new construction.
 - Stair Tower (Pg. 57-58/pg. 29-31 VA report) – We recommend that the proposed stair tower and restrooms should be located further to the rear of the building (similar to the siting proposed for the west side tower alternative), and that they be positioned to have the least impact possible on interior rooms.
- Basement
 - Explanation of Proposed Uses (Pg. 40-41/pg. 12-13 VA report) – The proposed alterations to the basement appear to be a function of creating more space for private partners. (Page 23 of the Basis of Design Report only refers to “the new

programmed [sic] space on the south portion of the basement,” but provides no explanation of what will be programmed, by whom, or for what purpose. Presentation Deck 2A from the VA Workshop (slide 10) simply references “maximum utilization of basement” as part of the project purpose and need, but offers no explanation for why this is necessary.) These alterations to the basement will result in the complete loss of spaces B-3 and B-4, which are identified as spaces of “primary significance” on the Existing Conditions Basement Plan prepared by M+Sa Architects. This level of alteration in the south portion of the basement will result in an adverse effect, which does not appear to be necessary, and it does not preserve or enhance the public’s understanding of the way in which Clara Barton utilized this area of the historic building.

- Exploration of Alternatives (Pg. 68/pg. 40 VA report)– To limit the potential impacts to the historic fabric and preserve the spaces of primary significance identified in the Existing Conditions Plan prepared by M+Sa Architects, we urge the NPS to give greater consideration to Alternative B1 in order to fulfill the agency’s mandate under Section 110(f) of the NHPA, to minimize harm to the maximum extent possible, and under Section 110(a) of the NHPA to give “special consideration” to the preservation of the property’s historic, architectural, and cultural values, in light of its national significance. 54 U.S.C. §§ 306107, 306102(b)(2).
- Conflicting Treatment Standards – We noticed conflicting treatment standards across the documents and have provided a few examples below. This underscores the importance of ensuring that this project *as a whole* complies with both Section 110(f) of the NHPA and NPS’s Level 1 policy guidance, Management Policies 2006.
 - 1897 Porch (Pg. 41/pg. 13 VA report) – The re-creation of the 1897 porch design appears to be one of the only aspects of the project that is explicitly concerned with “historically accurate restoration.” We urge the NPS to *expand* the use of historically accurate restoration within the scope of this project, such as for damaged or deteriorated original exterior materials, and interior spaces and finishes associated with the period of significance. Given CBNHS’s status as a National Historic Site it merits this treatment approach to the greatest extent possible. It is inappropriate to assert that the porch re-creation can “mitigate adverse effects” and “[gain] approvals for SHPO/106 compliance” since it is a core component of the proposed project, rather than a resolution of adverse effects identified via the Section 106 process.
 - Pg. 42/pg. 14 VA report – The preferred alternative appears to be in conflict with the recommendations in the Basis of Design Report (pg. 15), which state “that the approach to the exterior envelope be ‘preservation’ as part of the larger Rehabilitation of the house, as defined in the Secretary of the Interior’s Standards. We would replace existing material only where required by its level of deterioration. Where replaced, the approach is to replace in kind. The different designs of the siding where it has been replaced or patched over the history of the building, are evidence of the evolution of the house over time. In that regard, we recommend keeping the existing clapboard that is not consistent with the original. We do not

recommend 'restoring' the siding design to the original period. If its condition requires replacement, replace in kind from sustainable lumber sources."

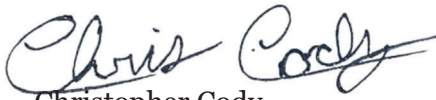
- Pg. 43/pg. 15 VA Report – The preferred alternative proposes new structural columns enclosed inside new matching wall surfaces, which would require removal and replacement of historic flooring materials on the 2nd floor. The Basis of Design Report (pg. 9) refers to the random width tongue-and-groove pine board floor throughout the 1st and 2nd floors as "original and significant." While structural upgrades are needed to make the 2nd floor publicly accessible and usable, this is a very intrusive alternative that will have an adverse effect on existing historic fabric. Section 110(f) requires that adverse effects like this be avoided to the "maximum extent possible."
- Budget (Pg. 49/pg. 21 VA Report) –There is a 10% "Profit" line item (\$905,270) in the Subtotal NET Construction Cost. Please provide an explanation of this line item, including which entity or entities will be the recipients of this "profit."
- Function Logic Diagram (Pg. 50/pg. 22 VA report) – The function logic diagram does not include communication/understanding of the history as a consideration for how the project strengthens the NPS mission. This appears to be a major omission in evaluating the purpose and effectiveness of the proposed project. However, the function logic diagram (Fig. 7, pg. 23) contains a number of items that relate to visitor access, and understanding of the site, its history, and significance. Please provide clarification regarding the relationship between these diagrams and NPS's approach to communication/understanding of history as a guiding consideration in this project.
- Phase III Creative Idea Listing (Pg. 53/pg. 25 VA report) – Some ideas (1, 5, 10, 13, 14) take into consideration alterations that would be more appropriate for the original landscape, building appearance, and uses of the historic property during the Period of Significance. How will the NPS determine whether and how these ideas are considered and incorporated into the proposed project? We urge greater incorporation of these recommendations to ensure preservation of the building's integrity and to minimize adverse effects.
- Structural Improvements (Pg.82/pg. 53-54 VA report) – Notes on floor plans and the key are not legible, making it difficult to fully understand the potential impact of the proposed structural changes on the existing floor plans and historic materials. More clear and detailed information on the proposed treatments and impacts should be provided to the Consulting Parties.
- Amending National Register Nominations (Pg. 11 VA report) –
 - The Basis of Design Report recommends amending the National Register and NHL nominations to include Criterion C, "because the work is a strong piece of vernacular architecture, drawing inspiration from summer and Chautauqua cottages and from purely functional prototypes like warehouses. By amending the nomination, the physical fabric of the structure will be preserved as well as the interpretive collection that is associated with the house's historical significance. Julian B. Hubbell was a partially trained engineer/architect who then changed fields to enter into medical

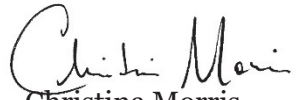
and humanitarian work. He designed the building in 1891 with Clara Barton's input. Barton herself remodeled it in 1897 while Hubbell was managing the Red Cross Park in Indiana.” We recommend that NPS adopt this recommendation and amend both nominations, which will bring greater understanding and appreciation to the physical structure, fabric, and design, which are integrally connected to Barton and Hubbell’s values and areas of expertise.

- The Basis of Design Report also recommends that the nomination should be amended to change the period of significance “to be stated clearly as 1891-1912” to reflect Barton’s use and residence in the house until her death. We encourage NPS to undertake this amendment to the nomination as well, to underscore the importance of Clara Barton’s life and work in association with the property.
- Defining the Appropriate Level of Use for the Building (Pg. 23, Ln. 45 of the “Park QA Review Matrix”) – This document contains a comment from “Karcher” that states, “Vol 1 page 21 - The suggestion that the building may be open 14 hours a day seems excessive. The NPS will be in the building approximately 9 hours a day. Does the partner want to be in the building up to 14 hours a day 7 days a week?” The response to this comment from Karcher is, “This is what the GEPPAC requested for building usage and hours of operation.” This exchange suggests that the Glen Echo Park Partnership for Arts and Culture intends to make intensive use of the property: 14 hours a day, 7 days a week. Such an intensive level of usage by the proposed private partner is likely not appropriate for this property and could result in an adverse effect. Please provide the Consulting Parties with a detailed description of the programmatic uses planned by Montgomery County and GEPPAC.
- The 100% Schematic Design Plans (Sheets A 1.0-A 1.2) – These plans indicate a large amount of generic “workshop/multipurpose/conference” space on the basement, first and second floors, which are located in areas that M+Sa define predominantly as spaces of “primary” and “secondary significance” on their Existing Condition floor plans. This would constitute an adverse effect on interior spaces and finishes related to the period of significance. In addition, there is no explanation of how these types of generic meeting spaces in these locations will further the purpose of this site, which is to interpret the history of the Red Cross and Clara Barton. We strongly recommend reducing the amount of space used for “workshop/multipurpose/conference” purposes in these significant areas and increasing the use of this space for interpretation.

We thank you for your consideration of our comments and look forward to working with you on this Section 106 consultation.

Sincerely,


Christopher Cody
Associate General Counsel


Christina Morris
Senior Field Director

cc: Chris Wilson and Chris Koepfel, ACHP
Stephanie Stephens, Federal Preservation Officer, NPS
Jeff Durbin, Deputy Federal Preservation Officer, NPS
Joy Beasley, Associate Director of Cultural Resources, Partnerships, and Science,
NPS
Kathryn G. Smith, National Historic Landmarks & National Register Coordinator,
National Capital Region, NPS
Matthew Virta, Cultural Resources Program Manager, GW Memorial Parkway, NPS
Elizabeth Hughes, Maryland SHPO
Lucienne Beard, Co-President, National Collaborative for Women's History Sites
Pamela Goddard, Mid-Atlantic Region Senior Program Director, National Parks
Conservation Association
Heather Huyck, Historian

Heather Huyck, Ph.D.
Mitchellville MD 20721
rangerhistorian@gmail.com
301.925.7255

Charles Cuvelier, Superintendent,
George Washington Memorial Parkway
Charles_Cuvelier@nps.gov

Dear Superintendent Charles Cuvelier,

Having given more thought to the situation at the Clara Barton NHS and NPS's plans for it I have several basic points.

1. We are ready, willing, and certainly able to help the park develop the Clara Barton NHS into an exemplary park that tells *the whole story*—a goal you recently noted for the Arlington House. While I cannot say much about Arlington House until I visit it-- and I thank you very much for your offer of facilitating a visit there-- I understand that the horrific history of slavery is now interpreted. Ironically, Robert E. Lee decided to leave his country and fight *against* it while than Clara Barton, a woman, fought *for* our country by caring for its soldiers before, during and after Civil War battles. By founding the American Red Cross, expanding the Red Cross' mission to include disaster relief, and by inventing First Aid, we all benefit from her hard work and her organization which daily affects our lives. The NPS desperately needs to increase its interpretation of half of all Americans – women—not to diminish it by shifting this park to other uses. In the past few decades, the scholarship and research on American women's lives has grown exponentially and is today a powerful and lively field which needs to inform this park and its future. Like Thomas Jefferson's Monticello, Clara Barton's American Red Cross headquarters/housing reflects her architectural autobiography in the way she designed it, re-constructed, and used it as a multipurpose building. It was *not* simply her misnamed "house."
2. The Clara Barton National Historic Site has three layers of protection—as a National Register property it is covered by Section 106 and this consultation; as a National Historic Landmark, it is covered by Section 110 which requires additional care. As a legislatively established national park unit it has the same level of legal protection as every other NPS park. It is a national park, with the same legal protections as the Grand Canyon or Yosemite or Women's Rights-- under the 1916 Organic Act 'no impairment', the 1935 Historic Sites Act, and the 1978 Redwoods Act "no derogation of values". That higher standard focuses on outcomes, not on the processes required by the National Historic Preservation Act for National Register properties. Pick any national park and imagine the proposal the NPS has put forth for the Clara Barton NHS. The precedent that would be set here could be damaging NPS wide. I have seen the NPS transfer the Lightship Chesapeake and the Claude Moore Colonial Farm: they lacked such protections. The status of Glen Echo Park is weaker because it lacks such specific authorizing legislation. There is no question about the national significance of the Clara Barton NHS—Congress recognized it in in 1974 when it made it a unit of the National Park system and reiterated that in 1989 when it

designated the Clara Barton Parkway. Its national significance and national audience/visitation need full implementation; it is not primarily the local destination that Glen Echo park is. Sadly, the NPS which for many years has not appreciated the Clara Barton NHS's significance and potential has inadequately supported it, is now using that lowered visitation for a reason to essentially transfer it to an inappropriate use and partner contrary to its nearly 50-year-old legislation. Further, while Clara Barton showed her respect for African Americans, Glen Echo park still echoes with its history of segregation.

3. The individuals and groups which have come together as part of the National Historic Preservation Act consulting process can develop a powerful and practical proposal that will fulfill the legislative intent, strengthen the NPS' interpretation of half the American population—for the education of ALL the American people. Doing that will require a collaborative approach, one that brings together the talents and expertise of both National Park Service and everyone else. It can be done but will need a genuine commitment from all parties. The Friends of Clara Barton should be re-established; it became defunct after the park was established. Such an organization could be a strong partner with the NPS and operate as a way to expand the much-needed interpretation of American women's history and to preserve this example of their accomplishments.
4. NO park with significant historical resources should have such planning, major projects, or management without empowered and highly knowledgeable historical research and personnel. Senior historians with relevant graduate education and degrees are necessary for such projects given the required expertise in subject matter and methodology. Professional history cannot be properly accomplished without such input—the NPS is expected to demonstrate such quality. As stated at the November 2022 meeting, no one would plan for Cape Cod NS without biologists or the Grand Canyon NP without geologists. Why would the NPS undertake such planning without full-fledged historians??? Cultural resource disciplines inform each other but are not interchangeable. Historians should not claim to function as archeologists, historic architects, or historic landscape architects any more than the other way around, just as going to FLETC for a “Law Enforcement for Managers” course does not make one a law enforcement ranger.

In conversation with you, you questioned the significance of Miss Barton, explaining that she was not on the Virginia Standards of Learning. While I question that as the measure of significance given its Congressional legislation (and that it's in Maryland) the revised Commonwealth of Virginia standards and now includes Clara Barton as part of the American Civil War (see [History and Social Science Standards of Learning- DRAFT- JANUARY 2023 \(virginia.gov\)](#)). More relevant, the Library of Congress has a new online exhibit “Join In: New Library of Congress Exhibition Features History of Voluntary Associations in America” that features the American Red Cross—I recommend it-- [Home | Library of Congress \(loc.gov\)](#). Its introduction states, “This history of voluntary associations reveals the aspirations of Americans as “a nation of joiners” The exhibition includes 114 artifacts, representing 45 different organizations, ranging from associations created by early American colonists to the **American Red Cross** [emphasis added], Salvation Army, NAACP,

Girl Scouts....” Clearly the Library of Congress recognizes Miss Barton’s work and legacy. The NPS must recognize her at this historic site as well.

As someone who first worked for the NPS in 1971 as a “Junior Historian” before becoming a Chief of Resource Management, Cultural Resource interpreter, and head of NPS Strategic Planning, who has studied the history of the organization and its people, and who as a public historian has expertise in the histories (plural) of American women, I have long argued that we ALL need to know and appreciate this history. As author of *Doing Women’s History in Public: A Handbook for Interpretation at Museums and Historic Sites*, based on my years of work with and for the NPS, I have developed a methodology for ensuring quality research, interpretation, and preservation for historic sites. I know it can be done—and here it needs to be done.

I know that these Consulting Parties are ready to offer assistance and expertise to help make this more positive approach become a reality. We can make this happen.

Finally, I have read and endorse the comments made by the National Trust for Historic Preservation, the National Collaborative for Women’s History Sites, and the National Parks Conservation Association. I find Kathryn Smith’s analysis especially compelling and hope that the George Washington Memorial Parkway will be open to our efforts to work with the NPS and ensure genuine success at the Clara Barton NHS. Instead of an inappropriate partnership and derogation of values and physical damage to a historic site, let’s work together to make this work.

Sincerely,

/s/ Heather Huyck

Heather Huyck, PhD
Public/American Women’s History



January 9, 2022

Mr. Charles Cuvelier
Superintendent
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Re: Clara Barton National Historic Site Section 106 Consultation

Dear Superintendent Cuvelier:

As Executive Director of the Maryland Women's Heritage Center, I want to encourage you to work with us to ensure that the Clara Barton NHS project can fulfill the very purpose that Congress established for it almost fifty years ago. As one of only two NPS women's history sites in the state of Maryland, it is very special to us and to this nation as well. Located in Montgomery County, Maryland, this park reflects the determination of the women of our state to improve the lives of Americans everywhere. Clara Barton, through her efforts to create the American Red Cross—and getting a Congressional Charter for it which was a momentous accomplishment itself. Barton's work created the historic relationship between the U.S. and the American Red Cross that needs to be recognized as a Great American. Her work has had a major effect on this country and continues to do so.

Clara Barton had the bicentennial of her birth in 2021. We need to give her proper due by ensuring that the American Red Cross headquarters and housing that she built and worked and lived in is preserved for another century. It is so important that Americans learn our long national tradition of "voluntary associations" often founded by women which have been crucial in having this country function as we have. We need to ensure that historians who know this history well participate in all your planning and that historic architects who appreciate this vernacular style give it great care.

We, at the Maryland Women's Heritage Center, embrace the rich diversity upon which our country was built. We seek out, listen, and preserve everyone's story. That means that the NPS needs to reconsider its earlier planning and develop a women's-history driven plan that respects Clara Barton and the people she worked with to cope with disasters and "calamities" of all kinds. On many current issues, her legacy will become even more important. We signed on to several technical letters of additional comments and concerns. Being an organization in Maryland

engaged with our federal legislators, we have a responsibility to our mission of “adding HERstory to history to tell OUR story”.

We want to work with the NPS to ensure that this historic park is a great place to educate all Americans about this tradition and about women’s accomplishments. We also want to recognize men present such as Stephen Barton and Julian Hubbell—under the current plan their spaces would be displaced by workrooms etc. Please help us tell the whole story. We want to attract national attention to this national park located in Maryland!

If I can provide any further information and women’s history expertise, please contact me at mwhcdiana@gmail.com or 443-996-1788. Thank you for your attention in this important matter and we appreciate the opportunity to support the NPS efforts.

Thank you. We look forward to working with you.

Sincerely,

Diana M. Bailey

Diana M. Bailey
Executive Director

January 9, 2023

Dear Superintendent Charles Cuvelier:



I write on behalf of the Executive Council of the Society of Civil War Historians, and thank you for including us as consulting parties in the Section 106 compliance process for the proposed rehabilitation of the Clara Barton National Historic Site. Between us, we represent decades of study of the Civil War era broadly defined as well as considerable experience working with and for the National Park Service, some of us as former employees and many of us in advisory capacities of numerous types. Based on our understanding of the proposed undertaking and materials provided to date, we believe that the proposed undertaking has the potential to result in adverse effects by diminishing the property's integrity of feel, by changing the character of the property's use (36 CFR 800.5 (a)(2)(iv)), and/or through the introduction of visual, atmospheric, or audible elements (36 CFR 800.5 (a)(2)(v)). We also believe that future adverse effects are reasonably foreseeable should the park transfer significant control of the property through lease or any other agreement without adequate and legally enforceable restrictions or conditions that ensure its long-term preservation (36 CFR 800.5(a)(2)(vii)). Each of these adverse effects can be avoided through proper planning and subsequent implementation. We appreciate the demands and constraints the NPS faces and we seek to be of assistance.

Based on the November 16 meeting and the materials provided since, we understand that this is a Legacy Restoration Fund project to complete a comprehensive rehabilitation of the property. Based on the "Rehabilitate Clara Barton National Historic Site CLBA 312325 100% Draft Schematic Design" document, we also understand that you intend to enter into an agreement with a third-party organization that would alter the future use of a substantial proportion of the property and transfer future maintenance responsibilities away from the NPS.

The next step in the 106 process is to define the Area of Potential Effect (APE), identify historic properties within it, and determine if the proposed undertaking is likely to have an adverse effect on the characteristics that make the property significant. As outlined in 36 CFR 800.4(a), the historic property identification stage should rely on existing documents and consultation with groups possessing relevant expertise. The existing documents relevant to this project include Clara Barton House National Survey of Historic



Sites and Buildings (1964), The Clara Barton House National Register of Historic Places Inventory - Nomination Form (1979), and the Clara Barton National Historic Site Historic Structures Report (2004). The decades-old nomination forms are deficient in accurately identifying all of the criteria under which the Clara Barton National Historic Site is National Register eligible. Before moving to the next step of the consultation process, the park should reevaluate the Clara Barton National Historic Site for additional National Register eligibility (36 CFR 800.4(c)(1)).

The Society of Civil War Historians is an especially relevant body to help at this critical stage because the humanitarian work that Barton undertook and institutionalized in the American Red Cross had its roots in the Civil War. Barton's battlefield aid, work with freedpeople in Sea Island contraband camps, and efforts to locate the remains of missing soldiers all alerted her to the need for humanitarian relief efforts so conspicuously absent from the Civil War, and the upheaval of war created opportunities for her to do something about those realizations. She chose to remain in the national capital region after the war expressly to act on those realizations. When given the opportunity to locate the American Red Cross warehouse and then headquarters in Glen Echo, Barton ensured that the structure and design reflected the experiences and knowledge she had accumulated through her humanitarian relief efforts that began with the Civil War. Therefore, Clara Barton National Historic Site represents a legacy of the war that is not evident at battlefield parks or in Civil War monuments. It is one uniquely and specifically tied to the building, which so eloquently demonstrates how much place matters in the preservation of historic places.

Any proposed alteration that minimizes or reduces the building's integrity and thus its ability to reflect that legacy is an adverse effect, as outlined in 36 CFR 800.5.

The 2004 *Historic Structures Report* (HSR) and the "Architectural Program" outlined in the "Basis of Design Report" in the "Rehabilitate Clara Barton National Historic Site CLBA 312325 100% Draft Schematic Design" (Mills + Schnoering Architects LLC, Princeton NJ for the National Park Service, Denver Service Center, October 28, 2022), demonstrate that the proposed undertaking would result in adverse effects through changes of use of spaces that the *National Park Service itself* has identified as significant in Volumes I and II of the *HSR*. Specific areas of concern include: the proposed use changes for rooms B4, B5, 111, 112, 209, and 211, which the *HSR* identifies as being of primary significance; proposed excavation of rooms B4 and B5; and proposed use changes for rooms 103, 108, 109, 116, 117, and 204, which the *HSR* identifies as being of secondary significance. There is also need

for clarity regarding the significance level of rooms 201, 203, 203A, identified as “Significant” in the *HSR*.

We believe that adverse effects can be avoided through proper consultation and planning. We very much look forward to a productive, ongoing relationship between the Society of Civil War Historians and the Clara Barton National Historic Site as we continue through this consultation process to ensure a successful rehabilitation with no adverse effects.

Sincerely,

A handwritten signature in cursive script that reads "Lesley J. Gordon".

Lesley J. Gordon, Ph.D.

Charles G. Summersell Chair of Southern History

President, Society of Civil War Historians



December 6, 2022

Charles Cuvelier, Superintendent
George Washington Memorial Parkway
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

**RE: CLARA BARTON NATIONAL HISTORIC SITE REHABILITATION PROJECT-
COMMENTS BY CONSULTING PARTY AS REQUESTED BY DECEMBER 9, 2022.**

Dear Superintendent Cuvelier:

Thank you for giving me the opportunity to serve as a Consulting Party representing the Bordentown Historical Society in Bordentown, NJ. I appreciated having had the opportunity to view the site, not having ever visited it previously and participating in the November 16th Section 106 consultation meeting. The 8 day extension for this comment period was helpful although, as you may know, many of the Consulting Parties are still requesting additional time (to 1/27/23) for comment given the volume of materials to be reviewed and additional parties who would like to have input.

It is my understanding that in 1974, when the Clara Barton Historic Site was established by Congress, it was recognized as an important site to focus on the life and accomplishments of Clara Barton, American Red Cross history, and American Women's History. This site is particularly noteworthy in that it was the first National Park site dedicated to a woman and because, 48 years later, there are fewer than a dozen of our 425 National Parks dedicated to women. All the more reason why the NPS has a huge responsibility to appropriately honor this American Icon by recognizing the significance of her life and legacy and the history and lasting impact of the American Red Cross.

I believe that the NPS proposal to "set aside" a minimal amount of space to "tell the history and significance of the CLBAHS" is inappropriate and would result in adverse effects. It would serve to minimize the importance of both Clara Barton and the American Red Cross and it would not permit the telling of related women's history. The fact is, telling Clara Barton's story alone could fill the entire 10,000 square feet of this structure: her childhood, her teaching experiences, her experience as the first female clerk at the US patent office, her initial involvement with soldiers in Washington, DC that led to her extensive Civil War efforts

and nursing, which earned her the nickname of “Angel of the Battlefield”, her years of locating missing soldiers at the Office of Missing Soldier’s, her role in establishing the Andersonville Cemetery, her lecturing about the Civil War, her experiences in Europe with the International Committee of the Red Cross and assistance during the Franco-Prussian War, her physical and mental health challenges, her role in the ratification of the Geneva Convention by the US, her founding and serving as President of the American Red Cross for 23 years, and her founding of the National First Aid Society. Clara Barton’s story also helps tell the story of that era of American women’s history. She supported the suffrage movement, she believed in equal rights for all, regardless of race, gender or economic station and she believed that women should be paid the same as men for the same work. She was a unrelenting humanitarian, the mother of volunteerism and an animal lover!

With all due respect, in my view it simply not possible for the story of Clara Barton, let alone the history of the American Red Cross and its historic disaster relief efforts, to be told in the limited space proposed by the NPS. Chris Cody, Esq., at the November 16th meeting, expressed concerns about the limited space envisioned and he indicated that only 1,910 square feet or only 23 percent of the entire structure would be available for interpretation with the balance of the structure being set aside for the “partner”. The entire life of Clara Barton, the detailed and important American Red Cross history and women’s history would all necessarily be minimized if given insufficient space for proper interpretation—in other words, I am concerned that such limited use of space is a substantial adverse effect that would diminish the historical mission of this site.

With regard to the NPS’s desire to have a partner, one that may be able to assist financially, perhaps the Consulting Parties can assist the NPS in finding a suitable partner with a focus on programming that would be consistent with the site’s core mission.

As I indicated in my initial request to become a Consulting Party, I am currently the Co-President of the Bordentown Historical Society (BHS). The BHS owns the historic Clara Barton Schoolhouse. Clara Barton taught in this Schoolhouse in 1852, establishing the first public school in the State of New Jersey. It is a very important and popular women’s history site and is a designated site on the New Jersey “Women’s History Trail.” I have personally portrayed Clara Barton (in Victorian garb!) for the past four years, I give tours of our Schoolhouse throughout the year to children, students and adults and I accept numerous speaking engagements where I expound upon the many amazing accomplishments of Clara Barton and the history of the American Red Cross - I never have enough time to get through them all!

Given my knowledge, my commitment to Clara Barton’s history and my experience hosting visitors at our historic Clara Barton Schoolhouse, I would welcome the opportunity to assist the NPS and the other knowledgeable Consulting Parties in ensuring that Clara Barton’s legacy would be appropriately honored at this site and that the American Red Cross history and women’s history would not be limited.

With regard to the building's many structural issues that were detailed by Architect Michael Mills and in the materials that were shared, it is clear that there is significant structural restoration required. Since this is a historic property, the characteristics that make the property significant must be retained.

As you know, many of the Consulting Parties have expertise that could assist the NPS in analyzing all possible alternatives. I stand with all of them who are dedicated to helping you make the best possible decisions for this special and important property.

Many thanks for your consideration of my concerns.

Very truly yours,

Bonnie Goldman, Esq, PJMC (ret.)

Cc: Charles Cuvelier: charles_cuvelier@nps.gov

Cc Matthew Virta: matthew_virta@nps.gov

Attachments



Historic Clara Barton Schoolhouse



Maryland
DEPARTMENT OF PLANNING
MARYLAND HISTORICAL TRUST

January 12, 2022

Charles Cuvelier, Superintendent
George Washington Memorial Parkway
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Sent via email to: GWMP_Superintendent@nps.gov & megan_bailey@nps.gov

Re: Clara Barton House/National Historic Site (NHS) Rehabilitation – Continued Consultation
Glen Echo, Montgomery County, Maryland

Dear Superintendent Cuvelier:

Thank you for providing the Maryland Historical Trust (MHT) and the other consulting parties with additional time to review materials presented at and provided following the consulting parties meeting held on November 16, 2022. We appreciate the opportunity to participate in ongoing consultation with NPS and others regarding this important undertaking, pursuant to Section 106 of the National Historic Preservation Act (NHPA).

The Clara Barton House was designated a National Historic Landmark (NHL) in 1965 for its association with humanitarian and founder of the American Red Cross, Clara Barton, and as the first headquarters of this organization. It is the first and one of only ten NPS sites that were established to interpret women's history. We fully support the rehabilitation of the Clara Barton House/National Historic Site by the NPS so it can be reopened and interpreted to the public. We acknowledge the concerted efforts NPS is taking to engage interested parties and the public in planning for this undertaking. The level of involvement from these parties clearly demonstrates there is a strong interest in this historic property and its proposed treatment. We offer the following general comments on the Value Analysis Report and draft Schematic (30%) Design, received on November 18, 2022, and await further consultation to resolve the questions and concerns of the consulting parties.

The proposed undertaking involves rehabilitation of the Clara Barton House NHS in order to reopen the property to the public as an interpretive and programming site, including staff offices, site storage, and meeting space. NPS intends to share the building with a private partner following its rehabilitation. As such, the undertaking as currently designed also includes providing office, programming, event and storage space to the partner organization. As detailed in the Value Analysis Report, multiple restoration and rehabilitation alternatives were evaluated by the design and project team, all adhering to current ADA and building codes thereby allowing public access and desired

partnership use. As detailed in the Schematic (30%) Design, the chosen alternative would involve the following elements: structural stabilization of the house (framing and foundation), restoration of the original façade, rehabilitation of the interior with restoration of the third floor, and construction of a new three story addition to provide ADA access to the basement, first and second floors, and to house ADA accessible bathrooms. The landscape surrounding the house would be rehabilitated with new ADA parking provided at the NPS parking lot entrance. A majority of the basement and second floor and roughly one third of the first floor would be used by the partner following rehabilitation. Proposed basement improvements would include a pantry/kitchen, required by building codes to hold events with refreshments in the building.

MHT's comments on the Value Analysis Report and the Schematic (30%) Design are general and conceptual at this time. Our primary concern involves ensuring that the proposed rehabilitation and reuse of this NHL provides the appropriate treatment and stewardship of this significant resource. We question why NPS and its project team did not consider and evaluate alternatives that did not involve partner use of the building. With the exception of providing financial support for long term maintenance and to justify the cost of the undertaking, it is difficult to understand how the planned partnership will benefit the rehabilitation and future preservation of the Clara Barton House. We are concerned that the partner's desired uses of the Clara Barton House have directed the design alternatives considered for this undertaking in a manner that will be difficult to meet the Secretary of the Interior's Standards for the Treatment of Historic Properties. We agree with the NPS NHL office, the National Trust for Historic Preservation, and other consulting parties that the proposed partnership program, as currently defined, may be incompatible with preserving this NHL property.

The current partner Glen Echo Park Partnership for the Arts and Culture (GEPPAC) operates the adjoining NPS property Glen Echo Park through an agreement with Montgomery County, who in turn has a cooperative agreement with NPS to operate and maintain the park. MHT is concerned that the current agreement may not include adequate provisions to protect the NHL property,. As an early 20th century amusement park, Glen Echo Park is a very different type of historic property in its resources, their construction type and ages, and possible uses of the property. If any partner is to share use of the Clara Barton House following its rehabilitation, a new agreement with that organization detailing the responsibilities and roles of each party will be essential to assure long-term preservation of this highly significant NHL property and meet NPS responsibilities under Sections 106 and 110 of NHPA. Given that this undertaking involves a substantial rehabilitation and a lease/use/cooperative agreement with an external user of the historic property, a Programmatic Agreement may be needed for this undertaking.

It is MHT's opinion that the undertaking as currently designed with chosen partner uses has not incorporated sufficient consideration of alternatives that minimize harm to the greatest extent possible to the Clara Barton House, as required under Section 110 of the National Historic Preservation Act. Other consulting parties have also expressed this opinion and provided specific comments on elements of the Schematic (30%) Design that are needed for the partner use and which may cause adverse effects to this NHL property. We urge NPS to fully develop and consider a wide range of rehabilitation alternatives for this undertaking, including options that do not involve or minimize

Charles Cuvelier, Superintendent
Clara Barton House/NHS Restoration, Continued Consultation
January 12, 2023
Page 3 of 3

partner use, including defining the types of allowed activities and number of rooms dedicated to partner use following rehabilitation.

We appreciate NPS's desire to reopen the Clara Barton House and the efforts taken by NPS to date in evaluating restoration and rehabilitation alternatives to accomplish that goal. We look forward to working with the NPS and other involved parties during project planning for the rehabilitation and reopening of the Clara Barton House/NHS to ensure the appropriate treatment of this important property and successful completion of the Section 106 consultation. If you have questions or need further assistance, please contact me at becky.roman@maryland.gov. Thank you for this opportunity to comment.

Sincerely,



Becky Roman
Preservation Officer, Project Review and Compliance

ELR/BC/202204766

Cc: Maureen Joseph (NPS GWMP/CLBA / maureen_joseph@nps.gov)
Allison Young (NPS NCR / allison_young@nps.gov)
Kathryn G. Smith (NPS NHL / kathryn_smith@nps.gov)
Rebecca Ballo (Montgomery County / rebeccah.ballo@montgmoeryplanning.org)
David Dise (Montgomery County / david.dise@montgomerycountymd.org)
Dia Costello (Mayor, Town of Glen Echo / mayorcostello@glenecho.org)
Christopher Cody (National Trust for Historic Preservation / ccody@savingplaces.org)
Christina Morris (National Trust for Historic Preservation / cmoris@savingplaces.org)
Christopher Wilson (Advisory Council on Historic Preservation / cwilson@achp.gov)
Pamela Goddard (National Parks and Conservation Association / pgoddard@npca.org)
Nichols Redding (Preservation Maryland / nredding@presmd.org)
Diana Bailey (Maryland Women's Heritage Center / mwhcdiana@gmail.com)
Judith Wellman (National Collaborative of Women's History Sites / historicalnewyork@me.com)
Heather Huyck (for the Group of Concerned Historians / huyckclapper@earthlink.net)



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

GWMP 1.A.2 CLBA Rehab

February 9, 2023

Re: Clara Barton National Historic Site Section 106 Consultation

Dear Consulting and Interested Parties:

As you are aware, the National Park Service (NPS) requested comments regarding the Schematic Design Plans for the proposed rehabilitation of the Clara Barton National Historic Site by January 9, 2023. We want to acknowledge and convey our appreciation of the time and attention you have given to this important project as part of the Section 106 process. We received many comments and are in the process of reviewing those comments in addition to what we heard during the two consulting parties' meetings in 2022. The NPS remains committed to this project and the preservation of this National Historic Landmark to ensure that the important stories of Clara Barton's work and life are shared for many generations to come.

Based upon our internal review process and the feedback that we received from our consulting parties, the NPS will reconsider the current project program and develop alternatives for the use and rehabilitation of the site. Over the next few months, the NPS will update the schematic design plans in a sincere effort to address your comments. As part of this process we will also be engaging the consulting parties.

In the meantime, if you have any additional questions, please contact me at gwmp_superintendent@nps.gov and cc: Ms. Megan Bailey, Acting Cultural Resource Program Manager at megan_bailey@nps.gov and Mr. Elias "Sonny" Lozano, Historian at elias_lozano@nps.gov.

Thank you for your continued involvement and interest in this nationally significant property.

Sincerely,

Charles Cuvelier
Superintendent

[EXTERNAL] RE: CLBA Consulting Parties Letter – VA and Schematic Design Comment Update

From Christina Morris <CMorris@savingplaces.org>

Date Fri 2/17/2023 3:06 PM

To GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>

Cc Christopher Cody <ccody@savingplaces.org>; Pamela Goddard <pgoddard@npca.org>; Kirsten B. Kulis <kkulis@achp.gov>; becky.roman <becky.roman@maryland.gov>; luciennebeard <luciennebeard@gmail.com>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; Robert Nieweg <RNieweg@savingplaces.org>; Pam Bowman <PBowman@savingplaces.org>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Superintendent Cuvelier – Thank you for your email and letter on February 9. The National Trust appreciates your thoughtful consideration of the significant input provided by our organizations, and the many other agencies and consulting parties who also care deeply about the Clara Barton National Historic Site and its history. We are pleased to hear that National Park Service is reconsidering the project with the intention of focusing on Clara Barton, her achievements, and her national and international impact.

We look forward to hearing more about the plans and timing for this important project, and working closely with you and your team as alternatives are considered and interpretative strategies are developed. Please don't hesitate to reach out if there are ways we can assist you with next steps.

Sincerely,
Chris Morris

Chris Morris (she/her)

SENIOR FIELD DIRECTOR | PRESERVATION SERVICES AND OUTREACH

Los Angeles, CA

E cmorris@savingplaces.org

M 213.705.7122

NATIONAL TRUST FOR HISTORIC PRESERVATION

600 14th Street NW Suite 500 Washington, DC 20005

[SavingPlaces.org](https://www.savingplaces.org)

From: Morales, Brendaliz <brendaliz_morales@nps.gov> **On Behalf Of** GWMP Superintendent, NPS

Sent: Thursday, February 9, 2023 9:28 AM

To: Smith, Kathryn G <Kathryn_Smith@nps.gov>; becky.roman <becky.roman@maryland.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <CMorris@savingplaces.org>; Christopher Cody <CCody@savingplaces.org>; cspeck <cspeck@delawarenation-nsn.gov>; Kirsten B. Kulis <kkulis@achp.gov>; cwilson@achp.gov; luciennebeard <luciennebeard@gmail.com>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; Luthye, Curtis <curtis.luthye@redcross.org>; bgoldman1 <bgoldman1@comcast.net>; Diana Bailey <mwhcdiana@gmail.com>; NRedding <NRedding@presmd.org>; Maria Mougridis <MMougridis@presmd.org>; ljgordon1 <ljgordon1@ua.edu>; TIM LOWRY <timlowry@bellsouth.net>; huyckclapper <huyckclapper@earthlink.net>; Julia Irwin <juliai@usf.edu>; jacob.remes <jacob.remes@nyu.edu>; Chandra M Manning <cmm97@georgetown.edu>; Kathryn Sklar <kksklar@binghamton.edu>; Judith Wellman <historicalnewyork@me.com>; cgood <cgood@marymount.edu>; Young, Pearl Joy <youngp@uhcl.edu>; Ross, Tara <rosst@sunyocc.edu>; Rosie Click <vrc10@georgetown.edu>

Cc: Bailey, Megan M <megan_bailey@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Stidham, Tammy <Tammy_Stidham@nps.gov>; Gossett, Tanya <Tanya_Gossett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; david.dise <david.dise@montgomerycountymd.gov>; Martha Morris <morrism@gwu.edu>; Porter, Beth <Beth_Porter@nps.gov>; shannon_frede@cardin.senate.gov; katie_corr@cardin.senate.gov; shelby_prettiman@vanhollen.senate.gov; lucy.shaw@mail.house.gov; Hall, Susan G <susan_hall@nps.gov>; Young, Allison M <Allison_Young@nps.gov>

Subject: CLBA Consulting Parties Letter – VA and Schematic Design Comment Update

February 9, 2023

Re: Clara Barton National Historic Site Section 106 Consultation

Dear Consulting and Interested Parties:

As you are aware, the National Park Service (NPS) requested comments regarding the Schematic Design Plans for the proposed rehabilitation of the Clara Barton National Historic Site by January 9, 2023. We want to acknowledge and convey our appreciation of the time and attention you have given to this important project as part of the Section 106 process. We received many comments and are in the process of reviewing those comments in addition to what we heard during the two consulting parties' meetings in 2022. The NPS remains committed to this project and the preservation of this National Historic Landmark to ensure that the important stories of Clara Barton's work and life are shared for many generations to come.

Based upon our internal review process and the feedback that we received from our consulting parties, the NPS will reconsider the current project program and develop alternatives for the use and rehabilitation of the site. Over the next few months, the NPS will update the schematic design plans in a sincere effort to address your comments. As part of this process, we will also be engaging the consulting parties.

In the meantime, if you have any additional questions, please contact me at gwmp_superintendent@nps.gov and cc: Ms. Megan Bailey, Acting Cultural Resource Program Manager at megan_bailey@nps.gov and Mr. Elias "Sonny" Lozano, Historian at elias_lozano@nps.gov.

Thank you for your continued involvement and interest in this nationally significant property.

Sincerely,

Charles Cuvelier
Superintendent
George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

July 24, 2023

Mr. Hamid Omidvar
Chief of DGS Division of Building Design and Construction
Montgomery County
101 Monroe Street, EOB 9th Floor,
Rockville, MD 20850
Sent by email to Hamid.Omidvar@montgomerycountymd.gov

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Continuation of National Historic Preservation Act of 1966 Section 106 Compliance

Dear Mr. Omidvar,

The George Washington Memorial Parkway (GWMP) of the National Park Service (NPS) is continuing the Section 106 process for the proposed subject undertaking to rehabilitate the Clara Barton National Historic Site (CLBA NHS), a National Historic Landmark (NHL) administered by GWMP.

The CLBA NHS is a historic property noted for its association with Clara Barton and the American Red Cross which she founded. The site served variously as a supply warehouse, administrative office / Red Cross Headquarters, and Ms. Barton's residence between 1891 and 1912 when she passed away. Currently closed to the public, the NPS-GWMP previously operated the building as a historic house museum.

The NPS-GWMP is developing a rehabilitation project which will make preservation maintenance repairs, improvements to building systems for health and safety codes, and structural upgrades to accommodate visitor use and accessibility. The project will be designed to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties for Rehabilitation. It will be planned to minimize harm to the site's special NHL status as per NHPA Section 110(f). Should Adverse Effects be determined, the Advisory Council on Historic Preservation and the Secretary of Interior (through the NHL program) will be invited to comment.

With this letter, the NPS-GWMP is submitting for your review our proposed Schematic Design Alternatives for the Clara Barton NHS Rehabilitation, which you can access and download from our public project page linked [here](#). The materials for review include:

- Schematic Design Alternatives Drawings
- Schematic Design Alternatives Report

Please review these documents and provide any comments within 30 days of receipt of this letter.

A consulting parties meeting (#4) has been scheduled during the 30-day review period to present these design alternatives and respond to any questions or comments you may have. You are invited to attend this meeting on **Monday, July 31, 2023** at 3:00pm at the George Washington Memorial Parkway Headquarters at 700 George Washington Memorial Parkway, McLean, VA 22101. A virtual link through

the Microsoft Teams platform has been provided via email for those that cannot attend in person. Your feedback is important to informing a Value Analysis that is scheduled for mid-September to weigh the revised proposed alterations with historic preservation.

With regard to NHPA Section 106, please see the attached proposed Area of Potential Effect (APE)-one for the cultural landscape of the house, immediate grounds, and viewsheds, and one for the limits of proposed ground disturbance defined for the purpose of evaluating project impacts on archeological resources.

If you have any questions or comments regarding this project, please contact me at gwmp_superintendent@nps.gov and cc Megan Bailey (megan_bailey@nps.gov) and Elias "Sonny" Lozano (elias_lozano@nps.gov).

Sincerely,



Charles Cuvelier
Superintendent

Cc:

Beth Cole, MHT
Becky Roman, MHT
Kathryn Smith, NPS-NHL-NCR
Megan Baily, NPS-GWMP
Maureen Joseph, NPS-GWMP
Susan Hall, NPS-GWMP
Elias Lozano, NPS-GWMP

Attachments:

APE Map
Limits of Proposed Ground Disturbance Map (Archeology)



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

July 24, 2023

Ms. Katey Boerner, Executive Director
GEPPAC – Glen Echo Park Partnership
For Arts and Culture
7300 MacArthur Boulevard
Glen Echo MD, 20812

Sent by email to kboerner@glenechopark.org, erogers@glenechopark.org

Attention: Ms. Emily Rogers

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Continuation of National Historic Preservation Act of 1966 Section 106 Compliance

Dear Ms. Boerner,

The George Washington Memorial Parkway (GWMP) of the National Park Service (NPS) is continuing the Section 106 process for the proposed subject undertaking to rehabilitate the Clara Barton National Historic Site (CLBA NHS), a National Historic Landmark (NHL) administered by GWMP.

The CLBA NHS is a historic property noted for its association with Clara Barton and the American Red Cross which she founded. The site served variously as a supply warehouse, administrative office / Red Cross Headquarters, and Ms. Barton's residence between 1891 and 1912 when she passed away. Currently closed to the public, the NPS-GWMP previously operated the building as a historic house museum.

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With this letter, the NPS-GWMP is submitting for your review our proposed Schematic Design Alternatives for the Clara Barton NHS Rehabilitation, which you can access and download from our public project page linked [here](#). The materials for review include:

- Schematic Design Alternatives Drawings
- Schematic Design Alternatives Report

Please review these documents and provide any comments within 30 days of receipt of this letter.

A consulting parties meeting (#4) has been scheduled during the 30-day review period to present these design alternatives and respond to any questions or comments you may have. You are invited to attend this meeting on **Monday, July 31, 2023** at 3:00pm at the George Washington Memorial Parkway

Headquarters at 700 George Washington Memorial Parkway, McLean, VA 22101. A virtual link through the Microsoft Teams platform has been provided via email for those that cannot attend in person. Your feedback is important to informing a Value Analysis that is scheduled for mid-September to weigh the revised proposed alterations with historic preservation.

With regard to NHPA Section 106, please see the attached proposed Area of Potential Effect (APE)-one for the cultural landscape of the house, immediate grounds, and viewsheds, and one for the limits of proposed ground disturbance defined for the purpose of evaluating project impacts on archeological resources.

If you have any questions or comments regarding this project, please contact me at gwmp_superintendent@nps.gov and cc Megan Bailey (megan_bailey@nps.gov) and Elias “Sonny” Lozano (elias_lozano@nps.gov).

Sincerely,



Charles Cuvelier
Superintendent

Cc:

Beth Cole, MHT
Becky Roman, MHT
Kathryn Smith, NPS-NHL-NCR
Megan Baily, NPS-GWMP
Maureen Joseph, NPS-GWMP
Susan Hall, NPS-GWMP
Elias Lozano, NPS-GWMP

Attachments:

APE Map
Limits of Proposed Ground Disturbance Map (Archeology)



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

July 24, 2023

Bonnie Goldman, Esq., Co-President
Bordentown Historical Society
302 Farnsworth Avenue,
Bordentown, NJ 08505
Sent by email to bgoldman1@comcast.net

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Continuation of National Historic Preservation Act of 1966 Section 106 Compliance

Dear Ms. Goldman,

The George Washington Memorial Parkway (GWMP) of the National Park Service (NPS) is continuing the Section 106 process for the proposed subject undertaking to rehabilitate the Clara Barton National Historic Site (CLBA NHS), a National Historic Landmark (NHL) administered by GWMP.

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Sincerely,



Charles Cuvelier
Superintendent

Cc:

Beth Cole, MHT

Becky Roman, MHT

Kathryn Smith, NPS-NHL-NCR

Megan Baily, NPS-GWMP

Maureen Joseph, NPS-GWMP

Susan Hall, NPS-GWMP

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United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

July 24, 2023

Ms. Kristen Kulis
Mr. Christopher Wilson
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, D.C. 20001-2637
Sent by email to kkulis@achp.gov, cwilson@achp.gov

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Continuation of National Historic Preservation Act of 1966 Section 106 Compliance

Dear Ms. Kulis and Mr. Wilson,

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Charles Cuvelier
Superintendent

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Megan Baily, NPS-GWMP
Maureen Joseph, NPS-GWMP
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Elias Lozano, NPS-GWMP

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Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation

From Morales, Brendaliz <brendaliz_morales@nps.gov>

on behalf of

GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>

Date Wed 7/26/2023 11:26 AM

To Maria Mougridis <MMougridis@presmd.org>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; Rosie Click <vrc10@georgetown.edu>; Ross, Tara <rosst@sunyocc.edu>; Young, Pearl Joy <youngp@uhcl.edu>; cgood <cgood@marymount.edu>; Judith Wellman <historicalnewyork@me.com>; Kathryn Sklar <kksklar@binghamton.edu>; Chandra M Manning <cmm97@georgetown.edu>; jacob.remes <Jacob.remes@nyu.edu>; Julia Irwin <juliai@usf.edu>; huyckclapper <huyckclapper@earthlink.net>; timlowry <timlowry@bellsouth.net>; ljgordon1 <ljgordon1@ua.edu>; nredding@presmd.org <nredding@presmd.org>; mwhcdiana <mwhcdiana@gmail.com>; bgoldman1 <bgoldman1@comcast.net>; Luthye, Curtis <curtis.luthye@redcross.org>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; luciennebeard <luciennebeard@gmail.com>

Cc Stidham, Tammy <Tammy_Stidham@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Mocko, Robert <Robert_Mocko@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>

 2 attachments (3 MB)

Ground Disturbance Map (Archeology) 7.6.23.pdf; CLBA_Landscape APE 5July2023 11x17 100sc.pdf;

Dear Consulting Parties,

The George Washington Memorial Parkway (GWMP) of the National Park Service (NPS) is continuing the Section 106 process for the proposed subject undertaking to rehabilitate the Clara Barton National Historic Site (CLBA NHS), a National Historic Landmark (NHL) administered by GWMP.

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Sincerely,

Superintendent
George Washington Memorial Parkway



GEORGETOWN UNIVERSITY
Georgetown College
Department of History

August 23, 2023

Mr. Charles Cuvelier
Superintendent
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

**Re: Section 106 Consultation - Rehabilitate Clara Barton National Historic Site (CBLA 312325),
Schematic Design Alternatives**

Dear Superintendent Cuvelier:

On behalf of myself as an individual Professor of History specializing in the era of Clara Barton's life and on behalf of the Society of Civil War Historians Executive Council, I write to thank you for the opportunity to participate as a consulting party under Section 106 of the National Historic Preservation Act in the review process for the rehabilitation of the Clara Barton National Historic Site. I also thank you and all parties involved in the undertaking for the collaborative approach to the project, genuine receptivity to concerns raised by the earlier proposal, willingness to revise the proposal so carefully and thoroughly, and for three strong proposals.

These comments restrict their focus solely to the matter of the rehabilitation of the physical structure proposed in the Schematic Design Alternatives. I also appreciate the consultation around interpretive matters initiated in the meeting of June 14, 2023. As interpretation falls more squarely within my and the SCWH's expertise, we anticipate having more to say about those proposals look forward to continuing collaboration at that point.

Because the physical space can enable or limit the stories a site can tell and the experiences it can offer to visitors, there is a relationship between the design rehabilitation and matters of interpretation, and to that end, these brief comments on the proposed design alternatives focus on alternatives that will enable rather than foreclose interpretation of Barton, the Red Cross, and her era.

All three proposals improve on the earlier proposal and address major concerns about the adverse effects likely to be caused by the initial proposal; that said, **ALTERNATIVE 3B** does the best job of balancing the building's integrity with visitor accessibility while leaving wide latitude for later discussion about interpretive approaches. Most important, **Alternative 3B** does the best job of keeping the major focus on Clara Barton and the History of the Red Cross, an institution that needs to be understood as (among many other things) a legacy of the Civil War, not just because Barton worked with soldiers, but because she also worked with refugees from slavery in contraband camps, an experience that made clear that non-combatants also suffer in wars and other disasters, and helps to explain why the American Red Cross's scope reached well beyond soldiers injured on battlefields, as the Red Cross as conceived at Soloverino in 1864 was initially constituted. Alternative 3B will also allow the interpretation of other major themes inherent to the site's enabling legislation and to the life of Clara Barton, including the history of women, humanitarianism and international relations, disaster and disaster relief, and the ways in which race interweaves and overlaps with all of those themes.

Additional recommendations include:

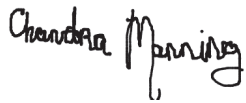
Revising the National Register and National Historic Landmark nomination to include architectural significance among the criteria, since the physical structure and uses of space within the building are not only unique, but also integrally linked to the early history of the Red Cross.

The number of rooms set aside as classroom rather than exhibit or interactive space seems disproportionate (ie more rooms taken offline from interpretation to be used as classroom space). I hope the possibility of multi-use for some of those spaces can be considered at the interpretive phase. In other words, school groups or other educational activities can take place in rooms with some interpretive function/content/purpose—20 second graders all trying to sit at Barton's desk would obviously be a bad idea, but a room set up to evoke a Red Cross work station could readily accommodate educational functions when needed and still be open to public visitation when not, for example. Especially given how multi-functional (and practical, not to mention frugal) Barton herself was, use of space in that way would heighten opportunities for visitor interaction and remain in keeping with the site's focus.

I notice the intention of keeping archival materials off site, which is likely needed for storage reasons. But I hope thought will be given to ease of accessibility to archival materials for potential researchers working in a reading room. Additionally, access to at least reproductions of archival material on the part of ordinary visitors and school children would be advisable.

Thank you again for providing these new alternatives and the opportunity to comment on them. I look forward to continued collaboration.

Sincerely,

A handwritten signature in black ink that reads "Chandra Manning". The signature is written in a cursive style with a large, looped initial "C" and "M".

Chandra Manning, Professor of History
Writing on behalf of myself and the Executive Council of the Society of Civil War Historians

Re: Clara Barton NHS Rehabilitation Consulting Parties Meeting #4 posted in PEPC

From Smith, Kathryn G <Kathryn_Smith@nps.gov>

Date Wed 8/23/2023 6:04 PM

To Lozano, Elias N <elias_lozano@nps.gov>; Maria Mougridis <MMougridis@presmd.org>; Rosie Click <vrc10@georgetown.edu>; rosst <rosst@sunyocc.edu>; Young, Pearl Joy <youngp@uhcl.edu>; cgood <cgood@marymount.edu>; historicalnewyork <historicalnewyork@me.com>; kksklar <kksklar@binghamton.edu>; Chandra M Manning <cmm97@georgetown.edu>; jacob.remes <jacob.remes@nyu.edu>; Julia Irwin <juliai@usf.edu>; huyckclapper <huyckclapper@earthlink.net>; timlowry <timlowry@bellsouth.net>; ljgordon1 <ljgordon1@ua.edu>; nredding <nredding@presmd.org>; mwhcdiana <mwhcdiana@gmail.com>; bgoldman1 <bgoldman1@comcast.net>; Luthye, Curtis <curtis.luthye@redcross.org>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; luciennebeard <luciennebeard@gmail.com>

Cc Stidham, Tammy <Tammy_Stidham@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Mocko, Robert <Robert_Mocko@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>

Hello Sonny, et al.,

Below are the National Historic Landmarks Program's comments on the Schematic Designs for the Clara Barton National Historic Site's rehabilitation.

General

I appreciate the presentation of three alternatives that show varying levels of intervention. I also appreciate that the alternatives generally respond to the concerns raised by my office and others about letting the physical limitations of the building and its primary national significance, as well as the purpose of the park unit, drive the program and design.

Alternatives

In general, the level of structural intervention shown in Alternative 3A and 3B is likely to have an adverse effect on the NHL. In addition, some proposed plan changes (in Alternatives 2 and 3) and other interior alterations appear to have a significant impact on spaces of primary significance, and thus, may constitute an adverse effect, especially in combination.

While Alternative 1 introduces the least alterations, it would limit the ability of visitors to experience some historical areas of the building.

Overall, Alternative 2 seems to be the best option in that it allows for use of the second floor, and it incorporates new structural and safety elements with less damage to historic

character-defining space and feature than Alternative 3. That said, there are still items that may require redefinition in Alternative 2. See my detailed comment below.

Detailed Issue List & Questions:

- Plan Change: Schematic drawings don't show demolition of what can't easily see the effects of alteration be made to the floor plan.
- Removal of the wall between Room 108 and 109. The removal of a structural wall that defined the pantry that connected to the kitchen. It's not clear why Room 109 was deemed to have secondary significance. I don't agree with the HSR's assessment because it's a barrier to the interpretation value, architectural decoration levels and the level of known information about the space to establish the significance level. A revised analysis of the significance would be helpful.
- Closets in the main hall are noted as a area of primary significance based on the history and use of the building. Can you articulate why certain ones are used to locate utility and structural elements and can you show that would diminish integrity? How many would be reserved for structural or other-structural conditions?
- Can you describe or provide detail on the proposed fall protection system on the roof?
- Exterior cladding replaced in kind: What is the density of wood will be used and will new wood be back-sanded? Note for the Clerk: The building will need careful maintenance and regular re-painting as the wood will be inferior to the historic wood.
- Surface mounted wall or ceiling lighting in significant spaces need to be certified appropriate.
- Alt. 2 new stair location: Can you identify which space on the first and second floor that the stairs will occupy, what were they historically, and what alterations have been made such that they do not detract?
- Deck of the ram and the reconstructed 1897 porch will require careful review. The ram should be designed to be as separate piece from the reconstructed historic porch. Is 5-foot minimum width allowed by code on the ram at the south end of the front porch. Could it be narrowed to minimize structural intrusion?
- Which rooms have structural plaster ceiling that will be removed in Alt 2 and 3 will gypsum or plaster be put back? Do we know of some ceiling with gypsum ceiling historically had muclin and cfo, will muclin be reinstated?
- Will joists be cut to install steel beam in Alt. 3 The narrative describes: At portions of the first floor and all the second floor, new steel beam will scan-a-cut-ways between steel column and new built-up laminated veneer lumber (LVL) beam will be certified and received with the depth of the existing floor framing, thus reducing the span of the existing floor joists. The existing floor joists will be re-

supported joists (Simpson Strong-Tie design professional-approved Equal).” Does the joists will be cut/re-ung to the intermediary beam? This is likely to cause adverse effects if the cuts are done a large number of joists.

- Narrative Alt 3 In two locations diagonal bracing will be located from the basement floor to the second floor. This bracing will be concealed in closets on the first floor.” Does this mean all studs in those locations will be removed? How much wall area are we talking about?
- Door modifications to provide accessible pathways in interior show will exist. If doors be modified and a dime size oval cutout will there be? Will historic doors be removed if so show may? [Modified doors 1st floor 3 doors 2nd floor 1 door]. Preservation Brief 2 suggests that adapt door hardware can sometimes allow for the required 2" opening. If a door opening is within a in a or two of a meeting the 32" (81 cm) clear opening requirement it may be possible to replace the standard hinges with off-set hinges to increase the size of the door opening as much as 1/2" (3.8 cm).
- Explain the difference between the egress stair addition Alternatives 2 and 3? Is Alternative 2 a fire-rated stair enclosure? How does inserting the fire-rated enclosure affect impacts to the building?
- Can you better describe the HVAC system? In Alt. 2 and 3 it looks like the proposal is to install fan coil units in the basement to condition the space and the space above on the first floor and then the second and third floors get dedicated fan coil units. Is that correct? What size ductwork is associated with the system and where will it be located? The cases located in the closets are those of the cold-water pipes to feed the fan coil units on the second and third floors? Approximately what would the dime size be of the cases be? Some first-floor rooms have their own fan coil units instead of floor registers. What's the reason for that? The VRF fan coil units can be either ducted ceiling mounted cassette units or wall mounted units or floor mounted "sole units" can you provide descriptions or typical images of each option? What are the pros and cons as a preservation of historic fabric and a visual intrusion in the space? Did the contractor look at a small ducting velocity mechanical system to reduce size of ductwork and registers?
- Are the electrical interventions seem more intrusive to the landscape on the north side. Could Alt. 2 be done with the electrical config. of Alt. 1? Alt. 3 as utility are adjacent for the largest distance. Is this configuration necessary?
- Are tree removals along the east side in line with the CAR recommendations?
- Mechanical pads should be moved away from the base of the building as shown in Alternatives 2 and 3.
- I'm not sure that the concrete walk around the north west and a third of the south elevations of the building is appropriate. Could the material be more blended into the landscape like an engineered permeable pavers that mimics gravel or mulch? Or could only portions of it be concrete?

- White class is set to be the north elevation. Is this consistent with the historical landscape/ CLR recommendations?
- CLR recommends installing the NHL plaque near Oxford Street end of the walkway. This seems more appropriate since it is not a historic element and this makes it a very fine immediate vicinity of the historic building but is still in a location where it can be seen by most visitors.
- Alt 2 - utility meter is located in the north elevation near the circular drive - why there and not on the south wall where it would be less visible?

Thank you for the opportunity to provide comments. I look forward to continued productive consultation.

Best,
Kathryn

Kathryn G. Smith (she/her)
National Historic Landmarks & National Register Coordinator
National Park Service
National Capital Region
202.619.7180
202.913.3859 mobile

1100 Ohio Drive, SW
Washington, DC 20242
kathryn_smith@nps.gov

NCR Website <https://www.nps.gov/RESSNCR>

NHL Website <http://www.nps.gov/nhl>

Facebook [National Historic Landmark Program - NPS](#)

Instagram [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

From: Lozano, Elias N <elias_lozano@nps.gov>

Sent: Monday, August 7, 2023 10:23 AM

To: Maria Mougridis <MMougridis@presmd.org>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; Rosie Click <vrc10@georgetown.edu>; Rosst <rosst@sunyocc.edu>; Young, Pearl Joy <youngp@uhcl.edu>; cgood <cgood@marymount.edu>; historicalnewyork <historicalnewyork@me.com>; kksklar <kksklar@binghamton.edu>; Chandra M Manning <cmm97@georgetown.edu>; jacob.remes <jacob.remes@nyu.edu>; Julia Irwin <juliai@usf.edu>; huyckclapper <huyckclapper@earthlink.net>; timlowry <timlowry@bellsouth.net>; ljgordon1 <ljgordon1@ua.edu>; nredding <nredding@presmd.org>; mwhcdiana <mwhcdiana@gmail.com>; bgoldman1 <bgoldman1@comcast.net>; Luthye, Curtis <curtis.luthye@redcross.org>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; luciennebeard <luciennebeard@gmail.com>; Christopher Cody <ccody@savingplaces.org>; Christina Morris <cmorris@savingplaces.org>; Pamela Goddard <pgoddard@npca.org>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; david.dise@montgomerycountymd.gov <david.dise@montgomerycountymd.gov>; Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; townhall <townhall@glenecho.org>; mayorcostello <mayorcostello@glenecho.org>; cspeck <cspeck@delawarenation-nsn.gov>; erogers

<erogers@glenechopark.org>; Katharine Boerner <kboerner@glenechopark.org>; Becky Roman -MDP- <becky.roman@maryland.gov>; Tepper, Audrey <Audrey_Tepper@nps.gov>; Kirsten B. Kulis <kkulis@achp.gov>; Christopher Wilson <cwilson@achp.gov>; Edward Stierli <estierli@npca.org>; NANCY HEWITT <nnewitt@scarletmail.rutgers.edu>; Jellison, Katherine <jellison@ohio.edu>; Varon, Elizabeth Regine (erv5c) <erv5c@virginia.edu>

Cc: Stidham, Tammy <Tammy_Stidham@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Mocko, Robert <Robert_Mocko@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>

Subject: Clara Barton NHS Rehabilitation Consulting Parties Meeting #4 posted in PEPC

Good morning, everyone,

Thank you all for attending and participating in our discussion on the Schematic Design Alternatives on July 31, 2023. We are happy to announce that the slide presentations and video recording of our meeting is available for review and reference on the public PEPC site. [ParkPlanning - Consulting Parties Meeting #4 \(nps.gov\)](#)

As always, we are thrilled to be working with everyone on this undertaking.

Please make sure you take time to comment on the schematic design alternatives by August 25, 2023.

All the best to everyone

Sonny



Elias N. "Sonny" Lozano Jr.
Historian

George Washington Memorial Parkway
700 George Washington Memorial Parkway
McLean, VA 22101
(202) 536-9391 (cell)



August 24, 2023

Superintendent Charles Cuvelier
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

RE: Rehabilitate Clara Barton National Historic Site, CLBA 312325, Schematic Design Alternatives

Dear Superintendent Cuvelier:

On behalf of the National Parks Conservation Association, I thank you for the opportunity to participate in the Section 106 Consultation for the Clara Barton National Historic Site and am providing our views for the rehabilitation of the first national park site dedicated to the contributions of a woman. We are grateful to you, your staff, and the many consultants working on this project for your willingness to meet with us, consider our perspective, and to restart the process to ensure that the rehabilitated Barton site will properly reflect and honor the historic significance of Clara Barton and the early days of the American Red Cross.

We strongly support Alternative 3B as the preferred alternative for rehabilitation of the site. We support the project goals of rehabilitation to permit the reopening of the site for increased public visitation; to ensure the site is safe and accessible to all; to afford greater interpretive opportunities; and to guarantee the historic furnishing and features of the site are protected by modernizing the electric, heating, and cooling systems. As you move forward on the site rehabilitation, we urge you to consider how future room uses will inform room design, ensuring that you build each room to accommodate future use. We understand that all alternatives will impact some historic features of the site and commend you for striving to make these impacts negligible.

We agree with the emphasis on preserving the most historically intact rooms within the house while retaining the historic features throughout the building. We support the structural upgrades necessary to make the site safe and accessible, completing critical repairs to the exterior; and modernizing the electrical, mechanical, and plumbing systems. We commend you for your approaches to protect the night sky by utilizing energy efficient LED lighting, adding cut off light fixtures, and removing the two façade flood lights.

To bring the Barton Historic Site into compliance with emergency egress and ABAAS enhancements, we support improvements to entrances, the addition of accessible bathrooms, the removal of some doors to widen entranceways, and the inclusion of a stairway lift. To maximize visitation numbers while retaining visitor safety, we support the use of steel beams to reinforce the building's integrity and to increase load capacity.

We support the goal of regaining the historic relationship of the house to the landscape; increasing accessibility to the house from the parking lot; and adding more accessible parking. We urge you to consider recreating Barton's history of vegetable gardening at the site. We encourage you to broaden the connections between Glen Echo Park and the Clara Barton National Historic Site to allow visitors to understand the shared history of the two sites. Improving the physical connection between the two sites with signage and a more visually inviting pathway would help accomplish this goal.

Although we would love to see access to the third floor, we understand that this cannot be achieved without fundamentally changing the building's structure, hence negatively impacting its historic character. We urge you to use innovative interpretative tools to allow visitors to experience the Red Cross windows and doors despite not being able to directly access them. We note another George Washington Memorial Parkway site, the Arlington House, includes an onsite virtual tour that is available when the second floor cannot be staffed to allow visitors upstairs.

We appreciate the rehabilitation plan's commitment to retaining as many historic features as possible while minimizing impacts. We also appreciate the commitment to enclose modern features in closets or the basement to prevent these modern intrusions into the site.

We support your recommendation to update the National Register/National Historic Landmark nomination to include the building's architectural significance and the contributions to the building's design by Dr. Hubbell and Miss Barton.

We support the use of the VRF Heat Pump System because it will allow maximum heating and cooling throughout the site and is a more modern and efficient system. We appreciate the plans to keep this modern system from impacting the site with custom enclosures and floor mounted registers to reduce visual intrusions. We also appreciate the commitment to keeping outdoor electric infrastructure improvements from visually impacting the building landscape by siting the upgrades out of view, using underground conduits, and removing utility poles. Although we acknowledge that utilizing geothermal or solar power is neither physically nor financially practical at this time, we urge you to seek these types of efficiencies in the future as they become more affordable and easier to implement.

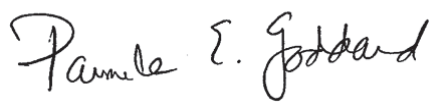
As stated previously, we strongly support Alternative 3B. We support this alternative first because it will restore and preserve a broad array of period rooms throughout the building and

retain critical historic features. This will allow visitors to learn about Clara Barton, Julian Hubbell and other influential people who lived and worked at the site; the history of an important organization that continues to serve our country today; and the inspiration for the building itself. We also support Alternative 3B because it maximizes the number of visitors who can occupy the site and it accommodates those with limited accessibility. Again, we acknowledge that all alternatives will impact the historic features of the site but thank you for striving to reduce those impacts and to keep modern intrusions hidden with design features.

We note that the National Trust for Historic Preservation provided detailed comments on the rehabilitation plan and we support the views they submitted to you

We sincerely appreciate the hard work of the National Park Service staff and the consultants who drafted these alternatives. As you know, the National Collaborative for Women's History Sites and the National Trust for Historic Preservation jointly funded three workshops with a broad array of participants to develop opportunities for interpretation, programming, and partnership at the Barton National Historic Site. A report of recommendations from these workshops is forthcoming with strong support for the creation of a Center for Women's History to be housed at the Barton site. Because building use informs building design, we hope to discuss this idea and other recommendations with you as you move forward on the site rehabilitation. We look forward to working together to ensure that, once rehabilitated, the Clara Barton National Historic Site becomes a vibrant, active tribute to Clara Barton and a thriving Center that celebrates and shares women's history.

Sincerely,



Pamela E. Goddard
Senior Program Director
Mid-Atlantic Region
pgoddard@npca.org
202.604.3781

Cc: Kirsten Kulis, Advisory Council on Historic Preservation
Kym Hall, Kathryn G. Smith, National Park Service National Capitol Region
Matthew Virta, George Washington Memorial Parkway
Elizabeth Hughes, Becky Roman, Maryland Historical Trust
Lucienne Beard, National Collaborative for Women's History Sites
Christina Morris, Christopher Cody, National Trust for Historic Preservation



Historical New York Research Associates
Judith Wellman, Principal Investigator

2 Harris Hill Road, Fulton, New York

www.historicalnewyork.org

historicalnewyork@me.com, 315-529-7808

Discovering Extraordinary People and Places in Time

August 25, 2023

Mr. Charles Cuvelier, Superintendent
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Re: Section 106 Consultation - Rehabilitate Clara Barton National
Historic Site (CBLA 312325), Schematic Design Alternatives

Dear Superintendent Cuvelier:

As a person who has worked as a scholar and professor of women's history, as vice-president of the National Collaborative of Women's History Sites, and as a public historian who has worked with the National Park Service for many years (I was the first historian at Women's Rights National Historical Park), I so much appreciate the opportunity to review design alternatives for rehabilitation of the Clara Barton National Historic Site.

I am impressed with such thoughtful consideration of both the physical site and the possible interpretive plans for it. Both aspects are so important. This site merits particular consideration because of its importance both for women's history and for the American Red Cross. As one of eleven NPS sites relating specifically to women or women's history, the Clara Barton National Historic Site can play a key role in promoting equal rights for all people.

All three design options seem workable, but it makes sense to start with design 3B, incorporating proposed structural strengthening as well as appropriate interpretive spaces. Interpretive possibilities will focus, we hope, on dynamic interactive exhibits relating both to the

life of Clara Barton and the history of the Red Cross, including the importance of volunteer activism by both women and men and the key role that the Red Cross has played and continues to play in disaster relief around the world. The use of direct quotes, as well as hologram or other life-sized figures will bring increased visitor identification with these stories. We hope that visitors will leave this site with a better understanding of women's history in general, of Clara Barton in particular, and of the importance of volunteerism—past and present--in all our lives.

Given our current climate crisis, it is extremely important that this site include an efficient fossil-free heating and cooling system. HVAC Design Alternative 3B, a VRF Heat Pump System (pages 36-37), would be far preferable to the propane-fueled water boiler system suggested as another possibility. If the local utility company allows you to sign up for community solar or wind-powered energy sources, that would be a fine option. There may be other opportunities for solar, wind, or geothermal energy in the future.

Many thanks for these detailed plans and for the opportunity to comment on them.

Sincerely,

A handwritten signature in cursive script that reads "Judith Wellman".

Judith Wellman
Principal Investigator, Historical New York Research Associates
Professor Emerita, State University of New York at Oswego
Vice-President, National Collaborative of Women's History Sites

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- A. Database of all African Americans listed in U.S. and New York State census records from 1855 to 1870 (1850, 1855, 1860, 1865, and 1870), Jan DeAmicis
 - B. Project Database of all known Underground Railroad places and people within Oneida County, reaching out as needed into the surrounding region. Mary Hayes Gordon

Underground Railroad
Ft. Stanwix

Sites related to the Underground Railroad, abolitionism, and African American life

* Location yet to be identified.

** Location known.

***Essay drafted.

1. ***Camden-- Camden Wesleyan Methodist Church. Established by Elijah Gaylord, a staunch abolitionist, it was formed by 16 members as an abolitionist church. --JW--5
2. *Deerfield--Site of home of enslaved people (Cuff et al), Alexander Coventry home. House on Cosby Manor Road in 1898 that was a stop on the Underground Railroad.” (White, 1998, Oneida County, p.148. Photo.). Need deed search. JW—2
3. *Deerfield—Church where rioters disrupted abolitionist meeting.
4. *Erie Canal. Discussion of African Americans who were affiliated with canals in Oneida County.
5. **Florence—Florence Farming and Lumber Association. Jessica Harney.
6. **Kirkland. Clinton—Young Ladies Domestic Seminary, Rev. H.H. Kellogg.—MHG--4
7. **Kirkland.Clinton--Hamilton College---Chief Skenandoah, Oneidas, Gerrit Smith. --2, 3. Smith graduated from here as valedictorian. Howard worked here. JW
8. *Lee—Farms owned by Alanson Frank and Robert Frank. JW--3
9. ***Marshall—Hanover church, now only a cemetery remaining. MHG--4
10. **Marshall—site of Brothertown Indian settlement. JW or MHG—2, 3
11. *New Hartford. Home of Charles Storum family, 2.
12. ***New Hartford—Willis home. MHG--2
13. **New Hartford—Presbyterian Church, 2.
14. ***Paris--Site of home of unknown AfAm, first settler, Town of Paris. Rogers, 1881. JW. Still need a deed search, but I think we know basically where this was.--2
15. **Paris—Hillcrest Cemetery—graves of people of color (John and Mary Roberts and five more). JW--5
16. ***Paris--Home of John Thomas and John Roberts, David Roberts, and Mary Roberts. Need deed search. JW--5
17. ***Paris--Site of home of Jesse Thomson, “quite prominent in the abolition movement.” Need deed search. JW--5
18. ***Paris--Site of homes of J.M. Simmons and Carlos Simmons. JW-5
19. ***Paris--Val Pierce Home on the Cassville Road. JW--5
20. *Paris--Henry Crane tavern—employed John Thomas for four years. Tavern in West Sauquoit. Deed search. JW--5
21. *Paris—Enoch Fortune. Earliest African American family to settle in what is now Oneida County. Free person, 1790 and 1800. Need deed.--2
22. ***Paris Green with Congregational and Episcopal churches. JW--4
23. **Paris. Sauquoit Presbyterian Church, Paris. JW—4, 5

24. **Remsen, Bethel Church. MHG.5
25. ***Rome—First Presbyterian Church. JW--4
26. ***Rome—Second Presbyterian Church, Rev. Avelyn Sedgwick. JW--4
27. **Rome—cemetery—Henrietta Bowen. Collins. Rome Cemetery--5
Willard W. /smith, 2nd lieutenant, 6th US Colored Volunteers, 1827-1876
Henrietta Bowen section L 588
Dr. Arba Blair, section E
O.B. Peirce, 11 section B
Marquis Kenyon, section c
Arlen Seymour, section ??E
Anson Spencer, section E
Ellie's collection includes a map of the grave sites
Do we want to include cemeteries?
28. ***Rome—Erie Canal. JW—2, 5
29. ***Rome—Erie Canal, 1817, Thomas James story. JW--2
30. ***Rome--Ft. Bull--Oneida Carry. JW--1
31. **Rome—Ft. Stanwix.--1
32. ***Rome—Railroad station. JW--6
33. ***Rome—Home of Arba and Wealthy Blair, 70 N. Washington (212) n.
Liberty, office 3 Arcade. JW--4
34. ***Rome—Stanwix Hotel. Site of Johnson's barbershop. Marcus Kenyon. He
owned a stagecoach company out of the Stanwyx Hotel. Check deeds for
property that Kenyon bought in 1850s on Bouck Street (home of Stevenson
family?) JW--6
35. ***Rome—Alfred and Sally Stevenson, 1850-1860. Need deed search. Or
use First Presbyterian Church. JW--5
36. ***Rome—Arden Seymour, Moved to Rome, 1814, corner Dominick
and St. George. JW--6
37. ***Rome—Home of freedom seekers Brown, a joiner, house on
Dominick street, first house west of the bridge over the Mohawk River,
south side of street. Left after Fugitive Slave Law. JW--6
38. ***Rome—Site of AME Church. Lawrence & DePeyster. Demolished
(Collins) AfAm convention, 1853. Need deed search. JW--6
39. ***Rome—Spencer Hall. Site of speeches by Douglass, Anthony. Oneida
County ASS meeting, 1857. (Collins) Spencer Hall, 80 Dominick? JW—6
40. ***Rome. Home of Robert Wilson.
41. ***Steuben—Welsh church, Capel Ucha. Robert Everett, minister.
George French, fugitive from Tennessee, spoke. AS petitions. Robert
Everett's Capel Ucha was considered the most influential Welsh church
in Remsen and Steuben. JD--5
42. ***Steuben—Home of Rev. Robert Everett, Elizabeth Everett, and
family. JD—5, 6
43. ***Utica—Site of A. B. Johnson home and home of enslaved people.
JW. DS—2, 3
44. ***Utica--Site of Benjamin Walker home and home of enslaved people
(Simon et al). JW--2
45. ***Utica—Mechanics' Hall. Colored Convention. Attempted meeting
with Susan B. Anthony et al at time of Lincoln's election. 1876.11.19.
Utica Morning Herald. JD--6

46. **Utica—Office of Alvan Stewart. JW—4, 5
47. **Utica—Johnson Park, Cornhill, developed by A.B. Johnson, center of African American community after people got pushed out of Post and Elizabeth Street. DS--6
48. **Utica—Rev George Storrs and Martha Storrs, 7 Blandina Street. With a kitchen (and perhaps a whole house) at 56 Washington Street. JW--4
49. **Utica—Lewis Lawrence, rescue of Harry Bird and George, 26 John Street Corner Catherine. H: Corner John & Lansing. 1834 Utica Directory) Later 24 Elizabeth Street. (1837/38 Utica Dir.) Later Rutger Street. Deirdre, you want to do this?--4
50. **Utica—James and Cynthia DeLong. JD, 4, 5, 6
51. ***Utica—Hope Street—need deed searches. “In 1828 the colored people, who were doing pretty well, bought some land on Hope Street. These were Peter Freeman, Joe Ten Eyck, Tudor E. Grant, Joseph C. Pancko, David Vinner, Moses Johnson, and David Wyckoff. They owned all that land on the south side of Hope street and were voters.” (“The Utica of Yesterday”, *Utica Daily Observer*, 1887, quoted in DeAmicis, “Slavery,” 49). Free heads of household--John Slaytor, Joseph Pankco, 1830. JW--3
52. **Utica—Bleecker St. Presbyterian Church. Site of 1835 riot. DS, 4
53. ***Utica—Site of Courthouse, 4, 5
54. **Utica—First Presbyterian Church. North west corner of Washington and Liberty Streets. Eunice Camp and first AfAm Sunday School. JW—2, 4
55. **Utica—Hope Chapel—751 South Street since 1965—4, 5, 6--
<https://www.uticaod.com/article/20100305/NEWS/303059907>---JW
56. **Utica—Hope Chapel, 1866-1916. Built 1866, Elizabeth Street, across from Court House. Torn down in 1916 when “present structure” built on Catharine Street, parsonage 407 Park Avenue. JW
57. **Utica—Hope Chapel, 1916-1965. Began on Charlotte Street, “moved to a small building Elizabeth Street across from the Court House and in 1916 the present chapel at 425 Catherine Street was built.” JW
58. ***Utica—Home of Samuel and Mercy Dove, 83 West Street. DS—5, 6
59. ***Utica.Peter Freeman, 26 West Street. Need deed search. JW, 5, 6
60. ***Utica. Munn, Rutger Place. DS, 6
61. **Utica—City Hall, speech by John Parker, fugitive, 1863. Colored State Convention, 1868. JW?--6
62. **Utica—Post Street. Center of AfAm settlement. Rev. James Fountain, Eli Atkins, Francoise DeLepine, DeNike, DeWitt, Joe and Margaret Pell and sons, Richard Jackson, J.D. Green—docsouth, Robert Johnson (barber, 16 Post St), etc. DS—4, 6, 6
63. *Utica—Publius V. Rogers, cashier, First National Bank. Patty, freed by Rogers in 1846, lived on Plant Street. Need deed search. JW—7?
64. *Utica—Francis Lippin, barber, Shop at 129 Genesee then 178 Genesee. Home - 16 Blandina, 51 Columbia, 29 Union. JW, 3
65. **Utica—Insane Asylum, where Gerrit Smith went after John Brown’s raid, 1859. JW, 6

66. **Utica—Site of offices of New York State Anti-slavery Society and *Friend of Man*, 1836-41. 56 Genesee Street. JW, 4
67. **Utica—railroad station. JW, 6
68. ***Utica—Judge Hayden’s law office, 96-98 Genesee Street. Harry Bird and George. Sites of offices of Alvin Stewart and Spencer Kellogg. Utica Rescue, December 29, 1836. JD, 4
69. **Utica—site of Spencer Kellogg’s store. JW, 4
70. **Utica—Devereux Block, Genesee Street. Site of Wesley Baily’s publication of the Liberty Press, successor to the *Friend of Man*. Wesley Bailey, editor of “The Liberty Press,” harbored John Thomas and one other fugitive in 1844. Perhaps persuaded Thomas to stay in the area. Directed by him to Jesse Thompson, Paris Hill, 5
1844-5 publisher Liberty Press, 10 Burnett
1845-6, publisher and proprietor Liberty Press, 3rd story Devereaux Block, Genesee, h. 63.
71. ***Utica. Home of Francis Wright and Paulina Kellogg Wright. JW, 5
72. ***Utica. Joshua Howe home, now Roscoe Conklin Park. Boulder memorial, 1915. House longer standing. JD—2.
73. **Utica. Forest Hills Cemetery
74. ***Western. Home of William Floyd and seven enslaved people. JW, 2
75. ***Whitestown--Oneida Institute (1827-1843) —Main Street and Mohawk River and Ellis and Ablett Avenues. Abolitionist bi-racial school. *Friend of Man* published here briefly. MS
76. **Whitestown—home of Beriah Green.
77. *Whitestown—home of Charles Rogers and safe house for Henry Howard, who escaped from slavery. JW, 5, “My folks were hidden for a short time in the home now owned by Charles Rogerts (sic) in Clinton,” the son of the slave [Henry Howard] said. “That was one of the stopping points on the “underground railroad.”
78. ***Whitestown. Home of Henry Howard. JW, 6. “My father was one of the first colored taxpayers in Oneida County.” *Observer Dispatch*, May 29, 1936. JW--4
79. *Baird family—free people of color and long-time landowners.

Possible additions

All of these would need deed searches. Sites with ** (possible Underground Railroad site) or *(site of escape from slavery) may be eligible for Network to Freedom nominations.

1. **Clinton--Washington Tract Farms: The former Nathaniel Griffin House on Bristol, now the Dr. Herbert Heintz House. Bonnie Waldron, Cleveland Place, Clinton (at Clinton His Soc talk 2003). Ellie has determined that the Bristol family in Clinton was an underground railroad site. The Bristol family was involved in the Second Utica Rescue. Whitestown (or Paris)--Kate, aka Old Kate: Emancipated by Nathaniel Griffin.
2. *Utica—site of home of David Hasbrouck and/or Amos G. Hull where Jack Sharp escaped from slavery.
3. *Utica—Home of Jonathan Hedges. Susan Bateman and Peter Bateman, both freedom seekers.

4. *Utica—site of home owned by C.W. Heist. Dinah Cook, freedom seeker.
5. Utica—Site of home of Walter and Cornelia Cochrane, Gerrit Smith's sister. Jesse enslaved by Cochranes.
6. Utica--Site of Home of Catherine and William Henry
7. Vernon--Site of Calvin Young home. Flora, Mike, and children Harry, George, and Mike enslaved by Calvin Young.
8. Vernon—Site of Peter P. Van Slyck home. Dina, enslaved by Peter P. Van Slyck.
9. Vernon—Site of Abram Van Eps home/store. Frank, Till, and children Margere, all enslaved by Van Eps.
10. Vernon—site of Samuel Gay home. Catherine Nicholson enslaved by Samuel Gay.
11. Vernon—home of Jane Elizabeth Hitchcok (Jones)
12. Thomas Gold—enslaver, 1800, 1814 (DeAmicis). Daughter married abolitionist John Frost.
13. Jonas Platt, enslaver 1800, 1810, 1814 (DeAmicis)
14. Vernon—Home of Thomas Williams. Enslaved Nan Tompkins and son Robert Tompkins.
15. *Whitestown—Home owned by Roger Maddock. Morris Dublin escaped from Roger Maddock of Whitestown, probably twice. Maddock advertised in newspaper for Morris, a 19-year- old fugitive.
16. Whitestown—home of Ives, slaveholder, and Joe Pell, enslaved.
17. Taberg, Ann's Mansion
18. Boonville, Millers.
19. Trenton Falls

Sites outside Oneida County, 1825-60. These are historic sites available either as to drive by or as interpretive sites that help tell the story of those who came to and through Oneida County:

1. Canada, Ontario--St. Catharine's, BME Church.--6
2. Albany County--Albany Stephen and Harriet Myers Residence. Paul Stewart--5
3. Cayuga County--Auburn, Harriet Tubman Home.--6
4. Oswego County--Gilbert's Mills, Oswego County. Biracial community settled by Hiram and Andrus Gilbert, Hannah [Slater?] Mason, Amos Mason, Samuel Slater, James Watkins Seward, and others [from New Hartford/Whitestown?].--2
5. Fulton County--Johnson Hall, Johnstown--Sir William Johnson, Molly Brant, John Johnson's home--1
6. Madison County--Cazenovia, Site of Cazenovia Convention.--6
7. Madison County--Peterboro, Gerrit Smith House.--5
8. Monroe County--Rochester, Kelsey's Landing.—5, 6
9. Niagara County--Niagara Falls, Suspension Bridge.=, 6
10. Onondaga County--Syracuse—Site of Loguen house, Genesee and Pine, 6
11. Oswego County, Mexico—Starr Clark Tinshop, 5
12. Oswego, Tudor E. Grant--barbership, corner West First and Bridge, and/or home of Gerrit Smith's agent, 5
13. Montgomery County--Ft. Johnson—Sir William Johnson, Molly Brant, John Johnson's home, 1
14. Montgomery County--Indian Castle Church—New York State Route 5S, near Danube/Canajoharie. https://en.wikipedia.org/wiki/Indian_Castle_Church. NR

15. Montgomery County--Herkimer House—owned enslaved people, 1
16. Herkimer County—German Flats, Fort Herkimer Reformed Protestant Dutch Church, Route 5S. Built 1767 near Fort Kouari and stone buildings that had been erected by the British and the Johan Jost Herkimer family on the north side of the Mohawk River to shelter settlers from French and Indian attacks before and during the French and Indian War (1754-63). The church - on the south side of the river - also was used as a place of refuge. During the Revolutionary War (1775-83), the church was an important stronghold for American forces and defenders used its walls to repulse Tory raiders, 1



August 25, 2023

Mr. Charles Cuvelier
Superintendent
National Park Service
700 George Washington Memorial Parkway
McClellan, VA 22101

Re: Clara Barton National Historic Site, Section 106 Consultation comments

Dear Superintendent Cuvelier:

As you may recall, I am the Co-President of the Bordentown Historical Society in Bordentown, NJ. The BHS is the steward of the historic Clara Barton Schoolhouse where Clara Barton established the first public school in New Jersey in 1852. Both our town's elementary school and our Post Office are named for Clara Barton and given her connection to Bordentown, we routinely celebrate her extraordinary lifetime accomplishments! For these reasons, having had the opportunity to participate as a consulting party in connection with the rehabilitation of the Clara Barton National Historic Site pursuant to Section 106 of the National Historic Preservation Act has been very meaningful to me and I am honored to continue to do so.

I attended the Glen Echo consultation meeting on November 16, 2022. It is clear from the presentations of July 31, 2023, that the NPS made substantial revisions to its original plans in response to consulting party comments and concerns. I wish to thank you and your team for your detailed consideration and response to those comments.

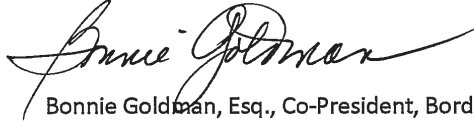
I have reviewed the comprehensive submission of Christina Morris and Christopher Cody from the National Trust for Historic Preservation and I am in agreement with their recommendations. In particular, given the explanation provided by the architectural team on 7/31/23 of the available alternatives, I believe that what was described as "Alternative 3B" is the best option.

Another important submission was made by Public Historian Heather Huyck, to which I have signed on. She details the many things that have made Clara Barton an American Icon and which must be highlighted and celebrated at the CBNHS. She envisions many exciting ways to engage visitors and the possibility of the inclusion of a Women's History Center is a fantastic idea.

Finally, as mentioned in the National Trust submission, exploration of options to reduce the Site's reliance on fossil fuels in the future, to the extent possible, is urged.

Many thanks for your consideration of my comments and those of my consulting party colleagues. I look forward to future opportunities to collaborate with you in support of this exciting and important project that will honor Clara Barton, women's history and American Red Cross history.

Respectfully submitted,

A handwritten signature in cursive script that reads "Bonnie Goldman". The signature is written in black ink and is positioned above the typed name.

Bonnie Goldman, Esq., Co-President, Bordentown Historical Society

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The Town of
GLEN ECHO

Chartered 1904

Town Hall · 6106 Harvard Avenue · Glen Echo · Maryland 20812 · (301)
320-4041

townhall@glenecho.org

August 25, 2023

The Town of Glen Echo continues to support the renovation project of the Clara Barton House. We agree that preserving the site to honor Clara Barton's distinguished history and immeasurable contribution to our country is an important aspect of Maryland's history.

As Glen Echo is immediately adjacent to the historic house on Oxford Road, our residents will be most affected in the short and long term by this endeavor. We have concerns regarding project planning and the construction process for our residents. Because we are a small community with homes very close to one another, issues regarding construction and ongoing noise, lighting, traffic flow and parking are paramount to the health and welfare of our unique town.

RENOVATION CONSIDERATIONS:

- Our engineering consultants from Oyster, Imus and Petzold, have reviewed the renewed plans and have expressed the following concerns we would like to see addressed:
- In general, any renovation revisions that will negatively affect our residents quality of life is, of course, our utmost concern. Permanent lighting spilling into resident yards on Oxford Road is important to consider. Noise from a new HVAC and whole house alarm system needs to be seriously considered to ensure the least intrusion occurs for our community.
- Traffic Control Plan needs to be provided.
- There is no identified materials storage area for removed material, for topsoil storage, for incoming materials, wood, concrete forms, etc.
- The 6 inch deep gravel base at the front of the building does not appear to be within the limits of disturbance (LOD); exceeding 5,000 sf of disturbance causes a change in the requirements for stormwater management.

- Construction vehicle access to rear (and sides) is not shown and not included within the LOD
- ADA access is along the travel lane of the street access. Engineering recommends perpendicular access across street, as shown, then directly into property to proposed ramp access instead of along travel lane as shown.
- We ask that NPS conduct a traffic study along Oxford Road, including the planned ADA parking area to see if there are any other options - both for the ADA parking area location and for all vehicular access to the house during this process.

CONSTRUCTION PROCESS PROTOCOLS:

In regards to the construction process, we would like confirmation that NPS will ensure contractors follow the Montgomery County guidelines on work hours and noise levels. The Town requests information on how often the debris will be removed from the site. Dumpsters must be covered and secured overnight and on the weekend according to our Town rules.

How will daily trash from workers be handled? Where will there be designated areas for the construction crews to park their personal vehicles. Where will portable bathrooms be located?

Oxford Road is narrow and well traveled by residents and park visitors, especially young children who attend the Park's classes and camps. How will issues regarding pedestrian safety be handled during construction? Can the park traffic be redirected to ensure enhanced safety measures? What will the truck route be and how will you communicate this with the expected multiple drivers (ie signage, maps to drivers, etc).

Direct and prolonged impact on our roads due to heavy equipment and increased traffic is an additional concern. As currently envisioned, the disruption associated with the process will include impeding access to our streets used by residents to get to their homes, and exacerbate already restricted residential parking availability. How will this be addressed?

The Town will require an MOU (memorandum of understanding) with NPS for fixing damage to Oxford Road and other Town roads used to access the project after construction is finished. How can truck routes be consistently restricted to Oxford Road off of MacArthur to limit the roadway wear and tear during the process?

NPS needs to keep the town informed on the construction timeline with weekly written progress reports. The town will require a meeting with NPS representatives and the onsite identified manager team prior to and during construction time. The town will provide consistent feedback to NPS during construction with a resident committee led by the Town Manager and / or Mayor of Glen Echo. We need contact information for all related project and site managers.

With experience, we know these issues and details, if organized ahead, will help residents know there are plans in place and the process can proceed more smoothly. We look forward to further collaborating together.

Respectfully,

A handwritten signature in blue ink that reads "Dia Costello". The signature is written in a cursive, flowing style.

Dia Costello

Mayor

cc: Town of Glen Echo Council Members
County Council Member Andrew Friedson
Del. Marc Korman
Del. Sarah Love
Del Susan Lee

University of Houston Clear Lake

College of Human Sciences and Humanities

August 25, 2023

Charles Cuvelier, Superintendent
George Washington Memorial Parkway
National Park Service
Department of the Interior

RE: Clara Barton National Historic Site Rehabilitation Project

To Superintendent Charles Cuvelier:

I write as a Section 106 consulting party with regard to the proposed rehabilitation of the Clara Barton National Historic Site. I am an academic historian of U.S. history with particular research interests in nineteenth-century women, moral reform, and the Civil War. I am honored to offer my professional insight into this endeavor to maintain and increase the accessibility to this important part of the nation's past and our ongoing social memory of the person and work of Clara Barton and the early endeavors of the American Red Cross. I look forward to working with the Park and other consulting parties to ensure that this undertaking recognizes and reflects the importance of Clara Barton's life and legacy to the United States and avoids undue adverse effects.

I am encouraged by the George Washington Memorial Parkway and the National Park Service's willingness and commitment to respond to feedback from its Section 106 consultants, and I find the schematic design alternatives presented in July 2023 to be much needed improvements from the shared-use plans previously offered. In particular, the now-proposed rehabilitation of the Clara Barton House appropriately recognizes and celebrates the physical space that embodied Clara Barton and her work with the American Red Cross at a pivotal moment in American cultural history and the history of public health and humanitarian aid.

Based on my expertise as a historian, I recommend design alternative 2 for this project. All three design alternatives strengthen the existing building and make it more accessible to the public in keeping with the project goals for (1) preservation and maintenance repairs of the building, (2) improvements to the building's systems for health and safety, and (3) structural upgrades for visitor use and accessibility requirements.¹ These changes transform and expand the potential of the site to maximize its reach to the public and could address concerns raised in the 1979 application to the National Register of Historic Places and the 2002 *Historical Structure Report* that noted constraints on the building's capacity to support "increasingly heavy visitation" and ongoing interpretative work long-term.²

While Alternative 1 disturbs the historical structure itself the least and maximizes visitor access and interpretation of the first floor, it limits the ability of the park to interpret the living spaces that were central to the inhabited work places characteristic of late nineteenth- and early twentieth-century progressive reform. The 2002 *Historical Structure Report* indicates that the "house/warehouse/headquarters" function of the house serves as a critical aspect of its architectural significance, and I believe that this aspect cannot be adequately

¹ Charles Cuvelier to Consulting Parties, email, July 26, 2023.

² Clara Barton National Historic Site, Nomination Form, National Register of Historic Places Inventory, National Park Service, U.S. Department of the Interior, 1979, 4; see also Gary Jo Lemple, *Clara Barton National Historic Site Historical Structure Report*, volume 1: Development History, National Park Service, Department of the Interior, 2002, VIII-4-5.

understood without public access to the second floor. (Public access to the third floor, which is not part of any of the three design alternatives, is not necessary for this purpose.) The *Historical Structure Report* refers to the house as a “strong piece of vernacular architecture, drawing inspiration from summer and Chautauqua cottages and from purely functional prototypes like warehouses.”³ This physical fabric of the house, while visible from the exterior, benefits from public access and experience on its interior, even if that public access is limited to small groups of visitors.

Both design alternative 3a and 3b involve significant disturbance of the physical structure of the building to increase the live load capacity of the second floor and add additional support throughout the building. It is unclear the extent to which the disturbance of the wooden beams and historic support structures will compromise the integrity of the building long-term, and the benefit of increasing the number of simultaneous visitors by 28 seems outweighed by the potential adverse effects to the historic structure itself. Although alternative 3b allows maximum access to the second floor with a platform lift, the proposed floorplan adversely affects the property’s integrity of feel by changing the character of the property’s use (36 CFR 800.5 (a) (2) (iv)) of second floor rooms to accommodate the lift structure. In particular, the redesignation of room 201 as a classroom space rather than an interpretative space shifts the use of that front room from a library or contemplative space to a more active and engaged space. The fact that the library was expanded over time and a staircase relocated to facilitate this expansion suggests that Barton found the library essential to her work and living and that it serves as a central location with the House.⁴ Design alternative 3b additionally significantly shrinks the designated space for temporary exhibits by locating it in room 218, which had historically been a parlor chamber or meeting room.⁵

Design alternative 2 provides a balance of access to the house with effective use of historic and interactive spaces with provisions for growth and innovation through the distance learning lab and designated classroom spaces. Accessibility limitations to the second floor will necessitate creative interpretation of second floor historic spaces but will also allow the park to maintain and recognize the complexities and multiple uses of the Clara Barton House in the period of significance for the house: 1897-1912. In support of my recommendation, I offer five examples of strengths in design alternative 2, some of which are also applicable to other design alternative as noted.

First, design alternative 2 (and 3) supports public access and Park Service interpretation of Clara Barton and Julian Hubbell’s work and living spaces, spaces that the *Historic Structure Report* had identified as areas of focus for the George Washington Memorial Parkway. Dr. Hubbell’s contribution to the early work of the American Red Cross has been underinterpreted and underappreciated, but the Park’s custody of Hubbell’s possessions, including letters, photographs, and furniture, together with the access to this physical space open the opportunity for further research and interpretation of the Red Cross and the Clara Barton House in a more expansive way.⁶ Additionally, incorporating these rooms into the interpretative space allows visitors to experience the inhabited workspace characteristic of social reform movements and the intertwined nature of Clara Barton’s vision for public health and humanitarian aid.

³ Lemple, *Historical Structure Report*, v. 1, xxi.

⁴ Oehrlein and Associates, *Clara Barton National Historic Site Historical Structure Report*, volume 2: Physical History and Condition Assessment, National Park Service, Department of the Interior, 1997, 170-174.

⁵ Lemple, *Historical Structure Report*, v. 1, IV-23, IV-31.

⁶ Lemple, *Historical Structure Report*, v. 1, xix, xxi, and VIII-3-4.

Second, design alternative 2 (and the other designs) provides visual access to the fireproof safe, a key element that was missing from prior proposals. The existence of this vault and its use during Clara Barton's lifetime reflect the utilitarian and unique way in which Barton worked. She intentionally designed a home that could function as both a significant storage site for emergency supplies and recognized the importance of preserving records of this work for future generations. The 1997 *Historic Structure Report* states, "The two-story vault is one of the most unusual features of this building. It was constructed as a fire-proof storage space for important Red Cross documents."⁷ The 2002 *Historic Structure Report* expands on this characterization, noting, "A specific description of the 'Japanese bread boxes' full of papers in the vault could provide an excellent starting point for interpreting the vault as part of the interpretation of the house. This is one of the most unique features of the house. It is important for the visitor to understand that Barton corresponded heavily, kept a daily diary, and held onto detailed records of all her relief work. The vault reveals that Barton knew her place in history by securing her personal and organizational papers in a fireproof location."⁸ Barton's many years in emergency relief work acclimated her to the frequency of nineteenth-century fires, and her careful efforts to systematically preserve her papers and to storehouse supplies is unusual for her time.

Third, design alternative 2 best provides ways for visitors to experience the property's integrity of feel through the use of interior rooms and through the appreciation of visual, atmosphere, and audible elements of the cultural landscape. In particular, the design's allocation of space for a reading room (203) on the second floor where part of the historic library was located and the construction of the 1897 porch with benches on the exterior would allow visitors to contemplate the magnitude of the House and its history as well as the cultural landscape surrounding the house.⁹ As the recent *Cultural Landscape Report* notes, the introduction of the 1897 porch "produced a bright and airy experience that was an important component of [Julian] Hubbell's vision for a healthful architectural design, which Barton shared," and a space where Barton and others frequently posed for photographs.¹⁰ Even should there be delays in or limitations to improving the grounds beyond the house, the inclusion of contemplative spaces re-emphasizes the domestic and residential aspect of the house while allowing visitors to appreciate the space as a haven from the busy metropolis of Washington, D.C. and to enjoy its proximity to the rest of the George Washington Memorial Parkway and to Glen Echo Park.

Fourth, the incorporation of classrooms, curatorial workspaces, and an interactive children's exhibit space in design alternative 2 (and 3) demonstrate an ongoing commitment to facilitate public engagement with the House and its many artifacts. Designated work area and storage for Park Service employees allow for rotating exhibits to be designed and maintained and for general management collections.

Fifth, the creation of a distance learning studio in design alternative 2 (and 3) serves as a means to offset limitations of access and storage while creating opportunities to preserve the House for the long-term. One weakness of design alternative 2 (and 3a) is that the second floor is not ABAAS-accessible and the Park would need to develop alternative interpretative devices for the second (and third) floors. A second weakness is that the extensive artifact collection that comprise part of the historic site, including but not limited to furniture, manuscripts, clothing, books, photographs, and other ephemera, will continue to be stored off-site. The

⁷ Oehrlein & Associates, *Historic Structure Report*, v. 2, 150.

⁸ Lemple, *Historic Structure Report*, v. 1, VIII-5.

⁹ Lemple, *Historic Structure Report*, v. 1, IV-23-24; Mills + Schnoering Architects, LLC., "Rehabilitate Clara Barton National Historic Site CLBA 312325 Schematic Design Alternatives," July 13, 2023, 21.

¹⁰ Heritage Landscapes LLC, Preservation Landscape Architects & Planners, "Cultural Landscape Report: Rehabilitate the Clara Barton National Historic Site," July 2023, 2.8, 2.21, 2.52.

rehabilitation project appears to have made adequate effort to permanently display some of these artifacts and rotate others through the house for public engagement.¹¹ The distance learning studio provides space for in-house development of necessary alternative interpretative devices and allows for additional access to artifacts and archival material that may be too fragile or damaged to be directly accessible to the public. Furthermore, this will also allow the Park Service to further document and capture elements of the House that may become inaccessible later should the House itself continue to deteriorate.

The Park's commitment to restore and rehabilitation the Clara Barton National Historic Site for the general public is both commendable and exciting. I recognize the many challenges the park faces in properly maintaining the site and opening it to the public. I am hopeful for the rehabilitation of this important historic property, and I look forward to continuing to work with the Park through the Section 106 consulting process as the project unfolds.

Sincerely,



Pearl J. Young
Assistant Professor of History
youngp@uhcl.edu
281-283-3317

¹¹ "Clara Barton National Historic Site," Nomination Form, National Register of Historic Places Inventory, National Park Service, U.S. Department of the Interior, 1979, 3; Kirk Value Planners, "Value Analysis Final Report," October 12, 2022, 2; Mills + Schnoering, "Rehabilitate Clara Barton National Historic Site," 25.



August 25, 2023

Mr. Charles Cuvelier, Superintendent
George Washington Memorial Parkway
U.S. Department of the Interior, National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Ref: *Proposed Rehabilitation of the Clara Barton National Historical Site
Glen Echo, Montgomery County, Maryland
ACHP Project Number: 019014*

Dear Mr. Cuvelier:

On July 24, 2023, the Advisory Council on Historic Preservation (ACHP) received your letter regarding the U.S. Department of the Interior, National Park Service's (NPS) review of the referenced undertaking, which is occurring pursuant to Section 106 of the National Historic Preservation Act, (NHPA, 54 U.S.C. § 306108), and its implementing regulations "Protection of Historic Properties" (36 CFR Part 800). The review was initiated on June 3, 2022 and is being administered by the NPS, George Washington Memorial Parkway (GWMP), which has jurisdiction over the Clara Barton National Historic Site, a National Historic Landmark (NHL).

The ACHP appreciates that the NPS recently modified the undertaking to focus on rehabilitation and that the agency plans to follow the *Secretary of the Interior's Standards for the Treatment of Properties* (Standards). At this point in consultation, the NPS is considering alternatives to avoid adverse effects to historic properties and has not yet assessed effects for the undertaking. To facilitate consultation and the agency's assessment, we note that the area of potential effects (APE) should identify the historic properties near the NHL and also include a more detailed map identifying the specific contributing elements of the NHL, such as landscape elements.

If the NPS determines the undertaking has potential to adversely affect historic properties, or if we receive a request for our participation from the Maryland State Historic Preservation Officer, a consulting party, or other party, we will consider whether our formal participation is warranted. Meanwhile, thank you for your agency's ongoing stewardship and Section 106 compliance efforts. If you have any questions, please contact Ms. Kirsten Kulis, NPS Liaison (202.517.0217, kkulis@achp.gov) and reference the ACHP project number above.

Sincerely,


Christopher Koeppl
Assistant Director
Office of Federal Agency Programs
Federal Property Management Section



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

January 9, 2024

SUBJECT: Clara Barton National Historic Site (MIHP No. M:35-25) Review of Assessment of Effects Report

Dear Consulting Parties,

The George Washington Memorial Parkway (GWMP) a National Park Service (NPS) unit is continuing the Section 106 process for the proposed subject undertaking to rehabilitate the Clara Barton National Historic Site (CLBA NHS), a National Historic Landmark (NHL) administered by GWMP. The CLBA NHS is a historic property noted for its association with Clara Barton and the American Red Cross, which she founded. The site served variously as a supply warehouse, administrative office / Red Cross Headquarters, and Ms. Barton's residence between 1891 and 1912 when she passed away. Current operations include limited tours for the public.

The rehabilitation project addresses preservation, maintenance, repairs, and improvements to building systems for health and safety codes, and structural upgrades to accommodate visitor use and accessibility. The project conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties for Rehabilitation. The preferred alternative minimizes harm on the NHL as expressed in NHPA Section 110(f).

As part of the continuing consultation process and per 36 CFR 800.11, please find for your review the Assessment of Effects (AOE) report for the proposed undertaking. As described in the AOE report, the NPS has determined that the preferred alternative would have no adverse effects on the NHL property. In addition, the 100% Schematic Design Report is provided for your reference while reviewing the AOE. The documents are available for review or download from our public project page (PEPC) Planning, Environment & Public Comment, <https://parkplanning.nps.gov>, linked [here](#). The files for download include:

- Assessment of Effects Report
- 100% Schematic Design Report
- Schematic Design Appendices

Please focus your review on the AOE and provide your comments within 45 calendar days from the date of this email.

A **Consulting Parties Meeting** has been scheduled during the 45-day review period to present the AOE and to discuss any questions or comments. You are invited to attend this virtual meeting on **Tuesday, January 30, 2024, from 11:00 am - 1:00 pm**. A meeting link through the Microsoft Teams platform will be included in a separate email.

During the past two months, the project team presented the schematic design for internal review and comment as part of our overall review process. We are pleased that the outcome of this effort supports the project moving forward into the design development phase. However, the project is still subject to a building code waiver process for access and use which may require operational changes.

If you have any questions or comments regarding this project, please contact me at gwmp_superintendent@nps.gov and cc Megan Bailey (megan_bailey@nps.gov) and Elias “Sonny” Lozano (elias_lozano@nps.gov).

Sincerely,

Charles Cuvelier
Superintendent

February 16, 2024

Charles Cuvelier, Superintendent
George Washington Memorial Parkway
National Park Service
Department of the Interior

RE: Clara Barton National Historic Site (MIHP No. M:35-25) Review of Assessment of Effects Report

To Superintendent Charles Cuvelier:

I write as a Section 106 consulting party in response to the Assessment of Effects Report and the 100% Schematic Design Report on the Clara Barton National Historic Site that were released in December 2023. I am an academic historian of U.S. history with particular research interests in nineteenth-century women, moral reform, and the Civil War. I am honored to offer my professional insight into this endeavor to maintain and increase the accessibility to this important part of the nation's past and our ongoing social memory of the person and work of Clara Barton and the early endeavors of the American Red Cross. I am thankful for the opportunity to work with the Park Service and other consulting parties to ensure that this historic site and the legacies of Clara Barton and the American Red Cross are maintained and accessible to the larger public without undue adverse effects.

In reviewing the Assessment of Effects Report and the 100% Schematic Design Report, I believe that the proposal represents a promising plan to rehabilitate the property and reopen it to the public on a large-scale basis. The reports reflect extensive research and careful consideration of existing limitations, historically relevant data, and feedback from consulting parties to support the necessary changes to make the structure safe and healthy for individuals to visit the site for many years to come. I believe that such changes can address concerns raised in the 1979 application to the National Register of Historic Places and the 2002 *Historic Structure Report* that noted constraints on the building's capacity to support large numbers of visitors and increasing interpretative work.¹ Unlike the 2022 rehabilitation proposal which included a shared use agreement, this plan embraces and celebrates the original purpose of the building and increases visitor access to the designated areas of primary significance in a way that had not been previously considered possible.² Even so, I am hesitant to endorse the Assessment of Effect's confident conclusion of "no adverse effect."³

Based on my expertise as a historian, I offer the following comments. I point to five strengths of the current rehabilitation proposal and its support of the National Park Service's goals and the character-defining features of the Clara Barton Historic Site. I also suggest five areas that would benefit from further analysis and consideration prior to a complete Assessment of Effects, particularly in relation to the site's original purpose as

¹ Paul Geoldner, Clara Barton National Historic Site Nomination Form, National Register of Historic Places Inventory, National Park Service, Department of the Interior, 1979, 4; Elizabeth J. Lampl, *Clara Barton National Historic Site Historic Structure Report*, Volume 1: Developmental History, National Park Service, Department of the Interior, VIII-4-5.

² Mills + Schnoering Architects, LLC., "Rehabilitate Clara Barton National Historic Site CLBA 312325 Assessment of Effects," 2023, 58.

³ Mills + Schnoering Architects, "Assessment of Effects," 2023, iii, 22, 60.

detailed in the 1965 and 1979 National Register of Historic Places nominations and the 1974 Congressional legislation that designated the site as part of the National Park system.

A first strength of the Assessment of Effects (AOE) report is that the significant alterations to the floorplan of the building to accommodate vertical circulation, including the lift and a new egress stairwell, and accessible restrooms is confined to a relatively small space within the first and second floors. Because these spaces are not visible from the central atrium and are not on the perimeter of the building, visitors will recognize this space as retrofitted and modern without disrupting the feeling or association of the house as a whole. As the AOE clearly states, “The design seeks to unify services and avoid impacts to historic fabric in multiple disparate areas of the building.”⁴ The proposal to create a vertical lift and an accessible bathroom that float within the historic structure allow for future interpretation of the space without damaging the underlying historic structure. Furthermore, the commitment to salvage doors and to preserve some doors *in situ*, locked in place as non-functioning doors, provides a way to meet current code requirements while reminding the visitors of the historic design, materials, workmanship, and feeling so important to the building itself.

Second, the plan to rebuild the 1897 open porch will restore the design, feeling, and association of the Clara Barton Historic Site by making the building façade more visible from the street and surrounding properties, one that has been obscured for over a century when the current porch was installed in 1919. As the 2023 *Cultural Landscape Report* notes, the introduction of the 1897 porch “produced a bright and airy experience that was an important component of [Julian] Hubbell’s vision for a healthful architectural design, which Barton shared,” and a space where Barton and others frequently posed for photographs.⁵ This restoration of the 1897 porch together with a new third floor balcony above will restore a character-defining feature to the property, and more importantly, give visitors a sense of the openness to nature and a concern about the public and the public good that were central to both Clara Barton and the American Red Cross she founded.⁶ Similarly, the proposed installation of a barrier-free ramp will create an unobstructed view of the house which is period appropriate.

Third, the rehab plan successfully creates interactive visitor spaces on both the first and second floor that will allow visitors to view interpretative spaces and to study or learn about Clara Barton, the American Red Cross, the larger region, and the time period through classrooms, exhibits, and an interactive children’s space. Because the Clara Barton House was originally multi-purpose and utilitarian in nature, this plan restores the feeling and association that were character-defining features of the building and welcomes visitors back into a space that was created to serve the public.⁷

Fourth, the rehab plan maintains the central atrium as the heart of building and planned changes around it, ensuring that enlarging doorways and adding mechanical and electrical wiring would not be visible from the atrium to visitors. Such complex measure demonstrate a commitment to maintaining this character-defining feature of the building itself and to preserving the feel and atmosphere of the building for visitors.

Fifth, the rehab plan successfully maintains the fireproof vault as an interpretative space that can be easily accessed by the visiting public on both the first and second floors. The existence of this vault and its use during

⁴ Mills + Schnoering, “Assessment of Effects,” 2023, 11, 58.

⁵ Heritage Landscapes LLC, Preservation Landscape Architects & Planners, “Cultural Landscape Report: Rehabilitate Clara Barton National Historic Site,” July 2023, 2.8, 2.21, 2.52.

⁶ Lampl, *Historic Structure Report*, 2002, IV-4, VIII-4; Mills + Schnoering, “Assessment of Effects,” 2023, 30.

⁷ See, for example, Nomination Form for Clara Barton House, National Survey of Historic Sites and Buildings, National Park Service, Department of the Interior, 1965.

Barton’s lifetime reflect her commitment to storing emergency supplies and her understanding that records of her relief work would be useful to subsequent generations.⁸ Such a character-designing feature is essential for visitors to have access to, and the plan allows for this space to be interpreted and viewed by visitors, particularly as the planned bookstore space would include an overlook into this area.

Despite these commendable strengths, the current rehabilitation plan contained in the 100% Schematic Design Report and its accompanying Assessment of Effects has some weaknesses that cannot be ignored. First, federal legislation on the Protection of Historic Properties (36 CFR 800) specifies in 800.11(e)(4) that any findings regarding adverse effect must delineate the impact on the characteristics that qualify the historic property for listing on the National Register. According to the AOE’s “Statement of Historic Significance”, the 1965 and 1979 documentation list areas of significance that correlate with the National Register listing Criteria A, B, and C. It also notes that the 2011 Cultural Landscape Inventory and the 2023 Cultural Landscape Report recommend that Criterion D should also apply. These classifications are outlined in Table 1 for convenience.

While the Assessment of Effects adequately addresses any potential adverse effect to Criteria C and D, it does not adequately address the (potential) adverse effects to criteria A and B. The report appears to suggest that because the rehab plan does not involve changes or interventions to rooms of primary significance, the building’s association with the American Red Cross and with Clara Barton will not be affected. However, any rehabilitation plan necessarily affects the building itself, which building, as a whole, is associated with a significant event and a significant person. Upon acknowledging that rooms of secondary significance such as rooms 103, 116, 117, 214, and 215 will be affected, the AOE argues that these roomers were re-designated in the 2002 *Historic Structure Report* without sufficient explanation and the historic use of the room(s) was either of short duration or insignificantly documented. The repurposing of these spaces seems reasonable. However, the AOE does not address how the rehab would reflect the multipurpose nature of the original building or the building’s connection to larger social and humanitarian issues.⁹ The AOE begins to make such a connection by suggesting that the new vertical lift be interpreted “with a focus on Clara Barton” but leaves it to the reader to imagine what this would be. Would the lift be considered auxiliary to the house as is suggested by creating it within a floating room like the accessible bathroom? Will it be considered a modern interpretation of the house or somehow connected to Clara Barton and her social and humanitarian work?¹⁰ Similarly, the AOE suggests that the rehabilitation of the walk to the house will restore a missing historic feature, that of a boardwalk that linked the house’s front door to the Glen Echo community. Yet this change seems to be merely one of shape – from curved to rectilinear – and not of material with both the old and the new sidewalks made of concrete. While not necessarily creating an immediate adverse effect, the allocation of funds and planning to replace an ahistoric feature with another visually and tactilely ahistoric feature seems short-sighted and perhaps a long-term adverse effect.¹¹

Additionally, the Assessment of Effects spend too little space discussing the American Red Cross itself or how the site connects to the Red Cross as an institution (Criteria A). The majority of the language focuses on Clara Barton herself. For example, project objective #2 states a commitment to “convey [the] story of Clara Barton’s

⁸ Oehrlein & Associates Architects, *Clara Barton National Historic Site: Historic Structure Report*, Volume 2: Physical History and Condition Assessment, National Park Service, Department of the Interior, 1997, 150; Lampl, *Historic Structure Report*, VIII-5.

⁹ Mills + Schnoering, “Assessment of Effects,” 2023, 41-43, 45-47, 58.

¹⁰ Mills + Schnoering, “Assessment of Effects,” 2023, 11.

¹¹ Mills + Schnoering, “Assessment of Effects,” 2023, 11, 25, 53.

life and humanitarian activities to local, national, and international visitors.”¹² However, the original period of significance was designated as 1897-1904, corresponding with the time that the American Red Cross was headquartered on site. The 1965 nomination for the National Register also designated the house as “primarily the headquarters of the American National Red Cross.”¹³ The 2002 *Historic Structure Report* similarly noted that the house should also be associated with Dr. “Julian Hubbell, who as chief field agent of the American Red Cross led the majority of reflect efforts for the organization for over 20 years.”¹⁴ While the rehab plan appears to leave Dr. Hubbell’s rooms intact for interpretation and open to visitors, the lack of significant mention of Dr. Hubbell in the AOE suggests that the potential adverse effects to the property under Criteria A (the Red Cross) and B (Clara Barton) have not adequately been assessed and that there is potential for historic value to be lost without further attention.¹⁵

Second, careful study of the 100% Design Schematic report suggests that the property’s integrity of feel and the visual, atmosphere, and audible elements of the cultural landscape may be impacted by the proposed designation of use for rooms 201, 203, and 218. In her writings and in her plans to renovate the house, Clara Barton clearly indicated the importance of creating a contemplative space at the front of the house that would house her extensive library and allow her to study in peace while looking at the expanse from the front windows of the house. Views from the house have been compromised by modern construction and changes in the cultural landscape that are beyond the Park’s control. However, the designation of rooms 201 and 203 as a classroom space run the risk of disrupting the meditative and contemplative haven that Barton found so important, a refuge hidden away from the visitors that frequently inhabited and visited the house.¹⁶ To preserve the feel and the visual and audible elements of this character-defining feature of nineteenth-century vernacular architecture, I suggest placing the temporary exhibits in this space and moving the classroom to room 218. This would allow the Park to reconsider the use of this space at a later time should more resources become available and, in the meantime, retain this space as a quiet place for philosophical reflection rather than a space of active and interactive learning. It would also connect the contemplative space directly to the open-air atrium of the building rather than allowing the noise from the classroom to spill into the entire building.

Third, the thirty-eight walk-in closets serve as a reminder of Clara Barton’s commitment to the house as a multi-purpose facility that served as a storehouse for emergency supplies. Although the rehab’s plan to use some of these closets to house vertical ductwork, piping, and conduit out of sight of visitors makes sense, a thorough study of the closets and a careful plan of which ones would be used for what purposes is necessary. The AOE indicates that false backs can be installed in the closets if concealment is necessary. I note that the addition of any modern elements to these closets necessarily impacts the property and its design, materials, and workmanship. This will impact any future plans for interpretation and permanently alter the walls, floors, and ceilings of these closets. From a historical perspective, the existence of thirty-eight closets in a late-nineteenth-century building with thirty-six rooms is unusual to say the least. Studies of the House since its acquisition by the Park Service have not revealed the specific uses of these rooms, but their number in and of

¹² Mills + Schnoering, “Assessment of Effects,” 2023, 8.

¹³ Nomination Form for Clara Barton House, 1965.

¹⁴ Lampl, *Historic Structure Report*, 2002, xxi, VIII-3-4.

¹⁵ I note here that Dr. Hubbell’s name is mentioned four times in the AOE. He is listed twice as an associate of Clara Barton who lived in the house, he is mentioned as having an influence on the architectural design of the building, and he is mentioned once as clearing a room.

¹⁶ Lampl, *Historic Structure Report*, 2002, IV-23-24.

itself and their placement around the central atrium speaks to their importance to the house and to Barton. Without a clear-cut commitment of how the rehabilitation of these closets will be planned and a discussion of how deep the false backs to the closets would be, it is difficult to determine the adverse effect that such plans would have.¹⁷

Fourth, the 100% Schematic Design report and the AOE indicate that rooms 116 and 117 will host the vertical lift and the accessible bathroom. The explanation for this choice in the AOE is satisfactory, particularly as the historical information regarding the use by Clara Barton of rooms 116 and 117 as a bedroom appears sparse. However, the rehab plan includes placing two new PTD steel columns into room 116 which will permanently alter the room. To mitigate any adverse effect to future research into the use of this room, particularly if new manuscript material should become available, this room's configuration should be adequately documented, including with photographs of the room absent any furnishings prior to any rehabilitation.

Fifth, the 1979 nomination for the National Register of Historic Places includes the designation of some 2000 artifacts, including but not limited to furniture, manuscripts, clothing, books, photographs, and other ephemera, which date either to the interpretative period 1890-1912 or from earlier in the nineteenth century. Technically speaking, because these items are elements of the historic site itself, any consideration of adverse effects should include discussion of whether the rehab project will restore these items to the site or continue to relegate them to off-site storage. Rooms 109 and 208 do not currently have any designated use, so presumably some of the material could be stored there as well as in the vault or some of the closets. Additionally, some of this material might be available to the viewing public in the interpretative spaces. However, the AOE should give some consideration to these as they are considered part of the character-defining features that places the Clara Barton National Historic Site on the National Registry.¹⁸

The National Park Service's commitment to rehabilitate the Clara Barton National Historic Site for the general public is commendable and exciting, and the tenacity and creativity of the Mills + Schnoering team bode well for the future of the park. I recognize the many challenges the Park faces in making the site safe and accessible for the general public and the tremendous work that it requires. I am hopeful for the rehabilitation of this important historic property, and I am grateful for the opportunity to work with the Park through the Section 106 consulting process as this project has unfolded.

Sincerely,



Pearl J. Young
Assistant Professor of History
youngp@uhcl.edu
281-283-3317

Enclosure: Table of National Register Criteria for the Clara Barton National Historic Site

¹⁷ Mills + Schnoering, "Assessment of Effects," 2023, 33, 34, 38, 59; Paul Goeldner, CLBA Nomination Form, 1979.

¹⁸ Paul Goeldner, CLBA Nomination Form, 1979.

Table 1: Table of National Register Criteria for the Clara Barton National Historic Site

Criterion	Description ¹⁹	Clara Barton National Historic Site ²⁰
A: Event	Are associated with events that have made a significant contribution to the broad patterns of our history	Its historic association with the American Red Cross (1891-1904)
B: Person	Are associated with the lives of persons significant in our past	Its association with the life of Clara Barton
C: Design/Construction	Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction	An outstanding example of late nineteenth-century American vernacular architecture that defies simple classification
D: Information Potential	Have yielded, or may be likely to yield, information important in prehistory or history	<i>Recommended as potentially significant:</i> prehistoric and historic archeological potential exists with direct relation to the significant themes of the property

¹⁹ Copied verbatim from the National Register of Historic Places Bulletin 15, "How to Apply the National Register Criteria for Evaluation," National Park Service, Department of the Interior, 1997, ii-iii, 2.

²⁰ Paraphrased for Criteria A and B and copied verbatim for C and D from Mills + Schnoering, "Assessment of Effects," 2023, 3-4.

February 22, 2024

Comments: Clara Barton Historic Site, Review of Assessment of Effects Report

Dear Superintendent Cuvelier:

On behalf of the Bordentown Historical Society, the steward of our own Clara Barton treasure, the Clara Barton Historic Schoolhouse, I thank you for the opportunity to be a participating Consulting Party.

It is clear from the 1/30/24 meeting that there have been significant changes from what was envisioned and presented at the meeting that I first attended on 11/16/22 at the site. The work that you, your staff and consultants have done since that time is remarkable. The detail in the architectural presentations was very helpful. The fact that you reconsidered, reassessed and redesigned so many aspects of the original plan based upon comments and concerns of the consulting parties is greatly appreciated by all.

Like other members of the consulting party group who have expressed their desire to continue to partner with the NPS in connection with exhibit and interpretation issues, I too would like the opportunity to remain engaged to help in any way I can while the site is being rehabilitated. With regard to interpretation, since it is an issue that has been discussed, please know that I am feel that many of the personal items belonging to Clara Barton, which are currently in storage, should be returned to the Site for exhibition.

I strongly support the proposal to establish a national women's history center at the Clara Barton Historic Site and agree that drafting a formal agreement outlining all relevant details would be appropriate. I also agree with all of the amendments proposed to the National Register Designation, particularly the expansion of the period of significance from 1897 to 1891.

I do wish to note that I was surprised by the Statement of Historical Significance (1.3) in the Assessment of Effects. In the 4th paragraph it repeated what was stated in the Schematic Design introduction (paragraph 3): "The purpose of this site is to tell the early story of the American Red Cross through the interpretation of the life and times of its founder, Clara Barton." In my view that is a very limiting statement of "historical significance" with regard to both Clara Barton and the

American Red Cross! Further down in the Statement of Historical Significance it talks about the American Red Cross and then states: “The house and grounds also meet National Register Criterion B based upon its association with the lives of persons significant in our past, specifically Clara Barton. Over the course of her lifetime Barton was a dedicated Civil War nurse, an active women’s rights suffragette, and the founder and first president of the American Red Cross”. Even that statement is a little light on her history of accomplishments! The NPS probably would not have first aid kits at all the parks but for the efforts of Clara Barton!!! When visitors come to the Schoolhouse where Clara Barton taught in 1852, we do not limit our discussion to what she did there in 1852. We talk about all of the amazing accomplishments of this American Icon and that is what I believe should be done at this Site in order to celebrate Clara Barton’s extraordinary legacy.

Again, many thanks for the opportunity to collaborate in connection with this significant National Historic Site and National Historic Landmark.

Sincerely,

Bonnie Goldman, Co-President, Bordentown Historical Society, PO Box 302
Bordentown, NJ 08505



**National Trust *for*
Historic Preservation**

Save the past. Enrich the future.™

SENT VIA E-MAIL

February 23, 2024

Charles Cuvelier
Superintendent
National Park Service
700 George Washington Memorial Parkway,
McLean, VA 22101

Re: Comments on the “Rehabilitate Clara Barton National Historic Site CBLA 312325 Assessment of Effects Report” (Dec. 19, 2023) and “Rehabilitate Clara Barton National Historic Site CBLA 312325 Schematic Design” report (Dec. 8, 2023)

Dear Mr. Cuvelier:

The National Trust for Historic Preservation (the “National Trust”) would like to express our sincere appreciation for you and your staff’s work on the rehabilitation and reuse project at Clara Barton National Historic Site (“CBNHS”). The current proposal is a dramatic improvement from the original plan, and we are happy to express our support for it. The Schematic Designs for Alternative 2 preserve original materials and spaces, sensitively increase public access to the property and accessibility in general, and--most importantly--prioritize interpretation of the history of Clara Barton, the American Red Cross, and Dr. Julien Hubbell. These improvements are a direct result of the willingness of George Washington Memorial Parkway (“GWMP”) to listen to comments from consulting parties, and to act on them. We understand that the reassessment and redesign of this project may have resulted in delays for GWMP, but we hope you agree that these efforts have produced a superior project that respects and preserves the historic significance of this National Historic Site and National Historic Landmark.

While we support the project as proposed, we would like to offer the following comments concerning the remainder of this Section 106 consultation:

Final Assessment of Effects

The Rehabilitate Clara Barton National Historic Site CBLA 312325 Assessment of Effects Report (“AOE”) states that the GWMP and their consultant team recommend Alternative 2 and that “the Proposed Rehabilitation...delivers a project with no adverse impacts on the character-defining features of the building and the site.”¹ The National Trust is fully supportive of the project as proposed, and we view it as a necessary and beneficial set of

¹ “Rehabilitate Clara Barton National Historic Site CBLA 312325 Assessment of Effects Report” (Dec. 19, 2023), p. 60

treatments and upgrades for this historic property. However, we do note the February 20, 2024, email from the National Historic Landmarks Program which stated, “[D]espite the park and its consultants’ wide-ranging efforts to avoid and minimize adverse effects to the NHL, we believe that, overall, the project will result in an adverse effect to the NHL.” We concur with their assessment, since the loss of historic fabric identified by the National Historic Landmarks Program as the basis for their determination is undeniable. The National Trust seeks to continue consultation with GWMP to achieve appropriate avoidance, minimization, and/or mitigation of those effects in a manner that allows this project to proceed and CBNHS to be reopened to the public.

Per the comments from the Advisory Council on Historic Preservation (ACHP) and the National Historic Landmark program at the January 30, 2024, Consultation Meeting, we look forward to receiving and reviewing the final assessment of affects once it has been prepared by GWMP. Based on comments made during the January 30, 2024, consulting parties meeting, it is our understanding there will be a 30-day comment period once those findings are released. This will be followed by another 30-day review and comment period after the completion and circulation of comments from the ACHP and Maryland State Historic Preservation Office (SHPO). The National Trust looks forward to these opportunities to continue our participation in this consultation.

Archaeology

The AOE states that a “Phase IA/IB archaeological survey will be completed based on the proposed rehabilitation and the survey’s findings incorporated into the final AOE at the appropriate time.”² We look forward to reviewing this final assessment of effects report when it is completed. We additionally request that GWMP notify the National Trust if this archaeological investigation identifies any potential for new adverse effects, so that we may consult on their resolution prior to the issuance of the final AOE. We also note that while previous construction of the parking lot potentially disrupted archaeological resources, any future projects that involve the removal of or reworking of the parking area, medians, or planting areas should consider the potential for the discovery of resources related to CBNHS.

Amendments to National Register of Historic Places Application

The AOE and Basis of Design report identify and propose several needed updates to the Statement of Significance recorded for CBNHS on the National Register of Historic Places, as well as the need to expand the nomination for Criterion B and C, and perhaps Criterion D, pending the outcome of the archaeological assessment. The National Trust concurs with all of the proposed amendments to the National Register application. We urge GWMP to undertake the proposed amendments and would like to learn about the timeline that GWMP envisions for this important work. The National Trust--and likely other consulting parties as well--would be willing to assist GWMP with this effort.

Partnership for Exhibitions, Interpretation, and Women’s History Center

The Schematic Designs for Alternative 2 include upgraded systems to accommodate future exhibitions within CBNHS. The National Trust and several of the Consulting Parties are interested in working with GWMP to inform the development of those

² *Id.* at pg. 3

exhibits. We recognize that planning of physical and virtual exhibits falls outside the scope of this project (and is unlikely to require independent Section 106 consultation), but we hope that our offer will be accepted.

The National Trust and several of the Consulting Parties also are interested in working with GWMP to explore the creation of a Women's History Center at CBNHS, which would be a first within in National Parks system. We greatly appreciated your January 20, 2024, email regarding this concept, as well as your allocation of Park staff and financial resources to explore the creation of this center and a new national network for women's history sites modeled on the Network to Freedom. The National Trust supports this approach and seeks to formalize a partnership with GWMP and other Consulting Parties by developing a plan of action to accomplish our shared goal. This initiative would be an ideal vehicle for mitigation of the adverse effects identified during this Section 106 consultation.

We are grateful for your consideration of these comments and for all that you have done to ensure this project's ultimate success.

Sincerely,



Christina Morris

Senior Director of Preservation Programs; Manager of Where Women Made History



Christopher Cody

Associate General Counsel

cc: Lucienne Beard, National Collaborative for Women's History Sites
Pamela Goddard, National Parks Conservation Association
Curtis Luthye, Maryland Red Cross
Becky Roman, Maryland Historical Trust
Kirsten Kulis, Advisory Council on Historic Preservation
Kathryn Smith, National Park Service

Re: Clara Barton National Historic Site (MIHP No. M:35-25) Review of Assessment of Effects Report

From Smith, Kathryn G <Kathryn_Smith@nps.gov>

Date Tue 2/20/2024 7:10 PM

To Lozano, Elias N <elias_lozano@nps.gov>; GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>; Becky Roman <becky.roman@maryland.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebeccah.ballo@montgomeryplanning.org>; David.Dise <david.dise@montgomerycountymd.gov>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; kluucas <kluucas@delawarenation-nsn.gov>; arichardson@rappahannock.org <arichardson@rappahannock.org>; Robert Gray <robert.gray@pamunkey.org>; Kirsten B. Kulis <kkulis@achp.gov>; cwilson@achp.gov <cwilson@achp.gov>; luciennebeard <luciennebeard@gmail.com>; Watson, Susan R. (Archives) <susan.watson@redcross.org>

Cc Stidham, Tammy <Tammy_Stidham@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Mocko, Robert <Robert_Mocko@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>; steve_katulla@nps.gov <steve_katulla@nps.gov>; Gossett, Tanya <Tanya_Gossett@nps.gov>

Superintendent Cuvelier and staff,

Thank you for the opportunity to review the "Rehabilitate Clara Barton National Historic Site Assessment of Effects Report" (dated December 19, 2023). The National Historic Landmarks Program appreciates the detailed analysis and itemized effects table included in the report.

Despite the park and its consultants' wide-ranging efforts to avoid and minimize adverse effects to the NHL, we believe that, overall, the project will result in an adverse effect to the NHL. The building's high degree of integrity, unique historic design and function combined with its structural challenges make opportunities for modification without adverse effects very limited. We understand the need to upgrade the building for safety and visitor accessibility, and we realize the serious constraints posed by the specific circumstances at this site. Alterations associated with the installation of a second egress stair and a lift require changes to the historic layout of the rooms and circulation patterns that will diminish the building's integrity of design. In addition, upgrades related to code and accessibility compliance necessitate removal of historic materials that are character defining to the building. This includes removal of flooring, plaster finishes, distinctive canvas closet doors, and board-and-batten and beadboard walls. Likewise, alterations to historic, doors and door openings will alter the character of the spaces. These removals and alterations will diminish the building's integrity of design, materials, and workmanship.

The National Historic Landmarks Program looks forward to continuing to work with the park, the State Historic Preservation Office, and other consulting parties to develop and record strategies to minimize and mitigate the unavoidable adverse effects while rehabilitating this important National Historic Site that does not easily lend itself to modernization.

Below are several comments and questions related to the Assessment of Effects report; some of which I conveyed verbally at the January 30th meeting. Thank you again for the opportunity to provide feedback.

Comments on the Assessment of Effects Report:

- Thank you for the detailed analysis and providing the design details and itemized table of effects.
- Table 1 in the report contains 17 instances in the table where the work results in a diminishment of integrity. Why does this not indicate an overall adverse effect?
- How did you determine the cumulative effect after looking at the individual elements? The report or separate finding of effect letter needs an overarching summary of how the project avoids adverse effects. I suggest directly addressing the criteria for adverse effects in the regulations; specifically show how the project will not “alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.” It might also be useful to discuss, in brief, how the project and its components meet the 10 Rehabilitation Standards in the Secretary of the Interior's Standards.
- Please include changes to the floor plan in your assessment of effects.
- I do not agree with the analysis used in this older HSR regarding the significance of certain spaces being “utilitarian” and thus not having significance. The building is utilitarian overall. The HSR’s analysis seems to erroneously rely on aesthetic value (quality of architectural detail) and interpretive value (we know nothing about it, thus it's not significant).
- Use of the term “minimization” throughout the report suggests there are adverse effects that we are treating through minimization steps.
- *De minimus* – meaning lacking significance or importance/ so minor as to merit disregard – is a legal term that I haven’t seen in Section 106 consultation. The effects determination should not be based on weighing the benefits against the negatives.
- Clarification: P. 3, line 14 – CLBA was listed in the National Register in 1966 by virtue of its 1965 NHL designation. In 1966 when the National Register was created, NHLs were its first listings. Formal documentation usually came later; thus the 1980 NR form for CLBA. So, its NR listing date is 10/15/1966 – the date the NHPA was signed into law.

Best,
Kathryn

P.S. I have submitted these comments through PEPC as well.

Kathryn G. Smith (she/her)
National Historic Landmarks & National Register Coordinator
National Park Service
National Capital Region
202.619.7180
202.913.3859 mobile

1100 Ohio Drive, SW
Washington, DC 20242
kathryn_smith@nps.gov

NCR Website <https://www.nps.gov/RESSNCR>

NHL Website <http://www.nps.gov/nhl>

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Instagram [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

From: Lozano, Elias N <elias_lozano@nps.gov>

Sent: Tuesday, January 9, 2024 5:14 PM

To: GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; Becky

Roman <becky.roman@maryland.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebeccah.ballo@montgomeryplanning.org>; David.Dise <david.dise@montgomerycountymd.gov>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; klucas <klucas@delawarenation-nsn.gov>; arichardson@rappahannock.org <arichardson@rappahannock.org>; Robert Gray <robert.gray@pamunkey.org>; Kirsten B. Kulis <kkulis@achp.gov>; cwilson@achp.gov <cwilson@achp.gov>; Luciennebeard <luciennebeard@gmail.com>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; Luthye, Curtis <curtis.luthye@redcross.org>; bgoldman1 <bgoldman1@comcast.net>; mwhcdiana <mwhcdiana@gmail.com>; nredding <nredding@presmd.org>; ljgordon1 <ljgordon1@ua.edu>; timlowry <timlowry@bellsouth.net>; huyckclapper <huyckclapper@earthlink.net>; Julia Irwin <juliai@usf.edu>; jacob.remes <Jacob.remes@nyu.edu>; Chandra M Manning <cmm97@georgetown.edu>; Kathryn Sklar <kksklar@binghamton.edu>; Judith Wellman <historicalnewyork@me.com>; cgood <cgood@marymount.edu>; Young, Pearl Joy <youngp@uhcl.edu>; Rosie Click <vrc10@georgetown.edu>; NANCY HEWITT <nhewitt@scarletmail.rutgers.edu>; Jellison, Katherine <jellison@ohio.edu>; Varon, Elizabeth Regine (erv5c) <erv5c@virginia.edu>

Cc: Stidham, Tammy <Tammy_Stidham@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Mocko, Robert <Robert_Mocko@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>; steve_katulla@nps.gov <steve_katulla@nps.gov>

Subject: Re: Clara Barton National Historic Site (MIHP No. M:35-25) Review of Assessment of Effects Report

Good afternoon everyone, my apologies but the link included in the memo may be taking you to some older documents. My change to the correct documents did not take as expected.

Here is where you will find the AOE: <https://parkplanning.nps.gov/documentsList.cfm?projectID=101787>

ParkPlanning -

Rehabilitate Clara Barton National Historic Site

ParkPlanning - Rehabilitate Clara Barton National Historic Site

parkplanning.nps.gov



Elias N. "Sonny" Lozano Jr.

Historian

George Washington Memorial Parkway

700 George Washington Memorial Parkway

McLean, VA 22101

(202) 536-9391 (cell)

From: Cuvelier, Charles J <Charles_Cuvelier@nps.gov> on behalf of GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>

Sent: Tuesday, January 9, 2024 2:56 PM

To: Smith, Kathryn G <Kathryn_Smith@nps.gov>; Becky Roman <becky.roman@maryland.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; David.Dise <david.dise@montgomerycountymd.gov>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; klucas <klucas@delawarenation-nsn.gov>; arichardson@rappahannock.org <arichardson@rappahannock.org>; Robert Gray <robert.gray@pamunkey.org>; Kirsten B. Kulis <kkulis@achp.gov>; cwilson@achp.gov <cwilson@achp.gov>; luciennebeard <luciennebeard@gmail.com>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; Luthye, Curtis <curtis.luthye@redcross.org>; bgoldman1 <bgoldman1@comcast.net>; mwhcdiana <mwhcdiana@gmail.com>; nredding <nredding@presmd.org>; ljgordon1 <ljgordon1@ua.edu>; timlowry <timlowry@bellsouth.net>; huyckclapper <huyckclapper@earthlink.net>; Julia Irwin <juliai@usf.edu>; jacob.remes <Jacob.remes@nyu.edu>; Chandra M Manning <cmm97@georgetown.edu>; Kathryn Sklar <kksklar@binghamton.edu>; Judith Wellman <historicalnewyork@me.com>; cgood <cgood@marymount.edu>; Young, Pearl Joy <youngp@uhcl.edu>; Rosie Click <vrc10@georgetown.edu>; NANCY HEWITT <nhewitt@scarletmail.rutgers.edu>; Jellison, Katherine <jellison@ohio.edu>; Varon, Elizabeth Regine (erv5c) <erv5c@virginia.edu>

Cc: Stidham, Tammy <Tammy_Stidham@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Mocko, Robert <Robert_Mocko@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>; steve_katulla@nps.gov <steve_katulla@nps.gov>

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Review of Assessment of Effects Report

The park invites your review and comment on the Clara Barton National Historic Site Assessment of Effect Report (AOE). The entire correspondence and links are in the attached document. A Consulting Parties Meeting has been scheduled during the 45-day review period to present the AOE and to discuss any questions or comments. You are invited to attend this virtual meeting on Tuesday, January 30, 2024, from 11:00 am - 1:00 pm. A meeting link through the Microsoft Teams platform will be included in a separate email.

Superintendent
George Washington Memorial Parkway

[EXTERNAL] Re: Clara Barton National Historic Site (MIHP No. M:35-25) Review of Assessment of Effects Report

From Becky Roman -MDP- <becky.roman@maryland.gov>

Date Thu 2/22/2024 2:59 PM

To GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>

Cc Smith, Kathryn G <Kathryn_Smith@nps.gov>; Katharine Boerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; David.Dise <david.dise@montgomerycountymd.gov>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; klucas <klucas@delawarenation-nsn.gov>; arichardson@rappahannock.org <arichardson@rappahannock.org>; Robert Gray <robert.gray@pamunkey.org>; Kirsten B. Kulis <kkulis@achp.gov>; cwilson@achp.gov <cwilson@achp.gov>; luciennebeard <luciennebeard@gmail.com>; Watson, Susan R. (Archives) <susan.watson@redcross.org>; Luthye, Curtis <curtis.luthye@redcross.org>; bgoldman1 <bgoldman1@comcast.net>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Megan Bailey, Cultural Resources Manager
Charles Cuvalier, Superintendent
George Washington Memorial Parkway, Glen Echo Park, and Clara Barton National Historic Site
National Park Service (NPS)

Good afternoon Megan and Charles,

Thank you for providing the consulting parties with 45 days to provide their comments on the Assessment of Effect (AOE) report for the rehabilitation of the Clara Barton House/NHS (MHT log 202400148). We appreciate the National Park Service's careful consideration of how the proposed design may alter character defining features of this highly significant building and National Historic Landmark, while still meeting the goal to reopen the building to the public and provide access to its second floor.

MHT has no comments on the AOE Report as in our opinion, it provides detailed information on the undertaking specific impacts to the character defining features and materials of the building. As we stated during the consulting parties meeting, this report does not provide a concise effect assessment of the undertaking on historic properties including archeological resources, nor does it provide the NPS' formal determination of

effect on historic properties. The report does provide the background and data needed to provide an assessment of effect to the above-ground/structural elements of this historic property. In the ACHP comments, Kirsten Kulis provided guidance on the items required to support your determination of effect on historic properties.

MHT looks forward to continued consultation with NPS and the other consulting parties. We await your submission of the archeology report and determination of effect on historic properties later this year.

Please do not hesitate to contact us with any questions or concerns. Have a great end to your week.

Becky



Becky Roman (*she, her, hers*)

Preservation Officer / Architectural Historian

Project Review and Compliance

Maryland Historical Trust

Maryland Department of Planning

100 Community Place, 3rd Floor, Crownsville, MD 21032

becky.roman@maryland.gov (410) 697-9587

Mht.maryland.gov [Please take our customer service survey.](#)

On Tue, Jan 9, 2024 at 2:56 PM GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov> wrote:

The park invites your review and comment on the Clara Barton National Historic Site Assessment of Effect Report (AOE). The entire correspondence and links are in the attached document. A Consulting Parties Meeting has been scheduled during the 45-day review period to present the AOE and to discuss any questions or comments. You are invited to attend this virtual meeting on Tuesday, January 30, 2024, from 11:00 am - 1:00 pm. A meeting link through the Microsoft Teams platform will be included in a separate email.

Superintendent

George Washington Memorial Parkway

Historical New York Research Associates

Judith Wellman, Principal Investigator

Discovering Extraordinary People and Places in Time



2 Harris Hill Road, Fulton, New York

www.historicalnewyork.net

historicalnewyork@me.net, 315-529-7808

February 24, 2024

Mr. Charles Cuvelier
Superintendent, George Washington Memorial Parkway
George Washington Memorial Parkway Headquarters
700 George Washington Memorial Parkway
McLean, VA 22101

Dear Superintendent Cuvelier:

Many, many thanks for your willingness to work with so many constituents in developing a plan for preserving and using the Clara Barton National Historic Site, a Congressionally designated unit of the National Park Service for fifty years. Many of us have been meeting regularly to review the latest drawings and specifications and to consider both interpretive themes and sustainable uses of this nationally significant site. We very much appreciate the opportunity to continue working with you.

As an historian who focuses on women's history, I have been especially interested in discussions relating to interpretation of this site. Three themes seem especially important: a) Clara Barton's life; 2) the American Red Cross; and 3) women's history, both within the National Park Service and more generally across the U.S. We hope that interpretation will include a consideration of the historic importance of these themes, as well as their contemporary relevance. We expect that audiences will include onsite visitors to this site as well as an outreach to virtual audiences. They will include people of all ages and those with a general interest, as well as historians who specialize in women's history and philanthropic endeavors. These can certainly be incorporated with any of the proposed preservation efforts. I will leave it to others to deal specifically with these.

One specific concern is the establishment of a Women's History Center at Clara Barton NHS. There is a need, both within the National Park Service and beyond, for help in interpreting women's history at place-based historic sites. This would take the form of a clearinghouse to develop guidelines and workshops that site managers could use to connect their own particular places with the best current scholarship in women's history. The National Collaborative of Women's History Sites has recently published a model for this

kind of work, *Telling Women's Stories: A Toolkit for Historic Sites and Museums* (2023), <https://ncwhs.org/resources/twstoolkit/>. This builds on an earlier report "Telling the Whole Story," developed from a joint NCWHS-NPS conference in 2012 (Washington D.C.: WASO, 2012). Funding would come from both private donations and grants from such agencies as the National Archives and Records Administration, which funds digitized versions of archival collections. Early grants might focus on digitizing material relating to Clara Barton and the American Red Cross.

We in the National Collaborative of Women's History Sites look forward to continuing discussion of these and other options.

We remain grateful for your willingness to facilitate this public input.

Warm regards,

A handwritten signature in cursive script that reads "Judith Wellman".

Judith Wellman, Vice-president, National Collaborative of Women's History Sites
Professor Emerita, State University of New York at Oswego
Principal Investigator, Historical New York Research Associates



February 23, 2024

Superintendent Charles Cuvelier
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

RE: *Rehabilitate Clara Barton National Historic Site, CLBA 312325, Assessment of Effects Report*

Dear Superintendent Cuvelier:

On behalf of the National Parks Conservation Association, I thank you for the opportunity to participate in the Section 106 Consultation for the Clara Barton National Historic Site and am providing our views for the rehabilitation of the first national park site dedicated to the contributions of a woman. We are grateful to you, your staff, and the many consultants working on this project for your willingness to meet with us, consider our perspective, and to restart the process to ensure that the rehabilitated Barton site will properly reflect and honor the historic significance of Clara Barton and the early days of the American Red Cross.

As stated previously in our August 2023 comments, we strongly supported Alternative 3B. We supported this alternative because it would restore and preserve a broad array of period rooms throughout the building and retain critical historic features. This would allow visitors to learn about Clara Barton, Julian Hubbell and other influential people who lived and worked at the site; and the history of an important organization that continues to serve our country today. We also supported Alternative 3B because it would have maximized visitor occupancy while accommodated those with limited accessibility.

Although we strongly supported Alternative 3B as the preferred alternative for rehabilitation of the site, we understand the National Park Service's decision to choose a modified Alternative 2 that includes construction of a new vertical platform lift and two toilet rooms. By choosing a modified Alternative 2, we believe this allows you to preserve the most historically accurate rooms and to reduce damage to the historic structure while allowing critical upgrades to ensure building safety and code compliance for park visitors.

We support the project goals of rehabilitation to permit the reopening of the site for increased public visitation; to ensure the site is safe and accessible to all; to afford greater interpretive opportunities; and to guarantee the historic furnishings and features of the site are protected by modernizing the electric, heating, cooling, and plumbing systems. However, we concur with

the National Park Service National Historic Landmarks and National Register Coordinator that the structural changes to the Clara Barton National Historic Site required for this undertaking will inevitably result in adverse effects to the historic site that must be avoided, minimized, and/or mitigated.

We believe structural changes must be made to the Barton site to ensure it can support its mission and that the resulting adverse impacts could be minimized or mitigated. Strategies of minimization and mitigation should be part of a continuing Section 106 process with the consulting parties. We have suggested potential mitigation strategies later in this letter. We look forward to participating in minimization/mitigation discussions in the future as part of the Section 106 consultation.

Assessment of Effects Report

Project Objectives

In our review of the *Assessment of Effects Report*, we are compelled to point out our disagreement with the statement that “The principal purpose of this site is to tell the early story of the American Red Cross through the interpretation of the life and times of its founder, Clara Barton” (page 1). We contend that the purpose of the Clara Barton National Historic Site is to share the complete story of Clara Barton, including her many achievements. Some of Barton’s countless accomplishments include the founding of a public school in New Jersey, her work at the U.S. Patent Office, her creation of the Office of Missing Soldiers, her modernization of disaster relief, the creation of First Aid, her leadership role in the ratification of the Geneva Convention, and the creation of the American Red Cross. Indeed, the Baltzley brothers would have been unlikely to have offered to build Barton a home and invite her to live there if there was not a broad recognition of her many accomplishments. We think this expanded view of the purpose of the site is more properly captured in *Project Objectives, # 2. Convey story of Clara Barton’s life and humanitarian activities to local, national, and international visitors* (page 8). Emphasis should be on the entirety of Barton’s significant contributions to our country with creation of the American Red Cross as one chapter of this amazing woman’s life.

Archaeological Survey

On page 56, the report notes that “A Phase 1A/1B archaeological survey will be completed and the survey’s findings will be incorporated into the final AOE at the appropriate time “. These findings should be made available as part of the Section 106 Consultation process with a corresponding comment period for consulting parties. We look forward to reviewing these findings and providing comments as part of the Section 106 Consultation.

Amendments to National Register of Historic Places

We support your recommendation to amend the National Register of Historic Places Listing to include the building’s architectural significance and the contributions to the building’s design by

Dr. Hubbell and Miss Barton. We support the recommendations in the 2011 Cultural Landscape Inventory and the 2023 Cultural Landscape Report to expand the period of significance to 1891 when Edward and Edwin Baltzley transferred the land to Barton and constructed the building.

National Park Service Assessment of Effects Summary Statement

At the January 30, 2024, consultation meeting, the NPS was instructed to produce a final summary statement on the assessment of effects of the project. This summary statement will be reviewed by the Advisory Council on Historic Preservation, the National Historic Landmarks Coordinator, and the Maryland Historical Trust for comment. Once these comments are shared, this summary statement must be made available to the consulting parties for review and a relevant comment period must be granted. We look forward to participating in this review.

Mitigation Strategies

As stated earlier, the immense structural changes necessary to rehabilitate the Clara Barton National Historic Site will produce adverse impacts. However, we deeply believe the site must be rehabilitated to fulfill the National Park Service mission to protect our national park sites unimpaired for the enjoyment of future generations. Discussion on how to avoid, minimize and mitigate these adverse impacts should be addressed in the Section 106 consultation process. We would like to suggest here some ideas to consider for potential mitigation.

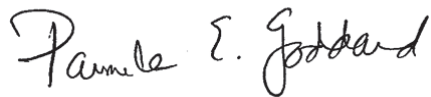
We do understand that interpretation planning is a separate undertaking from the site rehabilitation. However, we believe one opportunity for mitigation is in enhanced interpretation at the site, including housing a proposed women's history center in the Barton National Historic Site. One of the classrooms or special exhibit rooms proposed in the rehabilitation plan could be designated for a women's history center. A national network of women's history sites could be developed and shared across the National Park System. Special exhibits could inform park visitors about the changes made to the building and why. For example, the *Assessment of Effects Report* states, under salvage of historic materials that "materials that cannot be replaced in their original locations will be salvaged and stored in the basement of offsite by NPS" (page 59). One mitigation strategy could be to share the information on these materials with park visitors in exhibits that overview the rehabilitation process perhaps with pictures or video of the historic material removal and storage, educating the public on what historic materials were impacted and why.

An important mitigation strategy would be to formalize via an official agreement or process the involvement of women historians in the interpretation process. The *Assessment of Effects Report* states, "Concurrent to the physical rehabilitation project, NPS is developing the exhibits project by seeking input from historians and other interested parties to help direct the future interpretation of the site." (page 8). A potential mitigation strategy could be creating a formal agreement for the interpretation planning process, including how consulting parties, including

historians, could be actively engaged. We look forward to a robust discussion of these ideas and how impacts could be avoided, minimized, or mitigated as this project moves forward.

We are deeply appreciative of George Washington Memorial Parkway Superintendent Cuvelier committing staff time and hiring a facilitator to discuss future collaboration and partnership. We believe this collaboration will fundamentally revitalize the Clara Barton National Historic Site by bringing together a wealth of wisdom and expertise that will chart a new path in sharing the significant contributions of Clara Barton to our nation's history. We look forward to continuing to work with you and your staff on this important endeavor.

Sincerely,

A handwritten signature in black ink that reads "Pamela E. Goddard". The signature is written in a cursive style and is contained within a thin black rectangular border.

Pamela E. Goddard
Senior Program Director
Mid-Atlantic Region
pgoddard@npca.org
202.604.3781

Cc: Kirsten Kulis, Advisory Council on Historic Preservation
Kym Hall, Kathryn G. Smith, National Park Service National
Capitol Region
Elias Lozano, Rebecca Karcher, George Washington Memorial Parkway
Elizabeth Hughes, Becky Roman, Maryland Historical Trust
Lucienne Beard, National Collaborative for Women's History Sites
Christina Morris, Christopher Cody, National Trust for Historic
Preservation



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

June 3, 2024

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, MD 21032
Sent by email to elizabeth.hughes@maryland.gov

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Assessment of Adverse Effects

Dear Ms. Hughes:

The National Park Service (NPS) George Washington Memorial Parkway (GWMP) is proposing rehabilitation of the Clara Barton National Historic Site, a National Historic Landmark (NHL), in Glen Echo, Maryland and wishes to continue consultation with the Maryland Historical Trust (MHT) under Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. 306108) and all consulting parties in accordance with 36 CFR 800.4 and 800.5 of the regulations of the Advisory Council on Historic Preservation. The Proposed Rehabilitation project will resolve ongoing issues of life safety, accessibility, and indoor environmental control that threaten the long-term preservation of the NHL and challenge GWMP's ability to achieve their mission of interpreting the life of Clara Barton at Glen Echo, MD. In addition, the improvements better serve the general public, park programs, and NPS staff. This letter serves to provide updates on GWMP's continued efforts to identify historic properties for archeological resource types (36 CFR 800.4) and inform MHT that in the application of the criteria of adverse effect, per 36.800.5(a), the agency official finds that the undertaking shall result in an Adverse Effect (36 CFR 800.5(d)(2)), and seeks to continue consultation in the resolution of adverse effects, per 36 CFR 800.6.

Summary and Description of Undertaking

The 130-year-old Clara Barton National Historic Site (CLBA) suffers from the ongoing deterioration of materials and deferred maintenance and is in critical need of rehabilitation. Structural, mechanical, electrical, plumbing, and fire protection deficiencies have compromised the safety and comfort of staff and visitors. Insufficient structural live-load capacity and resistance to lateral forces (seismic, wind) have required GWMP to limit the number of visitors and access to upper floors. The overarching goal of the Proposed Rehabilitation project is to protect the integrity of this NHL through preservation, stabilization, and conservation of its historic fabric, to address critical code deficiencies, and to improve access for persons with mobility limitations.

In December 2023, GWMP prepared an initial draft Assessment of Effects (AOE) report documenting the Proposed Rehabilitation of the Clara Barton National Historic Site. The AOE provides necessary background information about CLBA, the regulatory context of the Proposed Rehabilitation (including both Section 110(f) and Section 106 implementing regulations), a detailed assessment of proposed actions and alterations, and a description of the prior documentation and reporting that guided crucial decisions for the proposed interventions. The NPS is following *NPS Technical Preservation Services Standards* and applying the *Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part*

68, 1995) as guidance to promote responsible preservation practices and to protect this irreplaceable cultural resource.

The proposed treatment actions and their effects on the integrity of the property's character-defining features are detailed in the AOE report in **Section 5.0 Assessment of Effects** and **Table 1 Aspects of Integrity Impacted, Analysis, and Minimization or Avoidance Measures by Character-Defining Feature**. **Section 6.0 Avoidance/Minimization/Mitigation** and **Table 1** present the measures presently identified through consultation to minimize and mitigate adverse effects.

Major changes to the historic site will include:

- A Moderate Structural Upgrade that will increase the live-load capacity of the second floor by sistering new lightweight metal joists to the existing, undersized 2" x 6' wood joists.
- Adding a code-compliant egress stair due to occupancy of the second floor, discharging at the basement exterior.
- Providing accessible restrooms at both the first and second floors.
- Replacing the existing HVAC with a new energy-efficient, sustainable heat pump VRF heating and cooling system.
- Adding a vertical platform lift to the design to provide access to the second floor.

These changes will enable the NPS to rehabilitate the house and preserve the character-defining features from the period of significance (1897-1912). The upgrades also provide more opportunities to interpret the story of Clara Barton and the American Red Cross at this site. Concurrent, yet separate from the building rehabilitation project, the NPS is developing programs and exhibits with input from a coalition of historians to guide and inform interpretation of the site.

Consultation and Other Cultural Resources

Beginning in 2022, GWMP initiated and invited input from consulting and interested parties, including Tribal Governments, in the Proposed Rehabilitation and Section 106 compliance process. GWMP has hosted several meetings to share information and solicit feedback on the project and remains committed to engaging with these interested parties (see Enclosure B: List of Consulting Parties).

Based on the history of indigenous peoples associated with the area, Native American Tribal Governments invited to serve as consulting parties include the Accohannock, Catawba, Delaware Nation, Eastern Shawnee of Oklahoma, Pamunkey Indian Tribe, Piscataway Indian Nation, Piscataway-Conoy Tribe, Rappahannock Tribe, and Seneca Cayuga Nation. GWMP is committed to continuing consultation with Tribal Nations to identify historic properties of religious and cultural significance and develop alternatives and modifications for avoiding adverse effects, wherever feasible.

A summary of the meetings hosted to date is provided below:

- **November 16, 2022:** At this initial consulting parties meeting, objections were raised to a proposed partnership with a local organization and their shared use of the building. Consulting parties' comments received and compiled on January 9, 2023, revealed that inclusion of a partner was considered a change of the property's use and association inconsistent with the qualifications and criteria for inclusion of the site on the National Register of Historic Places. Another objection brought forth during the consulting parties meeting was the inclusion of a tower to house lavatories, elevator, and egress stairwell and its diminishment of integrity of the design, setting, materials, workmanship, and feeling of the site (see Enclosure C: Consulting Party Comment Summary).
- **May 1, 2023:** A revision of the undertaking was presented in a meeting with the consulting parties. In this meeting, the process was reset, a new path forward was charted to meet the goals of the Section 106 process and the collaboration continued with the NPS and consulting parties.

- **July 31, 2023:** Three schematic design alternatives were presented for consideration by the consulting parties. At the completion of the thirty-day comment period, respondents concurred that Alternative 2 (with modifications) was the preferred alternative adding that it allowed for access to the second floor with less diminishment to the integrity of the property’s design, setting, materials, workmanship, and feeling of the site.
- **January 30, 2024:** The NPS preferred design alternative and the Assessment of Effect (AOE) report were presented to the consulting parties. The NPS published a draft AOE report that documented the rehabilitation of the CLBA and requested review and comment from consulting parties. At the conclusion of the 30-day comment period, respondents noted that many of the planned treatments for the historic structure would diminish the integrity of characteristics that qualify the historic property for listing in the National Register of Historic Places including design, materials, and workmanship. MHT and other commenters also noted the absence of archeological surveys of sensitive areas and evaluation of their eligibility for listing in the National Register of Historic Places (see Enclosure C: Consulting Party Comment Summary).

Area of Potential Effect

The Area of Potential Effect (APE) is defined under 36 CFR 800.16(d), as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

In July 2023, GWMP published a Cultural Landscape Report (CLR) for the Proposed Rehabilitation project at CLBA which assessed the cultural landscape of the site and identified character defining features of the landscape during the period of significance. Although the findings determined the overall cultural landscape has limited integrity, it retains the potential to portray the historical and cultural values associated with Clara Barton and the American Red Cross. The findings of the CLR were used to inform the APE for this Proposed Rehabilitation. Furthermore, the APE documented in the enclosed drawing (See Enclosure A) was agreed upon by the MHT in August 2023 and includes the cultural landscape and contributing landscape elements of the house, the immediate grounds, and viewsheds in the area surrounding the rehabilitation project site. More specifically, the APE includes:

- The entirety of the Clara Barton NHS, equivalent to the NHL and NRHP nominations
- South retaining wall
- Archeological Site 18MO154 (Clara Barton I)
- Oxford Road (general pattern)
- Residences adjacent to Oxford Road, entrance to the Clara Barton NHS
- Driveway loop (general pattern)
- Minnehaha Branch perennial stream
- Woodland along Minnehaha
- Steep slope south toward the Potomac River
- Lawn north of house
- Views to Potomac River from house
- Views to and from the Town of Glen Echo residential area to house
- Other Historic Properties located within the APE include a portion of the Brookmont Trolley Right-of-Way State District (M:35-31)

Identification of Historic Properties and Resources

Historic properties and cultural resources within or adjacent to the APE for the CLBA Rehabilitation Project were studied based on a review of existing documentation and with input from the MHT and other consulting parties. These resources and landscape features are identified and further discussed in Section 4.1.2 of the AOE Report (December 2023) and the Cultural Landscape Report (July 2023). The NPS, with input from consulting parties, considered the direct and indirect alterations this undertaking may

have on the qualifying characteristics of historic properties to determine the APE and define historic property identification efforts.

Archeological Resources

The APE contains an archeological site, 18MO154 (Clara Barton I). The National Register eligibility of the site has not been formally evaluated. However, a Phase 1B archeological assessment of the Clara Barton I site from April 8 through April 11, 2024, identified potentially significant archeological resources relating to both precontact Native American occupation of the promontory landform and, to the 1891-1912 period of significance for the historic occupation of the house. GWMP has concluded that the undertaking has the potential to cause effects to archeological resources, and for the purposes of applying the criteria of adverse effect per 36 CFR 800.5(a)(1), the agency official shall treat archeological site 18MO154 as eligible for inclusion in the National Register of Historic Places.

The NPS will continue consultation with MHT and Tribal representatives to determine the appropriate next steps for formally evaluating the site for eligibility and developing avoidance, minimization, and mitigation measures. GWMP shall incorporate all actions and activities related to archeological resources in the agreement document developed for the undertaking pursuant to 36 CFR 800.6.

Assessment of Adverse Effect

The high degree of integrity, unique historic design, and function of the Clara Barton National Historic Site, combined with its structural challenges make opportunities for modification without diminishing the integrity of characteristics that qualify the historic property for the NRHP very limited. The rehabilitation project will result in some degree of integrity loss or the diminishing of materials, workmanship, and design. This is the basis for the finding of an adverse effect. The opportunities for modification are further limited by existing structural challenges including insufficient live-load capacity and insufficient resistance to lateral forces (seismic and wind). The NPS desires to deliver a fully code-compliant rehabilitation project to ensure the life safety, accessibility, and life-cycle durability of the building. The NPS continues to study new design alternatives to improve structural performance while avoiding the intensification of the adverse effect. The treatments outlined in Section 5 of the draft AOE report and Table 1 will directly alter the integrity of the historic property that qualifies it for inclusion in the National Register. However, the NPS does not find that the project will change the status of the historic property on the National Register of Historic Places or National Historic Landmark.

Minimization and Avoidance of Adverse Effects

The NPS continues to consult with MHT, Tribes, and other consulting parties to develop and evaluate measures to minimize and mitigate adverse effects of the undertaking. The current minimization efforts are detailed in Section 6 and Table 1 of the draft AOE report. They include minimizing the number of floor penetrations in closets, concealment of HVAC components to the extent possible, period-appropriate heat registers and grills, concealment of structural upgrades, replacement of plaster in-kind, and salvage and storage of original doors.

Next Steps

The NPS will continue engaging with consulting parties to develop a Section 106 agreement, to document appropriate avoidance, minimization, and/or mitigation measures for adverse effects in a manner that allows this project to proceed and the facility to reopen to the public.

The NPS will continue consulting with MHT and other consulting parties in drafting the Section 106 agreement. This agreement will be used to define processes for: identifying archeological historic properties and evaluating potential effects on them; developing alternatives or modifications to the undertaking for avoiding, minimizing or mitigating additional adverse effects on historic properties; agreeing to minimization and mitigation measures for adverse effects to the historic structure; and

continuing consultation to consider (receive and evaluate) the comments of consulting parties (see Enclosure C: Consulting Party Comment Summary).

The full details and supporting documents for this undertaking, including those mentioned above, can be found on the NPS public site: [ParkPlanning - Rehabilitate Clara Barton National Historic Site \(nps.gov\)](#)

If you have any questions, please contact me at gwmp_superintendent@nps.gov and cc: Megan Bailey, Cultural Resource Program Manager at megan_bailey@nps.gov and Elias “Sonny” Lozano, Historian at elias_lozano@nps.gov. lias_lozano@nps.gov.

Sincerely,

Charles J. Cuvelier
Superintendent

Enclosures

- A: Area of Proposed Effect Map (two maps provided, with and without archaeological site)
- B: List of Consulting Parties
- C: Consulting Parties Comment Summary

cc:

Ms. Becky Roman, Preservation Officer, Maryland Historic Trust, Becky.roman@maryland.gov
Ms. Beth Cole, Administrator, Maryland Historic Trust, beth.cole@maryland.gov

Enclosure B: List of Consulting Parties (two pages)

Contact	Role	Organization
Kathryn Smith	NHL & NR Coordinator	NPS National Capital Region NHL
Becky Roman	State Historic Preservation Officer - MD	Maryland Historical Trust
Beth Cole	Administrator, Review and Compliance	Maryland Historical Trust
Anne Richardson	Chief	Rappahannock Tribe of Virginia
Robert Gray	Chief	Pamunkey Indian Tribe
Katelyn Lucas	Tribal Historic Preservation Office	Delaware Nation
Clarence Lone Wolf Tyler	Chief	Accohannock Indian Tribe
Paul Barton	Tribal Historic Preservation Officer	Eastern Shawnee of Oklahoma
Mark Tayac	Chief	Piscataway Indian Tribe
Francis Gray	Tribal Chair	Piscataway-Conoy Tribe
William Tarrant	Tribal Historic Preservation Officer	Seneca Cayuga Nation
William "Bill" Harris	Chief	Catawba
Lee Webb	Historic Preservation Specialist	National Capital Planning Commission
Katey Boerner	Executive Director	Glenn Echo Park Partnership for Arts and Culture (GEPPAC)
Emily Rogers	Site Operations Manager	Glenn Echo Park Partnership for Arts and Culture (GEPPAC)
Dia Costello	Mayor	Town of Glenn Echo
Elizabeth Stickler	Town Manager	Town of Glenn Echo
Rebecca Ballo	Historic Preservation Supervisor	Montgomery County Planning Department
David E. Dise	Department of General Services Director	Montgomery County Government
Hamid Omidvar	Chief of DGS' Division of Building Design and Construction	Montgomery County Government
Pamela E. Goddard	Director	National Parks Conservation Association
Christina Morris	Senior Field Director - Preservation Services and Outreach	National Trust for Historic Preservation
Christopher Cody	Associate General Counsel	National Trust for Historic Preservation
Kirsten Kulis	NPS Liaison	Advisory Council on Historic Preservation
Chris Wilson		Advisory Council on Historic Preservation
Lucienne Beard	Co-President	National Collaborative for Women's History Sites

Susan Watson	Archivist/Manager Historical Programs and Collections	American Red Cross
Curtis Luthye	Executive Director, Montgomery, Howard, Frederick Counties	American Red Cross
Bonnie Goldman	Co-President	Bordertown Historical Society
Diana M. Bailey	Executive Director	Maryland Women's Heritage Center
Nicholas Redding	President & CEO	Preservation Maryland
Dr. Lesley J. Gordon	President	Society of Civil War Historians
Tim Lowry		Individual
Dr. Heather Huyck		Individual
Dr. Julia F. Irwin	Department of History	Individual, University of South Florida
Dr. Jacob Remes	Clinical Associate Professor of History	Individual, Gallatin School of Individualized Study
Dr. Chandra Manning	Department of History	Individual, Georgetown University
Dr. Kathryn Sklar	Distinguished Professor of History Emerita	Individual, State University of New York, Binghamton
Dr. Judith Wellman	Principal Investigator	Individual, Historical New York Research Associates
Dr. Cassandra Good	Associate Professor of History	Individual, Marymount University
Dr. Pearl J. Young	Assistant Professor of US History	Individual, University of Houston—Clear Lake
Rosie Click	First-year History PhD student	Individual, Georgetown University
Nancy Hewitt	Professor Emeritus	Individual, Rutgers University
Katherine Jellison		Individual, University of Ohio
Elizabeth Regine		Individual

Enclosure C: Consulting Parties Comment Summary (two pages)

The CLBA Rehabilitation Project received a total of ten (10) comments submitted either to GWMP directly through email or through the NPS Planning, Environment, and Public Comment (PEPC) website. In total, twenty (20) persons contributed comments on the Draft Assessment of Effect (AOE) report during the prescribed comment period beginning January 9, 2024, and ending February 24, 2024. A summary of the comments, in addition to direct comments from the letters provided by the consulting parties, are provided below.

Comments were received from:

- National Parks Conservation Association (also provided separate individual letter).
- The Bordentown Historical Society (also provided separate individual letter)
- National Historic Landmarks and National Register
- The National Trust for Historic Preservation
- Maryland Historical Trust
- The Advisory Council on Historic Preservation
- Various Individual Contributors

Comment Summary

There were four themes which emerged from the comments received, which included:

- Adverse Effects
- Archeological Assessment
- Identification of Historic Properties
- Historical Significance of Rooms

Adverse Effects

An overarching theme noted during the review was the opinion that the treatments identified caused an overall adverse effect to the historic structure in several categories. Those impacts include the “historic integrity of the structure, design elements, character defining features, materials and workmanship.” Many of the comments suggested that there were “limitations to making modifications to the historic structure without resulting in an adverse effect.”

“Alterations such as the installation of a second egress stair, a lift, removal of flooring, plaster finishes, distinctive canvas closet doors, and board-and-batten and beadboard walls, alterations to historic, doors and door openings, and the use of historic closets to vertical ductwork, piping, and conduit out of sight would diminish the building’s integrity of design, materials, and workmanship.” This also included the addition of any modern elements which would “impact any future plans for interpretation.”

Overall, the commenters believed the project “would result in an adverse effect to the National Historic Landmark since the loss of historic fabric, identified by the National Historic Landmarks Program as the basis for their determination, is undeniable.” The structural changes necessary to rehabilitate the Clara Barton National Historic Site will produce adverse impacts.

Archeological Assessment

Several commentors noted that, “the Assessment of Effects (AOE) Report did not include an identification or an evaluation of effect on archeological resources and historical properties.” A commentor also suggested that “if the NPS were electing to phase or defer the identification and evaluation, a memorandum of agreement or programmatic agreement would be required in addition to the NPS’ formal determination of effect.” The commentor recognized that the report stated, “A Phase 1A/1B

archaeological survey will be completed and the survey's findings will be incorporated into the final AOE at the appropriate time" and requested that "these findings be available for comment by the consulting parties."

Identification of Historic Properties

Other comments sought to address the need to identify and document historic properties and their contribution to the historic landscape. Observations noted that, "the National Historic Site was not delineated on the APE, nor are any other historic properties within the APE."

Historical Significance of Rooms

Comment contributions included observations related to the designation of historical significance of the individual rooms and conflicts with the Historic Structure Report. "Upon acknowledging that rooms of secondary significance such as rooms 103, 116, 117, 214, and 215 will be affected, the AOE explains that these rooms were redesignated in the 2002 Historic Structure Report (HSR) without sufficient explanation and the historic use of the room(s) was either of short duration or insignificantly documented. The repurposing of these spaces seems reasonable. However, the AOE does not address how the rehabilitation would reflect the multipurpose nature of the original building or the building's connection to larger social and humanitarian issues." There was also disagreement with the analysis used in this older HSR regarding the significance of certain spaces being identified as "utilitarian" and thus deemed as not having significance. The commenter suggested that the building is "utilitarian overall and that the HSR's analysis seems to erroneously rely on aesthetic value (quality of architectural detail) and interpretive value (if little to nothing is known about the space, it is deemed as not significant). In other words, lacking significance or importance should not merit disregard."

Additional comments included inputs, advice, and expressions of continued interest on the future exhibition of objects at the historic site. Several reviewers also emphasized the inclusion of a Women's History Center.

----- End of Summary -----



Maryland
DEPARTMENT OF PLANNING
MARYLAND HISTORICAL TRUST

July 15, 2024

Charles Cuvelier, Superintendent
George Washington Memorial Parkway
National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Sent via email to: GWMP_Superintendent@nps.gov & megan_bailey@nps.gov

Re: Clara Barton House/National Historic Site (NHS) Rehabilitation
Glen Echo, Montgomery County, Maryland

Dear Superintendent Cuvelier:

Thank you for your recent letter continuing consultation with the Maryland Historical Trust (MHT) pursuant to Section 106 of the National Historic Preservation Act (NHPA) for the above referenced undertaking. The project involves the rehabilitation of the Clara Barton House NHS (MIHP M:35-25, a National Historic Landmark), which is nationally significant under the themes of women's history and disaster relief as the home and office of Clara Barton, founder of the American Red Cross. The letter included a description of the undertaking, history of consultation, the Area of Potential Effect (APE), status of archeological investigations, and the NPS assessment of effect on historic properties. MHT staff reviewed the provided materials and we offer the following comments and concurrence.

Archeological Sites: We understand that NPS recently completed a Phase I archeological survey of the Clara Barton site (18MO154) which "identified potentially significant archeological resources relating to both precontact Native American occupation of the promontory landform and, to the 1891-1912 period of significance for the historic occupation of the house." MHT looks forward to receiving a copy of the draft report on the archeological investigations for review, when available. We agree with NPS that it is appropriate to treat site 18MO154 as eligible for the National Register for the Section 106 consultation for this undertaking. We await further consultation with NPS and other consulting parties to develop appropriate measures to avoid, minimize, and mitigate any adverse effects to archeological site 18MO154.

Historic Structures and Landscapes: MHT agrees with NPS that the rehabilitation of the Clara Barton House (M:35-25) will cause an adverse effect on this historic property through loss of character-defining interior spaces on the first and second floors by the addition of a left and fire-rated stairs to the second floor of the three story building. These changes to the building are necessary to provide structural stability and full accessibility to the second floor of the building. NPS has considered multiple design alternatives in consultation with interested parties and

minimized the adverse effect to the greatest extent possible. MHT accepts that adverse effects to this significant building cannot be avoided.

In closing, we look forward to continued coordination with the NPS and other consulting parties to develop meaningful and achievable measures to resolve the adverse effect to this highly significant historic property and negotiate a Memorandum of Agreement for the undertaking. If you have any questions or need additional assistance, please contact Beth Cole at beth.cole@maryland.gov (for archeology) or Becky Roman at becky.roman@maryland.gov (for historic structures and landscapes). Thank you for this opportunity to comment.

Sincerely,

 for

Elizabeth Hughes
Director / State Historic Preservation Officer
Maryland Historical Trust

EH/ELR 202402682

Cc: Maureen Joseph (NPS GWMP/CLBA / maureen_joseph@nps.gov)
Elias (Sonny) Lozano (NPS GWMP/CLBA / elias_lozano@nps.gov)
Jason Theuer (NPS NCR / jason_theuer@nps.gov)
Sam Tamburro (NPS NCR / sam_tamburro@nps.gov)
Sean Garrett (NPS DSC / sean_garrett@nps.gov)
Annie Gilliland (NPS GWMP/CLBA / annie_gilliland@nps.gov)
Kathryn G. Smith (NPS NHL / kathryn_smith@nps.gov)
Kristin Kulis (Advisory Council on Historic Preservation / kkulis@achp.gov)
Christina Morris (National Trust for Historic Preservation / cmoris@savingplaces.org)
Pamela Goddard (National Parks and Conservation Association / pgoddard@npca.org)
Rebecca Ballo (Montgomery County / rebecca.ballo@montgmoeryplanning.org)
Dia Costello (Mayor, Town of Glen Echo / mayorcostello@glenecho.org)
Nichols Redding (Preservation Maryland / nredding@presmd.org)
Heather Huyck (for the Group of Concerned Historians / huyckclapper@earthlink.net)
Diana Bailey (Maryland Women's Heritage Center / mwhcdiana@gmail.com)
Judith Wellman (National Collaborative of Women's History Sites / historicalnewyork@me.com)

Re: PEPC Link to July 9th CLBA Rehab Consulting Parties Meeting

From Smith, Kathryn G <Kathryn_Smith@nps.gov>

Date Mon 7/22/2024 7:13 PM

To Lozano, Elias N <elias_lozano@nps.gov>; Becky Roman -MDP- <becky.roman@maryland.gov>; arichardson@rappahannock.org <arichardson@rappahannock.org>; Robert Gray <robert.gray@pamunkey.org>; klucas <klucas@delawarenation-nsn.gov>; Accohannock@verizon.net <Accohannock@verizon.net>; pbarton@estoo.net <pbarton@estoo.net>; tayac1@aol.com <tayac1@aol.com>; wtarrant.sctribe_contact <wtarrant@sctribe.com>; kboerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebeccah.ballo@montgomeryplanning.org>; david.dise@montgomerycountymd.gov <david.dise@montgomerycountymd.gov>; hamid.omidvar <hamid.omidvar@montgomerycountymd.gov>; pgoddard@npca.org <pgoddard@npca.org>; cmorris@savingplaces.org <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; kkulis@achp.gov <kkulis@achp.gov>

Cc Stidham, Tammy <Tammy_Stidham@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Mocko, Robert <Robert_Mocko@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>; Kattula, Steven R <steven_kattula@nps.gov>; Sherwood, Krista <Krista_Sherwood@nps.gov>; Tamburro, Sam <Sam_Tamburro@nps.gov>

Superintendent Cuvelier and staff,

Thank you for the informative consulting parties meeting on July 9th. I'm submitted in writing my thoughts and comments related to the addendum to the assessment of effect (necessitated by the new code-required work), along with suggestions for potential stipulations in the proposed Programmatic Agreement.

Assessment of Effect:

Questions regarding new work:

1. On the rear elevation, the new structural sheer wall cladding - will this replicate the existing siding design? Do we know what sort of damage could result from attaching the new siding atop the old siding? Your presentation said that the sheer wall would be installed as a base and the historic cladding applied on top of it. Perhaps these drawings just need to be updated?
2. Collector connections being made at the front masonry piers - will the anchors pass through the masonry and be visible on the front or only be attached on the back face of the piers?
3. Vertical holddown connectors pictured on Slide 14 - it seems that these can't be accommodated within the floor assembly. Can you explain what, if any portion of the hardware will be visible on the interior walls?

Change to the assessment Effect:

1. Please add a note as to how the insertion of new structural sewer wall elements and how they will affect historic materials. Confirm whether or not any portions of the work will be visible from the interior of existing and new effects they'll have on the historic character.

Suggestions on Programmatic Agreement Stipulations:

- I can't recall whether the park already plans to provide the NHL discussion, but as a potential mitigation.
- Discussion of the proposed removal with collection of resources used to design the reconstruction. Some interpretation (on site or virtually) of the choices made to reconstruct and what resources were used.
- Some of the adverse effects are interior, so I'd like to see mitigation as it improves or provides interpretation of the historic character of the interior. Are there areas that should be further restored? Selected museum subjects should be displayed on site of the interior could be set aside?
- Ongoing design review: make sure the frames for consulting parties' review are clear and decision points are communicated to all parties in a timely manner
- Interpretation of the Native American presence in the landscape would be appropriate in light of the findings of the archaeological survey
- Some interpretation of the building and its atypical design construction should be incorporated either on site or virtually along with an explanation of how the building has been modified to insure its sustainability.

Thank you for the opportunity to comment. Please reach out if you have questions.

Best,
Kathryn

• Kathryn G. Smith (she/her)

National Historic Landmarks & National Register Coordinator
National Park Service
National Capital Region
202.619.7180
202.913.3859 mobile

1100 Ohio Drive, SW
Washington, DC 20242
kathryn_smith@nps.gov

NCR Website <https://www.nps.gov/RESNCR>

NHL Website <http://www.nps.gov/nhl>

Facebook [National Historic Landmark Program - NPS](#)

Instagram [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

From: Lozano, Elias N <elias_lozano@nps.gov>

Sent: Tuesday, July 9, 2024 4:36 PM

To: Smith, Kathryn G <Kathryn_Smith@nps.gov>; Becky Roman -MDP- <becky.roman@maryland.gov>; arichardson@rappahannock.org <arichardson@rappahannock.org>; Robert Gray <robert.gray@pamunkey.org>; klucas <klucas@delawarenation-nsn.gov>; Accohannock@verizon.net <Accohannock@verizon.net>; pbarton@estoo.net <pbarton@estoo.net>; tayac1@aol.com <tayac1@aol.com>; wtarrant.sctscribe_contact <wtarrant@sctscribe.com>; kboerner <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; david.dise@montgomerycountymd.gov <david.dise@montgomerycountymd.gov>; hamid.omidvar <hamid.omidvar@montgomerycountymd.gov>; pgoddard@npca.org <pgoddard@npca.org>; cmorris@savingplaces.org <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; kkulis@achp.gov <kkulis@achp.gov>; cwilson@achp.gov <cwilson@achp.gov>; luciennebeard@gmail.com <luciennebeard@gmail.com>; Susan.Watson@redcross.org <Susan.Watson@redcross.org>; Luthye, Curtis <curtis.luthye@redcross.org>; bgoldman1@comcast.net <bgoldman1@comcast.net>; mwhcdiana@gmail.com <mwhcdiana@gmail.com>; nredding@presmd.org <nredding@presmd.org>; ljgordon1@ua.edu <ljgordon1@ua.edu>; timlowry@bellsouth.net <timlowry@bellsouth.net>; huyckclapper@earthlink.net <huyckclapper@earthlink.net>; juliai@usf.edu <juliai@usf.edu>; jacob.remes@nyu.edu <jacob.remes@nyu.edu>; cmm97@georgetown.edu <cmm97@georgetown.edu>; kksklar@binghamton.edu <kksklar@binghamton.edu>; historicalnewyork@me.com <historicalnewyork@me.com>; Cassandra Good <cgood@marymount.edu>; Young, Pearl Joy <youngp@uhcl.edu>; vrc10@georgetown.edu <vrc10@georgetown.edu>; nhewitt@scarletmail.rutgers.edu <nhewitt@scarletmail.rutgers.edu>; jellison@ohio.edu <jellison@ohio.edu>; erv5c@virginia.edu <erv5c@virginia.edu>

Cc: Stidham, Tammy <Tammy_Stidham@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Mocko, Robert <Robert_Mocko@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>; Kattula, Steven R <steven_kattula@nps.gov>; Sherwood, Krista <Krista_Sherwood@nps.gov>; Tamburro, Sam <Sam_Tamburro@nps.gov>

Subject: PEPC Link to July 9th CLBA Rehab Consulting Parties Meeting

Thank you everyone for attending this meeting today. We value your inputs on the programmatic agreement and look forward to hearing from you all in the very near future.

You'll find the meeting slide presentation and video at the following link: [ParkPlanning - July 9 Consulting Parties Meeting Presentation and Video \(nps.gov\)](#)

All the best

Sonny



Elias N. "Sonny" Lozano Jr.
Historian

George Washington Memorial Parkway
700 George Washington Memorial Parkway
McLean, VA 22101
(202) 536-9391 (cell)



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

July 22, 2024

Ms. Kathryn Smith
National Historic Landmarks and National Register Program Coordinator
National Capital Region, Resources, Stewardship, and Sciences
1100 Ohio Drive SW
Washington D.C. 20242
Sent by email to kathryn_smith@nps.gov

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Assessment of Adverse Effects

Dear Ms. Smith,

The National Park Service (NPS) George Washington Memorial Parkway (GWMP) is proposing rehabilitation of the Clara Barton National Historic Site in Glen Echo, Maryland and has initiated the Section 106 process per the National Historic Preservation Act (NHPA). The improvements proposed by the undertaking will address deferred maintenance and allow the NPS to better serve the general public, park programs, and NPS staff. The site is a National Historic Landmark (NHL) designated January 12, 1965. In compliance with Section 110(f) of the NHPA (54 U.S.C. 306107), the NPS invites the National Historic Landmarks Program to participate in consultation, on behalf of the Secretary of the Interior, under the authority of the Historic Sites Act of 1935 (16 U.S.C. 462). This letter serves to inform you that in the application of the criteria of adverse effect, per 36 CFR 800.5(a), the agency official finds, with concurrence from the Maryland Historic Trust (MHT) State Historic Preservation Office (see enclosures), that the undertaking shall result in an Adverse Effect to the NHL per 36 CFR 800.5(d)(2)), and seeks to continue consultation in the resolution of adverse effects, per 36 CFR 800.6.

Next Steps

The NPS will continue consulting with you, as the National Historic Landmarks Program Coordinator, along with MHT, and other consulting parties in drafting the agreement to resolve adverse effects in accordance with 54 U.S.C. 306107. The Advisory Council on Historic Preservation will also be notified of the Adverse Effect finding and invited to participate in the consultation and development of the agreement document. This agreement will be used to define processes for identifying archeological historic properties and evaluating potential effects; developing alternatives or modifications for avoiding, minimizing, or mitigating additional adverse effects on historic properties; agreeing to minimization and mitigation measures for adverse effects to the historic structure; and continuing consultation to consider comments of consulting parties.

If you have any questions, please contact me at gwmp_superintendent@nps.gov and cc: Megan Bailey, Cultural Resource Program Manager at megan_bailey@nps.gov and Elias "Sonny" Lozano, Historian at elias_lozano@nps.gov.

Sincerely,

Charles J. Cuvelier
Superintendent

Enclosures

A: Assessment of Effect Letter to MHT

B: Assessment of Effect Concurrence Memo from MHT

Re: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Assessment of Adverse Effects

From Smith, Kathryn G <Kathryn_Smith@nps.gov>

Date Tue 7/30/2024 4:04 PM

To GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>

Cc Bailey, Megan M <megan_bailey@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Becky Roman Roman <becky.roman@maryland.gov>; Tamburro, Sam <Sam_Tamburro@nps.gov>

Superintendent Cuvelier,

Thank you for your July 22nd letter formally inviting the National Historic Landmarks (NHL) Program to consult with you under Section 110(f) of the National Historic Preservation Act. I am pleased to continue to consult on the resolution of adverse effects to the NHL-designated Clara Barton National Historic Site.

Please keep me informed of any changes to the proposed undertaking and let me know when there are opportunities to meet and comment.

Best,
Kathryn

Kathryn G. Smith (she/her)
National Historic Landmarks & National Register Coordinator
National Park Service
National Capital Region
202.619.7180
202.913.3859 mobile

1100 Ohio Drive, SW
Washington, DC 20242
kathryn_smith@nps.gov

NCR Website <https://www.nps.gov/RESSNCR>

NHL Website <http://www.nps.gov/nhl>

Facebook [National Historic Landmark Program - NPS](#)

Instagram [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

From: Cuvelier, Charles J <Charles_Cuvelier@nps.gov> on behalf of GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>

Sent: Tuesday, July 23, 2024 1:29 PM

To: Smith, Kathryn G <Kathryn_Smith@nps.gov>

Cc: Bailey, Megan M <megan_bailey@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Assessment of Adverse Effects

July 22, 2024

Ms. Kathryn Smith
National Historic Landmarks and National Register Program Coordinator
National Capital Region, Resources, Stewardship, and Sciences
1100 Ohio Drive SW
Washington D.C. 20242

Subject: Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Assessment of Adverse Effects

Dear Ms. Smith,

The National Park Service (NPS) George Washington Memorial Parkway (GWMP) is proposing rehabilitation of the Clara Barton National Historic Site in Glen Echo, Maryland and has initiated the Section 106 process per the National Historic Preservation Act (NHPA). The improvements proposed by the undertaking will address deferred maintenance and allow the NPS to better serve the general public, park programs, and NPS staff. The site is a National Historic Landmark (NHL) designated January 12, 1965. In compliance with Section 110(f) of the NHPA (54 U.S.C. 306107), the NPS invites the National Historic Landmarks Program to participate in consultation, on behalf of the Secretary of the Interior, under the authority of the Historic Sites Act of 1935 (16 U.S.C. 462). This letter serves to inform you that in the application of the criteria of adverse effect, per 36 CFR 800.5(a), the agency official finds, with concurrence from the Maryland Historic Trust (MHT) State Historic Preservation Office (see enclosures), that the undertaking shall result in an Adverse Effect to the NHL per 36 CFR 800.5(d)(2)), and seeks to continue consultation in the resolution of adverse effects, per 36 CFR 800.6.

The entire letter is attached.

Enclosures

A: Assessment of Effect Letter to MHT

B: Assessment of Effect Concurrence Memo from MHT

Superintendent
George Washington Memorial Parkway

CLBA NHS Rehabilitation - e106 Submission

From Lozano, Elias N <elias_lozano@nps.gov>

Date Wed 7/31/2024 10:36 AM

To e106@achp.gov <e106@achp.gov>

Cc Joseph, Maureen <Maureen_Joseph@nps.gov>; Sherwood, Krista <Krista_Sherwood@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>; Smith, Christine M <Christine_Smith@nps.gov>; Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Hall, Susan G <susan_hall@nps.gov>

■ 4 attachments (3 MB)

06.03.2024 CLBA AOE Letter to MHT - Assessment of Adverse Effect.pdf; 07.15.2024 - MHT Adverse Effect Concurrence Memo 202402682 CLBA 2a signed.pdf; 07.31.2024 - e106 form CLBA 312325 Clara Barton NHS Rehabilitation.docx; Enclosure A_APE_With Archeological Site_Not for Public Distribution.docx;

Good morning,

The National Park Service - George Washington Memorial Parkway seeks to formally notify and invite the Advisory Council into consultation to fulfill Section 106 requirements for ACHP Project Number 019014. The attached documents include the completed e106 form for the proposed undertaking and also includes a link to the supporting documents.

GWMP-NPS appreciates ACHP's attention and consideration.

Best,

Sonny



Elias N. "Sonny" Lozano Jr.
Historian

George Washington Memorial Parkway
700 George Washington Memorial Parkway
McLean, VA 22101
(202) 536-9391 (cell)



July 31, 2024

Superintendent Charles Cuvelier
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

RE: Rehabilitation of Clara Barton National Historic Site, proposed Programmatic Agreement

Dear Superintendent Cuvelier:

On behalf of the National Parks Conservation Association, I thank you for the opportunity to provide feedback for the proposed programmatic agreement for the Section 106 Consultation for the Clara Barton National Historic Site and am providing our views. We are grateful to you, your staff, and the many consultants working on this project for your willingness to meet with us and to consider our perspective to ensure that the rehabilitated Barton site will properly reflect and honor the historic significance of Clara Barton and the early days of the American Red Cross.

We understand that the building rehabilitation will require major structural changes including adding a vertical lift; replacing the heating, cooling, and plumbing; making the site code compliant; and providing accessibility that will result in adverse impacts to this historic structure. We believe the rehabilitation should move forward to allow the site to safely reopen to the public and that adverse impacts can be mitigated.

We appreciate the National Park Service's (NPS) plans to minimize floor penetrations in closets, conceal HVAC components in period-appropriate registers and grills, conceal structural upgrades, replace plaster in-kind, and salvage and store the original doors. These actions and other efforts by the NPS to reduce visible intrusions on the historic structure and protect historic artifacts are deeply appreciated.

We agree that the best manner to outline the steps necessary to offset adverse impacts is to create a Programmatic Agreement (PA). We offer the following proposals for your consideration as the PA is crafted.

Foremost, we believe the Advisory Council on Historic Preservation (ACHP) should be a signatory to the PA, along with the NPS and the Maryland Historical Trust. As you know, the

ACHP provides crucial expertise and oversight to ensure our country's historic resources are preserved and protected. They have been a helpful resource throughout the Section 106 Consultation and would continue to add value to the formation and implementation of the PA.

We request that the PA include a stipulation that the National Historic Landmark documentation be updated. We believe that the original furnishings in the site were contributing factors that led to both the site's NHL and NHR listing status. We believe that the original furnishings and artifacts contribute to the visitor's understanding of how each space in the site was used and should be returned to the site post rehabilitation.

A robust interpretation plan will look at the site through the lens of Barton's achievements and the uses of the building: as her home, the American Red Cross headquarters, a disaster supply warehouse, and office space for ARC workers. Barton's other achievements could be incorporated in the interpretive plan, including her creation of the Office of Missing Soldiers, her service at Civil War battlefields, her establishment of the schoolhouse in New Jersey, and her work abroad.

Signage and virtual tours would be helpful mitigation tools to include in the PA. Temporary signage during construction can help visitors understand what is happening at the site and why. This signage could also walk visitors through what is currently open and what is envisioned for the future. A construction demonstration video posted online would further update those interested in Barton's accomplishments and lead to in-person visits. Post construction signage could share what was in the site and why it was removed, replaced, or not visible to visitors. Some examples include some of the muslin wall covering that must be removed or the ARC doors that cannot be accessed.

Once the rehabilitation is complete, robust signage is critical to ensure visitors know about the Barton site. Signage at the building itself, at Glen Echo Park, the parking lot and stream nearby, and at nearby highways will encourage visitation.

Another suggested stipulation for the PA is to restore the landscape in front of the site by removing the tree that currently blocks the view. Research should be conducted on how the garden was used during Barton's lifetime and it should be restored to reflect its original uses.

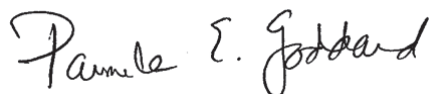
The NPS archeological survey discovered pre-contact Native American occupation on the land. Interpretation of the historical presence of Native Americans should be shared at the Barton site via signage and/or programming.

A major component of a proposed mitigation to be included in the PA is the creation of a Women's History Center that would be housed in the Barton site. Although it will take time to create a legal agreement between the NPS and the donor, we believe this is a worthy endeavor that will support not only the Clara Barton National Historic Site but at all 430 national park sites in the NPS system. A Women's History Center would coordinate experts who would conduct research, create programming, enhance interpretation, and provide critical support to national park staff across the country. The Center would be an important tool to advance women's history.

The PA could be crafted to include the creation of the Women's History Center when certain benchmarks are achieved over time. For example, a stipulation in the PA could state that in year one, NPS would work to partner with historians and other experts to begin planning for such a center. If certain benchmarks are reached, then NPS would move forward. These stipulations could contain specific requirements such as a legal cooperative agreement in place to move the Center forward.

Thank you for considering our ideas for inclusion in the PA. We believe advanced robust interpretation at the site along with the creation of a Women's History Center are critical ways to mitigate the adverse impacts the rehabilitation process will cause to the historic structure while enhancing public enjoyment of this important national park. We are grateful to you and your staff for your partnership and commitment to the Clara Barton National Historic Site.

Sincerely,



Pamela E. Goddard
Senior Program Director
Mid-Atlantic Region
pgoddard@npca.org
202.604.3781

Cc: Kirsten Kulis, Advisory Council on Historic Preservation
Lisa Mendelson-Ielmini, Kathryn G. Smith, National Park Service
National Capitol Region
Elias Lozano, Rebecca Karcher, Annie Gilliland, Megan Bailey,
George Washington Memorial Parkway
Elizabeth Hughes, Becky Roman, Maryland Historical Trust



**National Collaborative for Women's History Sites
P.O. Box 1376, Mount Laurel, NJ 08054**

August 1, 2024

Supt. Charles Cuvelier
George Washington Memorial Park
700 George Washington Memorial Parkway
McLean, VA 22101

RE: Clara Barton National Historic Site – Proposed Programmatic Agreement

Dear Superintendent Cuvelier,

On behalf of the National Collaborative for Women's History Sites (NCWHS) members and board of directors, we thank you for the opportunity to provide feedback for the proposed Programmatic Agreement (PA) to support the Section 106 Review of the planned rehabilitation of the Clara Barton National Historic Site. We offer the following comments:

- NCWHS members and leadership support NPS' efforts to restore the Clara Barton NHS with long-deferred repairs and upgrades to meet current safety codes and ADA compliance. The physical restoration work funded by the Great American Outdoors Act grant is vital to ensure that the building will stand for another century as an historic resource that tells an important chapter in America's history and present. It should be done in a manner that reflects Barton's life and work and the NPS' original intention when declaring the site an NHS.
- We understand that the building's rehabilitation work will require major structural changes that will result in adverse impacts to the historic structure, but we firmly believe that the rehab work should move forward in order to make the site accessible for public visitation and use.
- Our primary interest is the interpretation at Clara Barton NHS. The development of informative and relevant interpretation and programming at the site is a mitigation of any adverse effects of the physical rehabilitation of the building. The NPS shall commit to raising the funds necessary to ensure the development and implementation of an interpretive and exhibition plan. The NPS will use existing collections from the Clara Barton NHS, and in partnership with the American Red Cross and other entities, create public interpretation, exhibitions, and on-site and/or virtual programming that tells Clara Barton's story within the context of her time to illustrate the impact of her work during the period and through to today.
- NCWHS supports the establishment of a Programmatic Agreement (PA) to outline the steps and timelines necessary to offset the adverse impacts. We agree that the NPS, the Maryland State Historic Preservation Office and the Advisory Council on Historic Preservation should be the

primary signatories to the PA. We think it is important that the PA contain benchmarks for completion of different tasks, including but not limited to:

- a. Updating the documentation for the NHL and NHR listings
- b. Creating signage and virtual tours to explain the construction process to visitors and to interpret the site exterior and interior before, during and after construction
- c. Restoring the landscape in as much as possible and phasing implementation of recommendations in the Cultural Landscape Report
- d. Working with all Consulting Parties to develop new interpretive plans and a furnishings plan that returns original artifacts to the building, building on the suggestions made in the "Revitalizing Clara Barton National Historic Site" report submitted October 2023 and in the August 2024 submission to this round of comments by the Clara Barton Partnership historians group.

The possibility of establishing a women's history center in the building to serve CBNHS and the entire NPS system with programs, access to research resources and connections to the latest scholarship offers GWMP a unique opportunity to fulfill Executive Order #12141. The NCWHS will continue to advocate for the center and its location at CBNHS.

Finally, we are very appreciative of the partnership we have forged over the past two years during the Section 106 Review and thank you and your staff for your willingness to hear and consider our input. We look forward to continuing this collaboration into the future.

Thank you for this opportunity to comment.

Best Regards,

Lucienne Beard

For the Board of Directors, National Collaborative for Women's History Sites

Lucienne Beard, Treasurer, New Jersey
Judith Wellman, Vice President, New York
Andrea Malcomb, Co-President, Colorado
Nancy Baird Brown, Director, New York
Paula Casey, Director, Tennessee
Joanne Goodwin, Director, Nevada
Barbara Lau, Director, North Carolina

Ida Jones, Co-President, Washington, D.C.
Robyn Young, Secretary, Pennsylvania
Elizabeth Almlie, Director, South Dakota
Erica Buell, Director, New York
Joanie DiMartino, Director, Connecticut
Cheryl Harned, Director, Maryland
Lillian Williams, Director, New York

cc: Pamela Goddard, Mid-Atlantic Region Senior Program Director, National Parks Conservation Assoc.
Christina Morris, Senior Field Officer, National Trust for Historic Preservation
Christopher Cody, Assoc. General Counsel, National Trust for Historic Preservation
Diana M. Bailey, Executive Director, Maryland Women's Heritage Center
Bonnie Goldman, Co-President, Bordentown Historical Society
Becky Roman, Preservation Officer, Maryland Historic Trust
Elizabeth Hughes, Director, State Historic Preservation Officer, Maryland Historic Trust
Kirsten Kulis, Advisory Council on Historic Preservation
Heather Huyck, Clara Barton Partnership

Clara Barton National Historic Site - Programmatic Agreement suggested stipulations

From Bailey, Megan M <megan_bailey@nps.gov>

Date Thu 1/22/2026 2:53 PM

To Bailey, Megan M <megan_bailey@nps.gov>

From: Christina Morris <CMorris@savingplaces.org>

Sent: Thursday, August 1, 2024 6:45 PM

To: Cuvelier, Charles J <Charles_Cuvelier@nps.gov>; Lozano, Elias N <elias_lozano@nps.gov>; Karcher, Rebecca L <Rebecca_Karcher@nps.gov>; Gilliland, Annie G <Annie_Gilliland@nps.gov>

Cc: Christopher Cody <CCody@savingplaces.org>; Betsy Merritt <emerritt@savingplaces.org>; becky.roman <becky.roman@maryland.gov>; Kirsten Brinker Kulis <kkulis@achp.gov>

Subject: [EXTERNAL] Clara Barton National Historic Site - Programmatic Agreement suggested stipulations

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Cuvelier and GWMP staff –

Thank you for soliciting suggestions from the Consulting Parties for stipulations in the Programmatic Agreement for the Section 106 consultation regarding the rehabilitation of the Clara Barton National Historic Site. We have evaluated the three sample PAs that you shared from other undertakings in George Washington Memorial Parkway, considered the potential adverse effects that may result from the proposed project, and the opportunities that this rehabilitation presents for a public park site of women's history and American Red Cross history that has been largely inaccessible to the public for several years.

The National Trust for Historic Preservation offers the following suggestions for your consideration as you draft the Programmatic Agreement. We look forward to the opportunity to discuss these with you and your team, the Maryland State Historic Preservation Office, the Advisory Council on Historic Preservation, and the other Consulting Parties.

Definition of adverse effect

We understand that the scope of the adverse effect is still being determined. The National Park Service (NPS) should provide a full description of the adverse effects to the Maryland State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP), and Consulting Parties (CPs) before the Programmatic Agreement (PA) is finalized.

Signatories

The ACHP should be invited to participate in and be a signatory to the PA, with the authority to terminate the PA due to non-compliance.

Concurring Parties

CPs should be invited to participate in and be a concurring signatory to the PA, with the ability to request termination of the PA due to non-compliance.

Compliance and Professional Qualifications

All preservation and archaeology in the undertaking will comply with *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* (1983) and will be conducted under the direct supervision of professional consultants that meet or exceed the pertinent qualifications in the *Secretary of the Interior's Professional Qualifications Standards*.

Design review and consultation

- NPS will submit Construction Documents (CDs) in draft form at 30%, 70%, and 95% completion to SHPO, ACHP, and other CPs for a 30-day review and comment period.
- NPS and consultants to notify SHPO, ACHP, and CPs if work proposed in CDs will result in unanticipated new adverse effects or intensify adverse effects previously identified. NPS shall consult with all Signatories to seek ways to avoid, minimize, or mitigate adverse effects.
- If revisions to designs are made, the NPS shall submit the revised designs to the Signatories. Signatories shall have 30 days to comment on revised designs.
- If new adverse effects cannot be avoided, the NPS will consult with the Signatories and CPs to identify agreed upon measures to minimize or mitigate the newly identified adverse effects. These measures shall be incorporated into a subsequent design submittal or developed as a standalone submission.

Post-Review Discoveries

All CDs will include a provision that if previously unidentified historic properties or unanticipated effects to historic properties are discovered during construction, the construction contractor shall immediately halt all activity near the discovery, notify NPS within 24 hours of the discovery, and implement interim measures to protect the discovery.

Archaeology

- NPS will prepare, in consultation with the SHPO and other consulting parties, an Archeological Resources Protection Plan (ARPP) to guide all actions concerning archeological resources within the Area of Potential Effect (APE).
- NPS will review proposed plans for any ground disturbing activities and determine if archaeological investigations are warranted, and will notify SHPO, ACHP and other CPs of its decision.
- If archeological sites are identified within the Project APE that are determined eligible for the National Register of Historic Place, the NPS shall develop a plan for their avoidance, protection, or recovery of information in consultation with the appropriate SHPO and other consulting parties.

Reporting Requirements

- Annual Report - NPS shall provide to the SHPO, ACHP, and other consulting parties annually a summary report describing the findings of the work for the previous year. Summary will include, as appropriate, recommendations on NRHP eligibility or potential eligibility of all identified archeological sites (and if applicable, any newly identified historic properties), recommendations for further archeological investigations, the potential effects of the undertaking on historic properties, and suggested measures to resolve adverse effects through avoidance, minimization or mitigation.
- SHPO, ACHP and consulting parties will have a 30-day review and comment period on annual report.
- All reports will be incorporated into one final technical report for review and comment.

Avoidance and minimization

- Sensitive or fragile historic materials and character defining features, such as but not limited to original wall or ceiling coverings, stained glass, moldings and trim, doors, and hardware, should be protected in place whenever feasible.
- Vegetation in staging area that is identified to remain as part of the landscaping plan should be protected. Or if removal is required, restored in-kind after construction is completed.

Mitigation

- **Site Purpose** – NPS will commit that the Clara Barton National Historic Site shall be used for the public purpose of interpreting the life of Clara Barton, the history of the American Red Cross, and women's history and women's leadership.
- **Temporary Interpretive Signage** –
 - NPS will develop temporary outdoor interpretive signage in consultation with SHPO and CPs, and incorporate into construction of project, installed on staging area, sidewalks, parking lot, and pathway from Glen Echo Park. Signage will remain for the duration of the project.
 - NPS will work with interested CPs to explore how temporary signage can inform and be converted into permanent interpretative and wayfinding signage as part of a long-term interpretation plan.
- **Interpretation Plan** –
 - NPS will work with all interested CPs on the development of an interpretative and exhibition plan for the Clara Barton National Historic Site. This plan will consider the ways in which the existing collections from the Clara Barton NHS and the American Red Cross can be incorporated into public interpretation, exhibitions, and on-site and/or virtual programming.
 - NPS will commit to raise funds for the development and implementation of an interpretation and exhibition plan for the Clara Barton House.
- **Virtual Tour** - NPS, in collaboration with SHPO and CPs, shall prepare a virtual tour of Clara Barton National Historic Site building and landscape. The virtual tour will use existing reports, drawings, photographs, oral/video histories and interviews, video, LIDAR, and other media to provide a dynamic tour of the history, architecture, and landscape of the Clara Barton National Historic Site. The virtual tour shall include a tour of the property before and after construction. The virtual tour will be available to the public online and hosted by the NPS. NPS shall coordinate with the SHPO and the CPs during production of the virtual tour. The final virtual tour shall be completed within 1 year after construction is complete.
- **Preservation and Salvage of Historic Building Components** – NPS will identify building components that can be salvaged during project and coordinate their removal. Prior to removal, NPS will develop a conservation plan for the components, how and where they will be curated, and options for display and interpretation on site as part of interpretation or exhibit plan.
- **Women's History Resource Center** – NPS will continue to explore with interested CPs and other partners the potential to establish a women's history resources center at the Clara Barton National Historic site that can provide information, research, and models on the interpretation of women's history for NPS units nation-wide.
- **Cultural Landscape Plan** - NPS will develop plans for funding and phased implementation of recommended treatments in Cultural Landscape Report.
- **Case Study** – NPS as owner and steward of the property, in coordination with SHPO, ACHP, and CPs, will develop a case study of the Section 106 process for the Clara Barton National Historic Site. The case study will document the Section 106 process, including how and why it changed over time; provide recommendations for best practices in Section 106 consultation; and lessons learned during the project implementation. NPS will make final case study available to other NPS sites, and to ACHP, SHPO and CPs for circulation as a model. Case Study to be completed within 2 years of completing project.
- **Public Promotion** - Upon the completion of the project and the reopening of the Clara Barton NHS to the public, NPS will commit to promote and advertise the site to increase public awareness of the site.

Thank you for considering our suggestions and please feel free to contact Chris Cody or me directly if you have any questions.

Chris Morris

Chris Morris (she/her)

SENIOR DIRECTOR OF PRESERVATION PROGRAMS | PRESERVATION SERVICES AND OUTREACH

Los Angeles, CA

E cmorris@savingplaces.org

M 213.705.7122

NATIONAL TRUST FOR HISTORIC PRESERVATION

600 14th Street NW Suite 500 Washington, DC 20005

SavingPlaces.org



Jordan E. Tannenbaum
Vice Chairman

Reid J. Nelson
Executive Director, Acting



August 15, 2024

The Honorable Charles Sams III
U.S. Department of the Interior
National Park Service
1849 C Street, NW
Washington, D.C. 20240

Ref: *Proposed Rehabilitation of the Clara Barton National Historical Site
Glen Echo, Montgomery County, Maryland
ACHP Project Number: 019014*

Dear Director Sams:

In response to the recent notification by the U.S. Department of the Interior, National Park Service (NPS), on July 31, 2024, the Advisory Council on Historic Preservation (ACHP), will participate in consultation to develop a Section 106 agreement document for the referenced undertaking. Our decision to participate in this consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within the regulations, "Protection of Historic Properties" (36 CFR part 800) implementing Section 106 of the National Historic Preservation Act. The criteria are met for this proposed undertaking because it may have substantial impacts on important historic properties.

Section 800.6(a)(1)(iii) of these regulations requires that we notify you as the head of the agency of our decision to participate in consultation. By copy of this letter, we are also notifying Ms. Joy Beasley, Assistant Director, Cultural Resources, Partnerships, and Science, Dr. David Louter, Federal Preservation Officer, and Ms. Christine Smith, Acting Superintendent, George Washington Memorial Parkway, of this decision.

Our participation in this consultation will be handled by Ms. Kirsten Kulis, NPS Liaison, who can be reached at (202) 517-0217 or via email at kkulis@achp.gov. We look forward to working with your agency and other consulting parties to seek ways to avoid, minimize, or mitigate the undertaking's potential adverse effects on historic properties.

Sincerely,

Reid J. Nelson
Executive Director



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

IN REPLY REFER TO:

1.A.1

September 10, 2024

Dear Consulting & Interested Parties,

The National Park Service at George Washington Memorial Parkway (GWMP) is progressing on a major rehabilitation project of Clara Barton National Historic Site (NHS) also a National Historic Landmark (NHL). The purpose of the NHS is to tell the story of Clara Barton and the early years of the organization she founded, the American Red Cross, through the preservation and interpretation of her historic home and associated artifacts. The overarching goal of this project is to protect the integrity of this NHL through needed repairs, conserving the historic fabric, and rehabilitating the building for critical code deficiencies and accessibility. This will enable the NPS to continue telling the story of Clara Barton and the American Red Cross on this site to local, national, and international audiences.

The primary objectives of the rehabilitation project, include:

- Protecting the integrity of the NHL through repair and conservation of historic fabric.
- Conveying the story of the founding of the American Red Cross and Clara Barton's life and humanitarian activities to local, national, and international visitors.
- Rehabilitating the site to provide safe, comfortable, and accessible facility.
- Improving the landscape to convey historic character.

The NPS continues to lead the historic and environmental compliance process for Section 106 of the National Historic Preservation Act (NHPA) of 1966 and the National Environmental Policy Act (NEPA) of 1969, as amended. NPS is conducting consultation under Section 106 with Maryland Historical Trust (MHT), the Advisory Council on Historic Preservation (ACHP), Tribal Nations, and other Interested parties. The NPS appreciates your interest and engagement in this effort. Our goal is to continue providing opportunities for all who are interested to engage as we complete the compliance process and move toward the construction phase.

Opportunities for Engagement

Over the coming months, the NPS will continue to develop project design, NEPA, and Section 106 documents. We will be seeking participation from the Consulting Parties for the following:

- Review of draft design drawings and an amended Assessment of Effects report evaluating impacts of changes in response to windshear analysis.
- Participation in an upcoming Consulting Parties meeting to discuss the project plans and respond to questions and comments.

For other Interested Parties, we will be seeking public input on an Environmental Assessment (EA) for the rehabilitation project as required by the National Environmental Protection Act. The EA assesses the potential for impacts of the project to the environment, and will be appended by the PA. The draft EA will be published on the [NPS Planning, Environment and Public Comment \(PEPC\) site](#) for a 30-day public review and comment period.

The NPS values the input you have provided and continue to provide on the Clara Barton NHS rehabilitation project.

Additional Next Steps

The NPS is currently drafting a Programmatic Agreement (PA), in coordination with the PA Signatories, (MHT, ACHP, Tribes), to identify mitigation for adverse effects of the Clara Barton NHS rehabilitation project. Later this fall, the NPS will provide the draft PA to Consulting Parties for a 30-day review and comment period. The NPS will prepare a revised draft for final approval and signature by the PA Signatories.

Following the July 31, 2024, Consulting Parties meeting, the NPS solicited suggestions for mitigation items to be included in the PA. To date, the comments and recommendations we have received can be summarized in the following general categories: Documentation (e.g., updating or creating documentation of the historic structure before and after construction); Interpretation (e.g., developing interpretive products and services for the building, the exterior, and the landscape); Compliance (e.g., developing protocols for adherence to NHPA and other relevant federal laws); and Communication (e.g., reporting on progress and activities).

The NPS is thoughtfully considering each suggestion and will apply the following criteria: the mitigation must be commensurate with the site purpose and the rehabilitation project scope, and must align with NPS capacity, funding, and management policies. The PA will reflect activities the NPS is confident it can execute in the near future, and that are directly relevant and explicitly tied to legislative requirements for the site and the rehabilitation of, and physical changes to, the historic structure.

We encourage your continued involvement in this effort through the above identified opportunities to engage and request input, specifically as it relates to the goals and objectives of the rehabilitation project and the purpose of the NHS and how we can effectively provide outreach, updates, and education to the public while construction is underway.

For more information on the project and to review available documents, please visit the [NPS Planning, Environment and Public Comment \(PEPC\) site](#) for the Clara Barton NHS rehabilitation project.

Sincerely,

Christine Smith
Acting Superintendent



September 6, 2025

Superintendent Jennifer Madello
George Washington Memorial Parkway
Turkey Run Park
700 George Washington Memorial Parkway
McLean, VA 22101

RE: *Rehabilitate Clara Barton National Historic Site Environmental Assessment*

Dear Superintendent Madello:

On behalf of the National Parks Conservation Association, I thank you for the opportunity to provide feedback for the proposed Environmental Assessment for the Clara Barton National Historic Site and am providing our views. We are grateful to you, your staff, and the many consultants working on this project for your willingness to meet with us over many years and to consider our perspective to ensure that the rehabilitated Barton site will properly reflect and honor the historic significance of Clara Barton and the early days of the American Red Cross.

We understand that the building rehabilitation will require major structural changes including adding a vertical lift; replacing the heating, cooling, and plumbing; making the site code compliant; and providing accessibility that will result in adverse impacts to this historic structure. We believe the rehabilitation should move forward to allow the site to safely reopen to the public and that adverse impacts can be mitigated.

We appreciate the National Park Service's (NPS) plans to minimize floor penetrations in closets, conceal HVAC components in period-appropriate registers and grills, conceal structural upgrades, replace plaster in-kind, and salvage and store the original doors. These actions and other efforts by the NPS to reduce visible intrusions on the historic structure and protect historic artifacts are deeply appreciated.

We write in support of the Rehabilitation of the Clara Barton House which is the NPS Preferred Alternative. We ask that you will take advantage of temporary signage during construction that can help visitors understand what is happening at the site and why. This signage could also walk visitors through what is currently open and what is envisioned for the future. A construction demonstration video posted online would further update those interested in Barton's accomplishments and lead to in-person visits. Post construction signage could share what was in the site and why it was removed, replaced, or not visible to visitors. Some examples include some of the muslin wall covering that must be removed or the ARC doors that cannot be accessed.

Once the rehabilitation is completed, we look forward to working with you to raise necessary funding to return exhibits to the site. We believe that the original furnishings in the site were contributing factors that led to both the site's National Historic Landmark and National Historic Register listing status. We believe that the original furnishings and artifacts contribute to the visitor's understanding of how each space in the site was used and should be returned to the site post rehabilitation.

We also look forward to supporting a robust interpretation plan that will look at the site through the lens of Barton's achievements and the uses of the building: as her home, the American Red Cross headquarters, a disaster supply warehouse, and office space for ARC workers. Barton's other achievements could be incorporated in the interpretive plan, including her creation of the Office of Missing Soldiers, her service at Civil War battlefields, her establishment of the schoolhouse in New Jersey, and her work abroad.

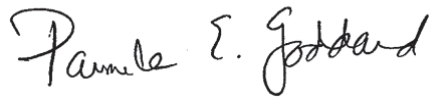
Once the rehabilitation is complete, robust signage is critical to ensure visitors know about the Barton site. Signage at the building itself, at Glen Echo Park, the parking lot and stream nearby, and at nearby highways will encourage visitation.

Restoring the landscape in front of the site by removing the tree that currently blocks the view will further encourage visitation. Research should be conducted on how the garden was used during Barton's lifetime and it should be restored to reflect its original uses.

The NPS archeological survey discovered pre-contact Native American occupation on the land. Interpretation of the historical presence of Native Americans should be shared at the Barton site via signage and/or programming.

Thank you for considering our views. We are grateful to you and your staff for your partnership and commitment to telling the important story of Clara Barton at the Clara Barton National Historic Site.

Sincerely,

A handwritten signature in black ink that reads "Pamela E. Goddard". The signature is written in a cursive style and is contained within a thin black rectangular border.

Pamela E. Goddard
Senior Program Director
Mid-Atlantic Region
pgoddard@npca.org
202.604.3781

Cc: Kirsten Kulis, Advisory Council on Historic Preservation
Jennifer Nersesian, Lisa Mendelson-Ielmini, Kathryn G. Smith,
National Park Service National Capitol Region
Elias Lozano, Rebecca Karcher, Annie Gilliland, Megan Bailey,
George Washington Memorial Parkway
Elizabeth Hughes, Becky Roman, Maryland Historical Trust

Wes Moore, Governor
Aruna Miller, Lt. Governor



Rebecca L. Flora, AICP, LEED ND / BD+C, Secretary
Elizabeth Hughes, MHT Director and
State Historic Preservation Officer

Maryland
DEPARTMENT OF PLANNING
MARYLAND HISTORICAL TRUST

October 2, 2024

Megan Bailey
GWMP Cultural Resources Program Manager
Clara Barton National Historic Site
National Park Service – George Washington Memorial Parkway
McLean, VA 22101
Sent via email to: megan_bailey@nps.gov

Re: Clara Barton National Historic Site Rehabilitation
Section 106 Review – Draft Phase I Archaeological Survey Report

Dear Megan:

Thank you for your recent letter, received by the Maryland Historical Trust (MHT) on August 26, 2024, requesting MHT's review and comment on the draft Phase I report NPS prepared for the above-referenced proposed undertaking. MHT reviewed the report and we offer the following comments pursuant to Section 106 of the National Historic Preservation Act.

The submittal provided MHT with a draft of the following report for review and comment: *Phase IB Archeological Survey, Clara Barton National Historic Site, Glen Echo, Montgomery County, Maryland* (Craft et al. 2024). NPS completed the investigations as part of planning for the currently proposed undertaking. The report presents documentation on the goals, methods, results, and recommendation of the archeological survey and meets the reporting requirements of MHT's *Standards and Guidelines for Archeological Investigations in Maryland*.

The survey further identified components of the previously recorded site, 18MO154, including archeological resources related to both prehistoric and historic uses of the area. MHT concurs with NPS that Phase II archeological evaluation of site 18MO154 is warranted, in order to definitively evaluate the site's eligibility for the National Register of Historic Places. The Phase II site evaluation must be sufficient to: a) identify the site's vertical and horizontal boundaries; b) interpret the site's cultural affiliations, functions, and significance; c) evaluate the site's integrity; d) conclusively determine the site's eligibility for the National Register of Historic Places; and e) define the need for further archeological work. The investigations should be undertaken by a qualified archeologist and performed in accordance with MHT's *Standards and Guidelines*. Based on the investigations' results, NPS will be able to make an informed assessment of the current undertaking's effects on the property's archeological record. We await the results of the Phase II investigations for review when available.

Megan Bailey
Clara Barton National Historic Site
Phase I Archeological Survey Report
October 2, 2024
Page 2 of 2

We look forward to further consultation with NPS and other involved parties to successfully complete the Section 106 review of this undertaking, as project planning progresses. If you have questions or need further assistance for archeology, please contact me at beth.cole@maryland.gov.

Thank you for providing us this opportunity to comment.

Sincerely,



Beth Cole
Administrator, Project Review and Compliance

BC/202403869

cc: Jason Theuer (NPS NCR / jason_theuer@nps.gov)



401 9th Street, NW

North Lobby, Suite 500

Washington, DC 20004

Tel 202.482.7200

www.ncpc.gov

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United States Senate
The Honorable Gary C. Peters

Chair
Committee on Oversight and
Accountability
U.S. House of Representatives
The Honorable James Comer

Mayor
District of Columbia
The Honorable Muriel Bowser

Chairman
Council of the District of Columbia
The Honorable Phil Mendelson

Executive Director
Marcel Acosta

IN REPLY REFER TO:
NCPC File No. 8562

July 15, 2024

Ms. Laurel Hammig
United States Department of the Interior
National Park Service
1100 Ohio Drive
Washington, DC 20242

Dear Ms. Hammig:

Pursuant to delegations of authority adopted by the Commission, I approved the preliminary site and building plans for the Clara Barton National Historic Site Rehabilitation located at 5801 Oxford Road, Glen Echo, MD. A copy of the Delegated Action of the Executive Director is enclosed and available online at www.ncpc.gov/review/archive/2024/7/ as part of the July 2024 meeting materials.

Sincerely,

Marcel Acosta
Executive Director

Enclosures

cc: Mr. Jason Sartori, Planning Director, Montgomery County Planning



Delegated Action of the Executive Director

PROJECT Clara Barton National Historic Site Rehabilitation 5801 Oxford Road Glen Echo, Maryland	NCPC FILE NUMBER 8562
	NCPC MAP FILE NUMBER 3101.00(00.00)45850
SUBMITTED BY United States Department of the Interior, National Park Service	ACTION TAKEN Approve preliminary site and building plans
	REVIEW AUTHORITY Advisory Per 40 U.S.C. § 8722(b)(1)

The United States Department of the Interior, National Park Service, has submitted preliminary site and building plans for the proposed rehabilitation of the Clara Barton National Historic Site (NHS), located at 5801 Oxford Road, Glen Echo, Maryland. The project aims to address ongoing issues of life safety, accessibility, indoor environmental controls, and building systems. Rehabilitation efforts include structural modifications, the addition of egress stairs and lifts, and the provision of accessible approaches, routes, and restrooms within the building. Exterior improvements involve the removal of select non-historic trees, the installation of new accessible parking spaces, the construction of a stormwater management micro-bioretenion facility, and the reconstruction of the historic porch. The objective is to enhance the site's functionality for both National Park Service staff and the general public while preserving its historical significance.

The Clara Barton NHS, constructed in 1891, served as both a residence and headquarters for the American Red Cross. The building, listed as a National Historic Landmark (NHL) on January 12, 1965, is subject to Section 106 of the National Historic Preservation Act. The National Park Service is conducting consultations with the Maryland Historic Trust and other consulting parties. The National Environmental Policy Act (NEPA) Environmental Assessment (EA) technical report is nearing finalization, and the Finding of No Significant Impact (FONSI) is expected to be signed in Fall 2024 following the completion of the Section 106 process. The project aligns with recommendations from previous assessments, including the Heritage Landscapes, LLC Cultural Landscape Report (2023).

Public outreach has included fieldwork for a Phase I archaeological survey, with a full technical report pending. The final consulting party meeting is scheduled for late in the summer of 2024. The project has been coordinated with multiple agencies, including NCPC, the Maryland Historic Trust, the United States Department of the Interior, and the National Park Service.

The proposed rehabilitation will have beneficial impacts on the building and site, allowing for increased public visitation and the restoration of degrading structural and building elements. Life safety improvements, such as egress stairs and lifts, will require minor modifications to historic

fabric but will enable public access to the second floor. Accessible approaches, routes, and restrooms within the building will be provided.

The project's landscape will be consistent with the recently completed Cultural Landscape Report. Limited removal of non-historic trees will benefit the building, accessible path, and view of the building from the parking lots. During construction, existing trees and contributing landscape features will be protected.

Next steps include conducting another consulting party meeting in the summer of 2024, completing the Assessment of Effect documentation, and coordinating the EA for public review.

Staff finds the proposed improvements are sympathetic with the historic building and site. Further, the improvements will help improve the visitor experience and ensure the historic site remains in good condition. The project is consistent with the Comprehensive Plan for the National Capital, particularly those policies in the Historic Preservation and Federal Environment Elements.

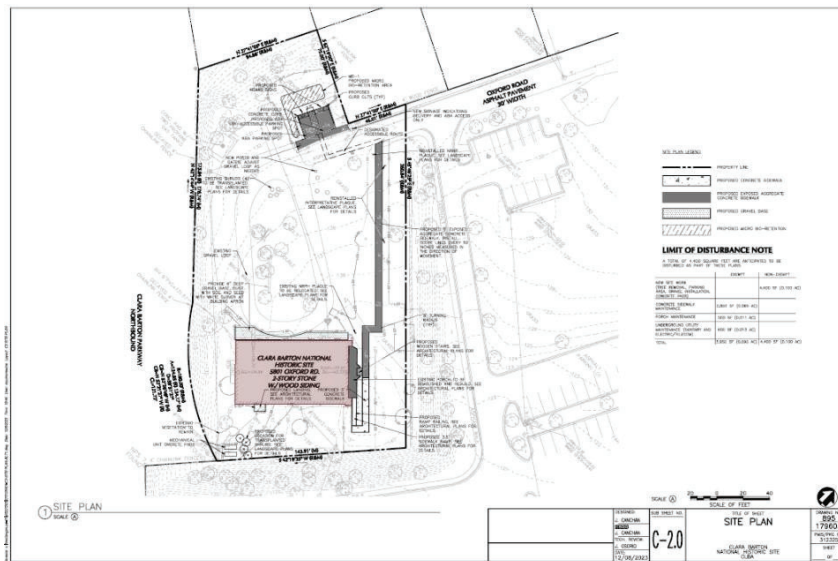


Figure 1: Site Plan

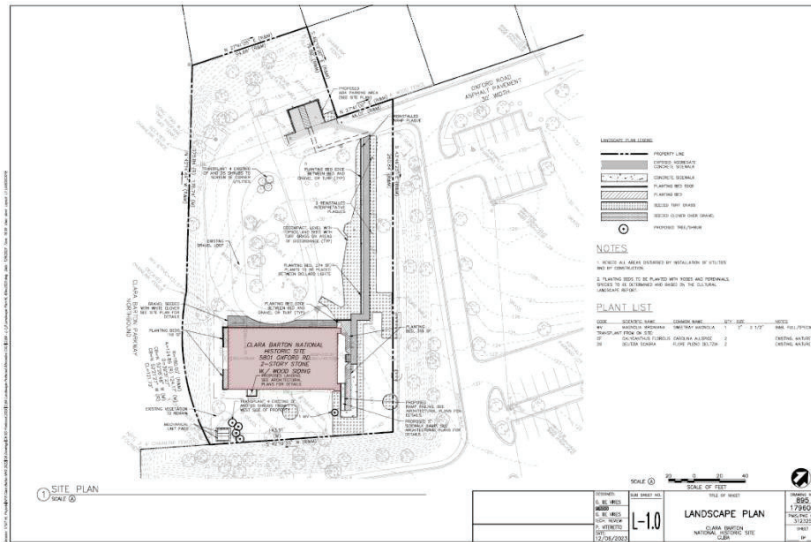


Figure 2: Landscape Plan



Figure 3: Rendering of Historic porch reconstruction

* * *

Pursuant to delegations of authority adopted by the Commission on April 1, 2021 and per 40 U.S.C. § 8722(b)(1), I approve the preliminary site and building plans for the proposed Clara Barton National Historic Site Rehabilitation, located at 5801 Oxford Road, in Glen Echo, Maryland.

Marcel Acosta 7/2/2024
Marcel Acosta Date
Executive Director

Clara Barton NHS Rehabilitation - Follow-Up

From Bailey, Megan M <megan_bailey@nps.gov>

Date Thu 2/20/2025 6:32 PM

To Smith, Kathryn G <Kathryn_Smith@nps.gov>; Becky Roman <becky.roman@maryland.gov>; historicalnewyork <historicalnewyork@me.com>; rosst <rosst@sunyocc.edu>; erv5c <erv5c@virginia.edu>; bgoldman1 <bgoldman1@comcast.net>; nredding <nredding@presmd.org>; ljgordon1 <ljgordon1@ua.edu>; chiefannerich <chiefannerich@aol.com>; kevin.brown <kevin.brown@pamunkey.org>; kendall.stevens <kendall.stevens@pamunkey.org>; jacob.remes <jacob.remes@nyu.edu>; kksklar <kksklar@binghamton.edu>; mwhcdiana <mwhcdiana@gmail.com>; huyckclapper <huyckclapper@earthlink.net>; erogers <erogers@glenechopark.org>; pgoddard <pgoddard@npca.org>; cmorris <cmorris@savingplaces.org>; ccody <ccody@savingplaces.org>; KKULIS@ACHP.GOV <KKULIS@ACHP.GOV>

Cc Joseph, Maureen <Maureen_Joseph@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Gladstone, Gail S <Gail_Gladstone@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>

Dear Consulting and Interested Parties,

Yesterday the George Washington Memorial Parkway held a Consulting Parties Meeting to share project and Section 106 updates for the Clara Barton NHS Rehabilitation. For those who were able to attend, we are grateful for your participation. We received many, many great questions and comments from attendees, and will carefully consider the ideas shared. For your reference, here are links to the following items:

- [Design Development Drawing Set](#)
- [Updated Assessment of Effects Report](#) (revised to address necessary accommodations for lateral forces resistance)
- [Presentation](#) delivered at the meeting

I will also follow up with a separate email to share the recording of the meeting — we're having some technical difficulties with the file.

As we shared in the meeting, drafting and executing a Programmatic Agreement is the next and final step in the Section 106 compliance process. Stay tuned for a copy of the draft PA for your review and comment.

If you have any questions, please feel free to reach out to us.

Best,
Megan

--

Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov

Re: Clara Barton NHS Rehabilitation - Follow-Up

From Becky Roman -MDP- <becky.roman@maryland.gov>

Date Mon 3/17/2025 3:23 PM

To Bailey, Megan M <megan_bailey@nps.gov>

Cc Smith, Kathryn G <Kathryn_Smith@nps.gov>; historicalnewyork <historicalnewyork@me.com>; rosst <rosst@sunyocc.edu>; erv5c <erv5c@virginia.edu>; bgoldman1 <bgoldman1@comcast.net>; nredding <nredding@presmd.org>; ljgordon1 <ljgordon1@ua.edu>; chiefannerich <chiefannerich@aol.com>; kevin.brown <kevin.brown@pamunkey.org>; kendall.stevens <kendall.stevens@pamunkey.org>; jacob.remes <jacob.remes@nyu.edu>; kksklar <kksklar@binghamton.edu>; mwhcdiana <mwhcdiana@gmail.com>; huyccklapper <huyccklapper@earthlink.net>; erogers <erogers@glenechopark.org>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; KKULIS@ACHP.GOV <KKULIS@ACHP.GOV>; luciennebeard <luciennebeard@gmail.com>

Good afternoon,

Thank you for your submission of the updated design plans and revised Assessment of Effect report to MHT (MD SHPO) and the other consulting parties, received February 21, 2025 (MHT loh 202501242) The presentation and question and answer session from the February 19, 2025 virtual consulting parties meeting was very helpful to understand the need for the revised design. MHT appreciates the efforts taken by the NPS design team to minimize the physical and visual effect of the needed design change on the NHL Clara Barton House National Historic Site (MIHP M: 35-25). MHT has no specific comments on the revised design and APE report at this time. We ask that NPS consider and take into account the comments of the other consulting parties, especially the ACHP and NHL office given their role in the Section 106 process for this undertaking.

It is MHT's opinion that the adverse effect determination remains unchanged with this design change. It is also our opinion that the mitigation activities described at the February 19, 2025 virtual consulting parties meeting will resolve the adverse effect of this undertaking on the NHL Clara Barton House. We await review of a draft Programmatic Agreement that will fully describe these mitigation activities and provide timelines for their completion, to assure they are carried out.

Please contact me at becky.roman@maryland.gov with any questions. MHT looks forward to working with NPS, ACHP, and the other consulting parties to complete the PA and see this exciting project begin construction.

Happy Monday and have a great week,
Becky



Becky Roman (she, her, hers)

Preservation Officer / Architectural Historian

Project Review and Compliance

Maryland Historical Trust

Maryland Department of Planning

100 Community Place, 3rd Floor, Crownsville, MD 21032

becky.roman@maryland.gov (410) 697-9587

Mht.maryland.gov

On Thu, Feb 20, 2025 at 6:32 PM Bailey, Megan M <megan_bailey@nps.gov> wrote:

Dear Consulting and Interested Parties,

Yesterday the George Washington Memorial Parkway held a Consulting Parties Meeting to share project and Section 106 updates for the Clara Barton NHS Rehabilitation. For those who were able to attend, we are grateful for your participation. We received many, many great questions and comments from attendees, and will carefully consider the ideas shared. For your reference, here are links to the following items:

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If you have any questions, please feel free to reach out to us.

Best,
Megan

--

Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov

Re: Clara Barton NHS Rehabilitation - Follow-Up

From Smith, Kathryn G <Kathryn_Smith@nps.gov>

Date Tue 3/18/2025 7:42 PM

To Bailey, Megan M <megan_bailey@nps.gov>; Becky Roman <becky.roman@maryland.gov>; historicalnewyork <historicalnewyork@me.com>; rosst <rosst@sunyocc.edu>; erv5c <erv5c@virginia.edu>; bgoldman1 <bgoldman1@comcast.net>; nredding <nredding@presmd.org>; ljgordon1 <ljgordon1@ua.edu>; chiefannerich <chiefannerich@aol.com>; kevin.brown <kevin.brown@pamunkey.org>; kendall.stevens <kendall.stevens@pamunkey.org>; jacob.remes <jacob.remes@nyu.edu>; kksklar <kksklar@binghamton.edu>; mwhcdiana <mwhcdiana@gmail.com>; huyckclapper <huyckclapper@earthlink.net>; erogers <erogers@glenechopark.org>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>; KKULIS@ACHP.GOV <KKULIS@ACHP.GOV>

Cc Joseph, Maureen <Maureen_Joseph@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Gladstone, Gail S <Gail_Gladstone@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Tamburro, Sam <Sam_Tamburro@nps.gov>; Campbell, Patrick <J_Patrick_Campbell@nps.gov>

Megan,

Thank you for the opportunity to review the current (1/10/2025) drawings and the revised Assessment of Effect report. I agree that the overall assessment of effect remains the same and I greatly appreciate the detailed recording of minimization and avoidance measures taken during the design development process. I agree with the Advisory Council on Historic Preservation that it would be beneficial to include the adverse effects table as an attachment to the PA along with baseline plans and drawings.

Below I've included some questions and suggestions offered in order to assure the rehabilitation work complies with the park's stated intent of minimizing loss of historic character.

Also, I would recommend adding continued design review for a small number of details that appear to not yet be fully worked out. These include the porch reconstruction and ramp design, as well as the closet alterations. There may be others and I leave those for you to add. Continued design review of select elements is a common feature in Programmatic Agreements where all design questions aren't yet finalized.

Please reach out if you have questions.

Thanks,
Kathryn

Here are a few questions and comments on the drawing set dated Jan. 10, 2025:

- Removal of 48" tree near new parking area? CLR recommends it be retained. Is it confirmed to be hazardous?

- Will excavation in the basement and below existing historic basement floor level and will it include archaeological monitoring?
- Confirm the material type being used to repair the surface for deterioration and repairs.
- What species and grade of wood will be used for replacement siding? Will it be back primed?
- Confirm the details of the porch including dimensions, materials, and details including trim profiles are based on a careful study of historic images from Clara Bartlett's period. Please provide a list of selected images and their dates used. This should be carefully documented in the HSR Part 3. Any deviations or unknowns should be clearly explained.
- The railing of the ramp looks similar to the reconstructed historic porch - the design should be differentiated further. Plain balusters or maybe a different type of material? Are the porch columns, there should be some indication the porch corner was actually angled like the appropriate rigidly. The ramp design should clearly read as a historic interior addition.
- The depth of the reconstructed porch doesn't seem to match with the historic porch graphs. It seems deeper. Is it a correction?
- Cluses - It appears the architectural cases are nearly finalized. Are there indications a doorway will be preserved in its original configuration. Is it a correction?
- Some of the doors indicate new trim and wide doors while the details A6.08 suggest you'll be retaining salvaged historic trim. Make sure specs are clear and consistent.
- I see composite board siding installed in places (A-5.11). Is it only a new addition to the building (like the pipe corner to the lower roof?) or is it being used for the entire reassembly select areas?
- Where is insulation being added and how? Are walls being furred out accordingly?
-

FOLLOWING ALL MEP AND STRUCTURAL WORK, INSERT NEW CHASE WALL TO MATCH EXISTING AT CLOSETS. THE INTENT IS TO MAINTAIN AT MINIMUM (1) CLOSET FOR INTERPRETATION WITH AS DEEP A CLOSET AS POSSIBLE.

Assessment of Effectiveness Report Update dated Jan 14, 2025

- The Park may warrant correction to the National Historic Landmark in Form 101 included in Section 1.3. The Secretary of the Interior designates NHLs, the Congress, since 1965 designations was made by the Secretary of the Interior. Congress designations National Historic Site (NHS) in 1948. It was administratively placed in the National Register when the act was created with the enactment of the National Historic Preservation Act October 1966. A National Register form was retroactively created and accepted in 1980. Also, I'm sure where the authors of the list of areas of significance show. These are not in the 1980 National Register form, which as far as is

know hasn't been dated. Her's h 1980 document: [Clara Barton at o al
toric Ste 10/15/1966](#)

- Page 9 - "The rRmp's RrRiculRtion of Rhe rRilinR will be similRr in mRteriRl, size RndR proportiRn Rb Rhe porchR rRlinR Rnd bRluseRers yeRdefibrinR ed tRrouRh simplificaRion of profiles" I couldn't discern Rny differenRion in Rhe drRwinRs. I tRink tRis wRrrRnRs furRer review.
- Question for Rhe Rark - How hRve you deRrmined tRe boundRry of tRe NHL? I hRveR been RrynRro figure RhatRoutRIR's noRcleRr RnR tRe verbRl boundRry gRven in RheR 1980 NR updatR wRs RloptRd Rs Rhe NHL boundRry. You show itR R Rhe NR ionRIR HisRoric SitR RNHSRboundRry, buRtR boundRry wRs esR blished in 1974 when RheR NHS waR esR blished. I'd like Rb coordinatR wRh Rhe park Rb figure outRwhatR documentR ion you hRre. Rhe boundRry mRy need Rb be revisiRd in Rhe proposdR NHL updr e.
- p. 15 - Rhe hisRoric propertiRes you hRve listRd wRh Rhe ARE don't include RheR BrookmontRrolley ROW which your ARE mRp shows inside your ARE. R

Kathryn G. Smith

National Historic Landmarks Coordinator
Community Preservation Assistance Program Manager
National Park Service
National Capital Region
202.619.7180
202.913.3859 mobile

1100 Ohio Drive, SW
Washington, DC 20242
kathryn_smith@nps.gov

NCR Website <https://www.nps.gov/RESSNCR>

NHL Website <http://www.nps.gov/nhl>

Facebook [National Historic Landmark Program - NPS](#)

Instagram [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

From: Bailey, Megan M <megan_bailey@nps.gov>

Sent: Thursday, February 20, 2025 6:32 PM

To: Smith, Kathryn G <Kathryn_Smith@nps.gov>; Becky Roman <becky.roman@maryland.gov>; historicalnewyork <historicalnewyork@me.com>; rosst <rosst@sunyocc.edu>; erv5c <erv5c@virginia.edu>; bgoldman1 <bgoldman1@comcast.net>; nredding <nredding@presmd.org>; ljgordon1 <ljgordon1@ua.edu>; chiefannerich <chiefannerich@aol.com>; kevin.brown <kevin.brown@pamunkey.org>; kendall.stevens <kendall.stevens@pamunkey.org>; jacob.remes <jacob.remes@nyu.edu>; kksklar <kksklar@binghamton.edu>; mwhcdiana <mwhcdiana@gmail.com>; huyckclapper <huyckclapper@earthlink.net>; erogers <erogers@glenechopark.org>; pgoddard <pgoddard@npca.org>; cmorris <cmorris@savingplaces.org>; ccodey <ccodey@savingplaces.org>; KKULIS@ACHP.GOV <KKULIS@ACHP.GOV>; luciennebeard <luciennebeard@gmail.com>; JLindberg <JLindberg@savingplaces.org>; susan.watson <susan.watson@redcross.org>; Cassandra Good <cgood@marymount.edu>; Young, Pearl Joy

<youngp@uhcl.edu>; vrc10 <vrc10@georgetown.edu>; Jellison, Katherine <jellison@ohio.edu>; david.dise <david.dise@montgomerycountymd.gov>; curtis.luthye <curtis.luthye@redcross.org>; cmm97 <cmm97@georgetown.edu>; SWorden <SWorden@savingplaces.org>; jar31 <jar31@nyu.edu>; kboerner <kboerner@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; townhall <townhall@glenecho.org>; rebecca.ballo <rebecca.ballo@montgomeryplanning.org>; klucas <klucas@delawarenation-nsn.gov>; arichardson <arichardson@rappahannock.org>; cwilson@achp.gov <cwilson@achp.gov>; nhewitt <nhewitt@scarletmail.rutgers.edu>; hamid.omidvar <hamid.omidvar@montgomerycountymd.gov>; juliai <juliai@usf.edu>

Cc: Joseph, Maureen <Maureen_Joseph@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Gladstone, Gail S <Gail_Gladstone@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>

Subject: Clara Barton NHS Rehabilitation - Follow-Up

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If you have any questions, please feel free to reach out to us.

Best,
Megan

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202.438.6641 (cell)
megan_bailey@nps.gov

Continuation of Section 106 Consultation: Clara Barton NHS Rehabilitation Draft Programmatic Agreement

From Bailey, Megan M <megan_bailey@nps.gov>

Date Wed 4/16/2025 12:18 PM

To Smith, Kathryn G <Kathryn_Smith@nps.gov>; Becky Roman <becky.roman@maryland.gov>; chiefannerich <chiefannerich@aol.com>; piscatawayconoycouncil <piscatawayconoycouncil@gmail.com>; Katelyn Lucas <kucas@delawarenation-nsn.gov>; Accohannock@verizon.net <Accohannock@verizon.net>; pbarton <pbarton@estoo.net>; tayac1 <tayac1@aol.com>; kevin.brown <kevin.brown@pamunkey.org>; kendall.stevens@pamunkey.org <kendall.stevens@pamunkey.org>; wtarrant.scribe_contact <wtarrant@scribe.com>; kboerner@glenechopark.org <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; GE Town Hall <townhall@glenecho.org>; Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; david.dise <david.dise@montgomerycountymd.gov>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <cmorris@savingplaces.org>

Cc Joseph, Maureen <Maureen_Joseph@nps.gov>; Scovel, Gigi L <gigi_scovel@nps.gov>; Hall, Susan G <susan_hall@nps.gov>; Theuer, Jason <Jason_Theuer@nps.gov>; Garrett, Sean M <sean_garrett@nps.gov>; Harrington, Trinie K <heidi_harrington@nps.gov>; Barlow, Erin <ERIN_BARLOW@NPS.GOV>; Torres, Joshua M <Joshua_Torres@nps.gov>; Hershey, Christopher L <christopher_hershey@nps.gov>; Gladstone, Gail S <Gail_Gladstone@nps.gov>

■ 5 attachments (10 MB)

APPENDIX A List of Invited Consulting Parties.pdf; APPENDIX B Area of Potential Effects Map.pdf; APPENDIX C Minimization Measures.pdf; APPENDIX D Selected Design Drawings.pdf; CLBA NHS Rehabilitation Draft Programmatic Agreement - 04.2025.docx;

Dear Consulting and Interested Parties,

George Washington Memorial Parkway (GWMP), a unit of the National Park Service, is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 of the National Historic Preservation Act, NPS has prepared a draft Programmatic Agreement (PA) to resolve adverse effects caused by the subject undertaking.

This draft was developed following solicitation of input and discussion from consulting parties. The stipulations included in the attached agreement document were determined to be commensurate with the site purpose and the rehabilitation project scope, and aligned with NPS capacity, funding, and management policies.

We are sharing the draft agreement document for your review and comment. NPS will consider all comments received on the draft PA as it works to finalize the document with the Signatories. Please respond with any feedback by **Friday, April 16**.

We sincerely appreciate your participation in the Section 106 process and look forward to receiving your comments.

Best,
Megan Bailey

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Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov

May 12, 2025

Jennifer Madello, Superintendent
George Washington Memorial Parkway
National Park Service
Department of the Interior

RE: Draft Programmatic Agreement among the National Park Service, Maryland Historical Trust, and the Advisory Council on Historic Preservation regarding the Rehabilitation of the Clara Barton National Historic Site, George Washington Parkway, Glen Echo, Maryland, circulated April 16, 2025

To Superintendent Jennifer Madello:

I write as a Section 106 consulting party in response to the draft Programmatic Agreement (PA) circulated for comment on April 16, 2025. This PA commits the National Park Service (NPS), the Maryland Historic Trust serving as the Maryland State Historic Preservation Office (MD SHPO), and the Advisory Council on Historic Preservation (ACHP) to an agreement regarding the anticipated rehabilitation of the Clara Barton National Historic Site (CLBA). I am an academic historian of U.S. history with particular research interests in nineteenth-century women, moral reform, and the Civil War. I am honored to offer my professional insight into this endeavor to maintain and increase the accessibility to this important part of the nation's past and our ongoing social memory of the person and work of Clara Barton and the early endeavors of the American Red Cross. As this rehabilitation undertaking will cause an adverse effect on this historic property,¹ I believe an ongoing plan to identify, document, and interpret critical changes to the Clara Barton National Historic Site and the choices behind key interventions is necessary and prudent to maintain an adequate historic record and to ensure that the historic property will remain fully accessible to the public despite the affirmative finding of an adverse effect.

This programmatic agreement between the NPS, the MD SHPO, and the ACHP adequately acknowledges and describes the findings of adverse effects as documented in the January 2025 Assessment of Effects as well as the National Park Service's reporting of adverse effects to the MD SHPO in June 2024 and the ACHP in July 2025. As the draft PA indicates, "the Undertaking shall constitute an adverse effect on historic properties due to the loss of integrity to the historic building that will diminish materials, workmanship, and design of CLBA."² Furthermore, Appendix C to the PA identifies character-defining features of the CLBA that are or could be

¹ An affirmative finding of adverse effect is documented in the January 2025 Assessment of Effects; reported by the NPS to the MD SHPO on June 3, 2024, and to the ACHP on July 31, 2024; and acknowledged in the PA. Mills + Schnoering Architects, LLC, "Rehabilitate Clara Barton National Historic Site CLBA 312325 Assessment of Effects Report," January 14, 2025; Charles Cuvelier to Elizabeth Hughes, State Historic Preservation Officer, Maryland Historical Trust, "Clara Barton National Historic Site (MIHP No. M:35-25) Proposed Rehabilitation, Glen Echo, Montgomery County, Maryland, Assessment of Effects," June 3, 2024; Charles Cuvelier to Advisory Council on Historic Preservation, "Rehabilitate Clara Barton National Historic Site and Associated Structural Utilities, Life Safety, and Accessibility Upgrades within the Historic House," e-Section 106 cover page, July 31, 2024; National Park Service, Maryland Historical Trust, and The Advisory Council on Historic Preservation, Draft Programmatic Agreement regarding the Rehabilitation of the Clara Barton National Historic Site, George Washington Parkway, Glen Echo, Maryland, April 16, 2025, 2-3.

² Draft Programmatic Agreement, 2.

affected by the plan, indicating any loss or diminishment of integrity, the assigned significance of the room, an analysis of the change, and intended minimization or avoidance measures.

Generally speaking, these plans recognize that while the historic character of the Clara Barton House will be directly affected through the rehabilitation, appropriate measures can be taken to minimize the effect, document and preserve evidence, and maintain a record of the changes. Following the Secretary of the Interior's Standards for the Treatment of Historic Properties during rehabilitation (36 CFR 68.3.b), this plan seeks to replace character-defining elements with similar features if possible, document and salvage materials that are removed, restore previously removed features, and introduce new additions (the vertical lift, the accessible bathroom, and the egress stairway) "in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired."³

As a historian, I offer select comments on the programmatic agreement and its characterization of future work regarding the rehabilitation of the Clara Barton National Historic Site with a focus on minimizing any adverse effect and maintaining an appropriate historical record of changes and salvaged materials that make this key historic landmark and historic place accessible to future generations of scholars and citizens. I recognize that the primary purpose of the programmatic agreement is to allow the rehabilitation project to move forward in a timely manner while the National Park Service addresses mitigation of adverse effects in consultation with the MD SHPO and the ACHP. However, the PA also sets the tone and expectations of the National Park Service at the Clara Barton National Historic Site and therefore should also address outstanding concerns regarding the designation of the house as a site of historic significance, particularly as the rehabilitation itself and the ongoing archeological work at 18MO154 have the potential to uncover new data that could augment or expand the significance of the historic site.⁴

Beginning with Part III: Historic Property Documentation, I recommend that (a) the update to the Historic American Building Survey (HABS) documentation for the Clara Barton National Historic Site also include drawings and photographs of the new porch once completed. The Programmatic Agreement, as currently delineated, provides for drawings and photographs of the current porch prior to work commencing, but information regarding the current porch and the new porch should be readily available in the same location. This is particularly pertinent as the current draft includes documentation of "the sources used to design the new porch construction."⁵ Because the historic porch will be reconstructed,⁶ text and visual records ought to be created for both the planned reconstruction and the completed reconstruction. The PA should specify where the new documentation should be housed, that is, whether this documentation would be submitted to the Library of Congress for inclusion in the Historic American Building Survey, and if so, on what timeline.⁷ The NPS

³ 36 CFR 68.3.b: The Secretary of the Interior's Standards for the Treatment of Historic Properties, Standards for Rehabilitation.

⁴ The archaeological site 18MO154 was identified by the National Park Service in 1978, and ongoing work at the site is outlined in Draft Programmatic Agreement, VII, 8-10.

⁵ Draft Programmatic Agreement, 5.

⁶ Here I refer to the definition of "reconstruction" as delineated by the Secretary of the Interior as "the act or process of depicting, by means of new construction, the form, features and detailing of a non-surviving... structure... for the purpose of replicating its appearance at a specific period of time and in its historic location." 36 CFR 68.2.d.: The Secretary of the Interior's Standards for the Treatment of Historic Properties, Definitions.

⁷ Submission through the National Park Service to the Library of Congress appears to be a standard means to submit Section 106 mitigation documentation to the Historic American Building Survey. Heritage Documentation Programs, National Park Service, "HABS/HAER/HALS Documentation and Section 106 Mitigation," National Park Service, Department

may also consider including such HABS documentation as an appendix to the proposed *Historic Structure Report* so that it will be readily accessible. I note that Volume 3 of the 2002 *Historic Structure Report* includes drawings for the 1976 HABS file for the Clara Barton House in Glen Echo, Maryland as well as the drawings and texts added to the file in 2003.⁸

Second, the recommended updates to the 1979 National Register of Historic Places (NR) Nomination and the 1965 National Historic Landmark (NHL) Nomination outlined in IIIb would benefit from more specificity on the desired changes, particularly as the 1965 NHL nomination predates the 1974 acquisition of the Clara Barton House by the National Park Service. The draft Programmatic Agreement specifies that both nominations should address “physical changes” to the site and “identify the elements that should be considered contributing features,” both of which are important.⁹ However, the National Park Service should take advantage of this opportunity to also address the period of significance, the qualifications or designations of the site, and any potential archaeological findings, areas where the rehabilitation project intentionally differs from the existing nominations. The 1979 nomination for the National Register designates the property as having “social/humanitarian” significance with the period of significance designated as 1897-1904. The 1965 National Historic Landmark nomination concurs with this designated period of significance.¹⁰

Dating back to 2002 and throughout the scope of the current Section 106 consulting process, the National Park Service has suggested expanding the period of significance for the Clara Barton National Historic Site to 1891-1912, broadening the scope of individuals connected with the property to include Dr. Julian Hubbell, and designating the home in the National Register under categories A, B, C, and D, categories of “significance in American history, architecture, archaeology, engineering, and culture” that did not exist when the original nomination was submitted. Importantly, a designation under Category A as “associated with events that have made a significant contribution to the broad patterns of our history” will highlight the work and legacy of the American Red Cross from 1897 to 1904 in this space, a correlation that neatly fits with the current period of significance. A Category B designation associates CLBA with the lives of Clara Barton and Dr. Julian Hubbell as “persons significant in our past.”¹¹ Category C for design and construction embraces CLBA as “an outstanding example of late nineteenth-century American vernacular architecture that defies simple classification.” Unless archaeological work proves otherwise, Category D also applies as “prehistoric and historic archaeological potential exists with direct relation to the significant themes of the property.”¹² Although these recommendations imply non-trivial changes to these nominations, the foundational rationale and historical data is already established in existing documentation including the 2002 *Historic Structure Report*, the 2011 *Cultural Landscapes Inventory*, the 2023 *Cultural Landscape*, the 2023 *Cultural Landscape Report*, and the 2025

of the Interior, last updated March 20, 2025: <https://home.nps.gov/subjects/heritagedocumentation/section-106-mitigation.htm>.

⁸ See the last two items in Rebecca L. Stevens, ed., *Clara Barton National Historic Site: Historic Structure Report*, volume 3: Collection of Documentation, Investigation, and Treatment Reports, 1976-2002, National Park Service, Department of the Interior, 2002.

⁹ H.R. 13157: National Park Service Omnibus Bill, 1979.

¹⁰ Paul Goeldner, Nomination form for Clara Barton National Historic Site, National Register of Historic Places Inventory, National Park Service, Department of the Interior, 1979; ---, Nomination Form for Clara Barton House, National Survey of Historic Sites and Buildings, National Park Service, Department of the Interior, 1965.

¹¹ 36 CFR 60.4: National Register of Historic Places, Criteria for Evaluation.

¹² Mills + Schnoering, “Assessment of Effects,” 2025, 3-4.

*Assessment of Effects.*¹³ Because these recommendations are over twenty years old and have been substantiated by multiple NPS staff and consultants and because the current rehabilitation plan endorses these changes, I recommend that these changes be formally submitted as part of the updated NR and replacement NHL nominations and that such changes be outlined in the PA.

Third, in III.c, the proposed *Historic Structure Report* part 3 should more fully develop any significant revisions and additions to the NR and NHL nominations. As stated above, much of the logic behind altering the period of significance, the identified individuals of importance, and the designation of the site has been previously argued and can simply be memorialized in the proposed *Historic Structure Report* part 3. This information will be essential for maintaining this national historic site and for future rehabilitation, interpretation, or research on or about the site.

Additionally, the timeline for completing a new *Historic Structure Report* and which projects it must encompass should be clarified. The draft Programmatic Agreement mentions the timeframe of completion “within six (6) years of project completion.”¹⁴ This generous time period is somewhat ambiguous as “project completion” is undefined, and the PA itself is set to expire “seven (7) years from the date of execution” unless an agreement is reached “to revise or amend or extend the document as necessary” prior to its expiration date.¹⁵ Unless the National Park Service expects the rehabilitation project to be completed in one year or less from the date of execution, the PA as currently worded runs the risk of expiring before a new *Historic Structure Report* is completed. Documentation of changes is an essential mitigation element of the proposed rehabilitation project, and the *Historic Structure Report* is the most accessible data source for future architects, historians, and other scholars to track adverse effects to the building’s character-defining features and the anticipated loss of integrity to the “material, workmanship, and design” of the Clara Barton National Historic Site. When it is no longer feasible to maintain elements of historic structure and landscapes, NPS staff, future consultants, and scholars need adequate documentation to ascertain what remains of historic value, what has been restored to be equivalent or close to the historic original, and what has been lost. The *Historic Structures Report* fulfills such a need that cannot be adequately addressed with the proposed Historic American Building Survey documentation, the updated National Register nomination, or the replacement National Historic Landmark nomination. A comprehensive *Historic Structure Report* will take time to generate, particularly as the PA requires the *Historic Structure Report* to contain documentation “for this project and any past projects that have not yet been documented.”¹⁶ This report ought to be completed prior to the expiration of the Programmatic Agreement, which will require either modifying the timeline for the report itself or the PA or mandating a time extension to the PA should the *Historic Structure Report* not be completed at the time of expiration.

Fourth, in Part V: Interpretation, the Programmatic Agreement outlines temporary signage, visual documentation of the rehabilitation and completed project, and permanent interpretation of the rehabilitation.

¹³ Elizabeth J. Lampl, *Clara Barton National Historic Site: Historic Structures Report*, volume 1: Developmental History, National Park Service, Department of the Interior, 2002, xxi-xxii, xxiv; Jonathan Pliska, *Glen Echo Park-Clara Barton House Cultural Landscapes Inventory*, National Park Service, Department of the Interior, 2011, 18-23; Heritage Landscapes, LLC, Preservation Landscape Architects & Planners, *Cultural Landscape Report: Rehabilitate the Clara Barton National Historic Site*, July 2023, 1.13-1.14, 4.2-4.3; Mills + Schnoering Architects, LLC, “Rehabilitate Clara Barton National Historic Site CLBA 312325 Assessment of Effects Report,” January 14, 2025, 3-4, 53.

¹⁴ Draft Programmatic Agreement, III.c, 6.

¹⁵ Draft Programmatic Agreement, IX.c, 12.

¹⁶ Draft Programmatic Agreement, III.c, 6.

All of these adequately serve the purpose of ensuring that visitors to the Clara Barton National Historic Site can bear witness to the rehabilitation and its legacy with modifications to the built environment and cultural landscape. However, some specificity would be helpful, particularly because such interpretation serves to mitigate adverse effects to the “material, workmanship, and design” of the Clara Barton House. The Programmatic Agreement should clarify if (c) Virtual Tour/Film is intended to capture the rehabilitation as a work-in-progress or merely as a completed project. It is also unclear when and how long such a virtual tour/film will be accessible to the public: is this intended to offset any lack of access to the building and grounds during construction? Or will it serve as a permanent method of welcoming guests to the national historic site virtually?¹⁷ Additionally, some clarification on the breadth and depth of the proposed virtual tour/film and the permanent interpretation would be helpful. The number of temporary signs is specified, but the scope of the virtual tour/film and the permanent interpretation is not.

The National Park Service’s commitment to rehabilitate the Clara Barton National Historic Site and to work with the Maryland Historic Trust as the State Historic Preservation Office and the Advisory Council on Historic Preservation on mitigation efforts is commendable. The Section 106 consulting process has been lengthy, but the Park has been responsive to many suggestions from the Consulting Parties and has set forth a rehabilitation plan that will make this national historic site safe and accessible to the general public while maintaining its utility for visitors, NPS staff, and scholars for years to come. I sincerely believe that this Programmatic Agreement offers a well-thought-out plan for mitigation of inevitable rehabilitation efforts, and I am looking forward to watching this rehabilitation project unfold in the very near future.

Sincerely,



Pearl J. Young
Assistant Professor of History
youngp@uhcl.edu
281-283-3317

¹⁷ I note that the current NPS webpage for the Clara Barton House includes a [virtual museum exhibit](#). A [link](#) to a virtual house tour is included in the exhibit, but it simply leads to a generic “page in-progress” landing page. National Park Service, “Clara Barton National Historic Site,” <https://www.nps.gov/clba/index.htm>, last updated April 5, 2024.

[EXTERNAL] Re: Continuation of Section 106 Consultation: Clara Barton NHS Rehabilitation Draft Programmatic Agreement

From Becky Roman -MDP- <becky.roman@maryland.gov>

Date Tue 5/13/2025 2:53 PM

To Bailey, Megan M <megan_bailey@nps.gov>

Cc Smith, Kathryn G <Kathryn_Smith@nps.gov>; chiefannerich <chiefannerich@aol.com>; piscatawayconoycouncil <piscatawayconoycouncil@gmail.com>; Katelyn Lucas <kucas@delawarenation-nsn.gov>; Accohannock@verizon.net <Accohannock@verizon.net>; pbarton <pbarton@estoo.net>; tayac1 <tayac1@aol.com>; kevin.brown <kevin.brown@pamunkey.org>; kendall.stevens@pamunkey.org <kendall.stevens@pamunkey.org>; wtarrant.sctribe_contact <wtarrant@sctribe.com>; kboerner@glenechopark.org <kboerner@glenechopark.org>; erogers <erogers@glenechopark.org>; mayorcostello <mayorcostello@glenecho.org>; GE Town Hall <townhall@glenecho.org>; Ballo, Rebecca <rebeccah.ballo@montgomeryplanning.org>; david.dise <david.dise@montgomerycountymd.gov>; Omidvar, Hamid <hamid.omidvar@montgomerycountymd.gov>; Pamela Goddard <pgoddard@npca.org>; Christina Morris <cmorris@savingplaces.org>; Christopher Cody <ccody@savingplaces.org>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Megan Bailey
Cultural Resources Program Manager
NPS-GWMP

Good afternoon Megan,

Thank you for your recent submission to our office, the ACHP, and other consulting parties of the draft Programmatic Agreement for the CLBA NHS Rehabilitation project (MHT log 202502278). MHT did review an earlier draft shared with the signatories, and we appreciate that the NPS incorporated our comments and suggested edits into this draft agreement. As such, we have no further comments at this time.

If any changes are made to this agreement document in response to the comments of the consulting parties, MHT asks that the revised draft be shared with the Signatories for review. We also request that the final Programmatic Agreement be shared with the Signatories for our final review before it is circulated for signature.

Please let me know if you have any questions. MHT has enjoyed working with the NPS staff at GWMP and the consulting parties over the past several years on this project. We look forward to working with everyone as we close out the Section 106 review process.

Have a great rest of your week,
Becky



Becky Roman (*she, her, hers*)

Preservation Officer / Architectural Historian

Project Review and Compliance

Maryland Historical Trust

Maryland Department of Planning

100 Community Place, 3rd Floor, Crownsville, MD 21032

becky.roman@maryland.gov (410) 697-9587

Mht.maryland.gov

On Wed, Apr 16, 2025 at 12:19PM Bailey, Megan M <megan_bailey@nps.gov> wrote:

Dear Consulting and Interested Parties,

George Washington Memorial Parkway (GWMP), a unit of the National Park Service, is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 of the National Historic Preservation Act, NPS has prepared a draft Programmatic Agreement (PA) to resolve adverse effects caused by the subject undertaking.

This draft was developed following solicitation of input and discussion from consulting parties. The stipulations included in the attached agreement document were determined to be commensurate with the site purpose and the rehabilitation project scope, and aligned with NPS capacity, funding, and management policies.

We are sharing the draft agreement document for your review and comment. NPS will consider all comments received on the draft PA as it works to finalize the document with the Signatories. Please respond with any feedback by **Friday, April 16**.

We sincerely appreciate your participation in the Section 106 process and look forward to receiving your comments.

Best,
Megan Bailey

--

Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov



May 15, 2025

Superintendent Jennifer Madello
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

RE: *Clara Barton National Historic Site, CLBA 312325, Proposed Programmatic Agreement*

Dear Superintendent Madello:

On behalf of the National Parks Conservation Association, I am writing to provide comments on the proposed programmatic agreement created to resolve adverse impacts at the Clara Barton National Historic Site. We are grateful to you, your staff, and the many consultants working on this project for your willingness to meet with us, consider our perspective, and work to ensure that the rehabilitated Barton site will properly reflect and honor the historic significance of Clara Barton and the early days of the American Red Cross.

We support your proposed measures to minimize and to mitigate the adverse impacts that will occur due to the rehabilitation of the site. We appreciate you minimizing ground-disturbing activities during construction and protecting the existing historic vegetation. We also appreciate and support the development of temporary outdoor interpretive signage that will share with park visitors the history of the Barton site and the purpose and need for the rehabilitation.

Historic Structure Report - The Barton Site has seen many structural changes over the years that have impacted its historic character. We support your proposed removal of non-historic features while documenting them so park visitors can understand why these changes will be made. We support the redesign of the current front porch along with documentation of its changes over time so visitors understand its history. We strongly support updating the National Register Nomination and the National Historic Landmark Nomination along with the conditions you present for each of them. We also support the creation of a Historic Structure Report; an analysis of the significance of individual rooms; and providing a draft of the HSR for review and comment by the signatories.

Historic Landscape – We support NPS developing and implementing the recommendations in the 2023 *Cultural Landscape Report: Rehabilitate the Clara Barton National Historic Site*.

Photo Documentation/Virtual Tour/Rehabilitation Interpretation – We support the photo documentation of the construction work and the creation of a virtual tour and film. Creating these and making them available to the public will enable park lovers to follow and to understand the rehabilitation process while allowing them to learn about Clara Barton while the building is closed to the public. We also strongly support the interpretation of the rehabilitation to broadly share the changes made to the site and why.

Site 18MO154/Unanticipated Discoveries – We understand that NPS is in the process of evaluating the significance of archeological site 18MO154 and is working with federally-recognized tribes to consult and to seek to avoid adverse effects on potential religious or cultural significant resources. We support NPS working with tribal representatives to develop any interpretation related to tribal presence on the landscape. We support the steps outlined in **VII Archeological Site 18MO154** to work with the MD SHPO and tribal representatives to ensure all entities concur with the recommendations of NR eligibility; the implementation of the recommendations; and proposed resolution of any issues that may arise. We support the proposed treatments if unanticipated discoveries arise during the rehabilitation process.

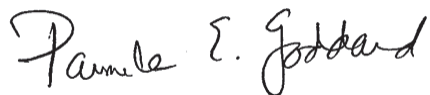
Construction Documents/Design Modifications/Restoration Plan – We strongly support providing signatories for review and comment all construction documents, design modifications, and restorations plans.

We are mystified that the Programmatic Agreement list only includes names of organizations. Many esteemed historians and other professionals spent years providing expertise and time, actively participating in the Section 106 consultation process. I have participated in numerous 106 consultations and have never experienced individuals not being included in the *List of Invited Consulting Parties*. We ask that you correct this oversight and include all participants who shared expertise, suggestions, and time to ensure that the rehabilitation of the Clara Barton National Historic Site will be the very best it can be.

Finally, we ask that all interpretation during the rehabilitation process and in the future when the site is restored and open to the public includes and recognizes the entirety of Clara Barton’s life and contributions to our country’s history; the lives, roles, and stories of the many individuals who worked and lived at the site, and the early days of the American Red Cross.

Again, we sincerely appreciate the hard work of the National Park Service staff and the consultants who drafted the programmatic agreement. We look forward to working together to ensure that, once rehabilitated, the Clara Barton National Historic Site becomes a vibrant, active tribute to Clara Barton and her amazing contributions to our nation’s history.

Sincerely,



Pamela E. Goddard
Senior Program Director
Mid-Atlantic Region
pgoddard@npca.org
202.604.3781

Cc: Kirsten Kulis, Advisory Council on Historic Preservation
Kathryn G. Smith, National Park Service National Capitol Region
Megan Bailey, Rebecca Karcher, George Washington Memorial Parkway
Elizabeth Hughes, Becky Roman, Maryland Historical Trust

[EXTERNAL] Re: Continuation of Section 106 Consultation: Clara Barton NHS Rehabilitation Draft Programmatic Agreement

From Chandra Manning <cmm97@georgetown.edu>

Date Thu 5/15/2025 7:58 AM

To Bailey, Megan M <megan_bailey@nps.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Megan,

Thank you for the opportunity to review the draft PA, which I have done on behalf of the Society of Civil War Historians (SCWH). The SCWH is pleased with the draft, wishes the Park the best in its implementation, and looks forward to continued consultation as the Park enters into the consideration of its Interpretive Plan.

Thank you,

Chandra Manning, on behalf of the Society of Civil War Historians

On Wed, Apr 16, 2025 at 12:19PM Bailey, Megan M <megan_bailey@nps.gov> wrote:

Dear Consulting and Interested Parties,

George Washington Memorial Parkway (GWMP), a unit of the National Park Service, is continuing to develop its proposed rehabilitation for the Clara Barton National Historic Site (CLBA NHS) in Glen Echo, Maryland. As part of our effort to fulfill our responsibilities under Section 106 of the National Historic Preservation Act, NPS has prepared a draft Programmatic Agreement (PA) to resolve adverse effects caused by the subject undertaking.

This draft was developed following solicitation of input and discussion from consulting parties. The stipulations included in the attached agreement document were determined to be commensurate with the site purpose and the rehabilitation project scope, and aligned with NPS capacity, funding, and management policies.

We are sharing the draft agreement document for your review and comment. NPS will consider all comments received on the draft PA as it works to finalize the document with the Signatories. Please respond with any feedback by **Friday, April 16**.

We sincerely appreciate your participation in the Section 106 process and look forward to receiving your comments.

Best,
Megan Bailey

--

Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov

[EXTERNAL] Comments on CBLA PA

From Christina Morris <CMorris@savingplaces.org>

Date Fri 5/16/2025 12:52 AM

To Bailey, Megan M <megan_bailey@nps.gov>

Cc Christopher Cody <ccody@savingplaces.org>; KKULIS@ACHP.GOV <KKULIS@ACHP.GOV>; Smith, Kathryn G <Kathryn_Smith@nps.gov>; Pamela Goddard <pgoddard@npca.org>; Becky Roman Roman <becky.roman@maryland.gov>

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Megan Bailey
Cultural Resources Program Manager
NPS-GWMP

Megan – On behalf of the National Trust for Historic Preservation, we thank you for inviting the review and comment of consulting parties on the draft Programmatic Agreement for the CLBA NHS Rehabilitation project. We are grateful to GWMP staff and leadership for their willingness to work with ACHP, the Maryland SHPO, the National Historic Landmarks staff, and consulting parties to design a project that is sensitive to the deep and important national history of the Clara Barton NHS. We appreciate that NPS incorporated consulting parties' suggestions for minimization and mitigation measures, particularly the much-needed updates to both the existing National Historic Landmark and National Register of Historic Places designations for the property, implementation of the recommended landscape treatments consistent with the 2023 *Cultural Landscape Report*, and the creation of new temporary and permanent interpretation on site.

We have no additional comments on the Programmatic Agreement and request a copy of final signed PA, when it is available. We also request notification of the official start of construction activities on site. We look forward to continued collaboration with GWMP on future plans for public interpretation and programming at the Clara Barton NHS.

Thank you
Christina Morris and Christopher Cody



[EXTERNAL] MHT e106 project review – MHT Completed Comments

From Maryland Historical Trust <donotreply@maryland.gov>

Date Mon 6/30/2025 9:51 AM

To Bailey, Megan M <megan_bailey@nps.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Date: June 30, 2025

To: Megan Bailey
National Park Service

Project Name: Clara Barton NHS Rehabilitation, Draft Final Design

County: Montgomery County

Agency: National Park Service

Second Agency: -- Not noted --

MHT Log #: 202502948

MHT Response: Thank you for providing the Maryland Historical Trust the opportunity to comment on the above-referenced undertaking using the MHT e106 system. The Maryland Historical Trust has reviewed the submitted project for its effects on historic and archeological resources, pursuant to Section 106 of the National Historic Preservation Act of 1966 and/or the Maryland Historical Trust Act of 1985. We offer the following comments and/or concurrence with the agency's findings:

Please refer to the note below or attached document for MHT's comments on the undertaking and/or specific recommendations for continuing consultation with our office.

Hello Megan - MHT appreciates the NPS sharing these with us for review. We have no comments on the draft final design for this undertaking. We ask that you incorporate any comments of the NHL office and the ACHP. We look forward to working with the NPS to ratify the PA and review activities stipulated to resolve the adverse effect. Please let us know if you have any questions. Have a great week, Becky

Thank you for your cooperation in this review process. Since the MHT response is now complete, this response will appear in the Completed section of your project dashboard. No hard copy of this response or attachments will be sent. If you have questions, please contact the following MHT project reviewers:

Becky Roman becky.roman@maryland.gov



Maryland Historical Trust
Project Review and Compliance
100 Community Place
Crownsville, MD 21032
mht.section106@maryland.gov

MHT.Maryland.gov
Planning.Maryland.gov

[EXTERNAL] Re: Clara Barton NHS Rehabilitation - Draft Programmatic Agreement

From Becky Roman -MDP- <becky.roman@maryland.gov>

Date Fri 7/25/2025 9:59 AM

To Bailey, Megan M <megan_bailey@nps.gov>

Cc KKULIS@ACHP.GOV <KKULIS@ACHP.GOV>; Dixie Henry -MDP- <dixie.henry@maryland.gov>

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Good Morning Megan,

Thank you for providing a copy of the revised draft PA for signatory review (MHT log 202503475), as MHT requested with our review of the draft PA circulated for consulting party comments. MHT requests one minor edit on our signature page - please add Director after Elizabeth Hughes' name. We have no other no comments on this final draft PA. Please incorporate any comments of the ACHP into the final PA.

Please let us know if you have any questions. MHT has enjoyed working with you and the other NPS staff at GWMP and all the other CPs during consultation for this project. We look forward to receipt of the final PA for review and signature.

Happy Friday and have a great weekend,
Becky



Becky Roman *(she, her, hers)*

Preservation Officer / Architectural Historian

Project Review and Compliance

Maryland Historical Trust

Maryland Department of Planning

100 Community Place, 3rd Floor, Crownsville, MD 21032

becky.roman@maryland.gov (410) 697-9587

Mht.maryland.gov

On Wed, Jul 9, 2025 at 4:10 PM Bailey, Megan M <megan_bailey@nps.gov> wrote:

Hi Becky and Kirsten,

NPS has completed our revisions on the draft PA for the Clara Barton NHS Rehab project based on comments from consulting parties — especially Kirsten and Kathryn Smith, who gave us very detailed feedback to make sure the document is as precise and accurate as possible. Becky, you had requested that NPS send any updated drafts to the Signatories for review. It's attached here and I also submitted it via the MHT e106 portal. You'll see that we didn't make any substantive changes in terms of the content — most of the edits were related to technical aspects (making sure the PA conforms with ACHP guidelines) and trying to be more specific about deliverables and deadlines for mitigation items. If you could return any comments within 30 days, that would be great.

Thank you!
Megan

--

Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov

[EXTERNAL] CLBA Rehabilitation PA

From Becky Roman -MDP- <becky.roman@maryland.gov>

Date Fri 12/19/2025 3:26 PM

To Bailey, Megan M <megan_bailey@nps.gov>

Cc GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>; Dixie Henry -MDP- <dixie.henry@maryland.gov>; collin.ingraham <collin.ingraham@maryland.gov>; Elizabeth Hughes -MDP- <elizabeth.hughes@maryland.gov>

 2 attachments (9 MB)

CLBA NHS Rehabilitation Programmatic Agreement Final 2025_MHT Signed.pdf; CLBA NHS Rehabilitation PA Final_ MHT Signature Page.pdf;

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Megan Bailey
Cultural Resources Manager
NPS, GWMP

Good afternoon Megan,

Please see attached with MHT's signature the final Programmatic Agreement for the Rehabilitation of the Clara Barton National Historic Site in Glen Echo, Montgomery County, MD. (MHT log 202505499). Also attached is just our signature page in case it will be helpful in compiling the fully signed document.

Please provide MHT a copy of the ratified PA when all parties have signed; once received, it will be added to our project file and archive. It should be emailed to my attention at becky.roman@maryland.gov and copy Dixie Henry at dixie.henry@maryland.gov.

MHT appreciates all of NPS' efforts over the past 3 - 4 years during consultation for this undertaking. We look forward to working with you and the other involved parties as the rehabilitation and mitigation work proceeds. I for one cannot wait to visit both during and after rehabilitation.

Have a great holiday season!
Becky



Becky Roman *(she, her, hers)*

Preservation Officer / Architectural Historian

Project Review and Compliance

Maryland Historical Trust

Maryland Department of Planning

100 Community Place, 3rd Floor, Crownsville, MD 21032

becky.roman@maryland.gov (410) 697-9587

Mht.maryland.gov



January 22, 2026

Ms. Jennifer Madello, Superintendent
George Washington Memorial Parkway
U.S. Department of the Interior, National Park Service
700 George Washington Memorial Parkway
McLean, VA 22101

Ref: *Proposed Rehabilitation of the Clara Barton National Historical Site
Glen Echo, Montgomery County, Maryland
ACHP Case Number: 019014*

Dear Ms. Madello:

Enclosed is your copy of the fully executed Section 106 agreement (Agreement) for the referenced undertaking. By carrying out the terms of the Agreement, the National Park Service will fulfill its responsibilities under Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800).

Please ensure all consulting parties are provided a copy of the executed Agreement in accordance with 36 CFR § 800.6(c)(9). The original Agreement will remain on file at our office.

We appreciate your compliance efforts and your commitment to stewardship of the Clara Barton National Historic Site. If we can be of further assistance as the agreement is implemented, please contact us at ofap_help@achp.gov and reference ACHP Case Number: 019014.

Sincerely,

Jaime Loichinger
Director
Office of Federal Agency Programs

Enclosure