



**Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
MS Word format**

Send to: *e106@achp.gov*

Please review the instructions at www.achp.gov/e106-email-form prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. Purpose of notification. Indicate whether this documentation is to:

- Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- Invite the ACHP to participate in a Section 106 consultation
- Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- Supply additional documentation for a case already entered into the ACHP record system
- File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- Other, please describe
[Click here to enter text.](#)

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): N/A

019014

3. Name of federal agency (If multiple agencies, list them all and indicate whether one is the lead agency):

Department of the Interior, National Park Service

4. Name of undertaking/project (Include project/permit/application number if applicable):

Rehabilitate Clara Barton National Historic Site and Associated Structural, Utilities, Life Safety, and Accessibility Upgrades within the Historic House

5. Location of undertaking (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

Glen Echo, Montgomery County, Maryland

The property is owned by the National Park Service and is not a tribal land.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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6. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:

Charles J. Cuvelier, Superintendent, George Washington Memorial Parkway
 700 George Washington Memorial Parkway
 Mclean, Va. 22101
 (office) 703-289-2511
 (cell) 202-809-5519
 Email: Charles_Cuvelier@nps.gov

II. Information on the Undertaking*

7. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

Explain whether this project will:

- be funded in whole or in part by a federal agency or under the direct or indirect jurisdiction of a federal agency;
- be carried out by or on behalf of a federal agency;
- be carried out with federal financial assistance, or
- require a federal permit, license, or approval.

The proposed undertaking will be carried out by the George Washington Memorial Parkway (GWMP), a unit of the National Park Service, with funding provided by the Great American Outdoors Act. The 130-year-old historic structure within the Clara Barton National Historic Site (CLBA) suffers from the ongoing deterioration of materials and deferred maintenance and is in critical need of rehabilitation. The proposed project will also address structural (live-load capacity, seismic, and wind shear), utilities, life safety, and accessibility needs (e.g., mechanical, electrical, plumbing, and fire protection) to increase the longevity of the building, and to maintain and improve public access to the first and second floors.

Major changes to the historic site will include:

- A moderate structural upgrade that will increase the live-load capacity of the second floor, and meet International Existing Building Code requirements, by sistering new lightweight metal joists to the existing, undersized 2" x 6' wood joists. Structural stabilization would include basement – additional reinforced concrete footings and columns, first floor – new steel beams and steel columns in the basement, second floor – reinforce existing framing by sistering cold-formed steep joists to existing joists, and roof – supplement with additional rafters and reinforce existing hip rafters with steel plates to support the flagpole. To increase resistance to lateral forces (wind shear) in accordance with the prevailing building code, the project will add shear walls and collectors. The shear walls will be added by reinforcing existing walls or roofs and from the proposed egress stair well. Collectors will be created by adding hold downs or connectors between joists and studs.
- The Engineer of Record analyzed the existing structure and determined the system does not satisfy the 2021 International Existing Building Code with regards to resistance to lateral forces. The analysis included by seismic and wind. Wind governs. While it is impossible to predict the timing, frequency, or significance of wind events, failure to remedy structural deficiencies could result in building damage and/or possible injury or loss of life.
- 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.
- Installing a new water heater and domestic water piping.
- Adding a vertical platform lift to the design to provide access to the second floor.
- Reconstructing and replacing the existing deteriorated front porch to resemble its configuration during the period of significance and incorporating an accessible ramp.
- Interior and exterior utility trenching for replacement of water, sanitary, and storm pipes.
- Implementing site improvements including an addition of two accessible parking spaces in the existing parking lot and connected to the front porch by a proposed concrete sidewalk. The sitework is consistent with the NHS's Cultural Landscape Report completed in July 2023.

8. Describe the Area of Potential Effects (APE):

GWMP presented a map of the Area of Potential Effect (APE) to consulting parties on July 26, 2023, and received concurrence from the Maryland Historical Trust (MHT) on August 25, 2023. The APE measures approximately nine (9) acres and is coterminous with the Clara Barton National Historic Site boundary, which includes the historic house and surrounding grounds. Within the APE are historic views to the Potomac River from the house and views to and from the adjacent Town of Glen Echo residential area, and the other historic properties noted below.

9. Describe steps taken to identify historic properties:

GWMP identified historic properties and cultural resources within or adjacent to the APE for the CLBA Rehabilitation Project based on a review of existing baseline documentation (e.g., National Register nomination, Historic Structures Report, Cultural Landscape Inventory) and through consultation with the MHT and other consulting parties. GWMP also consulted Medusa, Maryland's Cultural Information System, and the National Register of Historic Places. Furthermore, in July 2023 GWMP produced 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 that the cultural landscape has limited integrity, it contributes to the portrayal of the historical and cultural values associated with Clara Barton and the American Red Cross. Finally, Phase IA and IB archeological surveys were recently completed to identify archeological resources within the APE. A Phase II archeological study is planned to evaluate the NRHP eligibility of the identified site.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Historic properties within the APE include:

- The Clara Barton National Historic Site (NHS): A National Historic Landmark (NHL), the home of Clara Barton, and the headquarters of the American Red Cross, which she founded. The property includes a historic structure and surrounding grounds. The Clara Barton NHS was listed as an NHL on January 12, 1965. The established period of significance is 1897 to 1912.
- The Clara Barton NHS cultural landscape has limited integrity, but as a whole, the site retains the potential to portray the historical and cultural values associated with Clara Barton and the American Red Cross. The site expresses core character-defining features that establish a recognizable connection to the period 1897-1912 when Barton intensively shaped the landscape,

and particularly to those years through 1906 when Barton was able to maximize use of the lands now within the NHL property. After that date, amusement infrastructure encroached on the north and east sides of the property, in turn removing or altering prior pasture, paths, views, and other aspects of daily life for Barton.

- Extant contributing landscape features include relatively large-scale, essential aspects of the property such as natural systems and topography; spatial organization; some views; basic circulation including a driveway loop; and the Clara Barton House. Though present, each of these contributing features have been impacted by detrimental changes since 1912. In addition, numerous non-contributing features have been added either through commemorative action or NPS management. While the existing conditions pose challenges to the interpretive legibility of the Barton-era landscape, they can be reversed through the implementation of recommended landscape preservation, rehabilitation and management actions.
- Brookmont Trolley Right-of-Way: Listed in the Maryland Inventory of Historic Properties (M:35:31) in 1976.
- 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 conducted from April 8 through April 11, 2024, identified potentially significant archeological resources relating to both precontact Native American occupation and to the 1891-1912 period of significance for the historic occupation of the house. A Phase II study of the site has been programmed by NPS to determine if the site is National Register-eligible, but until that takes place, NPS is treating the site as eligible for the purposes of the Section 106 and the assessment of effects.

11. Describe the undertaking's effects on historic properties:

Due to the level of intervention in the proposed undertaking, the rehabilitation project will result in an *adverse effect* on historic properties. However, the NPS does not find that the project will change the eligibility of the Clara Barton NHS for the National Register of Historic Places or National Historic Landmark status. The Assessment of Effects Report for the proposed undertaking describes the anticipated impacts of the rehabilitation of the Clara Barton National Historic Site (NHS). The document was prepared in compliance with Section 106 and Section 110(f). Section 1.0 provides necessary background information about the Clara Barton NHS, provides the regulatory context of the Proposed Rehabilitation, and describes the prior documentation and reporting that guided crucial decisions for individual interventions. The Proposed Rehabilitation, as described in Sections 2.0 through 5.0, will resolve ongoing issues of life safety, accessibility, and indoor environmental controls and building systems that the Clara Barton NHS requires to better serve National Park Service (NPS) staff and the general public. The crux of the assessment rests on Section 5.0, which delves into great detail the effects of the Proposed Rehabilitation on each of the property's character-defining features and the resulting impacts on the subject feature's integrity. As described in Sections 5.0, 6.0, and Table 1, measures to minimize and avoid impacts will be implemented through: 1) the selection of specific spaces identified in prior documentation for the proposed interventions (those with less significance assigned by the Historic Structures Reports), 2) preserving existing walls or features within spaces of new function (such as new restrooms), and 3) proposed storage of architectural materials salvaged during construction. This Assessment of Effects concludes in Section 7.0 that the Proposed Rehabilitation will have an adverse effect on the Clara Barton NHS. While the alterations do not diminish the integrity of features that would qualify the property for inclusion in the National Register of Historic Places (NR) under Criterion A or B, the cumulative effect of alterations does diminish characteristics which qualify the building under Criterion C. In addition, archeologically sensitive areas within the Area of Potential Effect (APE) are assumed to be eligible for listing in the NR. As of May, 2024, fieldwork for a Phase I archeological survey has been completed and a full technical report is pending. Prehistoric and historic archeological

resources have been found.

12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

GWMP assessed effects of the proposed undertaking to the historic properties within the APE and determined that the rehabilitation project would result in some degree of integrity loss or the diminishing of materials, workmanship, and design of the Clara Barton National Historic Site. In addition, planned ground disturbing activities within the project's APE to create accessible walkways and proposed utility trenching have the potential to impact archeological resources that may be eligible for listing in the NRHP.

Opportunities for modification are limited by existing structural challenges including insufficient live-load capacity and insufficient resistance to lateral forces (seismic and wind). However, GWMP continues to study new design alternatives to improve structural performance while avoiding the intensification of the adverse effect.

GWMP will continue to consult with MHT, Tribes, and other consulting parties to develop and evaluate measures to minimize and mitigate adverse effects of the undertaking. 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. In addition, GWMP will continue consultation with MHT and Tribal representatives to determine the appropriate next steps for formally evaluating archeological site 18MO154 for eligibility (e.g., Phase II investigation) and developing avoidance, minimization, and mitigation measures.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

A summary of the comments, in addition to direct comments from the letters provided by the consulting parties yielded four common themes that included observation on adverse effects, archeological assessment, identification of historic properties, and the historical significance of rooms. Please see the attached Assessment of Effects letter submitted to the Maryland Historical Trust for the comment summary. In addition, as noted below, the NPS liaison at the ACHP, Ms. Kirsten Kulis, attended numerous consulting parties meetings in a technical capacity, and has been copied on comments throughout the consultation process.

III. Additional Information

14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

Beginning in 2022, GWMP initiated and invited input from consulting and interested parties (see attachment for complete list of participants). GWMP hosted consulting party meetings on November 16, 2022; May 1, 2023; July 31, 2023; and January 30, 2024, to describe the undertaking, discuss design alternatives, and present the preferred alternative and draft Assessment of Effects report. A summary of each meeting is included as part of the Assessment of Effects to the Maryland Historical Trust.

There has been significant interest in this project and GWMP has fielded numerous requests from those wishing to participate as consulting parties, largely from preservation professionals and academic historians. GWMP solicited the technical assistance of ACHP's Kirsten Kulis to navigate engagement with consulting parties and anticipate/resolve potential conflict. GWMP has been responsive to feedback from consulting parties and modified designs and the Assessment of Effects determination based on comments received from consulting parties. GWMP remains committed to engaging with consulting and interested parties for the duration of the rehabilitation project.

15. Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

[ParkPlanning - Rehabilitate Clara Barton National Historic Site \(nps.gov\)](#)

16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

No

The following are attached to this form (check all that apply):

- Section 106 consultation correspondence
- Maps, photographs, drawings, and/or plans
- Additional historic property information
- Consulting party list with known contact information
- Other: Adverse Effect Letter to Maryland Historical Trust with Enclosures

NOTE: All associated project materials can be found at: [ParkPlanning - Rehabilitate Clara Barton National Historic Site \(nps.gov\)](#).