FINDING OF NO SIGNIFICANT IMPACT

Repair and Rehabilitate the Petersen House, Ford's Theatre National Historic Site Washington, D.C.

The National Park Service (NPS) is proposing to repair and rehabilitate several sections of the Petersen House, including repairing exterior features; repairing the historic windows, casings, doors, and shutters; rehabilitating portions of the interior; and rehabilitating the rear porch to provide an accessible route in a manner that maintains the visitor experience while preserving the building's historic character. In addition, in cooperation with the Ford's Theatre Society, the project will provide a connection from the Petersen House, upon leaving the Death Room, to the adjacent Ford's Theatre Society Center for Education and Leadership (CEL) located at 514 10th Street, NW. The Petersen House, located on 10th Street, NW, Washington D.C., is the where President Abraham Lincoln died after he was assassinated at Ford's Theatre on April 14, 1865.

The proposed actions are needed for several reasons. Over the past few years, leaks have caused extensive water damage to the historic fabric of the house, while the lack of an environmental control system has led to poor ventilation and excessive humidity which has in turn impacted both the building and the objects. The house also has peeling paint, exposed wood on doors and windows, cracking and missing window glazing, and deteriorating wooden window features. In addition, the Petersen House is not accessible to those with mobility problems. The sole point of entry into the Petersen House is up a set of curved front steps off of 10th Street, NW; there is no ramp or lift to accommodate visitors in wheelchairs anywhere in the house.

In addition, the proposed connection from the Petersen House to the CEL will provide visitors with a connection to the array of programs that the new CEL will offer on the life, legacy, and lessons in leadership of President Abraham Lincoln. The CEL programs will be available to visitors of the Ford's Theatre National Historic Site, regardless if the Petersen House is directly connected to the CEL building. However, having the buildings connected will provide a continuous experience for visitors to the Petersen House and the programs and exhibits offered in the CEL. In addition, because the interior of the CEL will be universally accessible, it is the intent of this project to utilize the proposed connection between the CEL and the Petersen House as the means of providing, for the first time ever, an accessible route to the Death Room.

The NPS prepared an environmental assessment (EA) for the proposed repair and rehabilitation of the Petersen House and the rear porch, as well as the accommodation of a connection between the house and the adjacent CEL building, in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, and implementing regulations, 40 CFR Parts 1500-1508, NPS Director's Order #12 and the handbook, Conservation Planning, Environmental Impact Analysis, and Decision-making (DO-12). Compliance with Section 106 of the National Historic Preservation Act of 1966 has occurred in conjunction with the NEPA process.

SELECTED ALTERNATIVE

Based on the analysis presented in the EA, the NPS has selected Alternative C (the NPS preferred alternative) for implementation. The selected alternative will allow for multiple improvements to repair and rehabilitate the various exterior and interior elements of the Petersen House, install a new climate control system, and accommodate a connection between the Petersen House and the CEL. In addition, the selected alternative proposes to rehabilitate the rear porch for an accessible route to Petersen House. The selected alternative can be generally described as follows:

Exterior Repairs - Exterior repairs of the Petersen House will be conducted in identified areas of the house to help maintain and prevent further deterioration of the structure and related features from water damage. Elements of exterior repairs include the following:

- Install new flashing along parapet walls and chimneys.
- Repair cornices and/or replace gutters, downspouts and flashing and install screen covers at downspouts. Relocate downspouts at the rear ell and connect downspouts to existing and new underground storm sewer piping.
- Dismantle, repair, and reinstall the exterior stone landing and steps located at the front of the building. Remove, repair, and reinstall iron railings and balusters.
- Repair and replace damaged brick on the exterior of the building. Re-point deteriorated mortar joints.
- Remove existing patches at the first floor entrance door sill and plinths and install new repairs.
- Install a new drainage system in the backyard to include a gravel filled trench (i.e., French drain) along the ground floor exterior walls from grade to footing to drain water away from the building wall.
- Replace the ground floor areaway entrance drain and concrete slab. Relocate the existing drain; lower the slab and drain away from the entrance door.
- Install slate damp-proofing course.
- Apply mineral coating to exterior brickwork.
- Install new underground sewer (collection box) and sanitary piping to drain water and waste to existing sewer lines in alley to the west of the Petersen House property.
- Install structural repairs and modifications at floor and roof framing of the house.
- Install new support framing for the roof beams. Repair the first floor beam at the north end of the porch. Replace rotten roof framing and sheathing.
- Install interior energy panels at all storm windows.
- Insulate the floor of the Death Room and former kitchen.

Interior Repairs - Interior repairs of the Petersen House will be conducted in identified areas of the house to help maintain and prevent further deterioration of the structure and related features. Elements of interior repairs include the following:

- Abate loose lead paint down to sound paint in preparation for repainting throughout the house on interior walls, ceilings, doorways, doors, baseboards, window frames and sills. Prepare all surfaces for repainting.
- Strip wallpaper from exhibition area walls and ceilings in the hallway, front and back parlors and Lincoln's Death Room.
- Repaper exhibit area walls and ceilings using 1865 wallpapering expertise and methodology. Front hallway seams will face a westerly direction – the same direction as traffic flow.
- Repair plaster cracks and holes in walls and ceilings throughout the house on all floors where needed and prepare areas for repainting/repapering.
- Repaint non-papered rooms and all interior trims with historic 1865 colors, where known, or match existing colors.
- Repair wood flooring where it is damaged and buckled and refinish all wood flooring surfaces throughout the house.
- Remove all heating baseboards in public rooms and replace with appropriate wood baseboard trim to match existing size and profile.
- Replace non-historic carpeting in historic rooms with appropriate carpeting of the type that will have been present in a typical Washington, D.C. boarding house of 1865. Replace carpeting in hallway, hall stair, and room walkways with heavy-duty thick-weave wool carpeting of an 1865 pattern.

New Climate Control System - Installation of a climate control system will prevent further damage from extreme temperature fluctuations, lack of ventilation, and high levels of humidity. Currently the house does not have central AC and is subject to severe heat and humidity in the summer months. AC units are limited to one window unit and two portable units positioned in the first floor parlor and on the first to

second floor stair landing. These window units will be removed when the new climate control system is in place.

Elements of the installation of the new climate control system include installation of three exterior AC condensing units, mechanical equipment (boiler, air handlers, and ductwork) primarily in the attic, storage and mechanical rooms. High velocity ductwork will be hidden in roof or ceiling cavities to the greatest extent possible. In areas that cannot be hidden is such cavities, ductwork will be routed through portions of the house which are not open to the public and concealed behind removable, built-out chases. Improvements will also be made to the electrical system in order to accommodate new mechanical equipment. The three condensing units will be located at the rear of the ell on its west elevation so that they are not visible from the public areas of the house or from the center of the rear yard.

Historic Windows, Casings, Doors, Shutters - Deteriorated wood window sills, shutter hardware, sashes, and glazing will be repaired and replaced in-kind as necessary. The work will include repair of 31 historic wood windows. It will also include the repair of ten pairs of wooden shutters and six pairs of replica wood shutters. Repair work will be conducted to the greatest extent possible with limited replacement in-kind based on replication. The work will also include removal of deteriorated lead-based paint down to sound paint in preparation for repainting.

Repair of the windows, sashes, and door sills will be conducted offsite by a contractor in the local region. Temporary protective coverings to prevent water penetration will be installed to maintain secure conditions at all times when windows and building components are not in place. All repair work will be performed in accordance with Architectural Woodwork Institute Architectural Woodwork Quality Standards Illustrated, Premium Grade. Preservation approaches for the treatment and repair of historic windows and their associated features outlined in NPS Preservation Brief 9 will be followed.

Create Connection between Petersen House and Center for Education and Leadership Building - The Ford's Theatre Society, in partnership with the NPS, proposes a new penetration from the rear porch of the Petersen House to the adjacent CEL in order to provide a physical link between the two facilities and to provide for handicapped access to the Death Room. The actual construction of the proposed penetration at the 514 10th Street building will be undertaken by the Ford's Theatre Society as the wall is fully within their property line; however, the NPS will need to coordinate the appearance of the penetration and associated doors and the new circulation pattern from and to the Petersen House.

The rear porch currently serves as the exit for the public tour after visitors have seen the Death Room (via an interior porch stair which leads to an enclosed alley that connects back to 10th Street, NW). The proposed connection would provide visitors with an opportunity to continue their experience directly into the CEL. The penetration will lead to an elevator vestibule located within the CEL. From the elevator, visitors will be able to gain access to an array of exhibits within the CEL that will focus on the "Fourth Act" – what happened in the aftermath of President Abraham Lincoln's death. This will enrich the overall visitor experience of the Ford's Theatre National Historic Site – taking visitors from the Ford's Theatre museum where the assassination plot is interpreted, into the Ford's Theatre where President Lincoln was shot, to the Petersen House where Mr. Lincoln died, and finally to the CEL, where visitor will learn about the aftermath of the President's assassination as well as the significance of his death and the legacy he left the nation. Construction of the CEL is expected to occur from November 2010 through May 2011.

Rear Porch Rehabilitation for an Accessible Route: In order to better accommodate visitors with disabilities to the Petersen House, the existing porch will be reconstructed. The interior stair which constricts the width of the porch will be removed and relocated outside of the porch structure. The porch floor, which is currently at two levels, will be reconstructed so that it is all on a single level, flush with the Death Room floor, and flush with the floor elevation of the elevator vestibule being constructed in the adjacent CEL. The at-grade entrance of the CEL, its elevator, and the proposed connection to the Petersen House, will provide an accessible connection to the Death Room, which is the most significant visitor experience in the Petersen House. The reconstructed porch floor will accommodate the appropriate turning radius so that visitors in wheelchairs can return to the CEL elevator vestibule once they have viewed the Death Room. Removal of the stair also has the added benefit of providing a large enough unimpeded floor area to serve as a transition zone between the Petersen House and the CEL. The

space will accommodate the typical tour group of approximately 15 visitors and will provide a location for the Park Ranger to interpret the transition from the house into the adjacent CEL.

The rear porch has been identified as a secondary contributing feature of the Petersen House, though it is believed to have been largely reconstructed during the late 1950s. Photo documentation suggests that in 1958, only the existing roof structure appears to be intact. The windows appear to be non-historic metal casements in a different configuration from the wooden casements which exist today, and the interior porch stair currently being used as a rear exist apparently had not been constructed in 1958.

The selected alternative will salvage and repair the existing roof structure and sheathing and replace the metal roofing in-kind. It will include the relocation of the rear stairs to the outside of the porch and the reconstruction of the porch flooring to align with the floor of the Death Room and CEL elevator vestibule. The existing doorway to the Death Room will remain unaltered as it is considered primary contributing historic fabric. The rear wall of the porch will be reconstructed and insulated, incorporating more energy efficient wooden windows. The porch façade will be designed in keeping with the period of the house and will mimic the existing porch façade to the greatest extent possible. The new climate control system will be integrated into the porch rehabilitation as well.

OTHER ALTERNATIVES CONSIDERED

The EA also analyzed the potential environmental consequences of the no action alternative and one other action alternative, Alternative B. The no action alternative assumed the continuation of current management and operations of the Petersen House. Normal, but limited, levels of maintenance would continue at the Petersen House but would be inadequate to prevent further deterioration from water damage and temperature and humidity fluctuations. In addition, there would be no connection between the CEL and the Petersen House. Alternative B was similar to the selected alternative except that it did not include the rehabilitation of the rear porch. It would include the repair and rehabilitation of the Petersen House, the installation of a new climate control system, and the connection to the CEL in the same manner as described in the selected alternative; however it would not result in improvements to universal accessibility to the Death Room of the Petersen House.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The NPS is required to identify the environmentally preferred alternative in its NEPA document for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM4.10) and the Council on Environmental Quality's (CEQ) *NEPA's Forty Most Asked Questions*, defines the environmentally preferred alternative as the one that "causes the least damage to biological and physical environment". It is the alternative "which best protects, preserves, and enhances historic, cultural and natural resources" (Q6a).

The NPS has evaluated the impacts resulting from the different alternatives and has determined that the selected alternative best meets the conditions that will qualify it as the environmentally preferable alternative. The selected alternative best preserves and protects the historic house while assuring public health, safety, and welfare by installing an adequate climate control system, removing all of the loose existing lead-base paint in the house, fixing the loose floorboards, and providing a universally accessible route to the Death Room. The improved universally accessibility will accomplished without imposing unnecessary adverse impacts on the historic portions of the Petersen House by utilizing the connection with the CEL and modifying the non-historic porch area. In addition to preserving and protecting the historic fabric of the Petersen House, the new connection between the house and the CEL will enhance the overall experience of the visitors.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented as part of the selected action alternative.

Historic Districts and Structures

- Park staff will oversee every stage of construction activities to ensure that historic fabric is protected during the construction and that the Petersen House is rehabilitated according to the 2002 Historic Structures Report for the Petersen House.
- Temporary fire detection and suppression systems will be required to be in place and monitored by the contractor during construction to ensure the protection of the historic resource.
- All work will be carried out in conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and NPS *Management Policies 2006*.
- Additional interpretation appropriate to the historic context of the project and the site will be developed.
- Construction activities will be concealed to the greatest degree possible so as not to be aesthetically disruptive to the adjacent and nearby historic districts.
- Ongoing consultation with agencies (DC State Historic Preservation Officer [DC SHPO], National Capital Planning Commission [NCPC], and U.S. Commission of Fine Arts [CFA]) during the design and the Section 106 process will ensure that the proposed options blend as harmoniously as possible with the existing scale and character of the Petersen House.

Museum Objects

- Prior to construction, NPS curatorial staff and fine arts specialists will pack museum objects and transport them to a climate-controlled, secured storage facility, in accordance with Director's Order 24, NPS Museum Collections Management.
- Fixtures and paintings will be protected or removed for safety and security as a part of the initial preparatory preservation work to be performed by park staff.
- Objects will be returned and reinstalled in the Petersen House only after site inspections indicate that all repairs and rehabilitation activities are complete and systems are operating.
- All handling of museum objects will be performed by qualified, trained personnel, using proper equipment and tools, and collections will be protected at all stages of transport from potential environmental threats including water damage, rapid fluctuations in temperature and/or humidity, theft, excessive vibration, and as noted by NPS museum standards.

Archeological Resources

- Construction in areas outside locations of previously-documented archeological resources will be preceded by shovel testing and/or archeological monitoring to ensure no irreparable adverse impacts occur should any newly-discovered archeological resources in these areas be found.
- Should any archeological resources be identified during construction, work will stop until NPS archeologists evaluate the resources. The appropriate measures will be undertaken to document or mitigate impacts. The significance of these finds will be assessed in consultation with the District of Columbia State Historic Preservation Office (DC SHPO).

Visitor Use and Experience

- The NPS will close the Petersen House to the public for the duration of the construction activities which are expected to take approximately nine months. During this time, all visitors to the Ford's Theatre National Historic Site will be able to view the video of the Petersen House available at Ford's Theatre to learn about the history of the house.

Human Health and Safety

- The NPS will close the Petersen House to the public for the duration of the construction period for all repairs and renovations.
- The NPS will require the construction contractor to follow NPS standards during construction, including implementation of an accident prevention program, the installation of appropriate warning signs around the construction site and along nearby roads and pedestrian areas, and the maintenance of construction fencing around the construction site to prevent non-contractors and the public from entering the construction area.

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

As documented in the EA, the NPS has determined that the selected alternative, (NPS preferred alternative), can be implemented without significant adverse effects. As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an Environmental Impact Statement (EIS): As described in the EA, the selected alternative will have beneficial and/or negligible to minor adverse impacts on cultural resources, visitor use and experience, human health and safety, and park operations and management; however no significant impacts were identified that will require analysis in an EIS. Impacts that will occur to the resource and were analyzed in the EA include:

Historic Districts and Structures: Overall long-term beneficial impacts will result from the implementation of the interior and exterior repairs, repairs of the existing windows, and the installation of the new climate control system. Long-term minor adverse impacts (*no adverse effect under Section 106*) will result from the installation of the climate control system, since high velocity ductwork and air handling units will have some minimal impacts to the historic fabric, and condensing units will have to be placed in the rear yard, though those units will be located at the rear of the ell where they will not be visible from the primary contributing resource areas. The selected alternative will create long-term minor adverse impacts to the Petersen House (*no adverse effect under Section 106*) due to the construction of the new connection from the rear porch into the CEL; however the impacts will be mitigated by the careful design of the connection and doorway. Long-term minor adverse impacts will also result from the rehabilitation of the rear porch for an accessible route (*no adverse effect under Section 106*); however, these impacts will similarly be mitigated by the sensitive design of the of the porch construction.

Museum Objects: Implementation of the selected alternative will result in a beneficial long-term impact to the museum objects, due to the installation of a new climate control system; no additional impacts are expected from the rehabilitation of the rear porch for accessibility (*no adverse effect under Section 106*).

Archeological Resources: Ground-disturbing activities associated with the Selected Alternative are likely to result in negligible, adverse impacts (*no adverse effect* under Section 106) to the Petersen House Site. A considerable archeological deposit associated with the Petersen House Site has been identified along the southern margin of the rear yard in the approximate location of the footings for the exterior stairway. However, this resource has been entirely excavated in the projected locations of the footings, and archeological monitoring will be carried out to ensure that there is no disturbance to this resource beyond the limits of the Phase I/II excavations. Archeological monitoring will ensure that the excavations necessary for a staircase construction are limited to areas that have already been archeologically sampled.

Visitor Use and Experience: Implementation of the selected alternative will result in short-term, minor adverse impacts on visitor use and experience as a result of construction activities. In addition, the selected alternative will have long-term beneficial impacts to visitor use and experience due to the preservation of the resource and from the direct connection to the CEL interpretive experience, including the ability for disabled visitors to access the door of the Death Room by entering first through the CEL. There will be negligible, adverse impacts from the occasional disruption of the visitor circulation pattern when disabled visitors approach the Death Room from the CEL.

Park Operations and Management: Implementation of the selected alternative will result in short-term, negligible, adverse impacts to park operations and management during the construction period. After construction is completed, the selected alternative will have long-term, beneficial impacts as a result of repairs and rehabilitation activities and minor, adverse impacts to park operations and management due to increased energy costs and the increased responsibilities for Rangers as a result of

the connection to and accessible route from the CEL. Cumulative impacts to park operations and management will be long-term, minor, and adverse with the selected alternative.

Degree of effect on public health or safety: The repairs and rehabilitation and installation of a new climate control system proposed under the selected alternative will result in a beneficial impact on public health and safety, as interior air quality will be improved, deteriorated lead-based paint will be removed down to sound paint and the climate control system will prevent floorboards from warping and creating additional tripping hazards in the future. In addition, rehabilitation of the rear porch will improve accessibility to the greatest extent possible without having a significant, adverse impact to the historic fabric of the house. No cumulative impacts will occur.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas: No prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas are located within the project area that will be subject to effects resulting from implementation of the selected alternative.
The Petersen House itself is a historic resource and was individually listed individually on the National Register of Historic Places in 1966; subsequently becoming a contributing element of the Ford's Theatre National Historic Site. It is also a contributing element of one National Register Historic District, the Pennsylvania Avenue National Historic District, and is adjacent to the Downtown Historic District. The Petersen House itself is not a National Historic Landmark (NHL), however, nor is it a contributing element of one.

The Pennsylvania Avenue Historic District is a large district stretching from roughly 15th Street NW on the west, 3rd Street NW the east, Constitution Avenue NW on the south and, variously, E to G Streets, NW on the north. The spine is, of course, the diagonal of Pennsylvania Avenue NW, a street which has been the object of a 50 year period of concerted effort at historic preservation and appropriate infill development suitable for one of the Capital's most symbolic thoroughfares. The district includes most of the major public buildings north of the National Mall between the White House and the Capitol.

The selected alternative will have no visible effect on the character of the house's exterior street façade, and will have no effect upon the qualities of cohesiveness, architectural dignity and association with the government and politics of the United States.

The boundary of westernmost leg of the Downtown Historic District is to the northeast of the Petersen House as well as north of the house, across F Street, NW. The row of buildings that contain the Petersen House and Ford's Theatre lie just outside the district. The district is mainly comprised of concentrations of the lower scale 19th century residential and commercial row houses that are more associated with early Washington as a town than as a seat of government. Because the selected alternative will have no visible effect on the character of the house's exterior street façade it will have no effect on this adjacent historic district.

Degree to which effects on the quality of the human environment are likely to be highly controversial: There were no controversial effects identified during either preparation of the EA or the public review period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: There were no highly uncertain, unique or unknown risks identified during either the preparation of the EA or the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration: The selected alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts: As described in Environmental Consequences section of EA, cumulative impacts were determined by combining the impacts of the NPS selected alternative with other present and reasonably foreseeable future actions. Cumulative actions include the renovation of Ford's Theater (completed in spring 2009); the 10th Street, NW Curbside Management Plan; Previous renovations at the

Petersen House, including - roof replacement and asbestos pipe insulation abatement (1997), fire suppression system and communications system upgrades (2000–2001), and wall paper and roof replacement (2003–2004); existing commercial businesses located in the historic district, which includes 10th Street NW; and the current construction of the CEL museum (construction of this museum will occur regardless of the rehabilitation and repairs at the Petersen House or whether there was a connection between the Petersen House or not). Impacts of the NPS selected alternative on historic districts and structures, museum objects, archeological resources, visitor use and experience, human health and safety, and park operations and management were identified. The cumulative impact conclusions were reached for the following resource types:

Historic Districts and Structures: Recent renovations to the Petersen House have had a long-term, beneficial impact as they have helped to preserve the condition of the historic building and prevented further deterioration of the structure. The future CEL will alter the setting of the porch and could be anticipated to have a long-term, minor, adverse impact upon the historic house, particularly the feeling and association aspects of its integrity. When combined with the long-term beneficial and short- term minor adverse impacts associated with the selected alternative, the result will be long-term beneficial cumulative impacts to the Petersen House.

Museum Objects: None of the past, present and future projects included in the cumulative impact analysis will have any effect on the museum objects at the Petersen House Site, therefore, there will be no cumulative impacts.

Archeological Resources: None of the past, present and future projects included in the cumulative impact analysis will have any impact on the Petersen House Site (51NW65), therefore, no cumulative impacts on archeological resources will be anticipated from implementation of Selected Alternative.

Visitor Use and Experience: NPS projects within the vicinity of the Petersen House, such as the renovation of Ford's Theatre and at previous projects at the Petersen House, and the 10th Street Curbside Management Plan are complete and have had beneficial impacts to visitor use and experience by improving park facilities and the facilities surrounding the park. Commercial businesses located in proximity to the Ford's Theatre National Historic Site provide additional services and recreational opportunities for visitors. Future projects in the study area, including the construction of the CEL, will have beneficial impacts to visitor use and experience by expanding the interpretive experience of the Ford's Theatre National Historic Site. These impacts, when combined with the short-term negligible to minor adverse and long-term beneficial impacts of the selected alternative will result in an overall beneficial impact to visitor use and experience.

Human Health and Safety: None of the past, present and future projects included in the cumulative impact analysis will have any effect on human health and safety at the Petersen House Site. Therefore, there will be no cumulative impacts.

Park Operations and Management: NPS projects within the vicinity of the Petersen House, such as the renovation of Ford's Theatre and previous renovations at Petersen House, have already been completed and have had beneficial impacts to park operations and management by improving park facilities. On-going projects in the study area, including the construction of the CEL, will have beneficial impacts to park operations and management by expanding the interpretive capability of the Ford's Theatre National Historic Site.

These beneficial impacts, when combined with the long-term minor adverse impacts to park operations and management resulting from increased utility costs and increased park interpretive staff responsibilities associated with the selected alternative will result in long-term minor adverse cumulative impacts to park operations and management.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources: The Ford's Theatre National Historic Site is defined as two buildings, 511 and 516 Tenth Street, NW, Washington DC, Ford's Theatre and the Petersen House respectively. In

the nomination, the period of significance was identified as 1800-1899 and, specifically, as April 14-15, 1865 in the area of significance as Politics/Government and Theater. The text indicates that "Ford's Theatre is significant because it was the location of the assassination of Abraham Lincoln on the night of April 14, 1865, while President and Mrs. Lincoln were attending a performance of the play 'Our American Cousin'" and that "The Petersen House is significant in that it is the house where President Lincoln died."

Under the selected alternative, multiple improvements will be made to repair and rehabilitate various interior and exterior elements of the Petersen House including the repair of the historic windows, doors, and shutters and the installation of a new climate control system. The selected alternative also proposes to accommodate the connection from the Petersen House to the adjacent CEL and to rehabilitate the rear porch to create an accessible route from the CEL to the Death Room inside of the Petersen House. The selected alternative will create long-term minor adverse impacts due to the construction of the new connection to the CEL and from the rehabilitation of the rear porch for an accessible route. Implementation of the new climate control system will result in long-term, negligible, adverse impacts as well as long-term beneficial impacts. Long-term, beneficial impacts will result from the implementation of exterior and interior repairs and the repairs of the doors, windows and shutters. Implementation of selected alternative will result in a *no adverse effect on* historic districts and structures.

Ground-disturbing activities from the installation of the drainage improvements associated with selected alternative are likely to result in negligible, adverse impacts to archeological resources, specifically the Petersen House Site (51NW65). The area that will be disturbed by installation of the drainage improvements has been extensively tested, and the areas with intact deposits were largely or entirely excavated during the recent testing. A considerable archeological deposit associated with the Petersen House Site has been identified along the southern margin of the back yard in the approximate location of the footers for the proposed exterior stairway and at a depth of approximately 2.5 feet below grade. However, this resource, a trash midden, has been entirely excavated in the projected locations of the footers, and archeological monitoring will be carried out to insure that there is no disturbance to this resource beyond the limits of the Phase I/II excavations. Moreover, the midden is so deeply buried that it will be out of harm's way with regard to the footer excavations. Archeological monitoring of construction will insure that the excavations necessary for a staircase construction are limited to areas that have already been archeologically sampled. Implementation of the selected alternative will result in a *no adverse effect* on archeology.

In accordance with Section 106 of the *National Historic Preservation Act*, potential adverse impacts (as defined in 36 CFR 800) on historic districts and structures or archeological resources listed on or eligible for listing in the National Register of Historic Places will be coordinated between the NPS and the DC SHPO to determine the level of effect on the property and to determine any necessary mitigation measures. Continuing implementation of the *Cultural Resource Management Guideline* (NPS 1998b) and adherence to NPS *Management Policies 2006* (NPS 2006) and the 2008 NPS Programmatic Agreement with the ACHP and the National Conference of State Historic Preservation Officers (NPS 2008a) will all aid in reducing the potential to adversely impact the historic property. Copies of this EA have been distributed to the DC SHPO for review and comment related to compliance with Section 106 of the National Historic Preservation Act.

The DC SHPO was officially notified of the proposed project in May 2010. The DC SHPO has received up-to-date reports regarding archeological investigations and project planning. The DC SHPO responded on June 30, 2010 stating that the proposed action could potentially be determined to have no adverse effect; however, he had additional questions about the proposed connection to the CEL and the porch rehabilitation which needed to be answered in order to make his final decision. A meeting was held with the DC SHPO and representatives from the Park, Regional office, and the Ford's Theatre Society on August 3, 2010 to address any potential concerns. A new letter with clarifying information was sent to the DC SHPO on August 19, 2010 and the DC SHPO responded on August 31, 2010 with an official determination of no adverse effect.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: The selected alternative will not adversely affect an endangered or threatened species or its critical habitat.

Whether the action threatens a violation of federal, state, or local environmental protection law: The selected alternative violates no federal, state, or local environmental protection laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

In addition to reviewing the list of criteria for significant impacts, the NPS has determined that implementing the NPS selected alternative will not constitute an impairment of park resources or values. This conclusion is based on a thorough analysis of the impacts described in the EA, agency and public comments received, and the professional judgment of the decision-makers in accordance with NPS *Management Policies 2006*. Implementation of the NPS selected alternative will not result in impairment of Ford's Theatre National Historic Site resources or values whose conservation is (1) necessary to fulfill specific purposes identified in the park's establishing legislation, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified in the park's management plan or other relevant NPS planning documents as being of significance.

Although the selected alternative entails physical changes to the exterior and interior of the Petersen House, the proposed action will only minimally alter the original historic fabric of the house and will be in keeping with NPS management policies and goals.

Historic Structures and Districts: Although the Petersen House is key to the cultural and historic integrity and purpose of the Ford's Theatre National Historic Site, the selected alternative will not result in impairment of historic structures or districts. All improvements will be both respectful of the existing historic features and in keeping with the *Secretary of the Interior's Standard for the Treatment of Historic Properties*. The selected alternative will not diminish the integrity of the historic property or compromise its listing on the National Register of Historic Places. In addition, the selected alternative will support the Park's purpose and significance by improving visitor access to the Petersen House.

Museum Objects: The selected alternative will not result in impairment of museum objects because the proposed actions will not harm the integrity of those objects stored and displayed in the Petersen House. Furthermore, the proposed actions under the selected alternative will improve storage of the museum objects by providing the appropriate climate conditions and an additional emergency egress through the rehabilitated rear porch.

Archeological Resources: Although the archeological resources in the project area are key to the cultural integrity of the Petersen House and Ford's Theatre National Historic Site, the proposed actions under the Selected Alternative will not harm the integrity of those archeological resources. Areas with intact archeological deposits within the project area have been largely or entirely excavated and archeological monitoring will occur to ensure no damage to these resources.

PUBLIC INVOLVEMENT

The NPS engaged in public scoping as part of the preparation of the EA. The public scoping period began on May 14, 2010 and concluded on June 18, 2010. Notice of the public scoping period was posted on the Planning, Environment, and Public Comment (PEPC) website. NPS staff also met informally with representatives from the DC SHPO and CFA to discuss the proposed project. During the public scoping period, NPS received one comment from the public via the PEPC website regarding the proposed action. The commenter expressed concerns regarding the preservation of the historic nature of the building and the purpose in which the Petersen House will be connected to the CEL. These concerns have been addressed in the Purpose and Need for the Action and in the Environmental Consequences sections of the EA.

The EA was made available for public review and comment from July 9, 2010 through August 10, 2010. Notice of the availability of the EA was posted on the park's PEPC website. An electronic copy of the EA was made available on the PEPC website. During the 30-day public review and comment period, the NPS did not receive any comments.

CONCLUSION

The NPS has selected Alternative C for implementation. In light of the impacts described in the EA for the project and with guidance from NPS *Management Policies 2006*, natural and cultural resources information, professional judgment, and considering agency and public comments, the impacts that will result from the selected alternative will not impair any park resources and values. The selected alternative does not constitute an action that normally requires preparation of an environmental impact statement. The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible to minor in intensity. There will be no significant impacts on historic districts and structures, museum objects, archeological resources, visitor use and experience, human health and safety, and park operations and management. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing an EIS is not required for this action and thus will not be prepared. This is a finding of no significant impact.

Recommended: Kym Elder — 8/31/10

Kym Elder
Superintendent
Ford's Theatre National Historic Site

Date

Approved: Acting — 8/31/10

Margaret O'Dell
Regional Director
National Capital Region

Date

August 19, 2010

Mr. C Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office
District of Columbia Office of Planning
1100 Fourth Street SW, Suite E650
Washington, DC 20024

Subject: Section 106 Consultation – Project to Repair and Renovate the Petersen House

Dear Mr. Lewis:

Thank you for your letter of June 30, 2010 and for taking the time on August 2nd to meet with me and my staff as well as with representatives from Ford's Theatre Society so that we could more thoroughly present the details for the proposed project to Repair and Renovate the Petersen House.

As a follow up to our meeting, I am sending you additional materials to assist in your determination of effect. Enclosed please find 1) a floor plan showing the proposed opening between the Petersen House and the Center for Education and Leadership (CEL) and the new vestibule on the CEL side of the opening 2) design development drawings of the porch elevation and 3) a copy of the July 2, 2010 concept submission to the Commission of Fine Arts which includes:

- a 1958 photograph of the rear porch which indicates that the porch stair did not exist at that time and that the historic fenestration of the porch had by that time already been compromised
- a photograph from 2002 showing the condition of the porch before the ground level was enclosed
- current existing conditions of the rear porch
- proposed floor plans of the rehabilitated porch and relocated rear stair

As you know, the NPS has also undertaken a combined Phase I/Phase II archeological investigation in the rear yard area where ground-disturbing activities related to drainage improvements and installation of the new exterior staircase would occur. The NPS has and will continue to keep Dr. Ruth Trocolli informed as to the archeological aspects of the project.

Based upon the additional historic documentation and further development of the porch rehabilitation design, the NPS believes that the proposed project will not diminish any of the character defining features of Petersen House. The NPS is now prepared to make a formal determination of ***no adverse effect*** under Section 106 of NHPA for the Petersen House Repair and Renovation Project on Ford's Theatre National Historic Site. The NPS will carry out the

project in accordance with Secretary of Interior's Standards for the Rehabilitation of Historic Buildings. If at all possible, we would appreciate your concurrence by August 26, 2010.

Thank you for your assistance. If you have any questions, please feel free to contact me (kym_elder@nps.gov) or Rae Emerson, Deputy Superintendent (rae_emerson@nps.gov). We can both be reached at (202) 426 6925.

Sincerely,

Kym Elder, Superintendent
Ford's Theatre/Petersen House

Enclosures

cc:
Mr. David Maloney
State Historic Preservation Office

Ms. Nancy Witherell
National Capital Planning Commission

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER

August 31, 2010

Ms. Kym Elder, Superintendent
Ford's Theater/Petersen House
National Park Service
511 10th Street, NW
Washington, DC 20024

RE: Section 106 Review of the Proposed Repair and Renovation of the Petersen House

Dear Ms. Elder:

Thank you for providing additional information to the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking and for meeting with representatives of the Ford's Theater Society and me on August 2nd to discuss how the two projects will be coordinated. Based upon our review of the supplemental documentation and the discussions held during our meeting, we are writing to provide additional comments regarding effects on historic properties in accordance with Section 106.

As indicated in our prior letter of June 30, 2010, we concur that the "Preferred Option" for providing ADA access to the Petersen House will result in the least damage to historic fabric. And after discussing the remainder of the scope of work in our recent meeting, we can now concur that all of the rehabilitation work will conform to the *Secretary of the Interior's Standards*. This includes the work proposed for the rear stair because, as documented through photographic evidence, the portions that are proposed for replacement did not exist prior to 1958 and, therefore, do not contribute to the significance of the Petersen House.

We also find the plans for rehabilitation of the rear porch and staircase, including the connection between this area and the Ford's Theater Society Center for Education and Leadership, to be designed in a manner that would avoid any direct or indirect adverse effects. In short, we concur with the NPS determination of "no adverse effect" on historic properties for the overall project.

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, we thank you for providing an opportunity to review and comment on this important undertaking and look forward to continued coordination regarding archaeological resources.

Sincerely,

C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

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