



Darrah Hall

Historic Structure Report

**Cultural Resources, Partnerships and Science
Southeast Region**

Darrah Hall

Reconstruction Era National Historical Park

Beaufort, South Carolina

Historic Structure Report

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About the front cover: View of Darrah Hall looking west,
August 2017. Source: Wiss, Janney, Elstner Associates, Inc.

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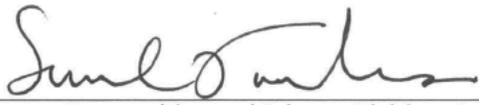
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Reconstruction Era National Historical Park

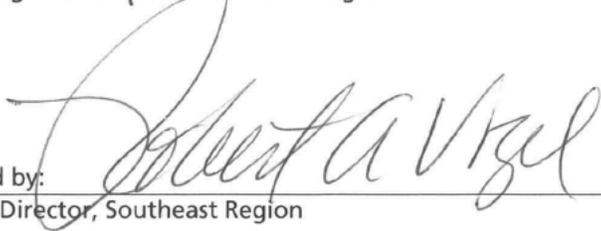
Beaufort, South Carolina

Historic Structure Report

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Foreword

We are pleased to make available this Historic Structure Report, part of our ongoing effort to provide comprehensive documentation for the historic structures and cultural landscapes of National Park Service units in the Southeast Region. A number of individuals contributed to the successful completion of this work, but we would particularly like to thank the Project Team who authored the report. The authors would like to thank the current Superintendent of the new park Reconstruction Era National Historical Park, Scott Teodorski, Acting Superintendents who assisted with the project, including Melissa English-Rias, Danita Brown, and Dawn Davis, as well as Historical Architects Ali Miri and Jessica Kelly of the Southeast Regional Office for their assistance. We hope that this study will prove valuable to park management in initial and ongoing efforts to preserve the building and to everyone in understanding and interpreting this unique resource.

Sam Tamburro, Acting Chief
Cultural Resources, Partnerships and Science Division
Southeast Regional Office
2019

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Management Summary

At the request of the National Park Service (NPS), Panamerican Consultants, Inc. and its subconsultants, Wiss, Janney, Elstner Associates, Inc. (WJE), WFT Architects (WFTA), and Hazclean Environmental Consultants (Hazclean), have developed this Historic Structure Report (HSR) for Darrah Hall at Reconstruction Era National Historical Park in South Carolina. Darrah Hall is located on the campus of Penn Center Historic District. Figure 1 is a map of the state of South Carolina showing the location of Beaufort and the Reconstruction Era National Historical Park. Figure 2 is a map Beaufort and St. Helena Island, South Carolina, showing the location of Penn Center Historic District and other key historic resources in Reconstruction Era National Historical Park. Figure 3 is an aerial photograph showing the location of Darrah Hall within Penn Center Historic District. (A detailed interpretive map of Penn Center Historic District is presented in the history chapter that follows.)

Penn Center Historic District is listed in the National Register of Historic Places as a National Historic Landmark. Darrah Hall is considered a contributing resource within Penn Center, and is one of several structures that represent the development of the campus during the 20th century.

Historical Data

Darrah Hall is a historic resource associated with the Reconstruction Era National Historical Park in Beaufort County, South Carolina, on the campus of Penn Center, once Penn School. The Reconstruction Era (1861–1900) is the historic period during which the United States struggled with the question of how to integrate millions of newly freed African American citizens into

traditional social, political, and labor systems.¹ A time of tumultuous change within the United States, the Reconstruction Era witnessed the creation of Penn School in 1862 by northern missionaries.

Beaufort County was one of the first places in the United States where formerly enslaved people began integrating into free society through educational, economic, and social opportunities. While the Civil War raged in other parts of the nation, Beaufort County became the birthplace of Reconstruction, or what historian Willie Lee Rose called a “rehearsal for Reconstruction.”² One of the leading institutions in this “rehearsal” was Penn School, which was created to provide an academic education to the newly freed community on St. Helena Island – a part of the “Port Royal Experiment.”

The earliest, and arguably one of the most successful, of the Reconstruction Era institutions was Penn School. It soon became the only African American secondary school on St. Helena Island, a place where newly freed black teachers were trained and a center of community activity emerged.³ Through changes in curriculum and an emphasis in type of education, the school

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1. Gregory P. Downs and Kate Masur, *The Era of Reconstruction, 1861-1900, A National Parks Theme Study* (Washington, DC: National Park Service, 2017).
 2. Barack Obama, “Presidential Proclamation: Establishment of Reconstruction Era National Monument,” Reconstruction Era National Monument, South Carolina, last modified, January 12, 2017, <https://www.nps.gov/reer/learn/proclamation.htm>
 3. Orville Vernon Burton and Wilbur Cross, *Penn Center A History Preserved* (Athens: The University of Georgia Press, 2014), 30.

remained an important training ground for African American landowners.⁴

Penn School created buildings specifically for the community to use. The first, constructed just off campus at The Corners, was Darrah Hall, named in memory of one of the founding missionary's sisters, Sophia Towne Darrah. After the building at The Corners burned, the school built another Darrah Hall for use by the community. Darrah Hall has continued to be used by the African American community as a gathering place for more than 100 years.

Treatment and Use

Darrah Hall is significant for its association with Penn School, now the Penn Center Historic District, and is a contributing resource to the Penn Center campus. The building, together with others on the campus, represents the development of Penn Center through the 19th and 20th centuries. It is anticipated to be used for interpretive purposes as part of the Reconstruction Era National Historical Park, as well as for community and park meetings.

Darrah Hall was documented on the National Register of Historic Places on September 9, 1974 and is a contributing feature to the nationally-significant Penn Center Historic District (NR 74001824). The historic district was designated a National Historic Landmark on December 2, 1974. Darrah Hall lies within the boundary of the Penn Center Historic District and is considered to be one of the resources referenced in the nomination form. An administrative determination of Ultimate Structure Treatment has not yet been made. Based on the findings of this Historic Structure Report, a treatment based on the *Preservation* standard is recommended. Additionally, following the development of the park's General Management Plan and determination of a program and use for Darrah Hall, use of the *Rehabilitation* standard may be appropriate.

The building is generally in fair condition, although the interior is generally in good

condition. The exterior requires cyclic maintenance to address deteriorated siding and other wood elements; paint failure; deterioration of the stairs at the south porch; damage to the railings at both porches; a missing sash at one window; and failure of glazing putty at window sash. The mechanical system is aged and reportedly is not working reliably.

Administrative Data

Locational Data

Building Name: Darrah Hall

Location: Penn Center Historic District, near Frogmore on South Carolina Highway 37, St. Helena Island, Reconstruction Era National Historical Park, South Carolina

LCS Number: 1096080

Related Studies

National Register of Historic Places Nomination Form, Penn Center Historic District, prepared by Nenie Dixon, Historic Preservation, South Carolina Department of Archives and History, and Sarah Coprich, Penn Community Services, entered into the National Register September 9, 1974.

National Register of Historic Places Multiple Property Documentation Form, Historic Resources of St. Helena Island, circa 1740–circa 1935, accepted October 6, 1988 (author not given in document).

Penn Center: A History Preserved, by Orville Vernon Burton and Wilbur Cross (Athens: University of Georgia Press, 2014).

The Era of Reconstruction, 1861–1900: A National Historic Landmarks Theme Study, prepared by Gregory P. Downs, PhD, Historian, and Kate Masur, PhD, Historian (Washington, D.C.: National Historic Landmarks Program, Cultural Resources, National Park Service, U.S. Department of the Interior, 2017).

4. Ibid.

Cultural Resource Data

Penn Center Historic District was designated a National Historic Landmark on December 2, 1974. It is significant for its role in development of African American institutions during Reconstruction, especially for its focus on education. Historically known as Penn School, the institution also provided community services supporting health, welfare, and cultural preservation.

Period of Significance: The History Branch has determined the period of significance to be about 1901 to 1969.

Proposed Treatment: Preservation

Project Scope and Methodology

The goal of the HSR is to develop planning information for use in the repair, maintenance, and preservation of this historically significant structure. First developed by the NPS in the 1930s, HSRs are documents prepared for a building, structure, or group of buildings and structures of recognized significance. They are used to record and analyze a property's initial construction and subsequent alterations through historical, physical, and pictorial evidence; document the performance and condition of the structure's materials and overall physical stability; identify an appropriate course of treatment; and, following implementation of the recommended work, document alterations made through that treatment.

The HSR addresses key issues specific to Darrah Hall, including the history and construction chronology of the building; the existing physical condition of the exterior envelope, structural systems, and primary interior spaces and features; and the historic significance and integrity of the building.

The following project methodology was used for this study.

Research and Document Review. Archival research was performed to gather information

about the original construction and past modifications and repairs for use in assessing existing conditions and developing treatment recommendations for the building. Documents reviewed included maps, drawings, specifications, historic photographs, and other written and illustrative documentation about the history of construction and repairs to the structure. The research for this study built upon prior historical and archival research done by the National Park Service and others, as outlined in the bibliography provided with this report. Primary reference material for this study was obtained from published and unpublished documentation available in the NPS Southeast Region library collection, provided by the park, and accessed online. Additional research material was obtained from the University of North Carolina archives, accessed online, and from Penn Center.

Condition Assessment and Documentation.

Concurrent with the historical research, a condition survey was performed and observations were documented with digital photographs, field notes, and annotation on baseline drawings. For purposes of the field survey, baseline drawings were prepared by the project team. The condition assessment addressed the exterior and primary interior spaces and features of the building, as well as hazardous materials if present. Measurements were taken during the field work for preparation of measured drawings as part of this project.

Development of History, Chronology of Construction, and Evaluation of Significance.

Based on historical documentation and physical evidence gathered during the study, a context history and a chronology of design and construction were developed. An evaluation of significance was also prepared, taking into consideration guidelines provided by *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*.⁵ This evaluation of history and significance provided the basis for the

5. National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Washington, DC:, Government Printing Office, 1997).

development of recommended treatment alternatives.

Guidelines for Preservation. Based on the evaluation of historical and architectural significance of the structure, guidelines were prepared to assist in the selection and implementation of Preservation treatments.

Resilience to Natural Hazards. While Penn Center and St. Helena Island have undergone many environmental events, especially hurricanes, flooding, storm events, and fires – the original Darrah Hall was in fact destroyed by fire - the recordation of these events was not undertaken with any regularity at the school. Meetings with school staff and the executive director of the school, research at the Beaufort Public Library and in the online historic archives of Penn School did not produce immediate information about natural hazards that may have impacted Darrah Hall.

Located near the Atlantic coastline, on low-lying terrain in a region of marshes and wetlands crossed by rivers and streams, the Penn Center Historic District on St. Helena Island is vulnerable to current and future threats associated with the increasing frequency of natural hazards. A study entitled, *Climate Change Impacts to Natural Resources in South Carolina*, by the South Carolina Department of Natural Resources (SCDNR) and published in 2013 noted: “A predicted result of climate change is the increase in intense storm events causing greater water inputs in shorter periods of time, affecting flood frequency and duration.”⁶ As noted in a 2016 study by the Environmental Protection Agency: “Since 1958, the amount of precipitation during heavy rainstorms has increased by 27 percent in the Southeast, and the trend toward increasingly heavy rainstorms is likely to continue.”⁷

Over the past eighty years, relative sea level has risen 10 inches at the National Oceanographic and Atmospheric Administration (NOAA) monitoring station in Charleston Harbor.⁸ Although the ocean rises and falls at different rates at different locations, making some coastal regions more vulnerable to flooding than others, in general a 1-inch rise in sea level translates to 100 inches of shoreline retreat.⁹ In an area such as St. Helena Island, flooding from more frequent severe storms and rising seas, together with sinking of wetlands and loss of sediment due to development, contribute to erosion and have significant negative impacts on the natural environment. In addition to the effect on the natural environment and landscape of historic sites, severe storms and flooding threaten cultural resources such as Darrah Hall. This structure is somewhat protected from flooding by its construction, raised above grade on piers, although it is still considered vulnerable. Park personnel reported that flooding during severe storms and a hurricane in 2016 made the site inaccessible at times, but did not result in flooding of Darrah Hall.

The SCDNR has identified resilience to natural hazards efforts, including recommendations for focused policies and opportunities; research and monitoring to standardize protocols and state-specific data and predictive modeling; communications and outreach; adaptation of activities; and suggested agency operational improvements (e.g., energy, fuel, and water efficiency, etc.).¹⁰ The recommendations developed by the SCDNR for natural resources may provide ideas for improving management of cultural resources as well.

Especially critical for coastal historic sites is identification of the resources anticipated to be threatened—both buildings and landscapes—and planning for protection as well as mitigation in the face of more frequent severe storms and sea level rise. As loss of historic resource integrity may

6. Bob Perry, compiler and editor, *Climate Change Impacts to Natural Resources in South Carolina* (Columbia: South Carolina Department of Natural Resources, 2013), 16.

7. *What Climate Change Means for South Carolina*, US Environmental Protection Agency, EPA 430-F-16-042 (August 2016).

8. “Rising Tide: Will Climate Change Drown Coastal Wetlands?” *Coastal Heritage* 21, no. 3 (Winter 2007), 3–6.

9. Ibid.

10. Perry, 100.

occur, suddenly or slowly, from conditions related to climate change, documentation can serve to help mitigate anticipated loss or diminishment, and to plan for the impacts associated with climate change. This Historic Structure Report, including the historical narrative condition assessment, and recommendations, together with photographs and measured drawings (which augment prior Historic American Buildings Survey documentation), is an important part of the documentation process.

As part of future efforts to build on and update the documentation provided in this Historic Structures Report, consideration can be given to developing detailed documentation using three-dimensional scanning technology, as well as monitoring weather-related deterioration, updating emergency and disaster planning to address climate change-related issues, and strategic planning for mitigation of the effects of climate change on park resources. The latter may include special protection, documentation, and interpretation measures to address resources that are especially vulnerable to damage or loss due to climate change-related conditions.

Efforts conducted for Darrah Hall will benefit from coordination with other planning and documentation projects to address effects of natural hazards under consideration or in the process of being implemented by the National Park Service in the Southeast Region. For example, the National Park Service is currently conducting natural hazards studies of several coastal national parks, comparing average temperatures and precipitation for intervals from 1901 through 2012.¹¹ Findings of this assessment indicated that

recent climatic conditions are already shifting beyond the historical range of variability, and that natural hazards will manifest itself not only in changes to temperature and precipitation, but also in changes in particular climate events (e.g., strong storms, floods, and droughts), which will affect the condition of park resources. The study will inform natural hazards adaptation and assist park personnel in understanding how recent climates compare to past climates, as well as in interpretation of natural hazards impacts on park resources.¹²

Although Darrah Hall avoided severe damage as a result of recent severe storms, future severe weather events, rising sea levels, and other impacts related to climate change should be anticipated and considered in planning for protection and maintenance of the site and its resources.

Treatment Recommendations. The Secretary of the Interior's Standards for the Treatment of Historic Properties guided the development of treatment recommendations for the significant exterior and interior features of the buildings, as well as for the features of the landscape included in this study. Following the overall treatment approach of *Preservation* for Darrah Hall, specific recommendations were developed to address the observed existing distress conditions as well as the

11. Bill Monahan and Nicholas Fischelli, "Recent Climate Change Exposure of Gulf Islands National Seashore," *Climate Change Resource Brief* (US Department of the Interior, National Park Service, Natural Resource Stewardship & Science, August 1, 2014). See also Sandra Fatorić and Erin Seekamp, North Carolina State University College of Natural Resources, Department of the Interior Southeast Climate Science Center, *Assessing Historical Significance and Use Potential of Buildings within Historic Districts: An Overview of a Measurement Framework Developed for*

Climate Adaptation Planning, AG-832 (Raleigh: North Carolina State Extension, 2017), citing Katie McDowell Peek., Robert S. Young, Rebecca L. Beavers, Cat Hawkins Hoffman, Brian T. Diethorn, and Shawn Norton, *Adapting to Climate Change in Coastal Parks: Estimating the Exposure of Park Assets to 1 m of Sea-Level Rise*, "Natural Resource Report NPS/NRSS/GRD/NRR—2015/961 (Fort Collins, Colorado: US Department of the Interior, Natural Resource Stewardship and Science, 2015). See also National Park Service., "Policy Memorandum 14-02: Climate Change and Stewardship of Cultural Resources" 2014, accessed July 17, 2018, www.nps.gov/policy/PolMemos/PM-14-02.htm.

12. Monahan and Fischelli.

park's intended future use and long-term objectives.¹³

Preparation of Historic Structure Report.

Following the completion of research, site work, and analysis, a narrative report was prepared that summarized the results of the research and inspection and presented recommendations for treatment. The HSR was compiled following the organizational guidelines of NPS *Preservation Brief 43: The Preparation and Use of Historic Structure Reports*, with modifications to organizational structure for purposes of this project.¹⁴

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13. Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Washington, DC: US Department of the Interior, National Park Service, Technical Preservation Services, 2017).
 14. Deborah Slaton, *Preservation Brief 43: The Preparation and Use of Historic Structure Reports* (Washington, DC: National Park Service, Technical Preservation Services, 2005).

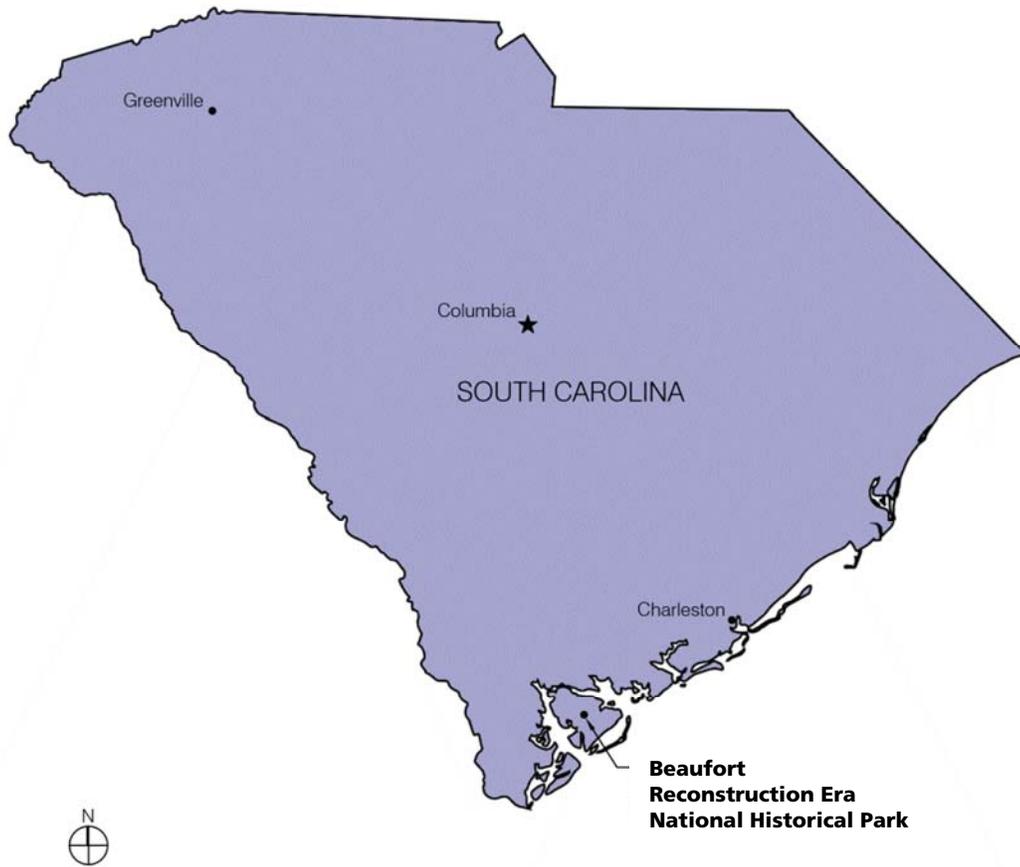


FIGURE 1. Map of South Carolina showing location of the Reconstruction Era National Historical Park (black dot) (not to scale). (Source: US Census Bureau, annotated by the authors)

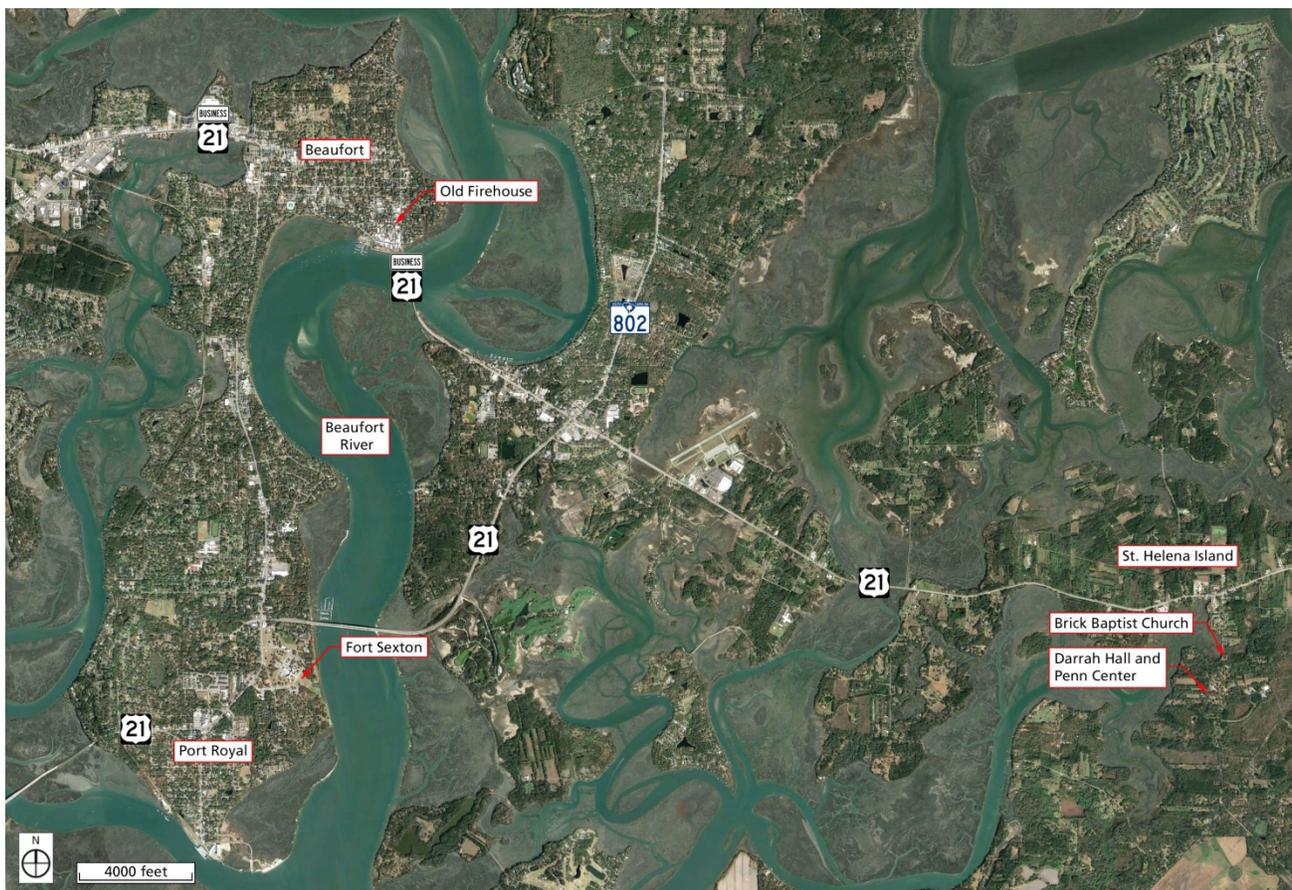


FIGURE 2. Aerial view of Beaufort and St. Helena Island showing the locations of Darrah Hall and other key historic resources within Reconstruction Era National Historical Park. (Source: GoogleEarth 2017, annotated by the authors)



FIGURE 3. Aerial view of Penn Center Historic District, a National Historic Landmark, showing the location of Darrah Hall and the Brick Baptist Church. (Source: GoogleEarth 2017, annotated by the authors)

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Developmental History

Historical Background and Context

Darrah Hall, a former community gathering hall, is now a historic resource associated with the Reconstruction Era National Historical Park in Beaufort County, South Carolina, and is also a part of the Penn School National Historic Landmark District. The Reconstruction Era (1861 to 1900), the historic period during which the United States attempted to answer the questions of how to integrate millions of newly freed African American citizens into traditional social, political, and labor systems, was a time of significant transformation within the United States.¹⁵ As part of this transformation, Penn School was created in 1862 by northern missionaries as one of the first schools to educate newly freed slaves.

Reconstruction. Reconstruction began when the first Union soldiers arrived in slaveholding territories during the Civil War, and enslaved people left the plantations and farms; some of them fled to free states, while others found safety with occupying Federal forces. The formerly enslaved people fleeing to the Union Army caused Americans to confront the question of what kind of a labor system would replace slavery. On the huge plantations near Beaufort, Hilton Head, and the South Carolina Sea Islands, freedpeople, northern missionaries, the Union Army, and private investors attempted to create a new society and to develop a system built on paid labor and

education.¹⁶ Beaufort County, South Carolina, became one of the first places in the United States where formerly enslaved people begin integrating into free American society. While the Civil War raged in other parts of the nation, Beaufort County became the birthplace of Reconstruction, or what historian Willie Lee Rose called a "rehearsal for Reconstruction."¹⁷

During the period, the United States Congress passed three constitutional amendments that permanently abolished slavery, defined birthright citizenship, guaranteed due process and equal protection under the law, and granted all males the ability to vote by prohibiting voter discrimination based on race, color, or previous condition of servitude (Thirteenth, Fourteenth, and Fifteenth amendments to the US Constitution). African American male suffrage was a pivotal issue for Reconstruction policy both in Washington, D.C., and in the South. Freed men and women, although they would not be able to vote, used all their old slave networks and newly acquired political and social power to assure the passage of the amendment. Upon gaining the right to vote, black males moved quickly to consolidate their gains creating public school systems, modernizing legal codes, expanding tenants' rights, and forbidding racial discrimination in public accommodations.¹⁸ Even as the African American population was making great strides, many in the white population were resentful and vengeful.

Congress also passed a series of Reconstruction Acts that divided the former Confederacy into five

15. The National Park Service dates the Reconstruction Era from 1861 to 1898 (Reconstruction Era National Monument, accessed November 14, 2017, <https://www.nps.gov/reer/planyourvisit/index.htm>) and sometimes 1861 to 1900.

16. Downs and Masur, 3.

17. Willie Lee Rose, *Rehearsal for Reconstruction; The Port Royal Experiment*. Oxford paperbacks (New York: Oxford University Press, 1976).

18. Downs and Masur, 43-48.

military districts and established requirements for re-admittance to the Union for the states in rebellion, except for Tennessee. Federal troops were stationed in these districts to oversee the implementation of the changes and their occupation of the South was bitterly resented by many Southerners. The experience of Reconstruction and the rebuilding of the Union following the Civil War resulted in changes that fundamentally altered the meaning of citizenship and the relationship between Federal and state governments. Social, economic, and political changes dramatically transformed the former Confederate states where serious and consistent activities of Reconstruction, as well as resistance to them, occurred. Armed uprisings against African American institutions such as churches and schools were common and the Ku Klux Klan, an all-white terrorist organization that sought to undermine African American institutions, individuals, and white supporters of African Americans, was founded. For all the gains made by African Americans during this period, white resistance gradually eroded them and replaced them with a series of highly restrictive and idiosyncratic segregationist laws and customs commonly known as “Jim Crow.”

The Sea Islands. The coastline of South Carolina, like much of the US Atlantic coast, is protected by a series of small islands that have played a significant role in the state’s history. The “Sea Islands” were home to some of the largest and most successful plantations in South Carolina, and by the middle of the eighteenth century, Beaufort, located on one of these islands, was one of the richest cities in the United States.¹⁹ The islands were highly adaptable to growing a wide variety of crops, and when one would prove no longer marketable another would be readily found to take its place. Thus, the islands successfully produced, in quick succession, indigo, rice, and cotton.

19. David B. Schneider, *Addendum to National Register of Historic Places Inventory-Nomination, Historic Beaufort* (2000), Section 7, 1. In Mrs. James W. Fant, *NRHP Inventory-Nomination, Historic Beaufort, South Carolina* (Columbia: South Carolina Department of Archives & History, November 1, 1969).

Large numbers of enslaved Africans were brought to the islands to work the plantations. The white plantation owners, however, did not stay on the islands because of their isolation, climate, and the many illnesses they perceived as occurring there.²⁰ The enslaved workers, toiling in isolation away from the constraints of plantation owners and their imposed culture, were thus able to maintain some of their African cultural traditions.

When the Civil War began, the white owners of Sea Island plantations immediately abandoned their properties, hoping that the Confederate defenses could protect area. When an overwhelming Union force arrived on November 7, 1861, a South Carolinian wrote, “[it was a] Smashing blow to our Sea Island plantations.”²¹ Any white person remaining on the Sea Islands fled the area as did many of the inhabitants of Beaufort. Approximately 10,000 formerly enslaved people on the South Carolina Sea Islands were left practically on their own.²² Northern missionaries, philanthropists, the US Army, and Federal government all arrived at the Seas Islands to begin the process of Reconstruction for the area and its people.

Penn School. The earliest and arguably most successful of the Reconstruction institutions was Penn School on St. Helena Island, Beaufort County. Penn School, founded in 1862, was created as part of the “Port Royal Experiment,” a “plan for the education, welfare and employment of former slaves.”²³ Penn School was created to provide an academic education for the freed children of St. Helena Island. St. Helena Island was the site of enormous cotton and rice plantations whose owners had fled during the war leaving the enslaved people behind. After the war, the formerly enslaved

20. Dan Harman, “Penn Center: Where African American History & Culture Come Alive,” *Sandlapper*, Autumn 1997, 14.

21. Robert K. Sutton and John A. Latscher, Eds. *The Reconstruction Era: Official National Park Service Handbook* (Washington, DC: US Department of Interior, Eastern National, 2016), 34.

22. Sutton and Latscher, 35.

23. Burton and Cross, 12.

people began to divide up the property and attempted to work the land. The Penn School, created by the American Missionary Association, and ably led by Laura Towne, used the desire of the new landowners to control their own destinies to create a new all African American school on the island.

Towne was quickly joined by Ellen Murray, and the school began in The Oaks plantation house, the Headquarters of the US Army occupying force. However, the school was soon moved to Brick Church, a Baptist Church in the center of the island, as The Oaks plantation grew too small for the demand for classes. It became apparent that the school needed a dedicated building and in 1864, a new school house was ready for occupation. Penn School not only became the only African American secondary school on the island, a place where black teachers were trained, but also a center of community activity.²⁴

[For] decades the Penn School remained a rare site of both academic and industrial education and a training ground for black landowners in the region. Citizenship schools at Penn were crucial training grounds for young African American activists in the post-World War II era. For more than a century, Penn School thus remained a crucial place for educational community, and political organizing – a center that links the democratic aspirations of Reconstruction to those of the civil rights movement and beyond.²⁵

The institutions that African American's created during Reconstruction served to stabilize their communities and provided them with resources crucial to their survival.²⁶ Even as political power shifted, and Jim Crow laws expanded, institutions like Penn School persisted. For the administrators of Penn School, it became evident early in the school's growth that a community gathering place was necessary. In 1882, the school created Darrah Hall, named in memory of Laura Towne's sister, Sophia Towne Darrah, off the campus proper on

The Green in The Corners area of the island.²⁷ The Corners, the intersection of what is now US Highway 21 and Martin Luther King Jr. Road (originally Lands End Road), was the site of several cultural and economic entities important to the community. In 1893, after the Great Hurricane of 1893, Darrah Hall burned, but the school decided to rebuild a much smaller community gathering place on campus. The new Darrah Hall was constructed on the campus Green close to Lathers Hall, and continued to operate in much the same way as it did while at The Corners—hosting community events including plays, sings, and meetings.²⁸

In 1925, Penn School built Frissell Hall as its new community gathering center. Frissell Hall featured a kitchen and dining room, an auditorium, a stage, and a library; it quickly replaced the smaller, single room Darrah Hall within the community.²⁹ In the 1950s or 1960s, the date is not clear, Darrah Hall was moved to its current location and was used as an indoor basketball court and a community cooperative tomato-packing house.³⁰ By the mid-1970s, the hall was abandoned and used for storage.³¹ In the 1990s, interest in the history and importance of Penn School led to interest in the restoration of buildings on the campus including

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27. Bruce Harvey, Colin Brooker, David B. Schneider, and Sarah Fick, "Intensive Level Building Inventory Form – Darrah Hall," *Beaufort County Above Ground Historic Resources Survey* (Atlanta, Georgia: Brockington & Associates, 1997), n.p. P U-13-38.03 (Site Number).
 28. Margaret E. Heggstrom, Steve Bailey, Ramsey Jefferson, Jr., Ellis Major, Shelia Rhodan, John Washington, and Anthony Benny Young, *Penn - A History – 1861-1982* (Columbia, South Carolina: Office of the Governor, C&TA Division, 1982).
 29. *Ibid.*
 30. *Memories of Penn School by Graduates and Former Students* (n.p., 2002); *Penn Center Historic District Walking Map* (St. Helena, South Carolina: Penn Center, n.d.).
 31. Nenie Dixon and Sarah Coprich, *National Register of Historic Places Nomination - Inventory Form [National Historic Landmark], Penn Center Historic District, Beaufort, South Carolina*, September 9, 1974.

24. *Ibid.*, 30.

25. *Ibid.*

26. *Ibid.*, 36.

Darrah Hall, the oldest building belonging to Penn Center. In poor condition and used for storage, Darrah Hall underwent restoration during the 1990s and was used once again for community events.³²

Almost twenty years ago, during the final days of President Bill Clinton's administration, various groups and individuals began to advocate for a Reconstruction Era National Monument. President Clinton's Interior Secretary, Bruce Babbitt, visited the Beaufort area accompanied by historian Eric Foner, who had just completed the book *Reconstruction: America's Unfinished Revolution, 1863-1877*. The initial effort to create a Reconstruction History Park, as it was known then, failed in Congress as a result of opposition from the Sons of the Confederacy led by South Carolina's Representative Joe Wilson.³³ Nevertheless, South Carolina's other Representative, James Clyburn, persevered with the dream.

When Barrack Obama was elected president, Clyburn and others saw an opportunity to move the idea forward. In 2015, the National Park Service undertook a field study of sites associated with the Reconstruction Era and issued a report, *National Historical Landmark Theme Study on the U.S. Reconstruction Era, 1861 – 1900*.³⁴ In 2016, at a symposium on the Reconstruction Era sponsored by Historic Columbia Foundation and the University of South Carolina History Center, a National Park Service officer indicated that

opposition to a proposed national monument from the Sons of the Confederacy had softened.³⁵

South Carolina's US Representatives Clyburn and Mark Sanford, whose district now included Beaufort after redistricting in 2010, were ardent supporters of creating a monument, and had sought to create one through Congress. When that effort failed, a proposal to create the Reconstruction Era National Monument through executive action was supported at a December 2016 public meeting held by Representative Clyburn and the National Park Service.³⁶

The Reconstruction Era National Monument was created in the final days of President Obama's term, and a public dedication ceremony was held in March 2017. The monument comprises four resources in and around Beaufort, South Carolina: Darrah Hall at Penn Center, the Brick Church at Penn Center, the Old Firehouse in Beaufort, and Camp Saxton / Emancipation Grove at the Navy Hospital campus at Port Royal. On January 10, 2017, Penn Center donated Darrah Hall and related areas to the United States government.³⁷

Darrah Hall Building History

Darrah Hall is located within the Penn Center Historic District on 24 Penn Center Circle, St. Helena Island, South Carolina (Figure 4). It was constructed in 1893 or 1894 by Penn School as the second building named "Darrah Hall"; the first Darrah Hall was destroyed by fire in 1893. In 1997, for the *Beaufort County Above Ground Historic Resources Survey*, Darrah Hall was described as:

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32. "Etc.: Saving Historic Penn Center," *Beaufort Gazette*, May 10, 1992.
 33. Bill Rauch, "Can the South Make Room for Reconstruction?" *The Atlantic*, September 17, 2017, <https://www.theatlantic.com/politics/archive/2016/09/can-the-south-make-room-for-reconstruction/500189/>.
 34. Downs and Masur.

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35. Hillary Hurd Anyaso, "Historian's work foundation of new national monument," *Northwestern Now*, January 30, 2017, <https://news.northwestern.edu/stories/2017/01/historians-work-foundation-of-new-national-monument/>.
 36. Stephen Fastenau, "Clyburn, Park Service hear overwhelming support for Reconstruction monument," *Beaufort Gazette*, December 15, 2016.
 37. Donation Warranty Deed, Tract No. P01-100, Darrah Hall and Related Areas, Beaufort County, SC, Recd, SK354, Pages 485-490, File No. 2017001662, January 10, 2017.

Rectangular gable front church [sic]. 3 bay façade features central double door. 5 bays along each side; single door entrance at 4th bay off right side. Front gable features fish-scale shingles and bulls eye window. Wooden shutter at each window.³⁸

Darrah Hall is a Folk-style building that is generally believed to have been built by students as a learning experience following the models of Tuskegee and Hampton institutes. The building is also believed to have been constructed of salvaged materials from the original Darrah Hall which was a much larger building.³⁹ Darrah Hall was used for public activities such as farmers' days, temperance meetings, plays, and other types of public meetings. Later it was used as an indoor basketball court; part of the court markings remain.



FIGURE 4. Darrah Hall (1893 / 1894), Penn Center Circle, Penn Center, St. Helena Island, South Carolina, one of four resources associated with Reconstruction Era National Historical Park, 2017. (Source: All photographs by authors unless otherwise noted)

History. The original Darrah Hall was an early school building constructed in 1882 off the Penn School campus at the intersection of US Highway 21 and old Lands End Road, now Martin Luther

King Jr. Road, on The Green.⁴⁰ This area of St. Helena Island has long been called “The Corners” and was the site of several other important community buildings and sites, including The Green, the Knights of Wise Men Lodge and African American fraternal organizations, the Corner Store and Corner Packing Shed, and the Dr. York Bailey house. Dr. Bailey was the first African American physician on St. Helena and a graduate of Penn School.⁴¹ It is not clear why Penn School would construct a school-related building off campus except, perhaps, that the building also served as a place for public activities (Figure 5).

As noted, the original Darrah Hall was named in memory of Mrs. Sophia Towne Darrah, sister of Laura Towne.⁴² It has been suggested that Sophia’s husband was the donor for the building, however no verification for this donation has been found.⁴³ Regardless of its antecedents, Darrah Hall at The Corners was used as a public building. After the Great Hurricane of 1893, the building was used by the displaced population. The many people crowding into the hall had built fires throughout it, and one of these fires spread, burning the building to the ground.⁴⁴

Apparently, the decision to rebuild a community gathering site was made quickly, and Darrah Hall, still presumably named in honor of Sophia Towne Darrah, was rebuilt in 1893 or 1894 on the Green

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40. *Penn Center Historic District Walking Map*; and Beaufort County Planning and Development, “The Corners,” *Beaufort County Historic Sites*, November 7, 2017, <http://www.co.beaufort.sc.us/departments/Planning-and-Development/planning/historic-sites/corners.php>.
 41. Beaufort County Planning and Development, “The Corners,” *Beaufort County Historic Sites* (Beaufort, South Carolina: Beaufort County Planning and Development, 2017).
 42. Harvey et al., U-13-38.03; *Penn Center Historic District Walking Map*.
 43. Harvey et al., U-13-38.03.
 44. Beaufort County Planning and Development; *The Penn Center Walking Tour* [brochure] (St. Helena, South Carolina: Penn Center, n.d.) indicates that Darrah Hall was burned to the ground in 1893, but does not link the fire to the Great Hurricane.

38. Harvey et al., U-13-38.03 (Site Number). The building is not a church and never has been a church; this is a misstatement by the surveyor.

39. *Ibid.*

on the Penn School campus.⁴⁵ Very little is known about the history of Darrah Hall, and the photographic record supplies some of the best information about it.



FIGURE 5. The original Darrah Hall (1882), photograph date unknown, and The Green at The Corners, burned in 1893. (Source: Penn School Papers #3615, Southern Historical Collection, Wilson Library, University of North Carolina at Chapel Hill)

The earliest known photograph of Darrah Hall is dated 1899 and is the backdrop for an unidentified woman posing in front of the side of the building. The photograph is entitled “Beside Darrah Hall, 1899” (Figure 6).⁴⁶ The earliest photograph to fully capture Darrah Hall is a 1901 image showing an extremely plain rectangular, gable front building (Figure 7).⁴⁷ The building is clapboard, painted white, and the front gable is shake shingles. The three-bay front features a front door with a two-light transom. The five-by-five south side, here

only three bays are shown, has windows with a single wooden shutter with strap hinges. The shutters are closed on all the windows except one. The front stairs are curved and recede up to the front door. The whole sits on exposed brick piers. The moderately pitched roof has a slight overhang. Another photograph which appears to have been taken about the same time, but has no date, clearly shows the south side four-paneled door and wooden steps (Figure 8).⁴⁸



FIGURE 6. First dated photograph of Darrah Hall, 1899; the woman at the center of the photograph is not identified. (Source: Image 0011d: “Beside Darrah Hall,” Penn School Papers #3615)



FIGURE 7. Darrah Hall in 1901, showing front, east side, and portion of south side. (Source: Image 0038rb: “Darrah Hall, 1901,” Penn School Papers #3615)

The building changed subtly for perhaps the next forty years and is documented in photographs although not in text.

45. *Penn Center Historic District Walking Map*. Many publications (*Penn Center Walking Tour* [brochure]; *Memories of Penn School by Graduates and Former Students*, 2002; and *Penn – A history – 1862-1982* (N.P., 1982) indicate that Darrah Hall was “moved” from The Green to the campus circa 1940. However, given the size of the original building and the size of the present building that seems unlikely.

46. “Image 00111d: Beside Darrah Hall,” 1899, Penn School Papers #3615, Southern Historical Collection, Wilson Library, University of North Carolina at Chapel Hill (hereafter Penn School Papers).

47. “Image 0038rb: Darrah Hall, 1901,” Penn School Papers.

48. “Image 0005ra: Darrah Hall,” Penn School Papers.



FIGURE 8. Darrah Hall, about 1901, south side. (Source: Image 0005ra: "Darrah Hall," Penn School Papers #3615)

The next date for which there is a photograph of Darrah Hall is March 22, 1904, which shows the inside of building looking from the stage down the aisle to the front doors (Figure 9).⁴⁹ The interior is as it is today, unfinished. The support beams and framing are clearly visible as is the framing for the windows, door, and transom. The double front door has applied decoration with an arched top mimicking the look of sunken panels. One addition has been made to the building—a new diamond-shaped window has been placed in the center of the gable, probably for more light. A packed house of all African American women is seated on wooden backless benches.

A second photograph showing all women but facing the stage provides another view of the early interior of the building. Although this photograph is not dated, it is possible that the photographs in Figures 9 and 10 are from the same event since they show women from about the same time at some type of an educational event (Figure 10).⁵⁰ The front of the hall is set up with a stage, which includes a blackboard, tables for instructors, and photographs and prints of important personages mounted on the walls. According to *Penn—A History—1861–1982*, the stage and benches were made by students and the benches were added in 1914. Nevertheless, this image is clearly dated

49. "Image 00521b: In Darrah Hall, March 22, 1904," Penn School Papers.

50. "Image 001191a: Darrah Hall," Penn School Papers. Please note that this photograph identifies photographer, Helen C. Jenks, which is unusual for this collection.

March 22, 1904, and the benches were present.⁵¹ *Penn—A History* also described the building as a "large barn type construction with an unfinished interior."⁵² Another interior shot, taken in 1905, showed the stage decorated for the 1905 Farmers Conference (Figure 11).⁵³ In this image the wooden benches are clearly seen as is the rise of the stage.

A March 1904 photograph of Darrah Hall's location on the campus Green showed it immediately to the side of agricultural teacher William Dawkins's house (Figure 12).⁵⁴ Although the Dawkins's house was a substantial story-and-a-half clapboard house, it does not appear on any Penn Center maps, and a map of Penn School has not been found. Nevertheless, it is believed Darrah Hall was located across from Lathers Memorial Hall, which is not included in this photograph (Figure 13).⁵⁵ While Darrah Hall was on the Green, it was the center of community activities. It served as the scene for temperance meetings, farmers' fairs, community sings, and the biannual performances of *Mystery Play*, a story of the birth of Christ, written by Grace House, an early teacher and principal at the school, and performed by Penn teachers and students.⁵⁶

51. Heggstrom et al.

52. Ibid.

53. "Image 00811: Farmers Conference 1905. In Darrah Hall," Penn School Papers.

54. "Image 0046ra: Dawkins' House Darrah Hall March 1904," Penn School Papers.

55. *Penn Center Historic District Walking Map*.

56. Heggstrom et al.; and *Penn Center Historic District Walking Map*.

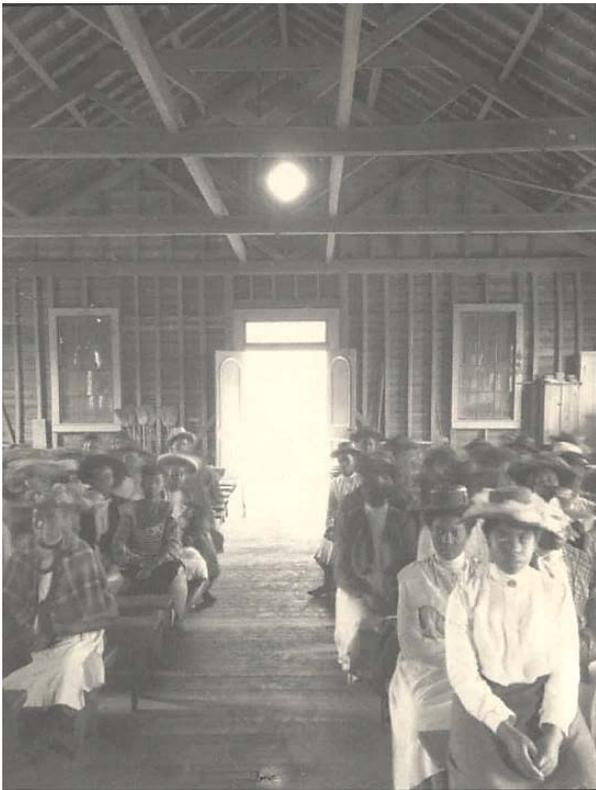


FIGURE 9. Interior of Darrah Hall, looking east toward the front door, 1904. (Source: Image 00521b: "In Darrah Hall," March 22, 1904, Penn School Papers #3615)

In a 1904 photograph, several changes to Darrah Hall are immediately evident (Figure 14). The hall had acquired a full-width front porch, lattice around the bottom of the front porch, and a flag pole mounted within the front gable. These new changes are more apparent in an undated photograph showing the new changes to the building. Note the landscaping of white rocks, or some element, tightly outlining the edges of the building providing a finished look (refer to Figure 14).⁵⁷ Historic research reports suggest that the porch was added to Darrah Hall in 1902; and certainly the porch had been constructed by 1904.⁵⁸



FIGURE 10. Interior of Darrah Hall, looking west toward the stage, unknown date possibly 1904; photograph by Helen C. Jenks. (Source: Image 01191a: Darrah Hall, Photograph by Helen C. Jenks, Penn School Papers #3615)

An undated photograph of Darrah Hall that appears to fall between the photographs dated 1901 and 1904 shows the placement of a flag staff within the front gable prior to the addition of the porch (Figure 15).⁵⁹ These differences place the photograph and the building within a very short time period – one to three years – before the porch was added and trace the evolution of additions to the building.

57. "Image 0053re: Darrah Hall," Penn School Papers.

58. Heggstrom et al.; Harvey et al., U-13-38.03.

59. "Image 0040l: Darrah Hall," Penn School Papers.



FIGURE 11. Stage of Darrah Hall decorated for 1905 Farmers Conference. (Source: Image 0081i: Farmers Conference, 1905, In Darrah Hall, Penn School Papers #3615)



FIGURE 12. Agriculture teacher William Dawkins's house and Darrah Hall on the Penn School Campus Green, unknown date. (Source: Image 0046ra: Dawkins' [sic] house Darrah Hall, Penn School Papers #3615)

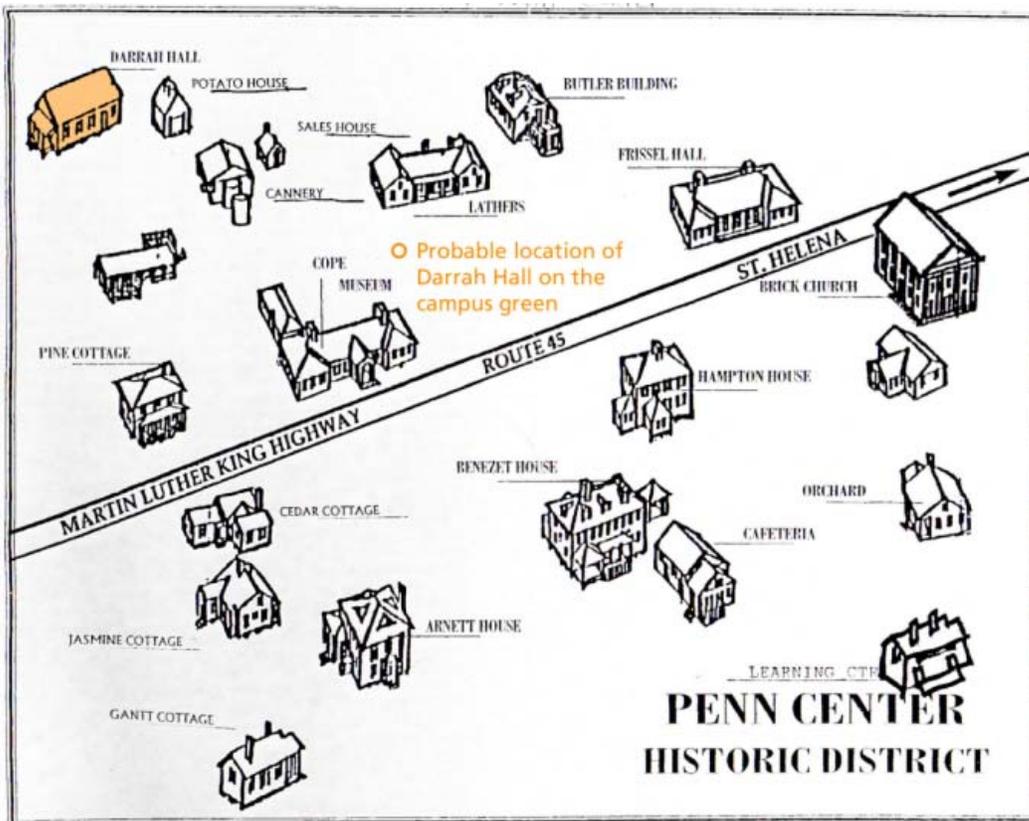


FIGURE 13. Map of Penn Center showing approximate location of Darrah Hall on the campus Green, unknown date. (Source: *Penn Center Historic District Walking Map*)

In 1925, Frissell Memorial Community House was completed and named in memory of Dr. Hollis Burke Frissell, President of Hampton Institute. Also serving as Chairman of Penn’s Board of Trustees for sixteen years, Frissell spearheaded Penn’s transformation from an academic school to industrial arts / progressive education school. Frissell House replaced Darrah Hall as the community center. It housed the Laura Towne Memorial Library, a stage, kitchen, and dining room, and a large meeting hall. Many organizations held regular meetings here including the Community Council of St. Helena, the Credit Union, and the County Teachers Association.⁶⁰



FIGURE 14. Darrah Hall with full-width front porch and diamond-shaped window in gable, unknown date. (Source: Image 0053rc: Darrah Hall, Penn School Papers #3615)

60. Heggstrom et al.; *Penn Center Historic District Walking Map*.

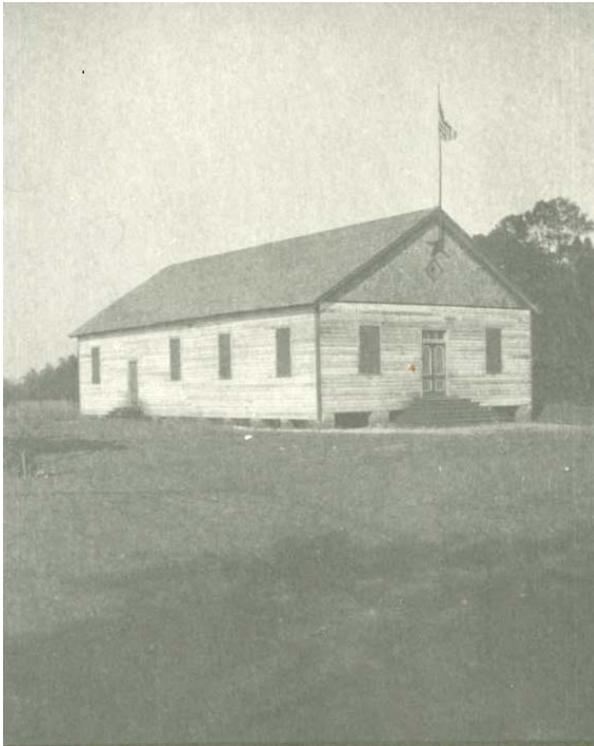


FIGURE 15. Darrah Hall with flag staff before the full porch, unknown date. (Source: Image 0040l: Darrah Hall, Penn School Papers #3615)

While it was situated on the Green, Darrah Hall underwent two more photodocumented changes, both at undocumented times. The exterior of the building was changed with the addition of a highly decorative, round Colonial Revival-style window that replaced the diamond-shaped window in the gable. The round window appears to be one that was purchased and not made by students on site (Figure 16).⁶¹ The building did acquire a heater in the 1940s, so perhaps this was an attempt to make the building warmer.⁶²

Aside from the activities previously mentioned, very little is known about other events held at Darrah Hall, although many of the photographs shown include individuals or some type of activity. It is believed that Darrah Hall was relocated off the campus Green in the 1950s.⁶³ However, the *Penn Center Historic Walking Tour* brochure states that Darrah Hall was moved to its present location in

61. "Image 0496lb: Leaving Darrah Hall," Penn School Papers.
 62. Heggstrom et al.
 63. *Memories of Penn School by Graduates and Former Students*.

1966. More confusingly, historic research documents indicate that Darrah Hall was moved from "The Green [at The Corners] to the center of campus."⁶⁴ All agree that in the Hall's later years it was used as a gym and as a tomato-packing house for the St. Helena Cooperative bypassing The Corner Packing Shed. Former students remember the "Indoor basketball court required that some goals be shot through the rafters, giving Penn an advantage over visiting teams."⁶⁵



FIGURE 16. Darrah Hall with round window, unknown date. (Source: Image 04596lb: Leaving Darrah Hall, Penn School Papers #3615)

While the debate over the movements of Darrah Hall may never be resolved, it is clear that the building is not on the campus Green, and, in fact, sits on the edge of the campus in a rather isolated area. By 1974, when the National Historic Landmark nomination was completed, a map of the school buildings showed Darrah Hall abandoned. It also notes erroneously that all buildings within the Penn Center Campus, except for Brick Church, "were constructed during the twentieth century and are of no architectural

64. Heggstrom et al.; and *Penn Center Historic District Walking Map*.
 65. *Memories of Penn School by Graduates and Former Students*.

significance.”⁶⁶ Historical significance is not entertained. Darrah Hall became a storage facility for furniture and cast-off items.

In the 1990s, a resurgence of interest in Penn Center led to a \$3 million campaign to restore nineteen buildings. The campaign was funded in part with state and federal monies, and many of the proposed projects were ambitious. None of the projects was more ambitious than the restoration of Darrah Hall. It proposed that Darrah Hall,

... built in 1882, [is] the oldest existing building at Penn Center. It was named after Sophia Towne Darrah and was originally used as a gymnasium. It will be restored at a cost of about \$200,000 for use as an auditorium and will include a video and audio recording and editing studio to preserve stories, music, dance and crafts indigenous to Sea Island culture.⁶⁷

There was exceptional interest in the restoration of Penn Center. The I.P. Stanback Museum and Planetarium, South Carolina State Museum, featured an exhibition, “Moments for the Past: An Exhibition in Celebration of the Penn Center of the Sea Islands,” from March 19, 1993 – June 30, 1993, and a catalog of the show was published.⁶⁸ The exhibition featured photographs by Cecil Williams of Penn Center’s buildings including Darrah Hall. Darrah Hall was shown completely boarded-up, with many of its clapboards broken and sagging, and its front porch filled with broken and cast-off furniture and items.

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66. Dixon and Coprich, 7. Harvey, Brooker, Schneider, and Fick indicate that Darrah Hall is listed as part of National Register historic district. Darrah Hall was shown on a map as “abandoned,” however, the only actual named “contributing” building was Brick Church.
67. “Etc.: Saving Historic Penn Center,” *Beaufort Gazette*, May 10, 1992.
68. Martin, Frank, ed. *Moments for the Past: An Exhibition in Celebration of the Penn Center of the Sea Islands March 19, 1993–June 30, 1993 at the I.P. Stanback Museum & Planetarium, South Carolina State University* (Orangeburg: South Carolina State Museums, 1993), 10.

Darrah Hall was restored in the 1990s; the exact date and the nature of the restorations are not clear. The Building Inventory Form for Darrah Hall indicates that the building was “altered” in 1996, but does not reveal the type of alteration.⁶⁹ Certainly, the alterations to Darrah Hall did not include a video, audio, and editing studio, but it is probable that the 1996 alteration cited in *Beaufort County Above Ground Historic Resources Survey, Beaufort County, South Carolina* (1997) was the alteration funded by the capital campaign.

After the restoration, Darrah Hall became quite popular within the community as a place for family reunions and other gatherings. The building was booked for events on a regular basis by individuals who remembered its importance.

On January 12, 2017, the Reconstruction Era National Monument was designated after almost twenty years of attempts and days before President Barack Obama left office. The monument includes four locations in and near Beaufort, South Carolina. The sites are: Darrah Hall at Penn Center, Brick Church at Penn Center, Old Firehouse in Beaufort, and Camp Saxton / Emancipation Grove at Beaufort Navy Hospital campus Port Royal. On January 10, 2017, Penn Center donated Darrah Hall and related areas to the United States government.⁷⁰

On March 12, 2019, the John D. Dingell, Jr. Conservation, Management, and Recreation Act, re-designated the Reconstruction Era National Monument as the Reconstruction Era National Historical Park.⁷¹

The National Park Service is consolidating its plans for Darrah Hall but anticipates having volunteers at the site soon.

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69. Harvey et al., U-13-38.03.
70. Donation Warranty Deed, Tract No. P01-100, Darrah Hall and Related Areas, Beaufort County, SC, Recd, SK354, Pages 485-490, File No. 2017001662, January 10, 2017.
71. Public Law 116-9, Title II, National, Parks, Subtitle C, Park System Redesignations.

Darrah Hall (LCS #1096080) Development and Use

- 1862 The first school in the United States for freed slaves was established on St. Helena Island with classes held in Brick Church.
- 1865 A new three-room school building becomes the first in the South created for the instruction of formerly enslaved people; officially called Penn School.
- 1882 The original Darrah Hall, named in honor of Sophia Towne Darrah, Laura Towne's sister, was constructed on The Green at the intersection of US 21 and Lands End Road, now Martin Luther King Jr. Road, known historically as "The Corners."
- 1893 The original Darrah Hall burned to the ground after surviving the great Hurricane of 1893.
- 1893 or 1894 A second, smaller Darrah Hall was constructed on "the Green" at Penn School. It is reputed to have been built with materials salvaged from the original Darrah Hall, but this belief cannot be confirmed. It was built by student labor in the model of Tuskegee Institute.
- 1899 First dated photograph of the present Darrah Hall building dates from at least 1899, based on the photograph.
- 1901 The first full-view, dated photograph of present Darrah Hall shows the building without a full-width front porch and with a two-light transom over the front door, operable shutters on all windows, and curved upward recessing exterior front stairs. A second photograph in this series shows the south side with one exterior door toward the rear, west side, with a four-panel door and wooden steps.
- 1902 The porch is believed to have been added.
- 1903 Darrah Hall was reported to have been constructed in this year, but the photographic record shows the current building existing at least since 1899.
- 1904 A photograph shows Darrah Hall on the Green in proximity to the Dawkins's House; it is not clear whether the Dawkins's House (Will Dawkins, Agricultural Teacher) is extant. By 1904, Darrah Hall has obtained its full-width porch and a flag pole mounted within the gable. Interior photographs show the building does not have interior finishes; double front doors have applied arched decorative panels; and a diamond-shaped window has been added to the front gable. The packed house is seated on backless, wooden benches.
- 1905 A photograph shows the interior and a raised stage at the front decorated for 1905 Farmers Conference and backless wooden benches. Another photograph of the front from about this same date shows a class of some type being conducted in the building. The complete teaching set up for a class included flags, blackboard, photographs of important individuals, and desks for teachers on the stage.
- After 1905 A photograph, undated, of the exterior of Darrah Hall shows it generally spruced up with a coat of bright white paint and lattice around the bottom of the front porch. The interior has gained pews – benches with backs.

Developmental History

1915	Benches were added according to the Building Inventory Form for Darrah Hall and <i>Penn-A History</i> , but clearly benches had been added before this date
1940	Furnace was installed.
Before 1940	A photograph, undated, shows that the small diamond-shaped front gable window of Darrah Hall has been replaced with a round, Colonial Revival-style window. This is the current gable window.
1950	Penn School became Penn Center.
1950s	It is generally believed that Darrah Hall was moved to its present location, and in use as an indoor basketball court. However, Dr. Rodell Lawrence, Executive Director, Penn Center, does not believe the building has been moved.
1966	Penn Center Historic Walking Tour map indicates that Darrah Hall was moved to its present location at this date.
1974	Penn Center was listed as a National Historic Landmark. Darrah Hall was listed as “abandoned,” and all buildings but Brick Church were erroneously listed as constructed during the 20th century.
1990	Penn Center placed on the list of “most endangered historic places” by the National Trust for Historic Preservation.
1992	Penn Center begins a multi-million-dollar campaign to rescue its historic buildings, including Darrah Hall, which was envisioned to become an auditorium with video, audio, and editing studio capabilities.
1994	Darrah Hall was reported as “collapsed” (Dan Harmon). Data to support this statement has not been identified. Nevertheless, the start and completion of the current renovation is not known.
1996	The <i>Beaufort County Above Ground Historic Resources Survey</i> indicated the building was “altered” at this date but does not indicate how.
1997	Darrah Hall was included in <i>Beaufort County Above Ground Historic Resources Survey</i> .
2007	Penn Center was listed on the 100 most significant Archeological Sites in South Carolina.
2015	Senator Bernie Sanders kicked off his South Carolina Democratic Primary campaign for President at Darrah Hall calling for a revolution.
2016?	Environmental Site Assessment completed.
January 10, 2017	Darrah Hall was donated to the National Park Service by Penn Center.
January 12, 2017	Reconstruction Era National Monument was designated by President Barack Obama and included Darrah Hall.
2017	Heating, ventilation, and air-conditioning system (HVAC) repaired.
March 12, 2019	Park redesignated Reconstruction Era National Historical Park.

Physical Description and Condition Assessment

Site

Reconstruction Era National Historical Park consists of three sites in and around Beaufort, South Carolina, and includes Darrah Hall.

Darrah Hall is located at Penn Center, a 47-acre property approximately one mile south of Frogmore on St. Helena Island. Penn Center comprises several buildings and structures set in a campus of turfed lawn and trees, located on either side of Dr. Martin Luther King Jr. Drive (Figure 17). A gravel road leads west from Dr. Martin Luther King Jr. Drive to Darrah Hall, which is situated at the south end of Penn Center (Figure 18). The area immediately adjacent to Darrah Hall consists of a grass lawn, with lightly forested areas to the north, south, and west (Figure 19). A small comfort station is located north of Darrah Hall. Paved accessible parking spaces are situated directly south of the comfort station. A paved concrete walk, 6 feet wide, leads from the comfort station to the east porch of Darrah Hall (Figure 20 and Figure 21).



FIGURE 17. A view northeast of Penn Center from Darrah Hall. (All photographs by authors in 2017 unless otherwise noted.)



FIGURE 18. The gravel road leading from Dr. Martin Luther King Jr. Drive to Darrah Hall.



FIGURE 19. Darrah Hall and its surroundings from the east.



FIGURE 20. The comfort station and paved walk north of Darrah Hall.



FIGURE 21. The paved walk leading to the east porch of Darrah Hall.

Exterior Description

Darrah Hall is a one-story, wood-framed structure (Figure 22). The building sits on brick piers and is clad with wood siding. A wood-framed porch extends the length of the east elevation, while small side porches are present on the north and south elevations (Figure 23). An accessible ramp extends from grade up to the small porch on the north elevation. Two wood-framed staircases are present on the west elevation of the building. The building has an asphalt shingle-clad gable roof, while there are asphalt shingle-clad shed roofs over the front and side porches.

The building is rectangular in plan, measuring 41 feet 6 inches wide by 76 feet 7 inches deep. The main porch centered on the east elevation measures 34 feet 2 inches wide and 9 feet 10 inches

deep. Each of the side porches on the north and south elevations measures 5 feet 5 inches wide by 6 feet 10 inches deep in plan.



FIGURE 22. Darrah Hall from the southeast.



FIGURE 23. Darrah Hall from the southwest. Note the covered porch on the south elevation.

The east elevation of Darrah Hall is the primary elevation of the building (Figure 24). A wood-framed porch with a shed roof extends the length of the east elevation, with a wood stair at the center. Wood double doors are centered on the elevation in line with the porch stairs, with a set of two double-hung wood windows located on each side of the doorway. A circular window is centered on the elevation at the gable end.



FIGURE 24. The east elevation of Darrah Hall.

The south elevation of the building consists of a small covered wood-framed porch near the west end of the elevation (Figure 25). A door provides access to the building from the porch. Three double-hung wood windows are equally spaced along the east side of the elevation, with an additional double-hung wood window near the west end of the elevation.



FIGURE 25. The south elevation of Darrah Hall.

The west elevation consists of a double-hung wood window at the center. This elevation has two doors, one each at the north and south ends of the elevation (Figure 26). A wood-framed, thirteen-step stair leads from grade to each of the doors. A diamond-shaped window is present at the center of the gable end.



FIGURE 26. The west elevation of Darrah Hall.

The north elevation is a mirror image of the south elevation, with a small covered wood-framed porch near the west end of the elevation (Figure 27). Three double-hung wood windows are equally spaced along the east side of the elevation, with an additional double-hung wood window near the west end of the elevation. A wood-framed enclosure clad with wood lattice panels hides an air-handling unit from view at the west end of the north elevation (Figure 28).



FIGURE 27. The north elevation of Darrah Hall.



FIGURE 28. The wood-framed enclosure at the west end of the north elevation.



FIGURE 29. A series of brick masonry piers at the south elevation of Darrah Hall.

Foundation. Darrah Hall sits on a series of masonry piers (Figure 29). There are thirty-five piers supporting the building, with seven rows of five running north-south. The piers are typically 16 inches by 16 inches in plan. The north-south spacing between the piers is approximately 9 feet 8 inches, while the east-west pier spacing is not regular, ranging from 15 feet 2 inches at the center of the building to approximately 7 feet at the west end of the building. The piers along the perimeter of the building are largely constructed of brick masonry, with the exception of three piers at the center of the west elevation, which are constructed of concrete masonry units (refer to Figure 29 and Figure 30). While the brick piers appear historic, it is not known if they date to the construction of the building or were added at a later date. The piers beneath the interior of the building are typically constructed of concrete masonry units (Figure 31). It is unknown when the concrete masonry unit piers were added to the building.

Six brick masonry piers are also present at the front porch at the east elevation (Figure 32). Each of the small covered porches at the north and south elevation is supported by two brick masonry piers at its perimeter (Figure 33).



FIGURE 30. Piers constructed of concrete masonry units at the west elevation.



FIGURE 31. The piers beneath the interior of the building are constructed of concrete masonry units.



FIGURE 32. Brick masonry piers at the east porch.



FIGURE 34. Typical wood siding on the exterior walls.



FIGURE 33. Brick piers at the covered porch on the south elevation.



FIGURE 35. Wood trim at the corners of the building.

Walls. The exterior walls of Darrah Hall are typically clad with wood clapboard siding painted white (Figure 34). The wood siding has an exposure ranging from 6-3/4 inches to 7 inches. The siding is secured to the wood-stud structure at 16 inches on center. Wood trim is present at the corners of the building (Figure 35). The trim is typically 5 inches wide and painted red.

The gable end on the east elevation is clad with scalloped wood shingle siding (Figure 36). A piece of flat wood cornice trim painted red lines the top of both the east and west gable ends, abutting the roof fascia.

The lower portion of the west elevation is clad with plywood (Figure 37). The plywood cladding extends from the north end of the elevation to the south door. The plywood is present only below the sills of the doors.



FIGURE 36. The gable end at the east elevation is clad with scalloped wood shingle siding.

The ends of the roof of the east porch are clad with scalloped wood shingle siding (Figure 38). The ends at the shed roofs on the small porches at the north and south elevation are clad with clapboard siding (Figure 39).



FIGURE 37. Plywood cladding at the base of the west elevation.



FIGURE 38. The ends of the east porch roof are clad with scalloped wood shingle siding.



FIGURE 39. The ends of the shed roof at the small covered porches are clad with clapboard siding.

Porches. There are three porches at Darrah Hall: one porch along the east elevation, and two small porches near the west ends of both the north and south elevations.

The east porch extends nearly the full length of the east elevation (Figure 40). A wood stair, consisting of five risers, leads from a paved sidewalk to the porch (Figure 41). The stair is composed of 2x12 treads that overhang a 6-inch riser board. Six brick piers support the porch deck, which consists of a wood-framed structure with 1x4 tongue-and-groove planking (Figure 42).



FIGURE 40. The east porch at Darrah Hall.



FIGURE 41. A wood stair at the east porch.



FIGURE 42. Tongue-and-groove wood decking at the east porch.

Four equally spaced columns line the east side of the porch, supporting the shed roof above (Figure 43). The 9-foot-tall wood columns are of the Tuscan order. Two wood pilasters, also of the Tuscan order, are located at each end of the porch where it intersects the main building. Steel pipe railings extend between the columns (Figure 44). No pipe railings are present between the center columns which border the stair to the porch. Two pipe railings centered on the stair are attached to the porch deck and the concrete walk to the east of the porch (Figure 45).

Above the columns, a box beam is present at the perimeter of the porch (Figure 46). The box beam is made up of wood planks, 1-inch thick (nominal) and 6 inches wide. The box beam supports the porch roof framing which comprises 2x8s spaced at 24 inches on center (Figure 47). A wood plank roof deck is located above the roof joists. The roof structure is exposed, with an open soffit.

The small covered porches at the north and south elevations are located near the west end of each elevation.



FIGURE 43. Columns line the east side of the east porch.



FIGURE 44. Steel pipe railings along the edge of the east porch.



FIGURE 45. Pipe railings extend down the center of the stairs at the east porch.



FIGURE 46. A box beam lines the perimeter of the east porch at the base of the roof structure.



FIGURE 47. The roof framing over the east porch.

The south porch is a wood-framed structure on brick piers (Figure 48). A six-step wood-framed stair leads from grade to the porch deck. The porch deck consists of 1-inch by 3-inch tongue-and-groove wood planks over 2x12 wood joists. Two columns at the south end of the porch support the wood-framed roof structure. The columns are 8 inches by 8 inches and 7 feet tall. Wood railings extend from the columns to the south wall of the building. At the east, a railing with a lattice infill panel is present, while only a railing is present on the west side of the porch. A metal railing extends from the southeast column down the east side of the stair to grade.

The roof structure of the south porch consists of 8-inch by 8-inch box beams that connect back to the building. A series of 2x8 wood joists spaced at 20 inches on center support the wood plank roof deck (Figure 49).



FIGURE 48. The south porch at Darrah Hall.



FIGURE 49. The roof structure at the south porch.

The north porch is similar in appearance and construction to the south porch (Figure 50). Like the south porch, the north porch is supported by two brick piers. The porch deck consists of 2x12 wood joists with 1-inch by 3-inch tongue-and-groove wood planks. Two wood columns support the porch roof. The railings on the north porch, which are present at the west side as well as both sides of the wood stair, are metal. Like the south porch, the wood-framed stair consists of six steps. A wood-framed accessible ramp extends from the east side of the porch along the north elevation of the building (Figure 51). The ramp consists of a wood railing made up of wood posts with lattice infill panels. The ramp connects to the concrete walk that leads from the accessible parking to the main porch on the east elevation.



FIGURE 50. The north porch at Darrah Hall.



FIGURE 51. The ramp along the north elevation.

Like the south porch, the roof structure of the north porch consists of 8-inch by 8-inch box beams that connect back to the building. A series of 2x6 wood joists support the wood plank roof deck (Figure 52).



FIGURE 52. The roof structure over the north porch.



FIGURE 53. The main entrance doors at the east elevation of Darrah Hall.

Exterior Doors. The main entrance to Darrah Hall is centered on the east elevation and consists of a double wood door with a transom window above (Figure 53). Each door measures 29 inches wide by 90 inches tall and consists of two panels: a square panel at the bottom and an arched panel above. The doors are 1-3/4 inches thick. Wood trim, 4 inches wide, lines the jambs of the doors and the transom above, with 5-inch trim present at the head of the door and at the head of the window. Contemporary door handles are present at each door, with a deadbolt at the north door (Figure 54). The interior of the door is identical to the exterior (Figure 55). Contemporary hardware consisting of push bars is present at the interior of each door.



FIGURE 54. Contemporary door hardware at the east entrance doors.



FIGURE 56. The entry door at the north porch.



FIGURE 55. The interior side of the main entrance doors.

A single wood door is present at the porches on the north and south elevations (Figure 56). Each door is 42 inches wide and 90 inches tall. The wood doors contain four panels and are surrounded by 4-inch trim. Each door has contemporary hardware (Figure 57). The interior of the doors are similar in appearance to the exterior (Figure 58). A contemporary push bar and kick plate are present on the interior of each door.



FIGURE 57. Contemporary hardware at the door at the north porch.

There are two doors at the west elevation of Darrah Hall (Figure 59). The wood, four-panel doors are nearly identical. Both doors measure 35 inches wide and 84 inches tall. Wood trim, 3-1/2 inches wide, surrounds each door. Contemporary door knobs and deadbolts are present at each door. The interior side of the door is nearly identical to the exterior (Figure 60).



FIGURE 58. The interior of the door at the north porch.



FIGURE 60. The interior of one of the west doors.



FIGURE 59. One of two doors at the west elevation of Darrah Hall.

Windows. The typical window at Darrah Hall is a six-over-six, wood, double-hung window. Eleven of these windows are on the building: two on the east elevation, four on both the north and south elevations, and one on the west elevation. Each of these windows measures approximately 40-1/2 inches wide by 78-1/2 inches tall (Figure 61). The window sash consists of 1-1/4-inch wide stiles and 1-inch wide rails. The sill rail at the lower sash is typically 2-5/8 inches wide. Wood trim, 3-3/4-inch wide surrounds the window openings at the head and jambs. The sill extends 5 inches from the window sash and 1-1/4 inches past the window trim.



FIGURE 61. A typical wood double-hung window.

At the interior, the windows are surrounded by 4-3/4-inch wood trim (Figure 62) at the jambs and head, and a two-piece sill that consists of 3-1/2-inch trim board below the 1-inch-thick sill piece. The window sash is recessed approximately 2-1/2 inches from the face of the interior trim.



FIGURE 62. An interior view of a typical wood double-hung window.



FIGURE 63. A typical wood shutter.

A wood shutter is present at each double hung window on the north, east, and south elevations (Figure 63). The shutters, which measure 39-3/4 inches wide by 77-3/4 inches tall, are constructed of 1x4 wood tongue-and-groove vertical planks.

On the interior face of the shutters, two horizontal 1x8s serve as cross bracing. Metal hinges are present at one end of the shutters.

A window is present at the gable end on the east and west elevations. At the east elevation is a circular, five-light window with multi-colored glass (Figure 64). The window is surrounded by wood trim. The window at the west gable end is diamond shape and contains multi-colored glass (Figure 65). The window is surrounded by wood trim.



FIGURE 64. The circular wood window at the east gable end.



FIGURE 65. The diamond shape window at the west gable end.

Roof. The main, gable roof of Darrah Hall is clad with red asphalt shingles (Figure 66). There are no penetrations in the roof. The shed roofs over the east porch as well as the small covered porches on the north and south elevations are also clad with asphalt shingles.

The soffits at the various roofs are exposed, while the fascia consists of wood board with a wood trim piece at the top edge (Figure 67). There are no gutters present on the building.



FIGURE 66. Darrah Hall from the southeast showing the main roof.



FIGURE 67. The soffit and fascia at the edge of the main roof.

Condition Assessment

- Deterioration of the wood siding was observed in several locations, particularly on the north elevation (Figure 68 and Figure 69).
- Paint failure at the wood siding and trim was observed throughout the exterior of the building (Figure 70).
- The scalloped shingle siding at the east gable end is deteriorated, with displaced and missing shingles (Figure 71).



FIGURE 68. Deterioration of the wood siding along the north elevation.



FIGURE 69. Deterioration of the wood siding at the west elevation.



FIGURE 70. Paint failure at a window sill.



FIGURE 71. Deterioration of the wood scalloped shingle siding. Note the missing and displaced shingles.



FIGURE 72. Portions of the wood columns on the east porch are missing.



FIGURE 73. Portions of the wood columns on the east porch are missing.

- Portions of wood at the base of the columns on the east porch are missing (Figure 72 and Figure 73).
- Paint failure was observed at the wood columns on the east porch (Figure 74).
- The stair leading to the east porch exhibits wood deterioration and paint failure (Figure 75).
- The stair at the south porch is deteriorated, with paint failure also observed (Figure 76).
- The railings at the stairs on the west elevation are damaged and deteriorated (Figure 77).
- The metal railing at the south porch stair is damaged, with portions of the railing detached from one another (Figure 78).



FIGURE 74. Paint failure was observed at the columns on the east porch.



FIGURE 75. Paint failure and deterioration was observed at the stair leading to the east porch.



FIGURE 76. Deterioration of the south stair. Note the extensive paint failure at the stair.



FIGURE 77. Railings along the west stairs are damaged and deteriorated.



FIGURE 78. The metal railing at the south porch stair is damaged.

- The wood lattice panels are damaged in several locations, with pieces of wood missing at the porches and accessible ramp (Figure 79).
- The wood stair at the north covered porch is deteriorated (Figure 80).
- Staining and paint failure were observed at the deck and railings of the accessible ramp on the north elevation (Figure 81).
- Widespread failure of the glazing putty was observed at the double-hung windows (Figure 82).
- Isolated glazing units were found to be cracked (Figure 83).



FIGURE 79. Portions of the wood lattice panels are missing at the south porch. This condition was also observed along the accessible ramp.



FIGURE 80. Deterioration of the north stair was observed.



FIGURE 81. Staining and deterioration was observed at the accessible ramp.



FIGURE 84. Paint failure was observed at several window sash.



FIGURE 82. Deteriorated and missing glazing putty was observed at several of the wood windows.



FIGURE 85. The lower sash at the central windows at the west elevation is missing.



FIGURE 83. Cracking of glazing units was observed at several windows.

- Paint failure was observed on the wood sash of the double-hung windows (Figure 84).
- The lower sash at the window centered on the west elevation is missing (Figure 85). A piece of plywood has been installed to cover the opening.
- Paint failure at the wood doors was observed, particularly on the west elevation (Figure 86).
- Both wood doors on the west elevation are cracked at the upper panels, with tape applied over the cracks (Figure 87).



FIGURE 86. Cracks were observed at both doors at the west elevation.



FIGURE 87. Tape was applied over the cracks at the doors at the west elevation.

- Isolated deterioration of the doors on the west elevation was noted (Figure 88).
- Staining of the roof over the north covered porch was noted.



FIGURE 88. Isolated deterioration of the doors at the west elevation was observed.

Interior Description

The interior of Darrah Hall is a single, uniform, rectangular space approximately 75 feet 6 inches long by 40 feet 3 inches wide with a raised platform or stage at the west end (Figure 89). Overall, the space is symmetrical around both the long, east-west axis and the short, north-south axis. The interior volume is delineated by five equal bays along the east-west axis articulated by exposed heavy timber structural framing. The timber framing consists of 6-inch by 8-inch posts spaced about 15 feet 2 inches on center along the north and south walls. Each post supports a built-up, heavy timber truss that spans across the width of the building (Figure 90).



FIGURE 89. Interior of Darrah Hall looking west toward the stage.



FIGURE 90. Interior of Darrah Hall looking east towards the main entrance.

The interior does not have a ceiling, so the space expands vertically to the underside of the sloped wooden roof deck, which rises to almost 26 feet above the floor to the top of the roof's ridge beam at the apex of the main trusses. These trusses are constructed of 6-inch by 10-inch bottom chords which bear on a post at each end of the trusses. A 10-inch deep beam at 12 feet 8 inches above the floor runs around the perimeter of the building at the top of the walls and connects to the posts and the lower chords of the trusses, completing the structural frame. A similar rim beam supported by masonry piers (described in the Foundation section above) also runs around the building and carries the floor joists. Wood-framed walls fill the spaces between the heavy timber posts and enclose the linear interior space.

Walls. The perimeter walls are 12 feet 8 inches high, and are framed with wood and clad with vertical and horizontal wood planks. A six-over-six, double-hung, wood window is centered in the wall of each of the five bays on the north and south walls, except in the fourth bay where there are doors instead of windows. All the windows have 3-1/2-inch-wide flat trim at the heads and jambs. The rounded, 1/2-inch-thick window sill aligns with the wainscot cap that runs horizontally around the space (Figure 91).



FIGURE 91. Typical wood detail at juncture of wainscot, window and wall cladding.



FIGURE 92. Note horizontal boards of wainscot below the wainscot cap and vertical boards above.

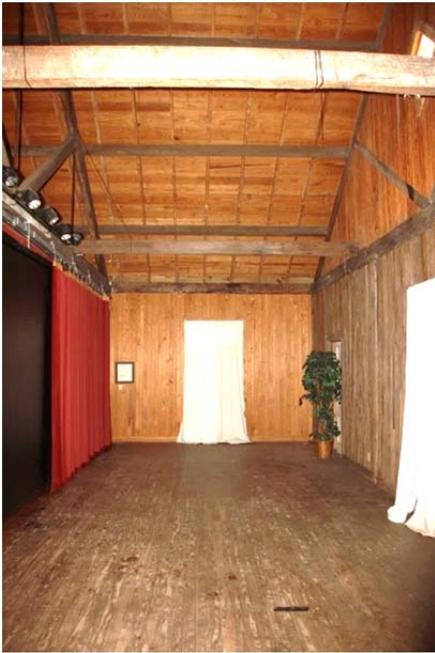


FIGURE 93. View of the stage looking south.

Below the windows is a continuous wood wainscot of horizontal 1x8 boards, a 6-inch-tall, plain wood baseboard, a quarter-round shoe mold along the floor, and cap molding with a rounded front edge. Above the wainscot cap molding, the walls are clad with 1x6 tongue-and-v-groove boards applied vertically (Figure 92). This detail is consistent in the building except on the walls surrounding the stage. In this bay, the walls are clad with narrow, wood bead board applied vertically and not divided by the wainscot cap molding (Figure 93).

The wainscot and the vertical tongue-and-v-groove wall cladding above it continue across the east end-wall. Vertical tongue-and-v-groove cladding also continues above the lower chord of the truss and fills the triangular portion of the end-wall below the sloped roof (Figure 94). At the west end-wall at the rear of the stage, the wall above the lower truss chord is also finished with vertical tongue-and-v-groove cladding.



FIGURE 94. View of the south end-wall.

All the wood wainscot and wall cladding have a clear, semi-gloss finish and is in good condition generally (Figure 95). Early photos show the interior of Darrah Hall with exposed wall framing, so it is likely that wood cladding was installed during a 1990s renovation project when the building was initially insulated and air conditioned. However, there is very little documented information regarding the scope of work for that project.



FIGURE 95. Note the sheen of the clear finish on this wainscot.

Ceiling. There is no typical ceiling inside Darrah Hall. Instead, the space expands upwards through the exposed heavy timber trusses to the underside of the pitched roof deck. The deck appears to be constructed of 1x8 boards attached to sub-purlins (Figure 96).



FIGURE 96. Roof deck attached to sub-purlins.

Trusses. Six original, heavy timber trusses are the primary structural elements of the building. Because they are visible and display the skill and craftsmanship of their builders, they are significant defining features of Darrah Hall.

The trusses were probably built on site. Each one comprises 6-inch by 10-inch upper and lower chords with 6-inch by 6-inch diagonal web members, and the joints are probably mortised. The ridge beam is set in a rabbeted joint at the apex of each truss. It is secured to the truss with a threaded steel rod that runs through the full height of the truss. Similarly, vertical steel rods tie together the timber connections at third points along the trusses (Figure 97 and Figure Figure 98). Three 4-inch by 6-inch main purlins are notched into the top chords on each side of the trusses. They span from truss to truss along the east-west axis of the building. Secondary purlins, approximately 2 feet on center, are perpendicular to the main purlins and run from the low eave to the ridge of the roof. Roof decking is fastened to the secondary purlins (Figure 99).



FIGURE 97. View of heavy timber trusses. Note steel rods at timber connections.



FIGURE 98. Steel rod at timber connections.

The Floor. Most of the existing 4-inch-wide wood flooring is original, and it appears to be heart pine with a medium brown stain (Figure 100). During the initial site visit in August 2017, Penn Center and National Park Service staff confirmed that a section of flooring was repaired and replaced. The date for the repairs was not specified. Newer floor boards were observed within an area from the base of the stage to the east about 11 feet and across the width of the building.

The original flooring is worn, with widespread cracks and splits and numerous holes and gouges (Figure 101). Previous attempts to patch some holes were observed (Figure 102).



FIGURE 99. Main purlin perpendicular to upper truss chord and smaller, secondary purlins parallel to upper truss chord.



FIGURE 100. Flooring. Note medium brown color.



FIGURE 101. Hole at the end of a floor board.



FIGURE 102. Hole repair in the floor.

The Raised Platform / Stage. The last bay at the west end of the interior space has a raised platform or stage that is 2 feet 6 inches higher than the main floor. It is approximately 15 feet 6 inches deep and 40 feet 3 inches wide. A full-width, red curtain hangs from a track attached to the bottom of the truss that is directly above the front edge of the raised platform (Figure 103). A retractable projection screen is mounted in front of the curtain at the center of the platform.



FIGURE 103. The raised platform / stage, looking north.



FIGURE 104. Steps up to the raised stage.

At the north and south ends of the platform there are steps up to the level of the stage. The steps are 2 feet 11 inches wide and have three treads and four risers (Figure 104). There are no handrails at either set of steps. Flooring on the raised platform / stage is the same as it is in the main space.

Two doors flank a single window in the back wall of the stage, and there are single windows in both the north and south walls (refer to Figure 103).

Doors and Windows. The primary entry into the building is from the east porch through a pair of 7-foot-6-inch-tall, two-panel doors with a three-light transom above. The upper panel in both doors has an arched top, making them unique compared to the other common four-panel doors in the building (Figure 105 and Figure Figure 106). As described earlier in this section of the report, the doors throughout Darrah Hall are in fair condition, and hardware is a mixture of contemporary knobs, latches, deadbolts, closers, and exit devices (refer to Figure 57, Figure 88 and Figure 105).



FIGURE 105. Main entrance doors with arched top panel



FIGURE 106. Typical four-panel door.

From inside, the six-over-six, double-hung, wood windows are in fair condition. Brass window locks are present, but there are no lift handles. At the time of the site visit, it was not determined if all the windows were operable (Figure 107). Further discussion of these windows is provided at the beginning of this this section.



FIGURE 107. Typical wood, double-hung window from inside.



FIGURE 108. Bulls-eye window in east gable.

Darrah Hall has two distinct windows that are considered significant features. One is the round, bulls-eye window in the east gable, centered above the entrance doors. It is clearly visible from inside and outside (refer to Figure 94). The four lights in the outer ring have alternating panes of colored glass, and the single, round center light has colored glass of a third hue (Figure 108).

The second distinctive window is centered in the west gable and is also visible from inside and outside the building (Figure 109). It is a diamond-shaped, fixed window with four equal sides. Here too, the window is divided into a border of sixteen small squares of alternating colored glass around a large center glass pane (Figure 110).



FIGURE 109. Diamond-shaped window in west gable from inside Darrah Hall.



FIGURE 110. Exterior of diamond-shaped window in west gable. Note colored glass panes.

Other Non-Original Features. In the southwest corner of the main space is very small L-shaped group of wooden cabinets with a stainless-steel, double-bowl sink on the south wall. Adjacent to the cabinets is a storage enclosure consisting of partitions that are approximately 5 feet 6 inches high and a pair of bi-fold doors. Behind the doors is a trash receptacle and a wooden counter that is open below. The cabinets and the storage enclosure are made of knotty pine with a clear protective finish (Figure 111).

Cabinet doors have brass hinges and round white knobs. The bi-fold doors at the enclosure are latched by a metal safety hasp.

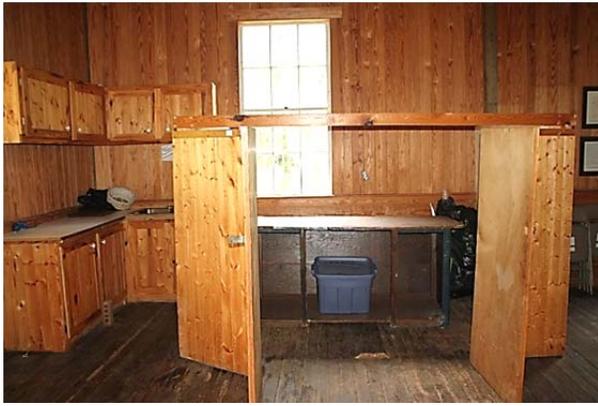


FIGURE 111. Cabinets and storage enclosure in the southwest corner of the interior space.

Mechanical and Electrical Systems. The current heating, ventilation, and air conditioning system (HVAC) is old and inefficient. It consists of a 1975 vintage, 15-ton York package unit next to the porch on the north side of the building. Propane gas is supplied by a tank which sits near the northwest corner of the building. Insulated supply ducts are routed under the building to floor registers inside Darrah Hall (Figure 112, Figure 113, and Figure Figure 114). Return air is pulled under the stage through damaged metal grilles in the vertical face of the platform (Figure 115). It could not be determined whether the space under the stage is a return air plenum or if there are return air ducts that run back to the outside HVAC package unit. Current codes would not allow the space under the stage to be a return air plenum.



FIGURE 112. HVAC package unit and propane gas tank beyond.



FIGURE 113. HVAC ducts in the crawlspace under Darrah Hall.



FIGURE 114. Floor register. Note rusted metal grille.



FIGURE 115. Metal return air grilles in the vertical face of the stage.

Information about the system's age or date of installation is not available, but it is conceivable that the equipment, which dates from the mid-1970s, was repaired in the mid-to-late 1990s in conjunction with a major rehabilitation of Darrah Hall. Penn Center and National Park Service staff noted that the equipment was broken and not operating for a lengthy period of time until the

blower motor was replaced and the fan belts were adjusted in July 2017.

Main ducts in the crawlspace under the building are lying on the ground and duct insulation is deteriorated or missing. Dirt and small debris have accumulated in the floor registers and the grills are rusted and damaged (refer to Figure 114). Controls are limited to a single thermostat, and it is not known if the HVAC system runs on a schedule in order to maintain a consistent temperature and control humidity levels or if the system is only in operation when Darrah Hall is occupied (Figure 116). Operating the system intermittently or not at all for periods of time will eventually be detrimental to the historic materials in the building.



FIGURE 116. Thermostat.

The electrical system seems to be adequate for the current loads and use of the building. A main conduit runs underground from a pole west of the building to a meter base at the southwest corner of the structure. The main electrical panel is adjacent to the meter base (Figure 117 and Figure 118). Metal electrical conduit is visible where it is attached to a sub-purlin and follows the roof slope to the four rows of pendant lights in the main interior space (Figure 119 and Figure 120). It is assumed that wiring to all the electrical devices (switches, receptacles, stage lighting, and mechanical equipment) is in metal conduit even when it is concealed in the walls. Future electrical upgrades should be planned so the system will handle new HVAC equipment and the power requirements of modern electronic devices.



FIGURE 117. Main electrical service at the northwest corner of Darrah Hall.



FIGURE 118. Main electrical service meter base and main panel.



FIGURE 119. Exposed metal electrical conduit to pendant lights.



FIGURE 120. Four rows of pendant lights in the main space.



FIGURE 121. Exit sign, emergency light and smoke detector above south door.

Basic life safety requisites are addressed by illuminated exit signs and battery-powered emergency lights above the main entrance and doors on the north and south sides of the main interior space (Figure 121 and Figure 122). There are no exit signs or emergency lights near the two doors in the west wall at the back of the stage. Some of the emergency lights are broken, and they

were not tested during the site visit. Smoke and fire detectors are also mounted at the east end of the north wall and near the door at the west end of the south wall, but the building is not sprinklered.



FIGURE 122. Exit sign and emergency light above main entrance. Note broken emergency light.

Condition Assessment

- The wood wall cladding and wainscot are not original materials but probably date from the 1990s. This material is generally sound and in good condition, particularly above the wainscot cap where it is less like to be subjected to wear and tear.
- The heavy timber trusses are character-defining elements of the interior. Although the wood has developed a patina, the members appear to be sound.
- Vertical steel rods tie together the timber connections of the trusses. Rust has developed on the rods, particularly on the bottom ends where there are nuts and washers.
- The heart pine flooring is badly worn, with widespread cracks and splits and numerous holes and gouges. The joints between floorboards have widened.
- Vertical boards on the face of the raised platform / stage are discolored and marred, and the finish is worn off in numerous places.
- The stage curtain is old and needs cleaning.

- Steps on the north and south ends of the stage are badly worn. Some treads have split and some nosings have splintered. There are no handrails.
- From the interior, the windows are in fair condition and exhibit minor deterioration. Also see above for a further condition assessment of windows on the exterior.
- Window locks are present, but there are no lift handles on the lower sashes.
- The pair of doors at the main entrance is in fair condition because it is protected from the weather by the east porch. Door hardware and locks may need to be replaced soon.
- The north and south doors are also protected from the weather by small porches, but they have experienced some deterioration, particularly on their exterior faces and along their bottom edges. Door hardware and locks may need to be replaced soon. Weather stripping is in poor condition or non-existent.
- Two doors in the west wall at the rear of the stage are in poor condition. Joints of the stiles and rails have opened, and moisture is causing the doors to deteriorate.
- The mechanical system is old and inefficient. It may not continue to operate for much longer.
- Ducts in the crawlspace are on the ground and can be inundated during heavy rains and flash flooding on St. Helena Island. Some duct insulation is torn and missing.
- HVAC supply and return air grilles are damaged and rusted.
- Batt insulation under the floor has fallen and some is missing.
- The electrical system seems adequate for now, but will require planned upgrades to accommodate new HVAC equipment and controls and modern electronic devices as this new park expands its programs.
- Current life safety measures are outdated and may no longer comply with current codes.
- All existing devices like illuminated exit signs, battery-operated emergency lights, and smoke and fire detectors should be tested for proper operation. A few of these devices are broken and should be repaired or replaced.
- Several bulbs need to be replaced in the pendant lights that illuminate the interior.

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Significance and Integrity

National Register of Historic Places

The National Register of Historic Places is the official list of the nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Park Service's National Register of Historic Places is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.⁷²

The significance evaluation identifies the important historical associations of the property, and comments on its architectural, archeological, and social value as they relate to the National Register of Historic Places. A property's significance is tied to a discrete period of time in which its important contributions were made and to relevant national, state, and local historic contexts.

Significance Criteria

In order for a property to be eligible for inclusion in the National Register of Historic Places, it must possess significance under one of four criteria. The Criteria for Evaluation for listing in the National Register of Historic Places state:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That 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; or
- D. That has yielded, or may be likely to yield, information important in prehistory or history.

Criteria Considerations

Ordinarily cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past fifty years shall not be considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- b. A building or structure removed from its original location but which is primarily significant for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

72. National Park Service, "National Register of Historic Places," accessed August 22, 2018, <http://www.nps.gov/nr/>.

- c. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life; or
- d. A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- g. A property achieving significance within the past fifty years if it is of exceptional importance.⁷³

National Register Status, Darrah Hall, Penn Center National Historic Landmark

National Register of Historic Places documentation reviewed for purposes of this project includes the following:

- *National Register of Historic Places (National Historic Landmark) nomination form, Penn Center Historic District*, prepared by Nenie Dixon, Historic Preservation, South Carolina Department of Archives and History, and Sarah Coprich, Penn Community Services, entered into the National Register on September 9, 1974. The historic district was designated a National Historic Landmark on December 2, 1974.

73. *Code of Federal Regulations*, Title 36, Part 60, "The National Register Criteria for Evaluation."

The 1974 National Register nomination addresses the history and significance of Penn School. The nomination cites the period of significance as nineteenth and twentieth centuries (per the nomination form in use at the time, centuries are indicated with a checked box) and specific dates of 1855, 1862, 1901, and 1951. Areas of significance indicated include education, political, social / humanitarian, and black history. The nomination notes that with the exception of the Brick Church, all of the buildings on the campus were constructed in the twentieth century and "are of no architectural significance."⁷⁴ However, the various resources on site are discussed and the significance of the overall campus is noted.

National Historic Landmark documentation was prepared by James Sheire, Historian, Office of Archeology and Historic Preservation, National Park Service, and is dated August 1974. The overall period of significance and designated areas of significance are similar to those identified in the signed nomination discussed above.⁷⁵ This document notes that other than the Brick Church, the buildings on site are of "no architectural significance," but also states:

The integrity of the Penn School is not derived from a single structure, but rather from the campus as a whole. All the structures are part of a 112 year history that has witnessed development from a rural school to a contemporary black community center.⁷⁶

- *National Register of Historic Places Multiple Property Documentation Form, Historic*

74. Dixon and Coprich, Section 7. See Section 7 for cited note regarding architectural significance.

75. James Sheire, *National Historic Landmark Documentation: Penn Center Historic District* (National Park Service, Office of Archeology and Historic Preservation, National Park Service, 1974). The historic district was designated a National Historic Landmark on December 2, 1974.

76. *Ibid.*, Section 7.

Resources of St. Helena Island, circa 1740–circa 1935, accepted October 6, 1988 (author’s name not given in document).

The National Register Multiple Property Documentation Form briefly mentions Penn School, but does not mention Darrah Hall.

- Gregory P. Downs and Kate Masur, *The Era of Reconstruction, 1861–1900: A National Historic Landmarks Theme Study*, produced by the National Historic Landmarks Program, Cultural Resources, National Park Service, U.S. Department of the Interior, 2017.

The Reconstruction Era National Historic Landmarks theme study describes the significance of the Penn School, as follows:

Schools of all kinds were another product of black institution building during Reconstruction. Freedpeople were deeply committed to creating schools and cultivating literacy. Every state in the Confederacy except Tennessee had, before the war, outlawed schooling for slaves and free black people. Even then, some southern African Americans, free and enslaved, had nonetheless managed to learn to read—sometimes in underground schools, or by teaching themselves, or from a fair-minded owner or other white person. Many slaves were well aware of the power of literacy; indeed, they had seen what literacy could do for masters. From the earliest days of the Civil War, as the US Army advanced on the Confederacy, freedpeople formed schools taught by the literate few or by northern teachers, both black and white.⁷⁷

One of those schools was the Penn School (Penn School Historic District, NHL, 1974) on St. Helena Island, South

Carolina, later renamed the Penn Center. Founded in 1862 as part of the “Port Royal Experiment,” the Penn School was one of the earliest schools established by northern missionaries in the occupied South and part of a broader effort by the federal government—along with missionaries and private businessmen—to implant northern ideals of free labor and public education in the South.

Under direction of its founders, Laura M. Towne and Ellen Murray, the school began in The Oaks plantation house, headquarters of the occupying US military forces in the region. From there it moved to the Brick Church, a Baptist church on the center of the island, and soon the school had a building of its own. Penn School eventually became the only secondary school for African Americans on the island, a place where black teachers were trained, and a center of community activity. Towne and Murray were exceptionally committed to their students and the community, remaining on the island for some forty years. For decades the Penn School remained a rare site of both academic and industrial education and a training ground for black landowners in the region. Citizenship schools at Penn were crucial training grounds for young African American activists in the post-World War II era. For more than a century, Penn School thus remained a crucial place for educational, community, and political organizing—a center that links the democratic aspirations of Reconstruction to those of the civil rights movement, and beyond.⁷⁸

- Proclamation 9567 of January 12, 2017, for Establishment of Reconstruction Era National Monument, by President Barack Obama. The proclamation notes:

... and the Penn School National Historic Landmark District, which also contains many objects of historic interest including Darrah Hall and the Brick Baptist Church, was designated in 1974 . . . Darrah Hall is

77. Downs and Masur, 29–30, citing James D. Anderson, *The Education of Blacks in the South, 1860–1935* (Chapel Hill: University of North Carolina Press, 1988); Ronald E. Butchart, *Schooling the Freed People: Teaching, Learning, and the Struggle for Black Freedom, 1861–1876* (Chapel Hill: University of North Carolina Press, 2010).

78. Downs and Masur, 29–30, citing Burton and Cross.

the oldest standing structure on the site of the Penn School grounds. Students and community members built it around 1903, during the transition in the South from the Reconstruction Era to an era of racial segregation and political disenfranchisement.⁷⁹

The findings of this Historic Structure Report conclude that Darrah Hall is a contributing structure to the district. Although somewhat altered on the exterior and interior, Darrah Hall survives with integrity to convey its historic associations.

Period of Significance

Darrah Hall was listed in the National Register of Historic Places on September 9, 1974, as a contributing property to the nationally significant Penn Center Historic District (NR 74001824). The historic district was designated a National Historic Landmark on December 2, 1974, utilizing the National Register nomination form (a specific National Historic Landmark form was not completed). At the time of the National Register listing and National Historic Landmark designation current guidance regarding establishing a period of significance had not been published; in the NR/NHL nomination, the period of significance for the Penn Center Historic District is broadly defined as nineteenth and twentieth centuries, with the oldest extant structure (the Brick Church) dating to 1855. Due to the date of the listing, the period of significance for the district is assumed to end in 1924 (current year at the time of listing, minus 50 years). However, the text of the nomination specifically states the following in Section 7, Description:

79. "Proclamation 9567 of January 12, 2017, Establishment of the Reconstruction Era National Monument," *Federal Register* 82, no. 12, January 19, 2017. Note that although the Proclamation cites a construction date of 1903 for Darrah Hall, archival documentation including photographic evidence suggests that the building was constructed during the 1890s, as further discussed in the history chapter of this report.

Structures on the campus span a period of over one hundred years, from the ante-bellum church to a retreat house constructed in 1968. . . The integrity of the Penn School is not derived from a single structure, but rather from the campus as a whole. All the structures are a part of a 112 year history that has witnessed development from a rural school to a contemporary black community center.⁸⁰

The nomination also specifically states the following in Section 8, Significance:

In 1948, when the State of South Carolina assumed responsibility for public education on St. Helena Island, the Penn Normal, Industrial, and Agricultural School's functions as a private normal and vocational school came to an end. Penn School became a community center incorporated in 1951 as Penn Community Services. Since 1951 Penn Community Services has developed a program centered on five functions: black land services, business development, preschool child development, a black cultural program oriented on the Gullah past, and a conference center for groups interested in black social, economic, and political concerns (Martin Luther King held a planning session at the center in preparation for his famous 1964 march on Washington). Today [1974], as in the days before the end of the Civil War, Penn is dedicated to promoting the interests of blacks through self-help and education.⁸¹

The suggested period of significance for Darrah Hall is circa 1901–1969, beginning with an estimated (and photo documented) date of existence and ending with the current year, minus fifty years. Period of significance is the time during which a property was associated with important events, activities, or persons, or attained the characteristics which qualify it for listing in the National Register or as a National Historic Landmark. The circa 1901–1969 period of significance includes the estimated construction date of the extant structure, and any additions and/or alterations made to the resource into the modern civil rights era, encompassing a time period in which the Penn Center National Historic

80. Dixon and Coprich, Section 7

81. *Ibid.*, Section 8

Landmark District is designated for its significance in the areas of education, politics, and social history.

Character-Defining Features

The historic nature of significant buildings and structures is defined by their character, which is embodied in their identifying physical features. Character-defining features can include the shape of a building; its materials, craftsmanship, interior spaces, and features; and the different components of its surroundings.⁸²

The following list identifies existing character-defining features found on the exterior and interior of Darrah Hall:

Exterior

- General configuration and orientation
- Sloped gable roof
- Wood siding (plain board and scalloped shingle)
- Red clay brick piers at foundation
- Projecting front and side porches
- Front porch columns
- Shape and configuration of window openings and historic wood-framed windows, including round, bulls-eye window with stained glass in east-facing gable end wall, and diamond-shaped window with stained glass in west-facing gable end wall
- Exterior window shutters at the double-hung windows

- Shape and configuration of door openings and historic wood doors

Interior

- Original floor plan: simple rectangular plan with a raised platform / stage at the west end
- Vernacular interior spatial form (volume) composed of tall side walls, exposed roof structure and exposed roof decking / sloped ceiling
- Original interior woodwork, wood flooring, exposed framing, and built-up roof trusses with steel tie rods
- Unfinished wood surfaces, transparent finish interior wood surfaces

Assessment of Integrity

Assessment of integrity is based on an evaluation of the existence and condition of the physical features that date to a property's period of significance, taking into consideration the degree to which the individual qualities of integrity are present. The seven aspects of integrity as defined in the National Register Criteria for Evaluation are location, design, setting, materials, workmanship, feeling, and association. As noted in *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*:

Location is the place where the historic property was constructed or the place where the historic event occurred. . . .Design is the combination of elements that create the form, plan, space, structure, and style of a property. . . .Setting is the physical environment of a historic property. . . .Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. . . .Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. . . .Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. . . .Association is the

82. Lee H. Nelson, FAIA, *Preservation Brief 17: Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character* (Washington, DC: National Park Service, Technical Preservation Services, 1988).

direct link between an important historic event or person and a historic property.⁸³

The property must retain the essential physical features that enable it to convey its historical significance. The essential physical features are those features that define both why a property is significant (National Register criteria) and when it was significant (period of significance). The *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* defines integrity as “the ability of a property to convey its significance.”⁸⁴

The historic integrity of Darrah Hall has been assessed within the context of the contribution of the building to the Penn Center National Historic Landmark site.

Integrity of Location. Darrah Hall retains limited integrity of location in relationship to its original site because it has been relocated; however, integrity of location is somewhat less diminished in that the building remains a part of the Penn Center complex.⁸⁵

Integrity of Design. Darrah Hall retains integrity of design. The interior in particular has been altered over time; however, the building continues to reflect its overall historic appearance. This is especially true of the building exterior as part of the overall campus.

Integrity of Setting. Darrah Hall retains integrity of setting. Although it has been moved from its original location, it is still set within a turfed area within view of other campus buildings, with a few trees nearby within the site.⁸⁶

Integrity of Materials and Workmanship.

Darrah Hall retains integrity of materials and workmanship. The exterior, and particularly the interior, have been altered over time through repairs and other modifications. However, the building continues to reflect its original materials and historic appearance.

Integrity of Feeling. Darrah Hall retains integrity of feeling. Although relocated and somewhat altered, the structure can be readily understood in terms of its original appearance and function and continues to be interpreted as such today. Additionally, alterations to the building have not significantly altered its historic character.

Integrity of Association. Darrah Hall retains integrity of association. The structure retains its relationship to the other historic structures of Penn Center and continues to convey its historic purpose and function.

83. National Park Service, 1997, 44–45.

84. Ibid.

85. Archival documentation does not clearly confirm that the existing Darrah Hall is the building constructed in the 1890s and subsequently moved to its present location. Refer to the history chapter of this report for further discussion.

86. Refer to history chapter for further discussion of the relocation of Darrah Hall.

Treatment and Use

Requirements for Treatment and Use

The following discussion of treatment and use for Darrah Hall has been prepared based on historical research, condition assessment, and discussion with the National Park Service to understand intended current and future use of the building. Darrah Hall considered a contributing structure to the Penn Center Historic District and the Reconstruction Era National Historical Park, and survives with sufficient integrity to convey its historic associations.

As such, treatment and use of Darrah Hall should be considered within the context of the legal mandates and policy directives established by NPS Cultural Resources Management Guideline (Director's Order 28) for the protection of cultural resources. The building is expected to be used by the park for interpretation of the history of Penn Center and the Reconstruction Era National Historical Park, as well as potentially in the future for programs and community activities.

Laws, Regulations, and Functional Requirements

Key laws, regulations, and functional requirements that apply to the recommended work include the following:

- National Park Service Cultural Resources Management Guideline (Director's Order 28), which requires planning for the protection of cultural resources on park property.
- Section 106 of the National Historic Preservation Act, which mandates that federal agencies, including the National Park Service,

take into account the effects of their actions on properties listed or eligible for listing in the National Register of Historic Places and give the Advisory Council on Historic Preservation a reasonable opportunity to comment.

Treatment of the building and site are also to be guided by the following:

- *Secretary of Interior's Standards for the Treatment of Historic Properties*
- National Park Service Management Policies, 2006
- Architectural Barriers Act Accessibility Standards (ABAAS)
- International Building Code (IBC), 2018⁸⁷
- International Plumbing Code (IPC)
- National Electrical Safety Code (NESC)
- National Fire Protection Association (NFPA) 101: Life Safety Code (LSC), 2015 and NFPA 1 Uniform Fire Code
- National Park Service Guiding Principles of Sustainable Design

The National Park Service is self-regulating in terms of enacting and enforcing building code

87. South Carolina has adopted the 2015 IBC but has not adopted the 2015 International Existing Building Code (IEBC) for statewide applicability. Some local agencies within the state have adopted the IEBC; however, Beaufort County has not.

standards. The Reconstruction Era National Historical Park is therefore not legally subject to local or state building code requirements. When undertaking repairs to buildings structures, the National Park Service endeavors to have the work comply with model building code standards. At this time, the 2018 IBC is the model building code used by the NPS for design and construction. The NPS Denver Service center also references the 2018 IEBC, with appendices and Resource A.

With historic structures, attempts to achieve strict conformance with model building code standards that are intended for new buildings can lead to destruction of the historic fabric. Alternative compliance procedures, such as Chapter 12 of the IEBC relating to historic buildings, should be referenced in determining code compliance. For Darrah Hall, alternatives to full prescriptive legislative and code compliance should be considered where such compliance would compromise the integrity of the structure.

The 2018 IEBC includes the following statements in Section 507, Historic Buildings:

507.1 Historic buildings. The provisions of this code that require improvements relative to a building's existing condition or, in the case of *repairs*, that require improvements relative to a building's pre-damage condition, shall not be mandatory for *historic buildings* unless specifically required by this section.

507.2 Life safety hazards. The provisions of this code shall apply to *historic buildings* judged by the building official to constitute a distinct life safety hazard.

507.3 Flood hazard areas. Within flood *hazard areas* established in accordance with Section 1612.3 of the *International Building Code*, or Section R322 of the *International Residential Code*, as applicable, where the work proposed constitutes *substantial improvement*, the building shall be brought into compliance with Section 1612 of the *International Building Code*, or Section R322 of the *International Residential Code*, as applicable:

Exception: *Historic buildings* need not be brought into compliance that are:

1. Listed or preliminarily determined to be eligible for listing in the National Register of Historic Places;
2. Determined by the Secretary of the US Department of Interior as **contributing** to the historical significance of a registered historic district or a district preliminarily determined to qualify as an historic district; or
3. Designated as historic under a state or local historic preservation program that is approved by the Department of Interior.

507.4 Structural. Historic buildings shall comply with the applicable structural provisions in this chapter.

Exceptions:

1. The *code official* shall be authorized to accept existing floors and existing live loads and to approve operational controls that limit the live load on any floor.
2. Repair of *substantial structural damage* is not required to comply with Sections 405.2.3, and 405.2.4. *Substantial structural damage* shall be repaired in accordance with Section 405.2.1.⁸⁸

The IEBC exceptions noted above pertain to Darrah Hall as part of Reconstruction Era National Historical Park, including Penn Center Historic District, as a property listed in the National Register.

In addition, the National Park Service provides guidance on sustainability in work on historic structures, in terms of energy efficiency, technology, and sustainable preservation in practice, as described in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated*

88. International Code Council, Inc., *International Existing Building Code 2018* (Country Club Hills, Illinois: International Code Council, 2018).

*Guidelines on Sustainability for Rehabilitating Historic Buildings.*⁸⁹

Also, newly installed electrical systems and components, including any significant alterations to existing electrical systems, should comply with applicable provisions of the NFPA 70: National Electrical Code (NEC).

Alternatives for Treatment and Use

The NPS has developed definitions for the four major treatments that may be applied to historic structures: preservation, rehabilitation, restoration, and reconstruction. The four definitions are as follows:

Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project. However, new exterior additions are not within the scope of this treatment. The Standards for Preservation require retention of the greatest amount of historic fabric along with the building's historic form.

Rehabilitation is defined 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. The Rehabilitation Standards acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building's historic character.

Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project. The Restoration Standards allow for the depiction of a building at a particular time in its history by preserving materials, features, finishes, and spaces from its period of significance and removing those from other periods.

Reconstruction is defined as the act or process of depicting by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location. The Reconstruction Standards establish a limited framework for recreating a vanished or non-surviving building with new materials, primarily for interpretive purposes.⁹⁰

Of the four treatment approaches, *preservation*, which involves sustaining the building in its existing form, is to some extent in progress as a result of ongoing repair and cyclical maintenance implemented by the park and is an appropriate treatment approach until park management determines the Ultimate Treatment.

Rehabilitation, which involves making possible a compatible use through repair, alterations, or additions, is not appropriate because an Ultimate Treatment has not yet been determined by park management. After a use has been defined by the park, it may be appropriate to revise the treatment approach to rehabilitation to meet the needs of

89. Anne E. Grimmer with Jo Ellen Hensley, Liz Petrella, and Audrey T. Tepper, *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings* (Washington, DC: US Department of the Interior, National Park Service, Technical Preservation Services, 2011).

90. Grimmer.

contemporary park visitation, interpretation, and National Park Service management needs.

Retention of original materials and character-defining features during rehabilitation work is practical and appropriate and will also assist in the interpretation of Darrah Hall as part of the Penn Center Historic District and the Reconstruction Era National Historical Park.

Ultimate Treatment and Use

Guidelines for Treatment

Guidelines and recommendations for treatment for Darrah Hall have been defined based on the preservation objectives and requirements for treatment and use outlined above. All treatment guidelines and recommendations were developed in accordance with the Secretary of Interior's Standards for Preservation.

The Secretary of the Interior's Standards for Preservation are as follows:

1. A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.
2. The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Work needed to stabilize, consolidate and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection and properly documented for future research.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color and texture.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.⁹¹

Guidelines for implementing the treatment recommendations provided herein are as follows:

- Undertake all work on the structure in compliance with the *Secretary of the Interior's Standards for Preservation*.
- Retain the character of the historic structure and environs by protecting the building and maintaining the site.
- Ensure that proposed new elements or construction are compatible with the historic character of the structure and its site.
- Protect adjacent natural resources during construction activities.
- Document through detailed as-built drawings, photographs, and written narrative all changes and treatments to the building and its immediate site. Maintain records of treatments and preserve documentation according to

91. Ibid. The guidelines that accompany the Standards also note that new materials should be distinguishable from old.

professional archival standards. Maintain a copy of records in the NPS archives.

- Retain features and materials at both the exterior and interior of the buildings that survive from the period of significance to the greatest extent possible.
- Incorporate sustainable design principles in all future projects that respect the preservation principles listed above.

Recommendations

Exterior

- Locations of deteriorated or missing trim and siding in the exterior envelope should be repaired by the addition of matching wood siding or trim. Repairs to siding should be integrated with the existing clapboard or scalloped shingle siding.
- Decay at wood siding, trim, and decorative elements should be removed and new wood dutchman units installed. The dutchman units should match the existing wood in profile and primed and painted to match the existing wood.
- Deteriorated wood window sash should be repaired or replaced. As part of repairs, the sash should be removed, deglazed, and the deteriorated portions of the sash removed and replaced with new wood dutchman and epoxy. Window sash should be adjusted and joinery reinforced so that frames are square.
- Missing wood window sash should be replaced. The new sash should match the existing sash and should be primed and painted to match.
- New glazing should be installed at locations where existing glazing is cracked or damaged.
- New glazing putty should be installed at locations where the existing putty is damaged or missing.
- At locations where portions of wood are missing from the base of the columns on the east porch, new wood elements should be installed. The new wood elements should match the existing wood in profile and should be primed and painted to match the existing.
- Deteriorated tongue-and-groove deck boards should be removed and replaced. New boards should be the same wood species and match the existing boards in dimensions, profile, color, texture and appearance. New boards should be primed on all faces prior to installation and then painted to match existing.
- Deteriorated wood boards at the exterior stairs should be removed and replaced. New boards should be the same wood species and match the existing boards in dimensions, profile, color, texture, and appearance. New boards should be primed on all faces prior to installation and then painted to match existing.
- At locations where paint failure is observed, the wood surface should be scraped, spot primed, and painted to match the original color scheme, using alkyd-based paints formulated for exterior wood.
- In areas of wood siding or decking that experience organic growth, the wood surface should be gently washed with a biocide and repainted using alkyd-based paints. For areas where mildew recurs rapidly, consideration could be given to stripping the surface to bare wood and repainting using alkyd-based paints containing anti-microbial additives.
- The damaged metal railing at the south porch stair should be repaired and reattached. Weld broken joints and grind the welded joints smooth to match the profile of the metal rail components at the joints. Prime and paint the railing.
- The asphalt-shingle roof should be maintained and periodically monitored for indications of

water infiltration. Any debris that accumulates on the roof should be removed.

- The building should be inspected and treated regularly for termites and other insect pests that are endemic in the region.
- Consideration could be given to providing new wood-framed screens at all operable windows, if future research shows they were present historically. If screens are historically appropriate, they should replicate the materials, dimensions, profile, configuration, and appearance of the original screens.

Interior

- Interior wood trusses, purlins, posts, and beams are original elements of the building and should be periodically monitored for signs of deterioration before it becomes serious and widespread. These heavy timber wood components are sound and have developed a natural patina that distinguishes them from newer wood members. Retain and preserve this heavy timber wood material. Do not sand or apply a finish to these timber components.
- Steel tie-rods are integral elements of the timber trusses. Surface rust should be removed by hand and without chemicals if necessary to restore the steel to its natural surface condition. Unless roof leaks occur or condensation forms on the steel, rust should not become a problem.
- Use only gentle cleaning methods on interior wood materials that have a clear protective finish. Harsh cleaners or chemicals should be avoided.
- Severely damaged or deteriorated wood wall cladding and trim with should be repaired with wood dutchman units that match the existing wood in size, shape, and profile. A new finish should be applied to the dutchman units that matches the finish on the adjacent wood material.
- The four-panel doors in the north, south, and west walls are not original and are non-character-defining. Repair the existing doors with dutchman units that match the existing size, shape, and profile of the stiles and rails. If it is necessary to replace the entire door, the replacement door should match the existing door.
- New and existing doors should be adjusted to fit in their frames with minimal perimeter gaps. Consider installing pressure-treated wood thresholds as needed and installing spring bronze weather stripping to minimize air and moisture infiltration and increase energy efficiency.
- The original pine flooring, a contributing feature, should be retained and preserved, even though it is worn, splintered, and split. The floor should be repaired where needed by carefully cutting and removing individual floorboards that are deteriorated or where there are holes or end gaps wider than 3/16 inch. A new piece of flooring should be installed that matches the original floorboard in thickness, width and profile. Stain and protective finish should be installed to match the adjacent flooring.

ADA ABA Improvements

- Consideration could be given to installing unobtrusive, ABAAS-compliant handrails at the steps to the raised platform.

Mechanical Systems

- The current mechanical system is old and inefficient. Maintaining consistent temperature and humidity is critical to the preservation of interior wood materials. A new HVAC system should be designed and installed to maintain appropriate levels of indoor temperature and humidity that will minimize excessive humidity and dry heat.
- A new system should be planned and designed that will minimize the removal and destruction of historic materials and character-defining features.

- Supply and return grilles should be as unobtrusive as possible. To the greatest extent feasible, reuse existing supply and return grill locations.
- Ducts should be thoroughly sealed to prevent air leaks and then insulated to inhibit condensation.
- Consider having a licensed electrical engineer inspect the existing electrical system and provide recommendations to upgrade it to meet current codes and the requirements of a new HVAC system.
- Also consider upgrading the electrical system to accommodate anticipated programmed uses for and activities in the building, for example, uses that may require internet service or Wi-Fi.

Current and forthcoming work.

The park has not indicated work currently planned to be completed at Darrah Hall.

Recommendations for Further Research

1. Further archival research is recommended to determine when the existing windows were installed, and whether screens were present during the period of significance. The limited information discovered and available through research conducted for this HSR made it problematic to assert that screens were present on the original windows of the reconstructed (current) Darrah Hall (perhaps dating to approximately 1893 or 1894 but photographically documented in 1899). Window screens were in common use at the beginning of the twentieth century, but as shown in the nineteenth-century and early twentieth-century photographs included in the HSR, shutters were present on the windows and in most of those photographs, the shutters are closed. If there were screens present during that time period, the shutters obscured them. The National Register nomination form and National Historic

Landmark documentation for Penn Center Historic District do not describe Darrah Hall in much detail; it does not provide evidence of the date of construction of the current building (it is listed on the 1974 National Register form as abandoned); and it does not provide even a general description of Darrah Hall that could have included the windows. Finally, limited documentation of the rehabilitation of Darrah Hall in the 1990s, after a capital campaign to fund the work, resulted in the assumption that the current windows date from that project. They are modern, double-hung windows and do not appear to be original windows that were repaired or restored, so there is no existing physical evidence that the original windows had screens. Therefore, we recommended further archival research as the best way to determine more conclusively whether Darrah Hall had window screens during the period of significance.

2. Further research is also recommended to understand the historic character of the foundation piers. The current brick piers at the building's perimeter, like the concrete block piers under the building, may not be from the period of significance. Testing / analysis of mortar and brick samples could be performed to help determine if the brick piers possibly date to the reconstruction of Darrah Hall around 1893–1894 or if the piers were repaired, re-built, or replaced during the 1990s rehabilitation of Darrah Hall.
3. Further research could also be conducted to understand how the building has been affected by natural and environmental events, such as hurricanes and severe storms, over time. This information may be useful in determining how the resource can be protected in the future. Documentation of the effects of environmental events on the historic resource in the future would be helpful in understanding how the building may need to be protected going forward.

Resilience to Natural Hazards

Located near the Atlantic coastline, on low-lying terrain in a region of marshes and wetlands crossed by rivers and streams, the Penn Center Historic District on St. Helena Island is vulnerable to current and future threats associated with natural hazards and environmental variability. A study entitled, *Climate Change Impacts to Natural Resources in South Carolina*, by the South Carolina Department of Natural Resources and published in 2013 noted: “A predicted result of climate change is the increase in intense storm events causing greater water inputs in shorter periods of time, affecting flood frequency and duration.”⁹² As noted in a 2016 study by the Environmental Protection Agency: “Since 1958, the amount of precipitation during heavy rainstorms has increased by 27 percent in the Southeast, and the trend toward increasingly heavy rainstorms is likely to continue.”⁹³

Over the past 80 years, relative sea level has risen 10 inches at the National Oceanographic and Atmospheric Administration (NOAA) monitoring station in Charleston Harbor.⁹⁴ Although the ocean rises and falls at different rates at different locations, making some coastal regions more vulnerable to flooding than others, in general a 1 inch rise in sea level translates to 100 inches of shoreline retreat.⁹⁵ In an area such as St. Helena Island, flooding from more frequent severe storms and rising seas, together with sinking of wetlands and loss of sediment due to development, contribute to erosion and have significant negative impacts on the natural environment. In addition to the effect on the natural environment and landscape of historic sites, severe storms and

flooding threaten cultural resources such as Darrah Hall. This structure is somewhat protected from flooding by its construction, raised above grade on piers, although it is still considered vulnerable. Park personnel reported that flooding during severe storms and a hurricane in 2016 made the site inaccessible at times, but did not result in flooding of Darrah Hall.

The South Carolina Department of Natural Resources (SCDNR) has identified core efforts, including recommendations for focused policies and opportunities; research and monitoring to standardize protocols and state-specific data and predictive modeling; communications and outreach; adaptation of activities; and suggested agency operational improvements (e.g., energy, fuel, and water efficiency, etc.).⁹⁶ The recommendations developed by the SCDNR for natural resources may provide ideas for improving management of cultural resources as well.

Especially critical for coastal historic sites is identification of the resources anticipated to be threatened—both buildings and landscapes—and planning for protection as well as mitigation in the face of more frequent severe storms and sea level rise. As loss of historic resource integrity may occur, suddenly or slowly, from conditions related to natural hazards and environmental variability, documentation can serve to help mitigate anticipated loss or diminishment, and to plan for adaptation. This Historic Structure Report, including the historical narrative condition assessment, and recommendations, together with photographs and measured drawings, is an important part of the documentation process.

As part of future efforts to build on and update the documentation provided in this Historic Structures Report, consideration can be given to developing detailed documentation using three-dimensional scanning technology, as well as monitoring weather-related deterioration, updating emergency and disaster planning, and strategic planning for mitigation of impacts on park resources. The latter may include special

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92. Bob Perry, compiler and editor, *Climate Change Impacts to Natural Resources in South Carolina* (Columbia: South Carolina Department of Natural Resources, 2013), 16.
93. *What Climate Change Means for South Carolina*, U. S. Environmental Protection Agency, EPA 430-F-16-042 (August 2016).
94. “Rising Tide: Will Climate Change Drown Coastal Wetlands?” *Coastal Heritage* 21, no. 3 (Winter 2007), 3–6.
95. *Ibid.*

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96. Perry, 100.

protection, documentation, and interpretation measures to address resources that are especially vulnerable to damage or loss.

Efforts conducted for Darrah Hall will benefit from coordination with other planning and documentation projects under consideration or in the process of being implemented by the National Park Service in the Southeast Region. For example, the National Park Service is currently conducting studies of several coastal national parks, comparing average temperatures and precipitation for intervals from 1901 through 2012.⁹⁷ Findings of this assessment indicated that recent climatic conditions are already shifting beyond the historical range of variability, and that environmental variability will manifest itself not only in changes to temperature and precipitation, but also in changes in particular climate events (e.g., strong storms, floods, and droughts), which will affect the condition of park resources. The

study will inform adaptation and assist park personnel in understanding how recent environmental conditions compare with those experienced in the past, as well as in interpretation of impacts on park resources.⁹⁸

Although Darrah Hall avoided severe damage as a result of recent severe storms, future severe weather events, rising sea levels, and other impacts should be anticipated and considered in planning for protection and maintenance of the site and its resources.

97. Bill Monahan and Nicholas Fischelli, "Recent Climate Change Exposure of Gulf Islands National Seashore," *Climate Change Resource Brief* (U.S. Department of the Interior, National Park Service, Natural Resource Stewardship & Science, August 1, 2014). See also Sandra Fatorić and Erin Seekamp, North Carolina State University College of Natural Resources, Department of the Interior Southeast Climate Science Center, *Assessing Historical Significance and Use Potential of Buildings within Historic Districts: An Overview of a Measurement Framework Developed for Climate Adaptation Planning*, AG-832 (Raleigh, North Carolina: North Carolina State Extension, 2017), citing Katie McDowell Peek., Robert S. Young, Rebecca L. Beavers, Cat Hawkins Hoffman, Brian T. Diethorn, and Shawn Norton, *Adapting to Climate Change in Coastal Parks: Estimating the Exposure of Park Assets to 1 m of Sea-Level Rise*, *Natural Resource Report NPS/NRSS/GRD/NRR—2015/961* (Fort Collins, Colorado: US Department of the Interior, Natural Resource Stewardship and Science, 2015). See also National Park Service., "Policy Memorandum 14-02: Climate Change and Stewardship of Cultural Resources" 2014, accessed July 17, 2018, www.nps.gov/policy/PolMemos/PM-14-02.htm.

98. Monahan and Fischelli.

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Bibliography

- Anderson, James D. *The Education of Blacks in the South, 1860–1935*. Chapel Hill: University of North Carolina Press, 1988.
- Anyaso, Hillary Hurd. "Historian's work foundation of new national monument," *Northwestern Now*, January 30, 2017. <https://news.northwestern.edu/stories/2017/01/historians-work-foundation-of-new-national-monument/>.
- Beaufort County Planning and Development. "The Corners," *Beaufort County Historic Sites*. Beaufort, South Carolina: Beaufort County Planning and Development, 2017.
- Burton, Orville Vernon, and Wilbur Cross. *Penn Center: A History Preserved*. Athens: University of Georgia Press, 2014.
- Butchart, Ronald E. *Schooling the Freed People: Teaching, Learning, and the Struggle for Black Freedom, 1861–1876*. Chapel Hill: University of North Carolina Press, 2010.
- Dixon, Nenie, and Sarah Coprich. *National Register of Historic Places (National Historic Landmark) Nomination Form, Penn Center Historic District*. Entered into the National Register of Historic Places on September 9, 1974 and designated a National Historic Landmark on December 2, 1974.
- Donation Warranty Deed, Tract No. P01-100, Darrah Hall and Related Areas, Beaufort County, South Carolina, Received, SK354, Pages 485-490, File No. 2017001662, January 10, 2017.
- Downs, Gregory P., and Kate Masur. *The Era of Reconstruction, 1861–1900: A National Historic Landmarks Theme Study*. Washington, DC: National Historic Landmarks Program, National Park Service, 2017.
- "Etc.: Saving Historic Penn Center," *Beaufort Gazette*, May 10, 1992, N.p.
- "Executive Order 13514 of October 5, 2009: Federal Leadership in Environmental, Energy, and Economic Performance." Washington, DC: *Federal Register* 74, no. 194, October 8, 2009.
- Fant, Mrs. James W. *NRHP Inventory-Nomination, Historic Beaufort, South Carolina*. Columbia: South Carolina Department of Archives & History, November 1, 1969.
- Fastenau, Stephen. "Clyburn, Park Service hear overwhelming support for Reconstruction monument," *Beaufort Gazette*, December 15, 2016.
- Fatorić, Sandra, and Erin Seekamp. North Carolina State University College of Natural Resources, Department of the Interior Southeast Climate Science Center. *Assessing Historical Significance and Use Potential of Buildings within Historic Districts: An Overview of a Measurement Framework Developed for Climate Adaptation Planning, AG-832*. Raleigh: North Carolina State Extension, 2017.
- Gonzalez, Patrick. "Climate Change Trends for Planning at Congaree National Park, South Carolina." Washington, DC: National Park Service, Natural Resource Stewardship and Science, February 11, 2013.

Bibliography

Grimmer, Anne E. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*. Washington, DC: US Department of the Interior, National Park Service, Technical Preservation Services, 2017.

_____, with Jo Ellen Hensley, Liz Petrella, and Audrey T. Tepper. *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*. Washington, DC: US Department of the Interior, National Park Service, Technical Preservation Services, 2011.

Harman, Dan. "Penn Center: Where African American History & Culture Come Alive," *Sandlapper*, Autumn 1997, 14.

Harvey, Bruce (Brockington and Associates, Inc.), Colin Brooker (Brooker Architectural Design Consultants), David B. Schneider (Historic Beaufort Foundation), and Sarah Fick (Preservation Consultants, Inc.). "Intensive Level Building Inventory Form – Darrah Hall," *Beaufort County Above Ground Historic Resources Survey, Beaufort County, South Carolina*. N.p.: Brockington and Associates, Inc., 1997.

Heggstrom, Margaret E., Steve Bailey, Ramsey Jefferson, Jr., Ellis Major, Shelia Rhodan, John Washington, and Anthony Benny Young. *Penn—A History—1861–1982*. Funded under Title IX, Department of Labor. Columbia, South Carolina: Office of the Governor, C&TA Division, 1982.

International Code Council, Inc. *International Existing Building Code 2018*. Country Club Hills, Illinois: International Code Council, 2018.

Martin, Frank, ed. *Moments for the Past: An Exhibition in Celebration of the Penn Center of the Sea Islands March 19, 1993–June 30, 1993 at the I.P. Stanback Museum & Planetarium, South Carolina State University*. Orangeburg: South Carolina State Museums, 1993.

Memories of Penn School by Graduates and Former Students. N.p., 2002.

Monahan, Bill, and Nicholas Fischelli. "Recent Climate Change Exposure of Gulf Islands National Seashore," *Climate Change Resource Brief*. Washington, DC: US Department of the Interior, National Park Service, Natural Resource Stewardship & Science, 2014.

National Park Service. *Foundation Document: Reconstruction Era National Monument, South Carolina*. Washington, DC: US Department of the Interior, National Park Service, January 2019.

_____. "National Register of Historic Places." Accessed November 20, 2017, <http://www.nps.gov/nr/>.

_____. "Policy Memorandum 14-02: Climate Change and Stewardship of Cultural Resources." National Park Service. February 10, 2014. Accessed July 17, 2018, <http://www.nps.gov/policy/PolIMemos/PM-14-02.htm>.

_____. "Reconstruction Era National Monument." Accessed November 14, 2017, <https://www.nps.gov/reer/planyourvisit/index.htm>.

_____. Southeast Region Office. "Statement of Work for Darrah Hall and Old Firehouse, REER, Beaufort South Carolina." Atlanta, Georgia: National Park Service, Southeast Regional Office, 2017.

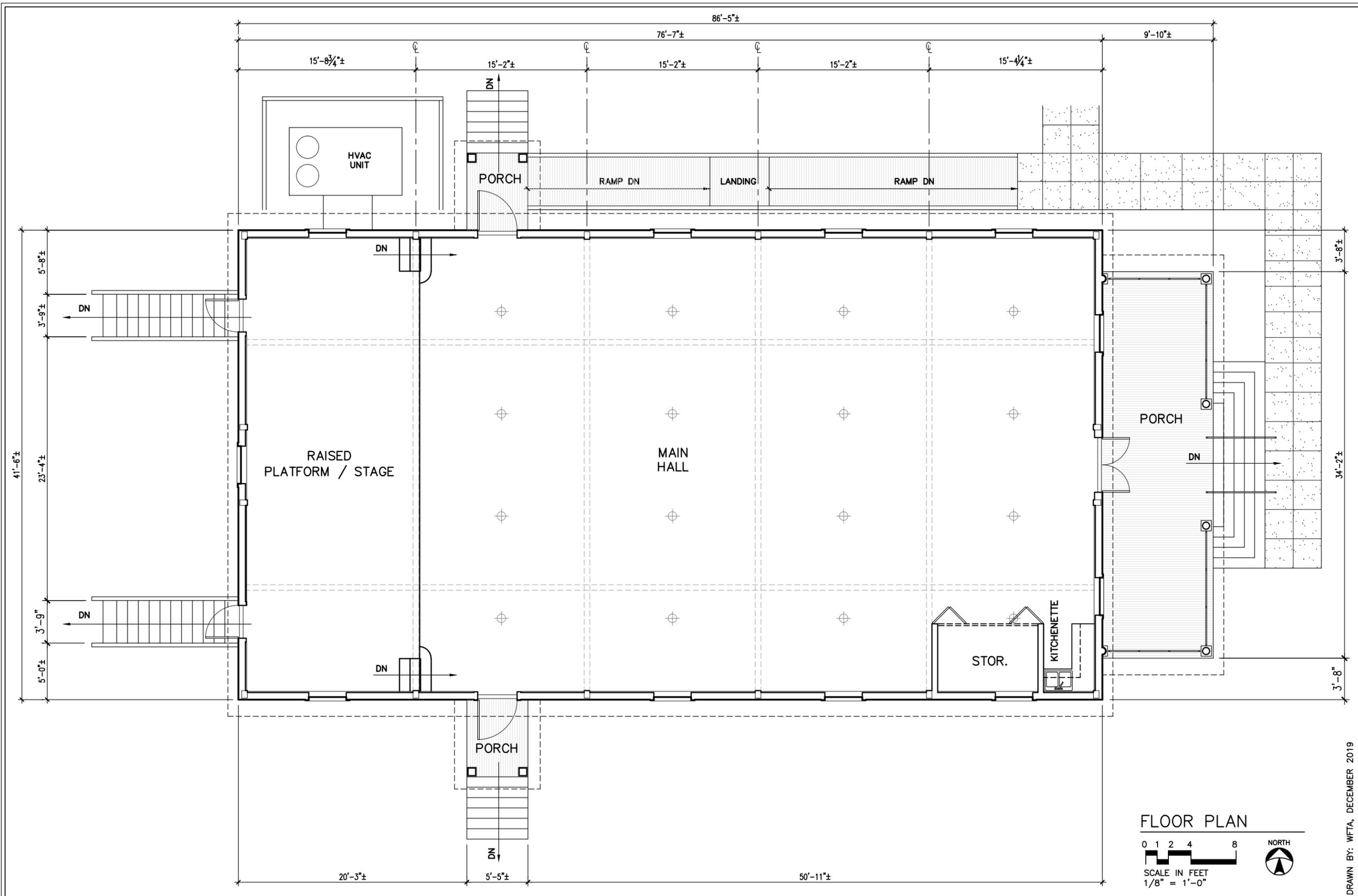
- National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. Washington, DC: Government Printing Office, 1997.
- National Register of Historic Places Multiple Property Documentation Form, Historic Resources of St. Helena Island, circa 1740–circa 1935*, accepted October 6, 1988.
- Nelson, Lee H., FAIA. *Preservation Brief 17: Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character*. Washington, DC: National Park Service, Technical Preservation Services, 1988.
- Obama, Barack. *Presidential Proclamation: Establishment of Reconstruction Era National Monument*, January 12, 2017. Reconstruction Era National Monument, South Carolina. Accessed July 18, 2018, <https://www.nps.gov/reer/learn/proclamation.htm>.
- Peek, Katie McDowell, Robert S. Young, Rebecca L. Beavers, Cat Hawkins Hoffman, Brian T. Diethorn, and Shawn Norton. "Adapting to Climate Change in Coastal Parks: Estimating the Exposure of Park Assets to 1 m of Sea-Level Rise." *Natural Resource Report NPS/NRSS/GRD/NRR—2015/961*. Fort Collins, Colorado: National Park Service, 2015.
- Penn School Papers #3615, Southern Historical Collection, Wilson Library, Chapel Hill: University of North Carolina.
- Penn School Papers #3615, Photograph Albums. Southern Historical Collection, Wilson Library. Chapel Hill: University of North Carolina.
- Penn Center Historic District Walking Map*. St. Helena, South Carolina: Penn Center, N.d.
- Perry, Bob, compiler and editor. *Climate Change Impacts to Natural Resources in South Carolina*. Columbia: South Carolina Department of Natural Resources, 2013.
- "Proclamation 9567 of January 12, 2017, Establishment of the Reconstruction Era National Monument," *Federal Register* 82, no. 12, January 19, 2017.
- Rauch, Bill. "Can the South Make Room for Reconstruction?" *The Atlantic*, September 17, 2017. <https://www.theatlantic.com/politics/archive/2016/09/can-the-south-make-room-for-reconstruction/500189/>.
- "Rising Tide: Will Climate Change Drown Coastal Wetlands?" *Coastal Heritage* 21, no. 3 (Winter 2007).
- Rose, Willie Lee. *Rehearsal for Reconstruction: The Port Royal Experiment*. Oxford paperbacks. New York: Oxford University Press, 1976.
- Schneider, David B. *Addendum to National Register of Historic Places Inventory-Nomination, Historic Beaufort*. Columbia, South Carolina: Department of Archives & History, 2000.
- Sheire, James. *National Historic Landmark Documentation: Penn Center Historic District*. National Park Service, Office of Archeology and Historic Preservation, National Park Service, 1974.
- Slaton, Deborah. *Preservation Brief 43: The Preparation and Use of Historic Structure Reports*. Washington, DC: National Park Service, Technical Preservation Services, 2005.

Bibliography

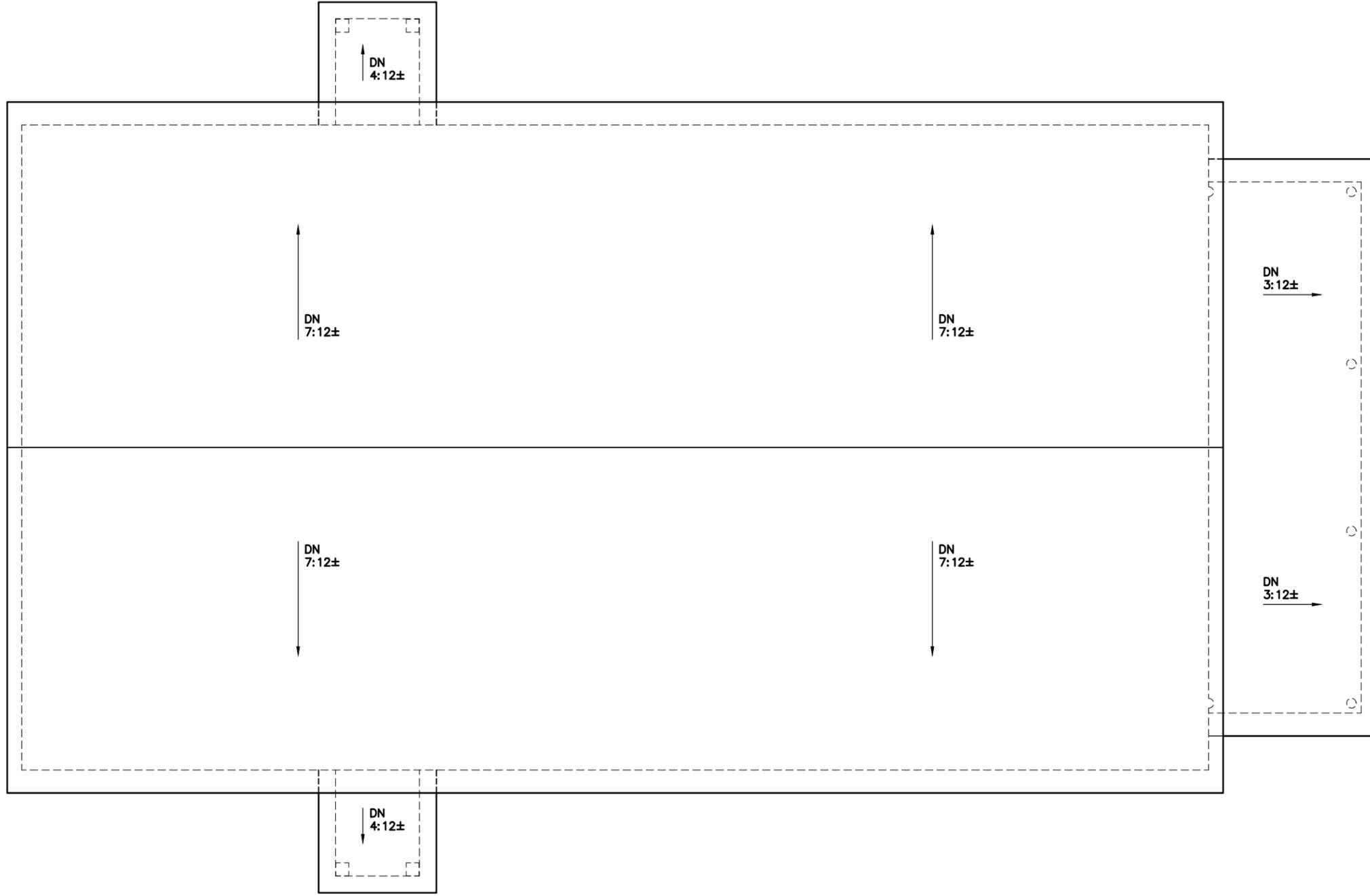
Sutton, Robert K., and John A. Latscher, Eds. *The Reconstruction Era: Official National Park Service Handbook*. Washington, DC: US Department of Interior, Eastern National, 2016.

What Climate Change Means for South Carolina. EPA 430-F-16-042. Washington, DC: US Environmental Protection Agency, 2016.

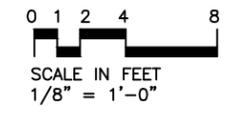
Appendix A: Measured Drawings



FLOOR PLAN
 0 1 2 4 8
 SCALE IN FEET
 1/8" = 1'-0"
 NORTH



ROOF PLAN



DRAWN BY: WFTA, DECEMBER 2019

NATIONAL PARK SERVICE
U.S. DEPARTMENT OF THE INTERIOR
SOUTHEAST REGIONAL OFFICE

BEAUFORT

DARRAH HALL
RECONSTRUCTION ERA NATIONAL HISTORICAL PARK

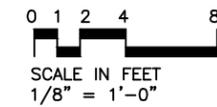
SOUTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET
2 OF 6



EAST ELEVATION



DRAWN BY: WFTA, DECEMBER 2019

NATIONAL PARK SERVICE
U.S. DEPARTMENT OF THE INTERIOR
SOUTHEAST REGIONAL OFFICE

BEAUFORT

DARRAH HALL
RECONSTRUCTION ERA NATIONAL HISTORICAL PARK

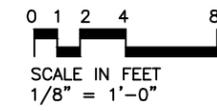
SOUTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET
3 OF 6



NORTH ELEVATION



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 NATIONAL PARK SERVICE
 U.S. DEPARTMENT OF THE INTERIOR
 SOUTHEAST REGIONAL OFFICE

BEAUFORT

DARRAH HALL
 RECONSTRUCTION ERA NATIONAL HISTORICAL PARK

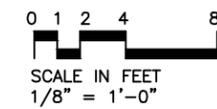
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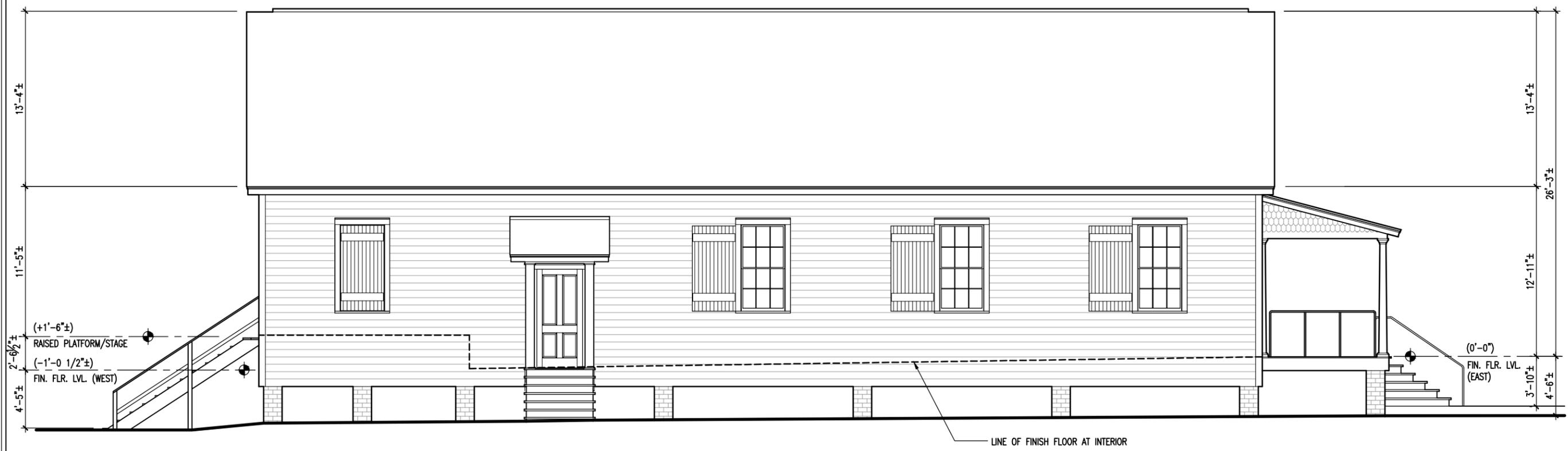
HISTORIC STRUCTURE REPORT

SHEET
 4 OF 6



WEST ELEVATION



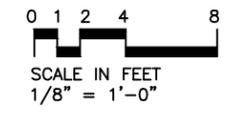


(+1'-6"±)
RAISED PLATFORM/STAGE
(-1'-0 1/2"±)
FIN. FLR. LVL. (WEST)

(0'-0")
FIN. FLR. LVL.
(EAST)

LINE OF FINISH FLOOR AT INTERIOR

SOUTH ELEVATION



DRAWN BY: WFTA, DECEMBER 2019
NATIONAL PARK SERVICE
U.S. DEPARTMENT OF THE INTERIOR
SOUTHEAST REGIONAL OFFICE

BEAUFORT

RECONSTRUCTION ERA NATIONAL HISTORICAL PARK

SOUTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET
6 OF 6

Appendix B: Hazardous Materials Survey Report

A REPORT FOR A QUALITATIVE SURVEY
FOR
SUSPECT ASBESTOS-CONTAINING MATERIALS,
LEAD-CONTAINING MATERIALS
AND
HAZARDOUS MATERIALS AND UNIVERSAL WASTE
AND OTHER ENVIRONMENTAL CONDITIONS

DARRAH HALL
RECONSTRUCTION ERA NATIONAL HISTORICAL PARK (REER)
STATE ROAD S7-45
BEAUFORT, SOUTH CAROLINA

SER NPS IDIQ P16PC00097

Requested by

PANAMERICAN CONSULTANTS, INC.
149 NEEDLES COURT
NASHVILLE, TENNESSEE
TELEPHONE NO. (615) 232-3963

Prepared by

HAZCLEAN ENVIRONMENTAL CONSULTANTS, INC.
P. O. Box 16485
Jackson, Mississippi 39236-6485
(601) 922-0766

HAZCLEAN Report No. 17.1813.03
November 2017

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Asbestos-Containing Materials

1.0 PURPOSE AND SCOPE OF SERVICES

HAZCLEAN ENVIRONMENTAL CONSULTANTS, INC. (HAZCLEAN) was retained by Panamerican Consultants, Inc., Nashville, Tennessee to conduct a facility Qualitative Survey to identify suspected Asbestos-Containing Materials (ACM) at Darrah Hall, Reconstruction Era National Historical Park (REER) Beaufort, South Carolina.

Specifically, the scope of services rendered included the following:

Scope of Work:

1. Conduct a visual survey of the building interior spaces and exterior to identify suspect asbestos-containing building materials.
2. Prepare a final report with observations and recommendations relating to the identified facilities' conditions.

2.0 SITE DESCRIPTION

HAZCLEAN, under the direction of Panamerican Consultants, Inc., Nashville, Tennessee conducted a site investigation on August 8, 2017, to identify suspected Asbestos-Containing Materials (ACM) at Darrah Hall, Reconstruction Era National Historical Park (REER) Beaufort, South Carolina. There is also a restroom building at the site which is included in this survey. Darrah Hall is a single story structure approximately 3100 square feet, with one large room, a stage and partial kitchen. The structure is a wood frame covered by wooden siding with a shingle pitched roof. The interior is also wood finished. The restroom building is wooden frame covered by cement board siding with a shingled pitched roof. The interior is concrete wall, floors and ceiling.

3.0 DISCUSSION OF OBSERVATIONS

HAZCLEAN only identified building materials that were suspect to be asbestos-containing materials (ACM). No sampling or laboratory analysis was conducted on these suspect materials. Any suspect building materials that were newly installed without documentation of being asbestos free or have no listed asbestos in the material safety data sheet (MSDS), safety data sheet (SDS) or manufacturer's data will be considered Presumed Asbestos Containing Materials (PACM) until laboratory analysis confirms if asbestos is present or absent.

This is a public access building subject to compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61 Subpart M.

HAZCLEAN was provided the *Phase I Environmental Assessment, Darrah Hall and Restroom Building, Penn Center, Saint Helena Island, South Carolina, S&ME Project # 4213-16-254* (October 21, 2016) and *Lead-based Paint Assessment and Visual Inventory of Suspect Asbestos Containing Materials Report, Darrah Hall and Restroom Building, Penn Center, Saint Helena Island South Carolina, S&ME Project # 4213-16-254*. The findings for those reports are incorporated by reference to the findings provided herein.

The following summary of findings is based on the results from the physical observation during the field investigation and the S&ME reports:

1. **HAZCLEAN** presents the following table, summarizing the results of the asbestos-containing materials (ACM) survey:

Material	Location	Comment
Roofing Shingles and associated felt	Exterior Roof of Darrah Hall	S&ME identified this material as suspect ACM and this will be considered PACM until sampled and analyzed
Drywall and associated joint compound	HAZCLEAN did not observe these materials installed in Darrah Hall	S&ME identified this material as suspect ACM and this will be considered PACM until sampled and analyzed
Heating Ventilation and Air-conditioning (HVAC) duct sealing mastic	Ductwork in the crawlspace beneath Darrah Hall	S&ME identified this material as suspect ACM and this will be considered PACM until sampled and analyzed
Window Grazing	Windows on Darrah Hall	S&ME identified this material as suspect ACM and this will be considered PACM until sampled and analyzed

Material	Location	Comment
Joint Compound between floor boards	Interior floors in Darrah Hall	HAZCLEAN identified this material independently of the S&ME reports and this will be considered PACM until sampled and analyzed
Roofing Shingle and associated felt	Exterior Roof of Restroom Building	S&ME identified this material as suspect ACM and this will be considered PACM until sampled and analyzed
Cement Board Siding	Exterior Roof of Restroom Building	S&ME identified this material as suspect ACM and this will be considered PACM until sampled and analyzed

The building was subject to extreme weather conditions due to Hurricane Irma in September 2017 after the **HAZCLEAN** site visit. The National Park Services reported that the building did not sustain damages that would require immediate abatement of the PACM listed above.

Inspection Report Limitations

This report shall not be used as a substitute for National Emission Standard for Hazardous Air Pollutant (NESHAP) thorough inspection prior to renovation of demolition activities (40 CFR Part 61 Subpart M).

According to the Environmental Protection Agency (EPA) any material containing greater than one percent (>1%) asbestos is considered ACM.

4.0 SUMMARY OF RECOMMENDATIONS

The following recommendations are made concerning the suspect building materials located at Darrah Hall, Reconstruction Era National Historical Park (REER) Beaufort, South Carolina:

1. **HAZCLEAN** recommends that prior to demolition or renovation of any of the listed suspect building materials that will be disturbed by these activities that a "thorough inspection" as referenced in NESHAP 40 CFR Part 61, Subpart M, be conducted by a south Carolina Department of Health and Environmental Control (SCDHEC) Licensed Inspector. The inspector should sample the suspect materials and have them analyzed at an accredited National Institute of Standards and Technology (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) laboratory to determine the absence or presents of asbestos in the building materials. Additionally, the Occupational Safety and Health Administration (OSHA) requires bulk sample analysis to declare that a material is not asbestos-containing (29 CFR 1910.1001 and 29 CFR 1926.1101).
2. **HAZCLEAN** makes no further recommendations at this time regarding the study site; however, **HAZCLEAN** reserves the right to modify our opinion should additional information, not available during the time of this investigation, be presented to **HAZCLEAN**.

Lead-Containing Materials

1.0 PURPOSE AND SCOPE OF SERVICES

HAZCLEAN ENVIRONMENTAL CONSULTANTS, INC. (HAZCLEAN) was retained by Panamerican Consultants, Inc., Nashville, Tennessee to conduct a facility survey to identify suspect lead-based paint and lead-containing materials at Darrah Hall, Reconstruction Era National Historical Park (REER) Beaufort, South Carolina.

Specifically, the scope of services rendered included the following:

Scope of Work:

1. Conduct a visual survey of the building interior spaces and exterior for suspect lead-based paint and lead-containing materials.
2. Prepare a final report with observations and recommendations relating to the facility conditions identified.

2.0 DISCUSSION OF OBSERVATIONS

HAZCLEAN presents the following table, summarizing the results of the lead-based paints survey and the S&ME reports:

Component	Location	Comment
Window Components	Exterior : Darrah Hall	S&ME identified these as low-lead (<0.7 mg/cm ²) and are not subject to SCDHEC regulations, however these items are subject to OSHA regulations
Door and Door Casings	Exterior : Darrah Hall	S&ME identified these as low-lead (<0.7 mg/cm ²) and are not subject to SCDHEC regulations, however these items are subject to OSHA regulations
Floor Boards	Exterior porch, Darrah Hall	S&ME identified these as low-lead (<0.7 mg/cm ²) and are not subject to SCDHEC regulations, however these items are subject to OSHA regulations

Component	Location	Comment
Columns	Exterior porch, Darrah Hall	S&ME identified these as low-lead (<0.7 mg/cm ²) and are not subject to SCDHEC regulations, however these items are subject to OSHA regulations
Handrails	Exterior porch, Darrah Hall	S&ME identified these as low-lead (<0.7 mg/cm ²) and are not subject to SCDHEC regulations, however these items are subject to OSHA regulations
Window Shutters	Exterior porch, Darrah Hall	S&ME identified these as low-lead (<0.7 mg/cm ²) and are not subject to SCDHEC regulations, however these items are subject to OSHA regulations
Door Casing	Interior, Darrah Hall	S&ME identified these as low-lead (<0.7 mg/cm ²) and are not subject to SCDHEC regulations, however these items are subject to OSHA regulations
Walls	Interior, Darrah Hall	Non-lead based paint (0 mg/cm ² by XRF)
Doors	Interior, Darrah Hall	Non-lead based paint (0 mg/cm ² by XRF)
Wooden Wall (east facing only)	Exterior; Restroom Building	S&ME identified these as low-lead (<0.7 mg/cm ²) and are not subject to SCDHEC regulations, however these items are subject to OSHA regulations
Wall (Cement Board) and Trim	Exterior; Restroom Building	Non-lead based paint (0 mg/cm ² by XRF)
Door	Exterior; Restroom Building	Non-lead based paint (0 mg/cm ² by XRF)
Walls, Partitions and Floors	Interior: Restroom Building	Non-lead based paint (0 mg/cm ² by XRF)

The State of South Carolina has set 0.7 milligrams per square centimeter (mg/cm²) by X-ray Fluorescence (XRF) analysis as the definition of Lead-Based Paint. The Occupational Safety and Health Administration (OSHA) regulates Lead in Construction by 29 CFR 1926.62 for any detectable lead and is dependent on the task impacting surfaces that have lead.

The building was subject to extreme weather conditions due to Hurricane Irma in September 2017 after the **HAZCLEAN** site visit. The National Park Services reported that the building did not sustain damages that would require immediate remediation of the lead-containing items listed above.

3.0 SUMMARY OF RECOMMENDATIONS

The following recommendations are made concerning the building materials at Darrah Hall, Reconstruction Era National Historical Park (REER) Beaufort, South Carolina.

1. **HAZCLEAN** recommends that for the low Lead-Containing painted surfaces that all personnel performing work on these materials be made aware of the presence of lead and to implement Occupational Safety and Health Administration (OSHA) safety measures. OSHA regulation 29 CFR 1910.1025 and 29 CFR 1926.62 establishes protection guidelines for workers who may be exposed to airborne lead, including a permissible exposure limit (PEL) for airborne lead particles averaged over an eight (8)-hour time-weighted average (TWA) period. OSHA has identified manual demolition of structures with lead content as a potential health hazard in the Construction Safety and Health Outreach Program.
2. **HAZCLEAN** makes no further recommendations at this time regarding the study site; however, **HAZCLEAN** reserves the right to modify our opinion should additional information, not available during the time of this investigation, be presented to **HAZCLEAN**.

Hazardous Materials and Universal Waste and Other Environmental Conditions

1.0 INTRODUCTION

HAZCLEAN ENVIRONMENTAL CONSULTANTS, INC. (HAZCLEAN) was retained by Panamerican Consultants, Inc., Nashville, Tennessee to conduct a Qualitative Survey for potential hazardous waste and universal waste and environmental conditions identified at Darrah Hall, Reconstruction Era National Historical Park (REER) Beaufort, South Carolina.

This report presents the Findings and Recommendations of the Qualitative Assessment for Hazardous Materials and Universal Waste and Environmental Conditions.

Background:

As background information and an introduction into the qualitative survey proposed for the subject facility, the following sections describe **Hazardous Materials and the Universal Waste Rule (UWR) and the relationship with hazardous waste typically handled by the Resource Conservation and Recovery Act (RCRA).**

1.1 Hazardous Materials

Hazardous materials pose hazards and risks to humans, animals, and the environment and can be any substance or material that could adversely affect the safety of the public, handlers or carriers. Hazardous material professionals are responsible for and properly qualified to manage such materials at any point in their life-cycle, from process planning and development of new products; through manufacture, distribution and use; and to disposal, cleanup and remediation. Hazardous materials are defined and regulated in the United States primarily by laws and regulations administered by the U.S. Environmental Protection Agency (EPA), the U.S. Occupational Safety and Health Administration (OSHA), the U.S. Department of Transportation (DOT), and the U.S. Nuclear Regulatory Commission (NRC). Each has its own definition of a "hazardous material."

OSHA's definition includes any substance or chemical which is a "health hazard" or "physical hazard," including: chemicals which are carcinogens, toxic agents, irritants, corrosives, sensitizers; agents which act on the hematopoietic system; agents which damage the lungs, skin, eyes, or mucous membranes; chemicals which are

combustible, explosive, flammable, oxidizers, pyrophorics, unstable-reactive or water-reactive; and chemicals which in the course of normal handling, use, or storage may produce or release dusts, gases, fumes, vapors, mists or smoke which may have any of the previously mentioned characteristics. (Full definitions can be found at 29 Code of Federal Regulations (CFR) 1910.1200.)

1.2 Universal Waste

The Universal Waste Rule (UWR) codified in Title 40 Code of Federal Regulations (CFR) Part 273, "Standards for Universal Waste Management," was promulgated by the Environmental Protection Agency (EPA) on 11 May 1995. The EPA developed the UWR to improve waste management practices of widely generated, low risk Resource Conservation and Recovery Act (RCRA) hazardous waste. Through streamlined RCRA waste management practices, the EPA intended to develop a system to separate "universal" hazardous waste from the municipal waste stream and ensure proper waste management.

The streamlined management established by the UWR provides relief from the full regulatory aspects of RCRA by simplifying collection and management requirements for universal waste. **In 1995, the EPA designated three types of hazardous waste as universal: batteries, pesticides, and thermostats. In 1999, the EPA added lamps to the list of universal waste and in 2005 EPA added Mercury-containing equipment which means a device or part of a device (including thermostats, but excluding batteries and lamps) that contains elemental mercury integral to its function.**

Although the UWR is less stringent than RCRA, EPA believes the rule encourages resource conservation and improves the implementation of RCRA. EPA developed the rule to facilitate and expand collection of universal waste, and hopes the rule will encourage unregulated entities to participate, further diverting these wastes from the municipal solid waste stream.

The following is the current list and definition of Universal Waste:

a. Batteries

A battery is defined in Title 40 CFR 273.9, "Definitions," as a device designed to receive, store, and deliver electric energy that consists of one or more electrically connected electrochemical cells. The term also includes an intact, unbroken battery from which the electrolyte has been removed. In short, many kinds/types of batteries are covered under the universal waste regulations as long as they are hazardous waste. Spent lead-acid batteries, which are managed under Title 40 CFR Part 266, Subpart G, "Spent Lead-Acid Batteries Being Reclaimed," are exempt from universal waste

regulations. However, if spent lead-acid batteries are not managed under Title 40 CFR Part 266, Subpart G, then they are subject to management under universal waste regulations.

b. Lamps

A lamp is defined as "the bulb or tube portion of an electric lighting device." Examples of common universal waste lamps include spent fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps. As of 6 January 2000, any spent or waste lamp that is hazardous or exhibits one of the hazardous waste characteristics identified in Title 40 CFR Part 261, "Identification and Listing of Hazardous Wastes," is subject to regulation as a universal waste.

c. Pesticides

A pesticide means "any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, other than animal drugs and feeds. Therefore, any unused pesticide products that are collected and managed as part of a waste pesticide collection/recall program mandated by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), or a voluntary recall program, are subject to management under universal waste regulations. [Note: Recalled pesticides managed by farmers in compliance with Title 40 CFR Part 262, "Standards Applicable to Generators of Hazardous Wastes," Subpart G, "Farmers," are not subject to regulation as a universal waste.]

d. Mercury-Containing Equipment

Mercury-containing equipment means a device or part of a device (including thermostats, but excluding batteries and lamps) that contains elemental mercury integral to its function. A thermostat means "a temperature control device that contains metallic mercury in an ampule attached to a bimetal sensing element, and mercury-containing ampules that have been removed from these temperature control devices." A thermostat becomes a solid waste on the date it is discarded, at which time the generator must determine if the thermostat exhibits any hazardous waste characteristic: ignitability, corrosivity, reactivity, or toxicity. If thermostats are not waste, or are not determined to be hazardous wastes, they are not subject to universal waste regulations.

2.0 PURPOSE AND SCOPE OF SERVICES

HAZCLEAN proposed to conduct a Qualitative Assessment for potential hazardous waste, universal waste and environmental conditions located at Darrah Hall, Reconstruction Era National Historical Park (REER) Beaufort, South Carolina.

Specifically, the scope of services rendered for this project included the following:

Scope of Work:

1. Conduct a Qualitative Assessment to identify potential hazardous waste and universal waste and environmental conditions that may impact planned renovation and/or demolition activities.
2. Review all field, survey, and analytical data (if available) to provide a comprehensive facility assessment.
3. Prepare a final report with observations and recommendations relating to the qualitative assessment.

3.0 DISCUSSION OF FINDINGS

HAZCLEAN conducted a facility-wide Qualitative Survey to identify potential **Hazardous Materials, Universal Waste and Environmental Conditions** that may have an impact on planned renovation and/or demolition activities. The Findings are discussed below:

3.1 Hazardous Materials

HAZCLEAN conducted a limited survey to identify hazardous materials or areas with environmental concerns. The following materials and concerns were identified:

1. **HAZCLEAN** determined by site interview and review of the *Phase I Environmental Assessment, Darrah Hall and Restroom Building, Penn Center, Saint Helena Island, South Carolina, S&ME Project # 4213-16-254* (October 21, 2016) that no previous and present underground storage tanks (UST) or above ground storage tanks were on this site.
2. **HAZCLEAN** did not observe areas of chemical/hazardous materials or waste storage in the form of bulk containers in the projected renovation areas.

3.2 Universal Waste

1. **HAZCLEAN** did not observe any batteries that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.
2. **HAZCLEAN** did not observe lamps as defined as a universal waste.
3. **HAZCLEAN** did not observe any pesticides that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.
4. **HAZCLEAN** did observe one zone control thermostat that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.

4.0 SUMMARY OF RECOMMENDATIONS

The following recommendations are made concerning universal waste and environmental conditions identified at Darrah Hall, Reconstruction Era National Historical Park (REER) Beaufort, South Carolina.

1. **HAZCLEAN** recommends that all mercury-containing equipment as defined by 40 CFR 273.4, including thermostats be inspected prior to renovation/demolition and all mercury-containing ampules be removed from these temperature control devices and be recycled or disposed of as a hazardous waste. Once the mercury-containing ampules have been removed and disposed of in accordance with Resource Conservation and Recovery Act (RCRA) as a hazardous waste, the thermostats can be recycled or disposed of as a solid waste and are not subject to universal waste regulations. Thermostat Recycling Corporation (TRC) is a national firm that facilitates the collection by HVAC wholesalers all brands of used, wall-mounted mercury-switch thermostats so that mercury can be purified for re-use.

QUALIFYING STATEMENT

HAZCLEAN has prepared this report for the exclusive use of the client. The report and its findings, conclusions, and recommendations either in part or in its entirety are not to be used or relied on by any other party without prior consent by **HAZCLEAN, the Client or assigns**. The report format is proprietary to **HAZCLEAN**, having been designed, developed, and prepared by **HAZCLEAN** at great expense and the information is secret, confidential, unique, and constitutes the exclusive property of **HAZCLEAN** and shall not be used by any third party without the prior written consent of **HAZCLEAN**. Any use thereof, other than the sole benefit of **HAZCLEAN** or the client, shall be deemed wrongful and will cause irreparable injury to **HAZCLEAN**.

HAZCLEAN presents the findings, conclusions and recommendations, therein, which are based solely on the conditions observed during the inspection and analytical results. The client should be aware that methodologies, results, conclusions, recommendations, and any remediation protocol to be written are based partially upon decisions made by the client concerning the extent of project work to be conducted, and are the results of a limited sampling program conducted on a specific date(s). A different sampling program or samples taken at another time may have resulted in different conclusions, recommendations, and protocols. Additionally, **HAZCLEAN** does not make any representation or projection as to past conditions or future exposures and does not extend its findings to areas outside of the statistical representation of the completed investigation.

National Park Service
U.S. Department of the Interior

Darrah Hall
Reconstruction Era National Historical Park
Beaufort, South Carolina

www.nps.gov/reer