



# Environmental Assessment for General Management Plan Birmingham Civil Rights National Monument Alabama



October 2022

**United States Department of the Interior  
National Park Service**

**Environmental Assessment for General Management Plan  
Birmingham Civil Rights National Monument  
Alabama**

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# CHAPTER 1: PURPOSE AND NEED

## Introduction

The National Park Service (NPS) is preparing a general management plan (GMP) and environmental assessment (EA) for the Birmingham Civil Rights National Monument (national monument or monument) in Birmingham, Alabama. The national monument was created by presidential proclamation in 2017 to commemorate, preserve, and interpret the struggle for human and civil rights that played out in Birmingham in the 1950s and 1960s. As an NPS new park unit, the national monument requires a GMP—a broad document, specific to the national monument that identifies long-term goals for the monument and guides management of the visitor experience, monument facilities, and operations.

The study area, as shown in figure 1, includes several prominent historic structures and landscapes within and outside the national monument boundary that were pivotal to the civil rights movement, including the 16th Street Baptist Church, Historic Bethel Baptist Church, St. Paul United Methodist Church, Kelly Ingram Park, the Masonic Temple, and the A.G. Gaston Motel (Gaston Motel). The Historic Bethel Baptist Church (National Register Information System [NRIS] #05000455) and 16th Street Baptist Church (NRIS #80000696) are designated national historic landmarks. NPS works in partnership with these sites as well as with other important civil rights sites associated with the larger Civil Rights National Register Historic District (NRIS #06000940) located in downtown Birmingham. In addition, the Birmingham Civil Rights Institute (BCRI) is an important cultural and educational research center and NPS partner site within the boundary of the national monument that provides a range of visitor services, including a museum, gift shop, and other interpretation and education opportunities. Of the sites within the national monument, only the Gaston Motel is directly managed by the NPS. The NPS owns one-half of the motel complex and manages it in partnership with the city of Birmingham, which owns the other half.

This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, and implementing regulations, 40 Code of Federal Regulations (CFR) Parts 1500–1508, Director’s Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making* and the NPS *NEPA Handbook* (NPS 2011, 2015).

## Purpose of the Action

The purpose of this project is to improve visitor experience, management capabilities, and facilities at the national monument by developing a GMP that is consistent with the character-defining aspects of the associated historic district and cultural landscape and protects the resources in the monument area. The plan would address administrative uses of existing facilities, visitor use, historic and non-historic structures, parking, roads, walkways, and associated infrastructure, including any future development or rehabilitation within the national monument.

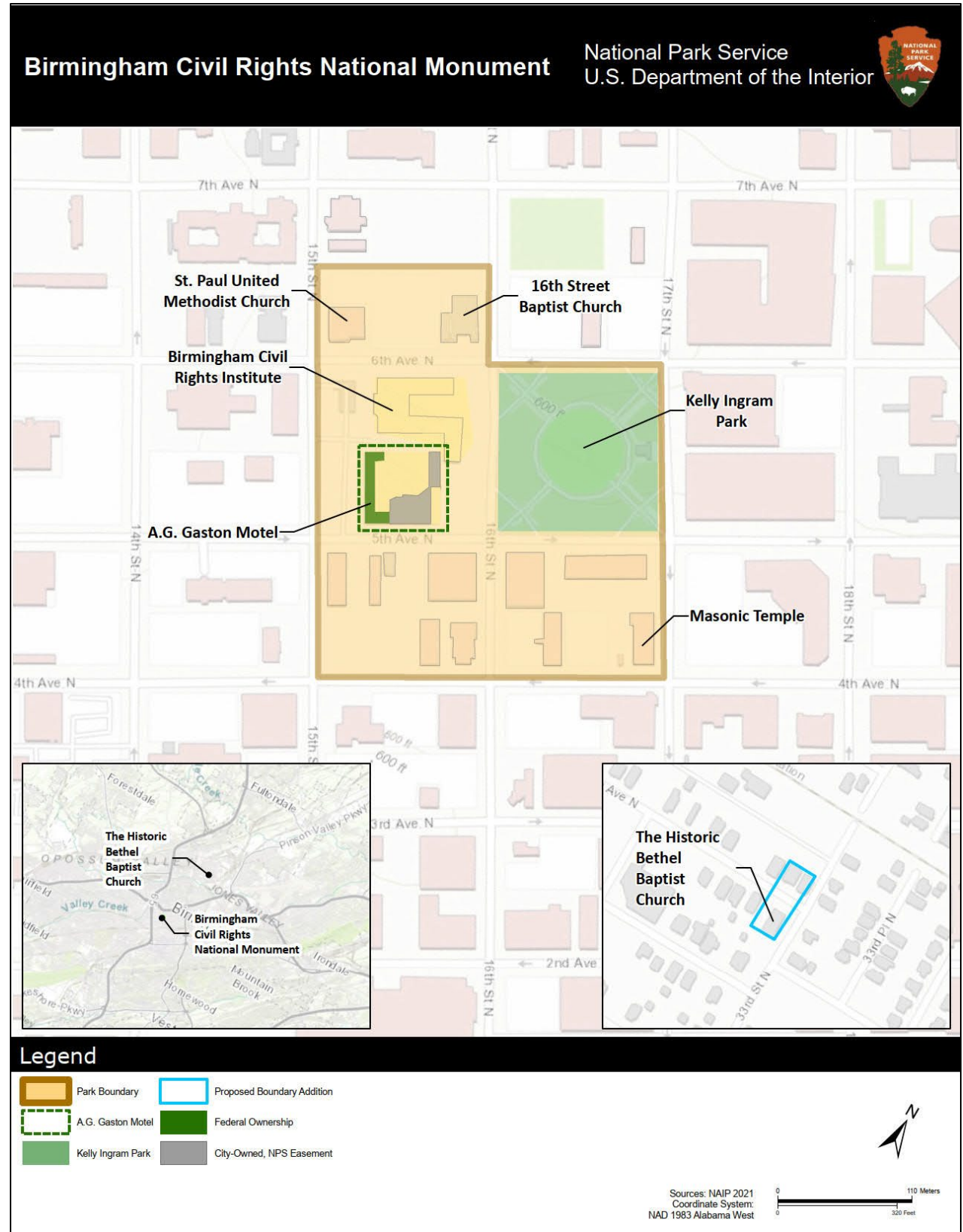


FIGURE 1: STUDY AREA

## Need for the Action

The GMP is needed to fulfill a park planning priority for resource preservation and facility asset management and address legal and policy requirements identified in the National Parks and Recreation Act of 1978 [Public Law 95-625] and 54 United States Code [USC] 100502. The primary physical resource under NPS care is the Gaston Motel, which needs restoration and rehabilitation before it can be opened to the public. Current facilities do not meet the goals of the national monument or its partner organizations or the needs of visitors. A historic structure report (HSR) and cultural landscape report (CLR) were completed that outline a plan for restoration of the motel (Lord Aeck Sargent 2016; WLA Studio 2019). A GMP is needed to incorporate the recommendations within these reports, address future development needs, and serve as the implementation plan for the desired conditions and management strategies identified during the public engagement process.

Furthermore, the national monument has multiple community partners, and the NPS needs to formalize these partnerships with agreements to coordinate and accomplish the shared goals and purpose of the national monument, including consistent visitor experiences, accessibility, interpretation strategies and programming, transportation and wayfinding, connectivity between resources, security issues, collections management, and economic development opportunities within the national monument and neighboring community. The GMP would serve as one of the guiding documents for engaging the community, formalizing partnership agreements, facilitating collaboration, and coordinating future activities. The GMP has also served as the initial platform for engaging many of these local partners as part of civic engagement in the development of the plan.

## Background

In 2017, the Birmingham Civil Rights National Monument was created to commemorate with local partners the nonviolent struggle to dismantle racial segregation and discrimination in Birmingham, Alabama, during the 1950s and 1960s. The Gaston Motel, within walking distance of the 16th Street Baptist Church, Kelly Ingram Park, St. Paul United Methodist Church, and other landmarks of the American civil rights movement, served as the headquarters for a civil rights campaign in the spring of 1963. Budding direct-action movements, such as sit-ins and marches, inspired individuals such as Reverend Fred L. Shuttlesworth, a local Birmingham religious leader and civil rights activist. He invited the Reverend Dr. Martin Luther King Jr. to co-lead a similar movement in Birmingham during the spring of 1963, which they called Project C. Images of snarling police dogs unleashed against nonviolent protestors and of children being sprayed with high-pressure hoses appeared in print and television news around the world. The episode sickened many, including President John F. Kennedy, and elevated civil rights from a southern issue to a pressing national issue. These efforts paved the way to the passage of the Civil Rights Act of 1964, a huge victory toward leading the nation to living up to its promise of liberty and justice for all (NPS 2018).



Source: Birmingham Public Library Archives

The Gaston Motel is nationally significant for its association with the 1963 Birmingham civil rights movement. However, the Gaston Motel is also a representative example of a motel that served African Americans during the era of segregation and as a midcentury motel design. The motel is also associated with the African American couple, A.G. and Minnie Gaston. A.G. Gaston was a regionally significant African American entrepreneur, millionaire, and philanthropist who built and operated the motel (Lord Aeck Sargent 2016). Minnie Gaston was an educational advocate who founded and operated the Booker T. Washington Business College, which helped provide staffing for the motel and other local Black-owned businesses.



Source: Birmingham Public Library Archives

The downtown Birmingham historic district was listed in the National Register of Historic Places (national register) in 2006, as a nationally significant district associated with the climax of the civil rights struggle during the 1956–1963 period. The historic district contains three key areas and the streets that connect them, covering 36 acres throughout the city; and the Gaston Motel, located in the African American commercial and cultural area known as 4th Avenue Business District, is deemed a “major significant resource” in the historic district.

In 2017, the city of Birmingham donated property interests in the Gaston Motel to the federal government, through the National Trust for Historic Preservation, for the purpose of establishing a unit of the national park system. The monument was established by presidential proclamation on January 12, 2017. Federal ownership in the area is centered around the lands associated with the Gaston Motel. The federal government (NPS) owns the original two-story motel and one-story lobby constructed in 1954, and a portion of the courtyard. The city of Birmingham owns the remainder of the motel and courtyard, including the two-story 1968 addition. The federal government holds a preservation easement on the city-owned portion of the site.

As noted above, other related and integral places to telling this civil rights story include the 16th Street Baptist Church, BCRI, Historic Bethel Baptist Church, St. Paul United Methodist Church, Kelly Ingram Park, and the Masonic Temple Building. The NPS is directed to use applicable authorities to enter into agreements with others, including the stakeholder sites listed above, to address common interests and



promote management efficiencies, such as the provision of visitor services, interpretation and education, establishment and care of museum collections, and preservation of historic objects. Further information on the purpose and significance of the park can be found in the GMP.

## Relationship to Other Planning Efforts

The GMP and EA for the national monument are heavily informed by and are being prepared in coordination with other studies and influenced by special mandates and administrative commitments with other federal agencies, state and local governments, utility companies, partnering organizations, and other entities. The HSR and CLR were completed by the Historical Preservation Authority of the city of Birmingham and the NPS to identify current conditions, restoration needs, and facility requirements specifically for the Gaston Motel. The foundation document for the national monument was completed by the NPS and provides guidance for planning and management decisions for the monument. Relevant recommendations from these plans are carried forward for analysis as part of this EA.

### FOUNDATION DOCUMENT

The *NPS Foundation Document for the Birmingham Civil Rights National Monument*, completed in 2018, is the foundational document for planning and management and identifies fundamental resources and values and interpretive themes for the monument (NPS 2018). The foundation document also includes special mandates and administrative commitments, an assessment of planning and data needs that identifies planning issues, planning products to be developed, and the associated studies and data required for monument planning including the GMP. The assessment provides a focus for monument planning activities and establishes a baseline for the GMP.

The foundation document presents the significance statements that describe the distinctive nature of the monument and the most important resources and values that will assist in monument planning and management. The fundamental resources and values identified are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to warrant primary consideration during planning and management processes because they are essential to achieving the purpose of the monument and maintaining its significance.

### HISTORIC STRUCTURE REPORT

The *A.G. Gaston Motel HSR*, completed in 2016, describes current conditions and provides recommendations for restoring and reconstructing features significant to the motel's primary period of significance (1954–1963). The treatment and use of the Gaston Motel would follow the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. The standards are a set of advisory principles that promote best practices in maintaining, repairing, or replacing historic materials, as well as designing new additions or alterations.

Recommendations for treatment, including restoration and reconstruction, provided in the HSR and carried forward for analysis in this document include:

- Preserving and restoring the extant exterior and structural portions of the 1954 motel.
- Reconstructing the interior spaces significant to the motel and the civil rights movement, including the Master Suite, lobby, coffee shop, restaurant, and at least one additional guest room.
- Reconstructing the damaged and missing 5th Avenue elevations of the coffee shop and restaurant.
- Rehabilitating all portions of the 1968 buildings and the interior spaces of the 1954 motel's rooms, excluding the historically significant Master Suite and other spaces that will be reconstructed (Lord Aeck Sargent 2016).

## CULTURAL LANDSCAPE REPORT

The *A.G. Gaston Motel CLR* (WLA Studio 2019), completed in 2019, is a companion report to the HSR. Historical data and treatment recommendations for the structures in the HSR were used and incorporated into the CLR. The CLR follows guidelines established by the Secretary of the Interior's *Guidelines for the Treatment of Cultural Landscapes*. Findings and treatment recommendations are based on observations during the site visit, historical research, and analysis and evaluation of this information. An assessment of the character-defining landscape features is provided to inform future management decisions that may affect significant cultural landscape features. Treatment recommendations were created to guide future management decisions related to the Gaston Motel's historic landscape resources. The landscape treatment recommendations would work in concert with the treatments prescribed in the HSR, including a combination of rehabilitation and restoration of the 1954 building and rehabilitation of the 1968 addition.

Treatment recommendations prescribed in the CLR and carried forward for analysis in this document include:

- Reconstructing the courtyard and elements within the former footprint of the one-story garage removed between 1960 and 1962.
- Restoring the balance of the parking court on the southwest side:
  - Restoration will complement the reconstructed area by completing the original scene from 1963. Restoration is the treatment for the front facade of the 1954 building, facing 5th Avenue North.
- Rehabilitating the east section of the parking court:
  - Includes the former footprint of the two-story garage and apartment buildings noted for removal in the construction plans for the 1982 conversion to A.G. Gaston Gardens; the architecture of the 1968 additions; and the open spaces between. Restoration applies to the front facade of the 1968 addition, facing 5th Avenue North (WLA Studio 2019).

## CHAPTER 2: ALTERNATIVES

NEPA requires federal agencies to explore a range of reasonable alternatives aimed at addressing the purpose of and need for a proposed action. Reasonable alternatives include alternatives that are “technically and economically practical or feasible and meet the purpose and need of the proposed action” (43 CFR § 46.420(b)). The alternatives under consideration must include a no action alternative as prescribed by Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR Part 1501.5).

This chapter describes the GMP and EA alternatives for the national monument area, consistent with the purpose of and need for action. A table, provided at the end of this chapter, compares all alternatives analyzed in this EA. Alternatives and actions that were considered but are not technically or economically feasible, do not meet the purpose of and need for the project, create unnecessary or excessive adverse impacts on resources, or conflict with the overall management of the monument or its resources were dismissed from detailed analysis (see “Alternatives Considered but Dismissed from Detailed Analysis”). This chapter also identifies the NPS preferred alternative and lists mitigation measures for the action alternatives.

The NPS explores and objectively evaluates two action alternatives in this EA:

- Alternative 1: No Action
- Alternative 2: NPS Proposed Action

Each alternative is described in detail in the following sections.

### **Alternative 1: No Action**

CEQ defines the no action alternative as the alternative that represents no change from current management, and the analysis provides a baseline of continuing with the present course of actions. Under the no action alternative, the GMP for the national monument would not be implemented, and the facilities would continue to exist in their current state. The NPS would maintain the existing facilities in their current conditions, configurations, and locations and would provide the existing level of coordination and support to partner sites throughout the national monument. Additionally, proposing expansion of the monument boundary to include The Historic Bethel Baptist Church, Parsonage, and Guard House would not occur. While the national monument would continue to operate through informal coordination meetings with its existing partner agencies and organizations, there would be no formal preservation strategy to guide the long-term management of the monument.

### **Alternative 2: NPS Preferred Alternative and Proposed Action**

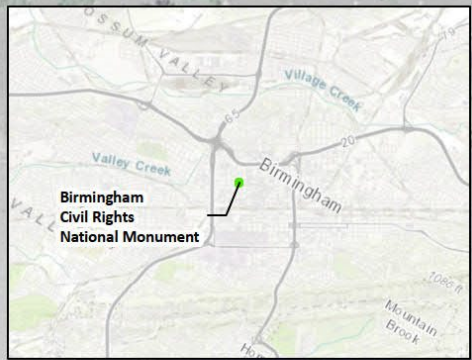
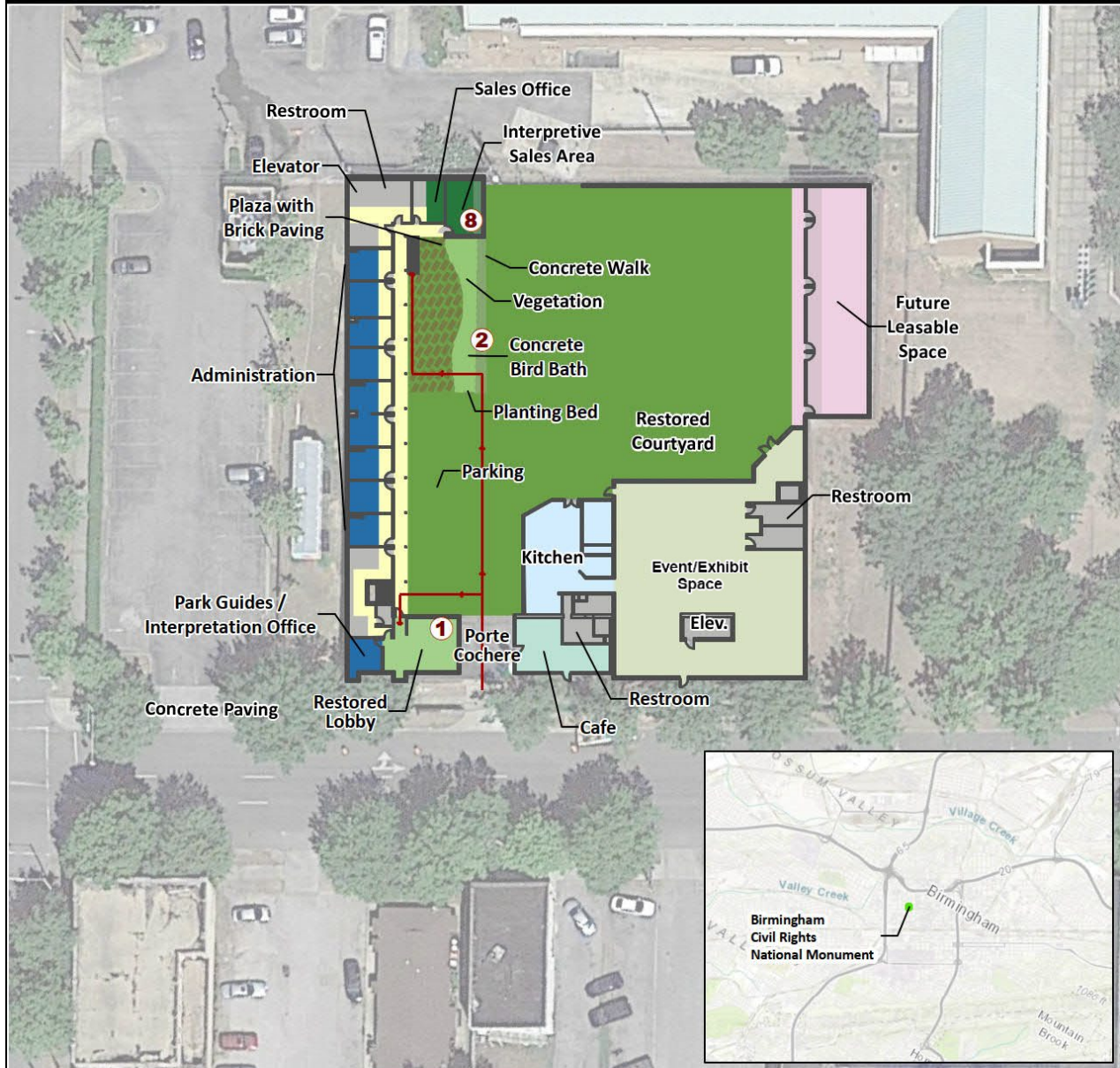
Under alternative 2, NPS would implement the desired conditions and management strategies defined in the GMP (see chapter 2 of the GMP) for the national monument and preserve, rehabilitate, and restore the Gaston Motel. This alternative would provide a visitor experience that emphasizes the significance of the motel and the city of Birmingham’s association with the civil rights movement and call attention to other partner sites (see figure 1) and key historic individuals, such as Rev. Fred Shuttlesworth. Figures 3 and 4 provide a plan view of the first- and second-floor facilities and infrastructure under the preferred alternative for proposed uses and treatments at the Gaston Motel. Under alternative 2, the treatment recommendations for the motel site would consist of a combination of rehabilitation, restoration, and reconstruction treatments as described in the Secretary of the Interior’s *Guidelines for the Treatment of Cultural Landscapes* and *Standards for the Treatment of Historic Properties*. Alternative 2 also proposes an expansion of the monument boundary to include The Historic Bethel Baptist Church, Parsonage, and

Guard House, consistent with the site boundary included in the national historic landmark nomination (NR #05000455) (see chapter 2 of the GMP).

Alternative 2 would protect the historic fabric of the Gaston Motel and the relationship between the other related resources while expanding partnership opportunities as appropriate to enhance the NPS presence in the community and support education, interpretation, and stewardship initiatives, and enhance visitor experience. Overall, alternative 2 would provide for a cohesive interpretive plan to help visitors understand the civil rights story in Birmingham during the 1950s and 1960s through the preserved and restored resources that contribute to the national monument's historic significance. Table 1 provides more detail on the alternative elements and compares the elements under each alternative.

# Birmingham Civil Rights National Monument A.G. Gaston Motel Site Plan - First Floor

National Park Service  
U.S. Department of the Interior



## Legend

Orientation	NPS Administration	Visitor Flow	Concrete Walk
Interpretation	Leasable Areas	Restored Lobby	Plaza with Brick Paving
Visitor Services	Restaurant Kitchen	Restored Courtyard	Vegetation
Restaurant Dining	Circulation	Bookstore	
Event Space	Support		

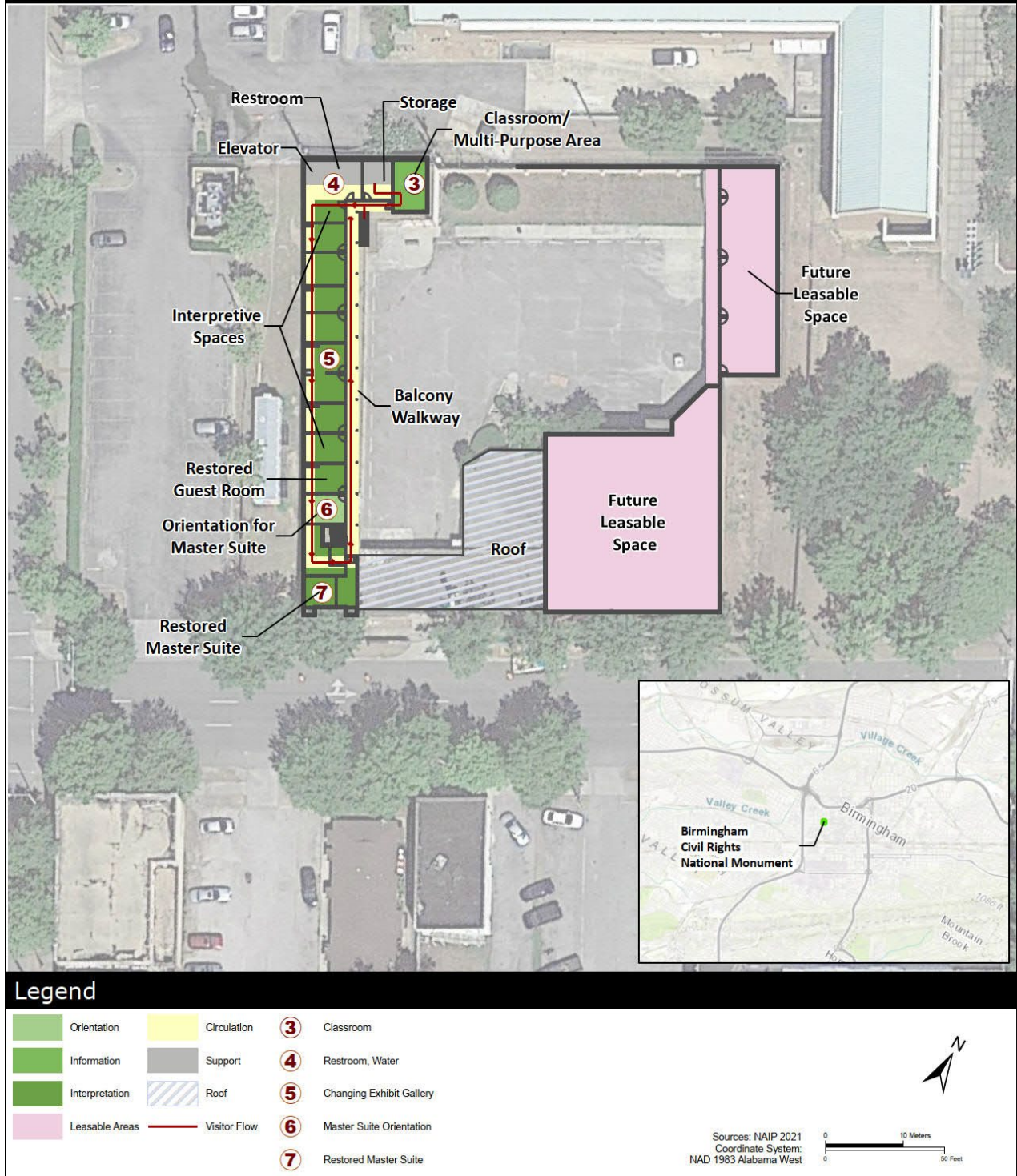
Sources: NAIP 2021  
Coordinate System:  
NAD 1983 Alabama West



**FIGURE 2: ALTERNATIVE 2 – NPS PREFERRED ALTERNATIVE SITE PLAN (FIRST FLOOR)**

# Birmingham Civil Rights National Monument A.G. Gaston Motel Site Plan - Second Floor

National Park Service  
U.S. Department of the Interior



**FIGURE 3: ALTERNATIVE 2 – NPS PREFERRED ALTERNATIVE SITE PLAN (SECOND FLOOR)**

**TABLE 1: ALTERNATIVES COMPARISON**

Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
<b>Community Partner Engagement</b>		
Boundary Adjustment	No boundary adjustment would occur to the national monument site.	NPS would seek to expand the boundary of the national monument to include The Historic Bethel Baptist Church site. A framework for identifying what additional sites, if any, should be included in the monument boundary would be determined at a later date. A rationale for the inclusion of the church in the monument boundary is included in the GMP (in the “Proposed Boundary Adjustment” section).
Monument Administration	The national monument would continue to work with partners through informal coordination meetings.	<p>A cooperative agreement between the NPS and the city of Birmingham would detail roles and responsibilities for the shared management of the Gaston Motel. Areas in this agreement could include, but would not be limited to:</p> <ul style="list-style-type: none"> <li>• Short- and long-term care and management per the Preservation and Conservation Easement Deed</li> <li>• Public access, security, and common areas</li> <li>• Public programs and interpretation</li> <li>• Consultation and approval procedures for site development, facility restoration, and uses</li> <li>• Maintenance requirements, scheduling, and responsibilities</li> <li>• Hours of operation, visitor capacity, and visitor capacity monitoring</li> <li>• Special event and public access permitting</li> <li>• Implementation planning, timing, and investment prioritization</li> <li>• Concessionaire contracting</li> </ul> <p>A Visitor Services Leadership team, comprising a representative from each partner organization would facilitate collaboration and information sharing among all partners. The team would meet regularly and abide by a charter</p>

Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
		<p>and strategic plan that clearly defines the roles of each partner, how the roles of various partners relate to each other, and how the NPS and partners would support one another. Formal agreements may be pursued between the NPS/the city of Birmingham and individual partner sites, as appropriate.</p> <p>The NPS would act as a consultant on partner site and city projects and provide assistance in the form of grant writing/collaboration or training and technical assistance. The cooperative management agreement would identify where the NPS could contribute financially to projects and improvements within the general vicinity of the monument.</p>
<p>NPS Participation in Partner Projects and Programs</p>	<p>The NPS would provide the current level of support and participation with partner projects and programs (e.g., acting as a consultant by providing guidance and input on various projects and initiatives as well as participating in project meetings when requested). The NPS would not expand the level of support.</p>	<p>The NPS would develop a monument map and brochure for use at all partner sites, and each site, including the Gaston Motel, would maintain its own NPS-branded passport stamp to encourage site coordination.</p> <p>The NPS would provide input to partner sites for the further development, marketing, and maintenance of the Heritage Trail.</p> <p>NPS staff would facilitate relationships with larger NPS programs such as the Centennial Challenge, Find Your Park, African American Civil Rights Network activities, and civil rights grants, that support community efforts for neighborhood preservation and revitalization.</p> <p>The NPS would coordinate with partners to evaluate other statewide and national initiatives related to the civil rights story and the role, if any, the national monument can play in these larger efforts.</p> <p>The NPS would participate in information sharing on small business opportunities for contracting at the monument, grant opportunities, and technical assistance available for preservation and restoration of historic resources within the monument and the historic district.</p>



Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
		The NPS would participate in local and national fundraising initiatives and act as a liaison with national donor and philanthropic organizations (e.g., National Park Foundation or Friends group).
Youth Engagement	The NPS would provide the current level of support with youth engagement, which includes the Youth and Young Adult Programs that offer internships, jobs, and volunteering. Many of these youth developmental opportunities and jobs are filled at the monument level, but other opportunities are advertised and recruited nationally by the NPS in partnership with youth organizations. The NPS would not expand the level of support at the monument.	BCRI Legacy Youth Leader program, NPS interpretation internships, and other partners' youth engagement activities would be coordinated to provide training in interpretation and internships that open a career pathway for youth from the local community. NPS interpretive programming would be coordinated with partners to include youth engagement/activism.
<b>Visitor Experience</b>		
Equity and Inclusion	The NPS would continue to promote equity and inclusion in all national monument efforts.	Same as the no action alternative. In addition, equity and inclusion themes would be woven into interpretation and themes throughout the national monument, including involving and engaging in the city of Birmingham, local community businesses, contractors, residents, and partner organizations in future interpretation, concession, and contracting opportunities.
Primary Visitor Contact Station, Ticketing, and Fees	<p><u>Primary Visitor Contact Station:</u> There would be no primary visitor contact station established for the monument.</p> <p><u>Ticketing/Fees:</u> Site visitation would not occur, and ticketing operations would not be needed.</p> <p><u>Visitor Counts:</u> Site visitation would not occur, and visitor counts would not be needed.</p>	<p><u>Primary Visitor Contact Station:</u> The Gaston Motel would serve as the primary visitor contact station and "point of arrival" for the national monument as a whole.</p> <p><u>Ticketing/Fees:</u> There would be no fee charged at the Gaston Motel, and a ticket/reservation for entry would not be required. Ticketing for other sites that require tickets or reservations would occur at the primary visitor contact station and at the individual sites or through specific partner websites.</p> <p><u>Visitor Counts:</u> The NPS would maintain visitor counts at the Gaston Motel following NPS guidelines for such procedures. Individual partner sites would be responsible for their own</p>

Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
		<p>visitor counts. The NPS would provide guidelines for how to conduct consistent counts between sites.</p>
<p>Visitor Services</p>	<p>Visitor services would continue to be provided at the various partner sites, with no visitor services available at the Gaston Motel. NPS coordination of these services would remain minimal.</p>	<p>The following full information and visitor services would be provided at the primary visitor contact station:</p> <ul style="list-style-type: none"> <li>• Monument map and brochure directing visitors to other monument sites</li> <li>• Tour and program schedule information</li> <li>• Ranger-led and/or self-led tours</li> <li>• Coordinated ticketing, as applicable to sites requiring a fee and/or reservation</li> <li>• Access/wayfinding to other sites (including The Historic Bethel Baptist Church)</li> <li>• Restrooms, drinking fountain, water, weather protection</li> <li>• Gift shop/bookstore</li> </ul> <p>Basic information and visitor services would be provided at each partner site including:</p> <ul style="list-style-type: none"> <li>• Monument maps and brochure directing visitors to other monument sites</li> <li>• Restrooms, water, weather protection</li> <li>• Passport stamps</li> <li>• Access/wayfinding to other sites (including The Historic Bethel Baptist Church)</li> </ul> <p>Additional information and visitor services could be provided at partner sites to the extent feasible, including site-specific information, merchandise, and refreshments.</p> <p>Food service would be provided at the Gaston Motel in the restored coffee shop.</p>

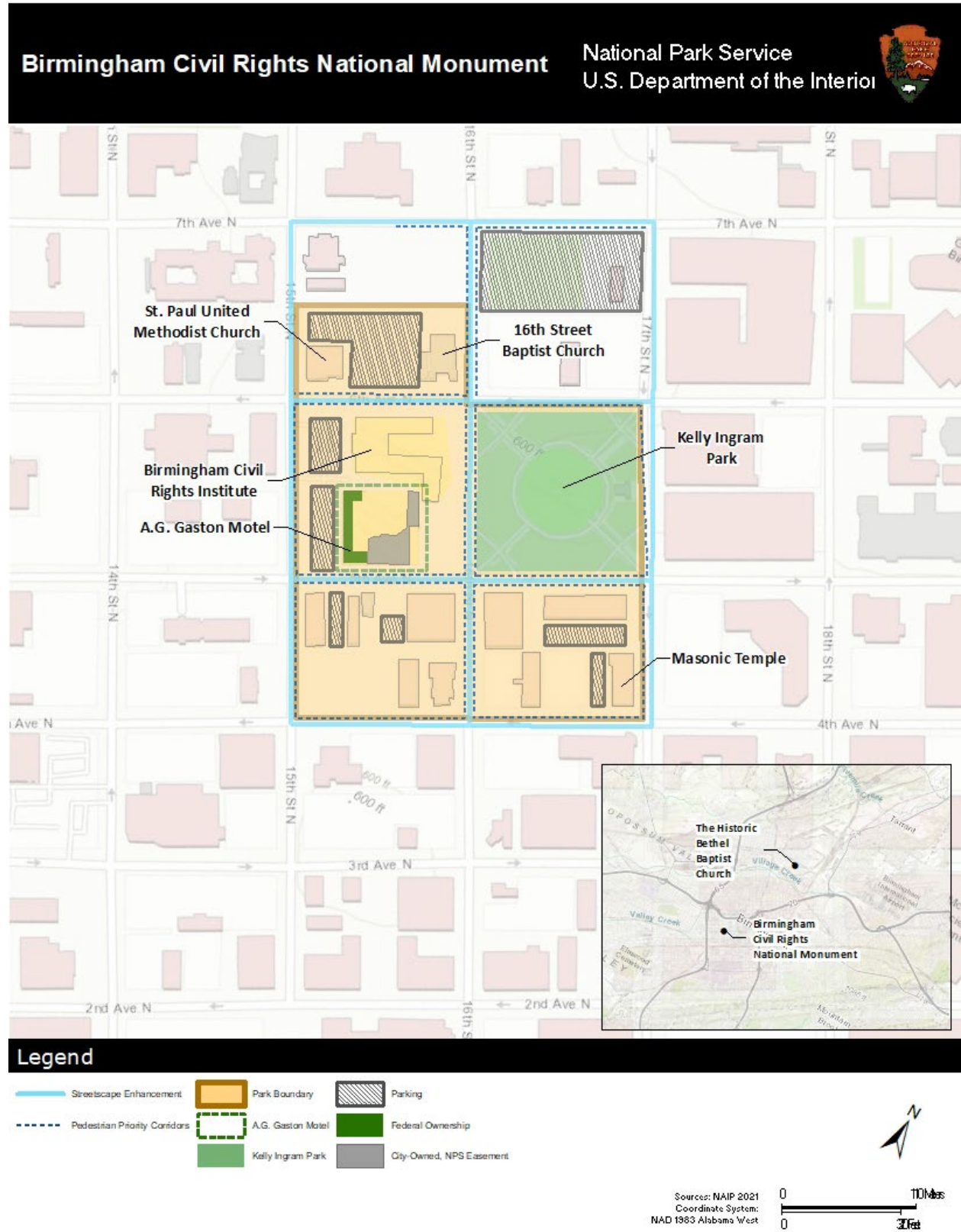
Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
Visitor Service Concessions	The NPS would not engage in any contracts for visitor service concessions. Individual sites may choose to engage such services, but this effort would not likely be coordinated between sites.	Visitor services that are not provided directly by the NPS or partner organizations would be provided by one or more concessionaires. Concession contracts for food service, tours, parking lots, transportation, and a gift shop or bookstore would be contracted separately by partner sites and coordinated among all partner sites to avoid redundancy and ensure equitable business opportunities.
Security	The NPS would work with partners, including the city of Birmingham to address ongoing safety concerns.	Same as the no action alternative.
Coordinated Interpretive Plan	The NPS would not develop or participate in the interpretation of the Gaston Motel or the greater national monument.	<p>The NPS would develop a coordinated strategic interpretive plan that outlines how the overall national monument story is told and what part of the story is emphasized at each site. Partner organizations would participate in plan development. The plan would also define an umbrella graphics guide for branding and signage at individual sites and on websites, social media, and other publications and identify roles and responsibilities of each site in providing visitor contact stations and information services, programming, and special events. The interpretive plan would detail the type and scale of public programs to be provided at the Gaston Motel.</p> <p>The NPS would provide cohesive interpretive support and resources for partners organizations and others in the national monument boundary, such as training and technical assistance on interpretation and branding/promotion.</p> <p>The NPS would develop a website and interpretive materials to provide information on key experiences at the national monument, including NPS sites, partner sites, and other associated resources, such as the Heritage Trail. The NPS would assist partner organizations in the further development, marketing, and maintenance of the Heritage Trail. Potential joint marketing efforts would be identified.</p>

Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
		<p>The NPS would act as a resource to coordinate interpretation between sites, including providing a ticketing mechanism for each site. NPS would provide resources and training as needed. There would be a combination of ranger-lead, site-led, and self-guided tours throughout the national monument.</p>
<p>Access</p>	<p><u>Parking:</u> Existing parking at partner sites would continue to serve each site. The Gaston Motel site would not be open, and parking would not be provided.</p> <p><u>Pedestrian/Bike Trails:</u> No changes/improvements would be made to surrounding transportation infrastructure.</p> <p><u>Wayfinding Systems:</u> No NPS wayfinding systems would be installed at the national monument or at the Gaston Motel.</p>	<p><u>Parking:</u> Parking for overall national monument visitation would be provided at partner sites, on the street, or in public parking lots in the neighborhood. Parking would continue to be provided at existing partner site lots, as feasible, and coordinated with the city (see figure 4).</p> <p><u>Pedestrian/Bike Trails:</u> Pedestrian and bicycle access throughout the monument would be provided on city sidewalks according to a Universal Design Plan and streetscape guidelines. City of Birmingham pedestrian and bicycle improvements within the monument and environs would occur primarily within the pedestrian priority corridor (see figure 4) and would be coordinated with the NPS and other partner sites. Improvements would include bike lanes, wayfinding/graphics, bike parking, and water stations.</p> <p><u>Wayfinding Systems:</u> NPS markers and branding would be located at all sites, and the primary national monument marker would be located at the primary visitor contact station. A map would be provided to visitors.</p> <p>The interpretive plan would integrate the Heritage Trail into the wayfinding signage between monument partner sites.</p> <p><u>Access to Other Sites:</u> Access from the national monument to The Historic Bethel Baptist Church and other civil rights sites outside the boundary would be coordinated through a separate process to evaluate shuttle, trolley, or other transportation options. The NPS would coordinate with the city on existing/planned transportation options.</p>

Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
Universal Design	Site access by the public would not be provided; therefore, a universal access plan would not be developed.	<p>The NPS would develop a universal access plan for the monument to ensure compliance with Architectural Barriers Act Accessibility Standards (ABAAS) throughout the monument and to identify access needs for visitors with vision, hearing, mobility, cognitive, and other impairments. The NPS would provide technical assistance to its partners in meeting these standards.</p> <p>At the Gaston Motel, the ABAAS would be applied to the rehabilitation treatments (see detailed site plan) and to streetscape guidelines developed by the city of Birmingham. The NPS would provide technical assistance to provide equitable and inclusive access to facilities and sites.</p>
<b>Cultural Resources</b>		
Compatible Development	The NPS would not coordinate with partners regarding compatible development.	<p>The NPS would support any city of Birmingham-led efforts to develop Character-based Design Guidelines to ensure consistent development within the national monument boundary. Development would follow city ordinances and cultural resource surveys and assessments. Streetscaping would be compatible with the current city plans. The NPS would encourage and provide technical assistance and preservation guidance to the city and other partners regarding the development of controls and design standards related to the form and type of development in areas within the viewsheds of historic structures and landscapes within the national monument boundary.</p>
Preservation of Oral History	The NPS would not provide technical assistance or guidance related to the preservation of oral history.	<p>The NPS would provide technical assistance and preservation guidance in the development of an oral history collection to be housed at BCRI or Ballard House. This could include engaging community members and family members through stories, song, film, primary source documents, and interviews. NPS would coordinate with BCRI and other partners external to the national monument, such as Ballard House and Alabama African American Civil Rights Heritage Sites Consortium,</p>

Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
Museum Collection and Storage	The NPS would not provide technical assistance or guidance related to the museum collections and storage.	<p>to digitize existing libraries to increase access and equity.</p> <p>The NPS would develop a scope of collections plan for a physical and oral history collection related to the Gaston Motel. The NPS would develop a collection storage strategy for facilities that meet professional standards and offer capacity for future collections for the Gaston Motel. Storage for collections would not be provided at the Gaston Motel.</p> <p>The NPS would provide technical assistance and preservation guidance for physical and oral history collections at partner sites and a collection storage strategy for facilities that meets professional standards and offers capacity for future collections for partner sites.</p>
<b>A.G. Gaston Motel Specific Elements</b>		
Program of Uses for the Rehabilitated/Restored NPS-owned Portion of the Gaston Motel	No rehabilitation or restoration would occur at the Gaston Motel	<p>The following rehabilitation/restoration would occur:</p> <p><u>1st Floor</u></p> <p>Orientation</p> <ul style="list-style-type: none"> <li>• Restored Lobby</li> </ul> <p>Information</p> <ul style="list-style-type: none"> <li>• Restored Check-in Desk/office with information desk staff by a ranger; guide office, and former restroom restored for staff use</li> </ul> <p>Interpretation</p> <ul style="list-style-type: none"> <li>• Restored Courtyard, not reconstructing the garage building</li> </ul> <p>Visitor Services</p> <ul style="list-style-type: none"> <li>• Restrooms</li> <li>• First aid</li> <li>• Small bookstore/souvenirs</li> <li>• Elevators</li> </ul> <p>NPS Administration</p> <ul style="list-style-type: none"> <li>• Maintenance office/custodial closet</li> <li>• Storage</li> <li>• Rehabilitated guestrooms for Administrative Offices</li> </ul>

Impact Topic/Element	Alternative 1: No Action	Alternative 2: NPS Preferred Alternative
		<p><u>2nd Floor</u>                      Interpretation</p> <ul style="list-style-type: none"> <li>• Restored Master Suite and one guest room</li> <li>• Rehabilitated guestrooms for permanent or changing exhibits</li> <li>• Educational/Multi-Purpose Space</li> </ul>
Program of Uses for the Rehabilitated/Restored City-owned Portion of the Gaston Motel	To be determined by the city of Birmingham.	To be determined by the city of Birmingham.
Courtyard Treatment	The courtyard would not be restored and reconstructed.	The character-defining features of the courtyard would be restored and reconstructed to the 1963 condition including spatial definition, period furniture, and cars, and would be used to orient/interpret the events of the spring of 1963 that are the basis of the designation of the Gaston Motel and environs as a national monument.
Courtyard Usage	No uses would occur within the courtyard.	The two-story garage would not be reconstructed. Mobile interpretive panels would be used to restore the spatial definition of the cultural landscape interpretive area allow the full extent of the 1963–1968 courtyard to be used for events or to provide separation for events and day-to-day functioning of the 1963 cultural landscape.
Services Access	No service access would occur at the site.	Services access would occur through back-alley access point and operational details would be worked out between NPS and the city.
Accessibility	No visitation would occur at the site, and no improvements consistent with ABAAS would be made.	A minimum number of doorways would be modified to meet ABAAS accessibility standards. One elevator would be installed to allow access to the second floor. All visitor and NPS administrative spaces would be made fully accessible.



**FIGURE 4: ALTERNATIVE 2 – NPS PREFERRED ALTERNATIVE PEDESTRIAN AND PARKING**



## Mitigation Measures

NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts; therefore, the following mitigation measures would be implemented under the action alternative to protect cultural and historic resources and ensure the quality of the visitor experience. The impacts analysis in chapter 3 assumes that the mitigation measures are implemented.

- Hold a preconstruction meeting to inform contractors about sensitive areas within the motel, including cultural resources.
- Require contractors to properly maintain construction equipment to minimize noise and do not allow construction vehicle engines to idle for extended periods.
- Require any contractors to develop and adhere to a spill prevention control and countermeasures plan during construction to address hazardous materials storage, spill prevention, and response. Prohibit hazardous or flammable chemicals from storage in the area, except for those substances identified in the Oil and Hazardous Materials Spill Prevention, Control, and Countermeasure Plan. Require the contractor to immediately remove hazardous waste materials from the project site in approved containers.
- Require any contractors to comply with all applicable regulations and policies during the removal and remediation of asbestos, lead paint, and polychlorinated biphenyls.
- Close active work zones at the Gaston Motel to visitor use.
- Require the construction contractor to follow NPS construction contract standards during construction, including implementation of an accident prevention program, installation of warning signs at the construction site and along the nearby parking lot, and installation and maintenance of construction fences around the construction sites to prevent non-contractors and the public from entering the construction areas.
- Inform visitors in advance of construction activities via a number of outlets, including the monument's website, various signs, and communications from national monument partners.
- Require all work to meet the Secretary of the Interior's *Guidelines for the Treatment of Cultural Landscapes* and *Standards for the Treatment of Historic Properties*.

## Alternatives Considered but Dismissed

Through the planning process, the project team discussed various ways to use the space and manage the entire A.G. Gaston Motel, both the 1954 portion of the motel, the majority of which is owned by the NPS, and the 1968 addition, owned and under the authority of the city of Birmingham. Through the implementation of the GMP, the NPS would continue to coordinate with the city on the uses that would occur on the 1968 site but has no direct control over those uses. Therefore, the alternatives in this EA related to use of the Gaston Motel focus on the areas that the NPS controls directly. The planning team considered alternatives that included the NPS seeking to use more of the city-owned portion of the Gaston Motel for a range of visitor services and monument operations; however, it was determined that the existing NPS-owned portion of the Gaston Motel provided enough of a footprint to adequately meet the purpose and need for overall monument management. If conditions change in the future, the NPS would consider using more of the city-owned portion as necessary.

The planning team also considered different configurations for using the space on the NPS-owned portion of the Gaston Motel, including putting the main interpretation area on the first floor of the motel. The team agreed that because visitors experience the Master Suite (known as the War Room) on the second

floor, offering interpretation on the second floor provided for the optimal visitor flow and visitor experience. Some interpretation (for the courtyard and motel lobby) would still occur on the ground level.

During public scoping, various ideas were presented for how to manage the national monument. These ideas and the reasons for their dismissal from the range of alternatives are described below.

- Commenters provided suggestions for the interpretation of the national monument as a whole and for the Gaston Motel specifically. Suggestions included types of tours (e.g., self-guided, ranger guided, use of cell phone technology), who should lead the tours (the NPS versus individual sites), and what information should be provided in the interpretation and wayfinding, including what stories to tell and what sites should be interpreted. Many of these decisions are not being made in the GMP but will be developed in a more detailed interpretive plan. With regard to who leads tours at each site, public and stakeholder feedback was clear that each site should be allowed to tell their own story; however, the NPS will partner with these sites and provide assistance (as appropriate and requested), in terms of organization, coordination, and assistance, and will help to provide consistency on interpretation throughout the monument.
- Commenters suggested alternative locations for the national monument’s main visitor contact station, including BCRI, 16th Street Baptist Church, the Birmingham Civil Rights Activist Committee Headquarters, or a new building constructed for this purpose. While other options are available for a main visitor contact station, the NPS felt it was appropriate to have the Gaston Motel serve as a main visitor contact station because of NPS ownership of the site, the availability of visitor access and services there, and its central role and location within the national monument boundary.
- Commenters suggested specific management models for the national monument operations, including managing the monument through a 501(c)3 structure. While this management structure could be an option, the GMP does not direct the specific type of partnership agreements that the NPS would execute with other partners in the national monument; this option could be considered as future planning around specific partnership agreements occurs.
- Commenters requested that the NPS finance specific improvements throughout the monument including cleaning adjacent properties, completing construction projects, and repairing sidewalks. The NPS is committed to working with its partners in the monument to achieve improvements like the ones suggested by the public. Assistance could come in many forms such as technical assistance, grant writing assistance/collaboration, and other support. Although the GMP does not state these specific improvements, the NPS is committed to working with the national monument partners.
- Commenters suggested several other sites that should be considered for inclusion in the national monument, including Eddie Kendrick Park; Linn Park; the Birmingham Public Library; City Hall; the Greyhound station; the Civil Rights Heritage Trail; A.H. Parker High School; 4th Avenue Business District; the radio station building; and the corner of 17th and 7th Streets. The GMP does not propose these specific sites for inclusion in the national monument but instead would rely on future boundary studies to establish guidelines and evaluate sites for inclusion in the national monument.

## **CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

This chapter describes the affected environment and analyzes the potential environmental impacts of each alternative for the resources described below. The affected environment describes existing conditions for those elements of the human environment that would be affected by the implementation of the alternatives considered in this EA. Beneficial and adverse impacts that would result from implementing any of the alternatives considered are analyzed in the “Environmental Consequences” section for each alternative. As required by the CEQ regulations implementing NEPA, this chapter compares the environmental consequences for each alternative.

### **Issues and Impact Topics**

The NPS identified a range of issues and impact topics to evaluate in this EA. The issues and concerns identified during scoping were used to identify potential impact topics associated with the GMP, rehabilitation activities, and future development of the national monument area. These topics are resources of concern that could be beneficially or adversely affected by the actions proposed under the action alternative and are developed to ensure that the alternatives are evaluated and compared based on the most relevant topics. Several issues were also eliminated from further consideration. The NPS *NEPA Handbook* provides specific guidance for determining whether to retain issues for detailed analysis. Issues should be retained for consideration and discussed in detail if:

- the environmental impacts associated with the issue are central to the proposal or of critical importance;
- a detailed analysis of environmental impacts related to the issue is necessary to make a reasoned choice between alternatives;
- the environmental impacts associated with the issue are a big point of contention among the public or other agencies; or
- there are potentially significant impacts to resources associated with the issue (NPS 2015a).

If none of the considerations above apply to an issue, it was dismissed from detailed analysis. Issues and impact topics dismissed from detailed analysis, including dismissal rationale, are provided below. Issues carried forward for detailed analysis fall under the following impact topics:

- Visitor Use and Experience
- Cultural Resources
- Socioeconomics

### **ISSUES AND IMPACT TOPICS DISMISSED FROM DETAILED ANALYSIS**

NEPA and CEQ regulations direct agencies to prepare NEPA documents that are analytic, concise, and no longer than necessary to comply with NEPA. NEPA reviews should focus on important environmental issues and only briefly discuss other than significant issues.

Furthermore, agencies are directed to discuss non-significant issues only in enough detail to show why more study is not warranted (40 CFR 1502.2 and section 4.2(E) of the NPS *NEPA Handbook*). The impact topics that have been dismissed from detailed analysis in this EA are listed below. During internal scoping, the project team reviewed all impact topics analyzed and considered the impacts that could

potentially result from the proposed action. In the cases where impacts are not anticipated or where impacts under the alternatives are not measurable in the long term, the impact topics were dismissed from detailed analysis and the rationale for dismissal is included below.

### **Wetlands, Stormwater, and Floodplains**

Wetlands do not occur on or near the national monument area. Therefore, this topic was dismissed from further analysis, and a statement of findings is not required for wetlands.

The construction of new facilities and infrastructure are not part of the proposed action and would not increase impervious surfaces that would exacerbate current stormwater management and erosion concerns and increase sediment accumulation in drainage areas. Therefore, this topic was dismissed from further analysis.

Executive Order 11988, "Floodplain Management," requires all federal agencies to take action to reduce the risk of flood loss, restore and preserve the natural beneficial values served by floodplains, and minimize the impact of floods on human safety, health, and welfare. The project area is not located within a regulatory floodplain. This project is not expected to affect the floodplain; therefore, floodplains were dismissed from further analysis.

### **Geology, Soils, and Topography**

The proposed action would not require excavation or grading in a way that would disrupt any geological resources outside the area zoned for restoration, rehabilitation, or future development. The soils in the national monument area are previously disturbed, and any additional ground disturbance would be minimal. The slopes and contours of the landform on the monument area grounds would not be altered. Therefore, these topics were dismissed from further analysis.

### **Vegetation**

The project area is in an urban setting; thus, the primary vegetative features of the area are hedges, lawns, and other landscaping that defines the ground plane and open spaces of the site. Other predominant types of vegetation are street trees that delineate the perimeters of the area. No vegetation would be removed, and any added landscape design would be consistent with the CLR to the greatest extent practicable. Therefore, this resource area was dismissed from further analysis.

### **Air Quality**

Section 118 of the Clean Air Act requires the NPS to meet all federal, state, and local air pollution standards (42 USC 7401 et seq.). Areas where ambient air concentrations of a pollutant are below the ambient air quality standard limits are classified as being "in attainment" for the pollutant. The national monument is considered to be in attainment for all criteria pollutants based on the current National Ambient Air Quality Standards set by the US Environmental Protection Agency for the Birmingham area. Furthermore, the proposed action would not result in the increased discharge of greenhouse gases to the atmosphere. Implementation of the proposed action would result in localized emissions and fugitive dust during restoration and rehabilitation construction activities; however, emissions and fugitive dust would occur only during the construction period and would dissipate quickly. No long-term impacts on air quality are expected. Therefore, this topic was dismissed from further analysis.

### **Climate Change**

The proposed action is not expected to increase carbon and other greenhouse gas emissions. Similar to the discussion above regarding air quality, temporary greenhouse gas emissions would be associated with the construction period, but no long-term sources of greenhouse gas emissions would be associated with the action alternative. Reduced congestion and improved levels of service could reduce carbon emissions

from queuing vehicles. The elements of the alternative do not significantly vary in their effect on climate change. Therefore, the topic was dismissed from further analysis.

### **Hazardous, Toxic, and Radioactive Waste**

The proposed action would not introduce any new hazardous, toxic, or radioactive waste to the national monument, and any waste from construction would be handled according to appropriate regulations; therefore, in meeting the regulatory obligations, all adverse effects on human and health and safety would be avoided. Therefore, this topic was dismissed from further analysis.

### **American Indian Trust Resources**

Indian trust resources are not present in the project area; therefore, no impacts would occur. In accordance with the Environmental Compliance Memorandum 97-2 by the US Department of the Interior, the NPS must ensure that it explicitly addresses any anticipated effects on Indian trust resources in an environmental compliance document. If any effects are identified, the NPS must consult with the affected tribe(s) on a government-to-government basis with respect to the impact from the proposed project or action. However, if the project or action is expected to have either an insignificant impact or no impact on any Indian trust resources, the environmental compliance document must state the reason for dismissal. Because no known Indian trust resources exist in the national monument area, this topic was dismissed from further analysis.

### **American Indian Sacred Sites**

In accordance with Executive Order 13007, "Indian Sacred Sites," the NPS must accommodate access to, and ceremonial use of, Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. Continued access to, and use of, these sites is often essential to the survival of family, community, or regional cultural systems, including patterns of belief and sociocultural and religious life. However, no known Indian sacred sites are found in the national monument area. Therefore, this topic was dismissed from further analysis.

### **Noise and Soundscapes**

In accordance with the NPS *Management Policies 2006* (NPS 2006) and Director's Order 47: *Sound Preservation and Noise Management* (NPS 2000), an important component of the NPS mission is the preservation of the natural soundscape. During restoration and rehabilitation construction, anthropogenic noise would likely increase because of the activities, equipment, vehicular traffic, and construction crews. Any sounds generated would be temporary, lasting only as long as the restoration and rehabilitation construction activity is generating the sounds, and would have no long-term, measurable effect on visitors, employees, or natural soundscape conditions. Therefore, this topic was dismissed from further analysis.

### **Land Use**

NPS *Management Policies 2006* provide for the protection of parklands, federal lands, and privately owned lands adjacent to the national monument. Both the no action and action alternative would be consistent with and support the NPS's policies and would not change land use in the project area, land use was dismissed from further analysis.

### **Transportation**

The national monument is located in the heart of the commercial and institutional center of the city of Birmingham, Alabama. The surrounding transportation system is composed of urban roadways, parking lots, sidewalks, and bus and bicycle lanes. Together these systems connect the Gaston Motel to the other

participating partnering locations. The proposed action is not anticipated to significantly increase the overall number of tourists to the area given its location in an existing tourist/visitor hub in downtown Birmingham; therefore, the impact on existing roadways or traffic within the immediate area or on regional roadways would not result in measurable effects. The existing transportation infrastructure currently servicing visitors to the monument area and the historic district are adequate to meet the future needs, and there are no plans for major improvements associated with the proposed action. Furthermore, GMP management strategies related to off-site parking, pedestrian and bicycle trails, and improved shuttle and trolley services are expected to have an overall beneficial impact. As a result, transportation and traffic were dismissed from further analysis.

### **Lightscaapes**

In accordance with NPS *Management Policies 2006*, NPS strives to preserve dark night skies and will “minimize light that emanates from monument facilities, and also seek the cooperation of monument visitors, neighbors, and local government agencies to prevent or minimize the intrusion of artificial light into the night scene of the ecosystems of parks” (NPS 2006). Restoration and rehabilitation construction activities would not occur at night; however, there may be occasions during special events that activities occur after normal operating hours. The national monument is in an urban setting, surrounded by streetscape lighting, businesses, and other sources of lighting. The ambient light levels would not increase beyond current levels as a result of the proposed action. Therefore, this topic was dismissed from further analysis.

### **Wildlife and Threatened and Endangered Species**

The national monument is in an urban setting, surrounded by lawns and landscaping, and adjacent to heavily used roads with attendant vehicle noise. As a result, wildlife in the project area is limited to adapted urban species; no threatened and endangered species or habitats are known to occur in the area. Although construction-related activities may temporarily displace wildlife from the area, the proposed action would not result in measurable effects on wildlife or wildlife habitat. Due to the area’s urban context, the level of human activity, and minimal habitat value, these topics were dismissed from further analysis.

### **Archeological Resources**

The proposed action would not have any foreseeable impacts on archeological resources, and thus archeological resources were dismissed from further analysis. If restoration and rehabilitation plans for the national monument proceed, the NPS would review the plans to assess possible impacts on archeological resources. If improvements require excavations that could affect potential archeological resources, NPS would continue section 106 consultation with the state historic preservation office (SHPO) and other partnering sites through the standard review process.

### **Ethnographic Resources**

Ethnographic resources are landscapes, objects, plants and animals, or sites and structures that are important to a people’s sense of purpose or way of life. While the urban landscape and structures found within the national monument area are important to the cultural landscape and historic context of the area, they are not important to a people’s sense of purpose or way of life. Therefore, this topic was dismissed from further analysis.

### **Museum Collections**

The proposed action would not have any direct effect on recognized museum collections (historic artifacts, natural specimens, and archival and manuscript material); therefore, this topic was dismissed from further analysis.

## General Methodology for Establishing and Assessing Impacts

For each resource topic fully analyzed within this chapter, the affected environment is described. This description serves as an account of the baseline conditions within the project area upon which the impacts of each alternative are compared. CEQ regulations define effects or impacts as changes to the human environment from the proposed action or alternatives that are reasonably foreseeable, including those effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives but are still reasonably foreseeable (40 CFR § 1508.1). The impact analyses and conclusions in this chapter are based on a review of existing literature, studies and research, information provided by experts within the NPS, professional judgment, and staff expertise and insights. Short-term impacts are construction-related and are expected to occur during the period of construction, generally less than a year. Long-term impacts would be permanent. Mitigation measures presented in “Chapter 2: Alternatives” are included in the analysis of impacts.

## Cumulative Impacts Analysis Method

To assess cumulative impacts, it is necessary to identify other past, ongoing, or reasonably foreseeable future actions at and around the national monument that would affect the resources evaluated in this EA. Cumulative impacts are defined as the impact on the environment which results from the incremental impact of the action when added to the effects of other past, present, or reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions (40 CFR 1508.1). Cumulative impacts are determined for each impact topic by combining the impacts of the alternative being analyzed and other past, present, and reasonably foreseeable actions that also would result in beneficial or adverse impacts. Because some of these actions are in the early planning stages, the evaluation of the cumulative impact is based on a general description of the following projects. Past actions have been captured in the affected environment for each resource presented below.

- Urban Impact Master Development Plan – Urban Impact Inc., REV Birmingham, and the city of Birmingham, in close collaboration with the local community, are currently producing a development plan for the Northwest Quadrant of Downtown Birmingham. to address how redevelopment should occur to be consistent with the historic district and national monument. The plan would include retail and other developments along 4th Avenue North as well as entertainment spaces along the corridor. It would also incorporate streetscape improvements. Plans also note several potential buildings in and around the district that could be renovated. Community meetings were held in December 2021 and a plan is expected in late 2022.
- Masonic Temple Building Redevelopment – A \$29 million mixed-use redevelopment of the Masonic Temple Building in Birmingham’s 4th Avenue Historic District started in early 2022. Plans for the building include incubator retail, makerspace, and office space. The project's design phase started in 2021, with the start of construction planned for late 2022.
- Partner-held events – Partner interviews indicated that events held by these organizations (e.g., Urban Impact envisions holding lectures and other events, BCRI Juneteenth Festival, city of Birmingham festivals and other events) would bring additional visitation to the national monument.
- Historic Bethel Baptist Expansion – Partner interviews noted that the present-day church is trying to enlarge its congregation. The church has purchased some of the homes and vacant lots in the community with a goal or rebuilding the community by restoring the historic homes for people to live.

- City Center Master Plan, City of Birmingham – The City Center Master Plan outlines six guiding principles that are intended to guide and focus attention and investment going forward (Stantec 2020). Part of this plan address the Civil Rights District. The Civil Rights District is located in the upper northwest quadrant of the City Center, with a concentration of historic and cultural sites. It includes the Birmingham Civil Rights National Monument, composed of key historic sites as the A.G. Gaston Motel, Kelly Ingram Park, 16th Street Baptist Church, St. Paul United Methodist Church, Historic Bethel Baptist Church, and the Colored Masonic Temple. The BCRI and the historic 4th Avenue Black Business District are nationally recognized significant resources. This district is rich with the history of the civil rights movement and serves as a destination for worldwide visitors and residents alike. Many of these important landmarks and the district itself are under consideration for World Heritage status by UNESCO. Key initiatives in this district include:
  - A three- to four-story mixed-use development replacing the surface parking lot to the north of Kelly Ingram Park that sensitively respects the 16th Street Baptist Church and reflects conditions existing during the period of historical significance of 1963, including a height transition and setback at the corner at 16th Street North/6th Avenue North with a public plaza.
  - Expanded BCRI and fully preserved and interpreted A.G. Gaston Motel.
  - Enhancements to 16th Street North to better connect Kelly Ingram Park to the BCRI including a renovated plaza and the possibility of a shared street.
  - Streetscape improvements along 16th Street North to connect the Civil Rights District to the Innovation District.
  - Fully restored 4th Avenue North as the “main street” for the district with streetscape improvements, one-way to two-way conversion, strategic infill, and re-activation of storefronts.
  - Conversion of 5th and 6th Avenues North to two-way and improved streetscape detailing to 20th Street North.
  - Renovated Kelly Ingram Park that respects the dignity of the current space while providing for its long-term sustainability.
- Birmingham Sidewalk Master Plan – The Birmingham Sidewalk Master Plan is intended to ensure pedestrian connectivity within and among neighborhoods, dense areas of activity, and throughout the city and incorporate that connectivity into multimodal transportation and transit systems. Sidewalks are essential because they provide a separate space for pedestrians, who are vulnerable on streets. While pedestrians are the most vulnerable, they are also the most universal, as everyone is a pedestrian at some point in every trip. Sidewalks offer a certain degree of protection from hazards on the road and are especially important for people that rely on public transportation. The plan provides citywide recommendations that include establishing zoning regulations that future development must follow in relation to this type of connectivity (Goodwyn, Mills Cawood 2020).
- Wallace Rayfield Museum – The parsonage at the 16th Street Baptist Church would be restored and repurposed for a Wallace Rayfield Museum.
- Expand the 16th Street Baptist Church – This expansion would include building a multi-purpose building with office and administrative spaces for the church. It would also provide an economic resource for the church with food courts, a restaurant, meeting spaces, outdoor spaces, additional parking, and event or office space for leasing. These additions would expand a visitor’s experience on the history and importance of one of the first trained African American architects,



Wallace A. Rayfield; and provide a gathering space with dining choices for reflection and conversations. The multi-purpose facility would also expand restroom and resting spaces for visitors and tourists.

- St. Paul United Methodist Church – The church received a \$500,000 grant from the NPS’s African American Civil Rights grants program in 2019. The National Parks Grant funds awarded will be used to preserve and restore St. Paul’s historic church building as a part of the National Monument Civil Rights Grants, currently in progress to restore the exterior and interpretation (Alabama Newscenter 2022). The Church also received a \$100,000 African American Heritage Preservation Program grant in 2022 to advance the ongoing restoration of the structure (The Star Democrat 2021).
- NPS Long-Range Interpretive Plan– The NPS plans to develop a long-range interpretive plan that envisions the next ten years of interpretive and educational services at national monument.
- Global Forum for Freedom and Justice Campus – The US Economic Development Administration issued a federal grant of \$2.9 million in 2020 to develop a feasibility study to determine where to establish the Global Forum for Freedom and Justice in the city of Birmingham (EDA 2020). Plans call for a hotel and conference complex near Birmingham’s Civil Rights District, which includes the BCRI and the 16th Street Baptist Church. The study was projected to take up to 18 months to complete, with building construction within 3 to 5 years.

## **Visitor Use and Experience**

The current facilities and amenities in the national monument at the Gaston Motel are inadequate and need significant restoration and rehabilitation to serve visitors and meet the vision of the monument and interpretive programs.

### **AFFECTED ENVIRONMENT**

The mission of the NPS is to preserve unimpaired natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. It is a fundamental purpose of all parks that the NPS is committed to providing appropriate, high-quality opportunities for visitors to enjoy the parks (NPS 2006).

There are currently no visitor uses or experiences at the Gaston Motel because it is closed to the public due to inadequate facilities. However, the other related partner sites within the national monument and surrounding area, including the 16th Street Baptist Church, St. Paul United Methodist Church, Kelly Ingram Park, the Masonic Temple, BCRI, and Historic Bethel Baptist Church, offer a range of visitor experiences and access.

### **Access, Wayfinding, and Parking**

The national monument may be reached by personal vehicle, with parking available at adjacent sites and public parking lots in the neighborhood at various locations. Additionally, some visitors arrive via city bus and shuttle connections, which let passengers disembark at various partner sites within the historic district. Visitors also arrive at various access points by bicycle or on foot. Sidewalks provide circulation for pedestrians. The national monument lacks sufficient wayfinding, maps, orientation, coordinated ticketing, and parking facilities between partner sites.

The Birmingham Civil Rights Heritage Trail is a trail linking the historic partner sites in the downtown area, marking significant locations along the 1963 civil rights march routes, the northwest corner of Kelly Ingram Park, and along 6th Avenue North. Designed as a self-guided tour, the trail route directs visitors along this historic pathway with maps with photographs, quotes from the era, and other wayfinding

features at each location within the monument. The Historic Bethel Baptist Church is a destination stop along the larger Civil Rights Heritage Trail, outside the national monument boundary area. The church maintains a parking lot that can accommodate cars, recreational vehicles, and buses.

### **Visitor Services**

The NPS currently provides no visitor services or concessions at the Gaston Motel. Visitors to the historic district must contact each of the partnering sites individually for admission tickets and tours, although the Greater Birmingham Convention and Visitors Bureau does offer means to purchase multiple tickets for each of the venues in one location. Local business owners offer some interpretative tours to visitors, and non-profit organizations conduct tours led by volunteers from the community. Various commercial tour companies offer guided civil rights and historical tours within the city of Birmingham to the various partner sites. Attendees at the 16th Street Baptist Church and BCRI provide a variety of visitor services. The 16th Street Baptist Church offers tours, classroom spaces, a historic gallery, and meeting spaces. Visitors can purchase tickets for tours on the church's website (<https://www.16thstreetbaptist.org/tours/>). The annual visitation for the 16th Street Baptist Church is approximately 100,000 (Alabama Newscenter 2020). BCRI offers individual and large group tours as well as event space rental for special event parties, community meetings, receptions, and weddings. Visitors to BCRI include school groups, civil rights history tours, and individuals. Tickets can be purchased on BCRI's website (<https://www.bcri.org/visit-us/>). There is street parking around BCRI and free parking for cars and buses adjacent to their building off 15th Street North. BCRI hosts about 150,000 visitors every year, and an additional 80,000 people are reached through outreach functions (BCRI 2020). The BCRI meeting space can hold up to 120 people (theater style) in a second-floor meeting room and offers reception space for 250 in the rotunda. Other visitor services at BCRI include restrooms and gift shop. Based on conversations with representatives of the church during stakeholder engagement, The Historic Bethel Baptist Church receives between 2,000 and 3,000 visitors each year, between tour groups and individuals. Visitors can purchase tickets for tours on the church website (<https://thehistoricbethel.org/>). St. Paul United Methodist Church welcomes a few visitors each year and does not keep visitor counts; the church is in the formative stages of developing a visitor experience. St. Paul has begun to offer in-person tours by appointment only but are continuing to conduct free virtual tours via livestream on various social media platforms.

Overall, the national monument area lacks sufficient visitor service facilities (e.g., restrooms, concessions, refreshments, bookstores).

### **Interpretive and Educational Opportunities**

Interpretive themes are ideas, concepts, or stories that are central to a national monument's purpose, significance, identity, and visitor experience. Opportunities to understand the important events that occurred at the Gaston Motel and in the city of Birmingham during the civil rights movement are of key importance to visitor experience. Participating in personal interpretive services (e.g., staffed visitor centers, ranger-led activities) and making use of nonpersonal interpretive services (e.g., wayside exhibits, visitor center exhibits, publications, and media) help visitors form their own intellectual and emotional connections with the meanings and significance of the national monument resources. The interpretive themes define concepts that should be available to every visitor. Themes also provide the framework for the interpretation and education programs; influence visitor experience; and provide direction for planners and designers of the exhibits, publications, and audiovisual programs.

Currently the Gaston Motel does not provide any interpretive facilities and programs for visitors. However, many of the partner sites in the national monument and historic district have existing interpretive spaces, media, and interpretive programs. The 16th Street Baptist Church offers interpretive space in classrooms with media capabilities and an experience room with a media presentation. The church has exhibits and experiences to honor the memory of the four girls killed in the 1963 bombing and to tell the story of the church from its founding in 1873.

The Historic Bethel Baptist Church offers interpretive elements and uses music, poetry, recitation, and art to reach visitors. The church presents a documentary from Cleveland public television that introduces visitors to Rev. Shuttlesworth. Visitors participate in the recitation of the poem *100 Years Waiting* that captures some of Rev. Shuttlesworth's fiery spirit. A plaque on the church memorializes the retaliatory bomb attack on the church. A permanent exhibit covers the Reverend's action from 1956 to the 16th Street Baptist Church bombing.

BCRI museum exhibits and interpretive programs offer a glimpse of a segregated city in the 1950s. The permanent exhibits are a self-directed journey through Birmingham's contributions to the civil rights movement. BCRI has an orientation theater and multiple galleries, including a replica of a Freedom Riders bus and the actual jail cell door from behind which Dr. King penned his famous "Letter From Birmingham Jail." In addition to its permanent exhibits, BCRI also has traveling exhibitions on a variety of human and civil rights themes and subjects.

Kelly Ingram Park contains designed landscape with sculptures and interpretive waysides depicting key moments in the civil rights struggle aimed at educating visitors.

Other partner sites, such as the Masonic Temple and St. Paul United Methodist Church currently lack interpretive spaces, exhibits, media, and/or interpretive materials but have future plans for more public access to these sites.

## **ENVIRONMENTAL CONSEQUENCES**

### **Alternative 1 – No Action**

Under the no action alternative, the GMP would not be implemented, and the plan's desired conditions and management strategies (see chapter 2 of the GMP) for visitor use and experience within the national monument would not be realized. There would be no management strategy in place to rehabilitate, restore, and reconstruct the Gaston Motel. Visitor services would continue to be provided at the various partner sites, with no expanded visitor services or amenities at the motel. Adoption of the no action alternative would most likely result in long-term, adverse impacts on visitor use and experience in the national monument area because access to the Gaston Motel, visitor services and concessions, and a coordinated interpretive plan would not be provided. Furthermore, the Gaston Motel would be one of the only locations within the monument and historic district that would remain closed to the public and unable to contribute to the larger narrative of the Birmingham civil rights movement. Visitors would not experience the story of the Gaston or benefit from the visitor services. Alternative 1 would, therefore, increase the potential for direct, long-term impacts that would adversely affect the ability of the national monument to convey its significance and association with the Birmingham civil rights movement.

### **Cumulative Effects**

The no action alternative would contribute adverse impacts to the overall cumulative effects on visitor use and experience in the monument area. The availability of visitor uses and experience resources at the Gaston Motel would remain unchanged, resulting in long-term, adverse impacts on visitor experience. Ongoing and future projects with the potential to contribute cumulative impacts on visitor use and experience include the Urban Impact Master Development Plan, Masonic Temple Building Redevelopment, Historic Bethel Baptist Expansion, City Center Master Plan, Birmingham Sidewalk Master Plan, Wallace Rayfield Museum, 16th Street Baptist Church Expansion, St. Paul United Methodist Church NPS Grant Project, NPS Long-Range Interpretive Plan, and the Global Forum for Freedom and Justice Campus.

The Urban Impact Master Development Plan, Masonic Temple Building Redevelopment, 16th Street Baptist Church Expansion, the Wallace Rayfield Museum, and the Global Forum for Freedom and Justice Campus would provide additional amenities and services for visitors to the monument area such as

additional retail, entertainment spaces, food courts, a restaurant, meeting spaces, event and outdoor spaces, and additional restrooms and parking. The St. Paul United Methodist Church project and the NPS Long-Range Interpretive Plan would potentially develop additional interpretive and educational opportunities for visitors within the monument area. In addition, the parsonage at the 16th Street Baptist Church would be restored and repurposed for a museum that would benefit monument users. The City Center and Birmingham Sidewalk Master Plans would provide additional opportunities for visitors to experience the monument by bicycle and other multimodal transportation options, outside their vehicles, and provide the district with streetscape improvements that would improve visitor experience. All cumulative projects are intended to have long-term, beneficial impacts on visitor use and experience.

The no action alternative would contribute direct, long-term, adverse impacts to the overall cumulative effects of the visitor uses and experience in the national monument. The primary driver of adverse cumulative impacts would continue to be the lack of management strategy in place to rehabilitate, restore, and reconstruct the Gaston Motel, and the fact that visitor access and services would not be expanded to the motel.

### **Alternative 2 – NPS Preferred Alternative**

Under alternative 2, the NPS would implement the GMP's desired conditions and management strategies for the national monument and preserve, rehabilitate, and restore the Gaston Motel. This alternative would provide a visitor experience that emphasizes the significance of the motel and the city of Birmingham's association with the civil rights movement and call attention to other historic partner sites related to the purpose and significance of the national monument.

The implementation of the GMP under alternative 2 would generally result in a seamless visitor experience between NPS and partner sites in the national monument, including a coordinated approach to access, branding, services, and interpretation. The Gaston Motel would serve as the primary visitor contact station and would provide full information and visitor services as outlined in the GMP. The NPS would coordinate with the city of Birmingham on the use of the 1968 side to develop a plan to ensure visitor services can be provided in both the NPS- and city-owned portions of the motel. No fee would be charged at the Gaston Motel, and a ticket/reservation for entry would not be required at this time. Visitors would be able to access the motel and other national monument sites during operating hours through a variety of travel modes, including car, bicycle, and pedestrian means. Parking would continue to be provided at existing partner site lots, as feasible, and coordination with the city for additional off-site parking would be explored. Visitor access from the national monument to The Historic Bethel Baptist Church and other civil rights sites outside the monument boundary would be coordinated with the city to evaluate shuttle, trolley, or other visitor transportation options.

The NPS would develop a universal access plan for the monument to ensure compliance with the Architectural Barriers Act Accessibility Standard (ABAAS) and with city streetscape guidelines and to identify access needs for visitors with vision, hearing, mobility, cognitive, and other impairments. The NPS would provide technical assistance to its partners in meeting these standards to provide equitable and inclusive access to facilities and sites.

Under alternative 2, visitor amenities at the Gaston Motel would include rehabilitating and restoring the historic restaurant and coffee shop. Other concession contracts for food service, tours, parking lots, transportation, and a gift shop or bookstore would be contracted separately by partner sites and coordinated among all partner sites to avoid redundancy and ensure equitable business opportunities.

The implementation of the GMP under alternative 2 would improve the overall visitor experience by providing additional interpretive and educational opportunities. An interpretive plan that details the public programs to be provided at the Gaston Motel would be developed. Specific interpretive themes identified for the national monument are presented in the 2018 foundation document. The interpretive plan would incorporate these themes into the structure necessary for monument staff to provide opportunities for

visitors to explore and experience. The plan would integrate the Heritage Trail into the wayfinding signage between monument partner sites. The NPS would facilitate cohesive interpretive guidance for partner sites and others in the national monument boundary, including training and technical assistance on their interpretive programs (NPS 2018). The NPS would develop a website and interpretive materials to provide information on key experiences at the national monument, including NPS sites, partner sites, and other associated resource. The NPS and its partners would identify clear roles and responsibilities for operations and interpretation through agreements, including guidelines for the extent of NPS involvement in interpretive delivery. The final interpretive and educational themes for the national monument would be consistent with the purpose, significance, and fundamental resources and values of the national monument.

Overall, alternative 2 would provide for a cohesive visitor experience and interpretive plan to help visitors understand the civil rights story in Birmingham during the 1950s and 1960s through the rehabilitation, restoration, and reconstruction of the Gaston Motel as described in the GMP. Alternative 2 would improve the visitor experience and most likely attract additional visitors to the national monument and partner sites within the city. For these reasons, alternative 2 would result in direct, long-term, beneficial impacts on visitor use and experience at the national monument.

### **Cumulative Effects**

Impacts on visitor use and experience from cumulative projects would be the same as those described for alternative 1. Alternative 2 would have beneficial impacts on visitor use and experience from the implementation of the GMP's desired conditions and management strategies. Rehabilitation and restoration of the Gaston Motel would provide visitors with a cohesive interpretive experience of the historic significance of the monument and would contribute direct, long-term, beneficial impacts to the overall cumulative effects of visitor experience in the national monument. When the incremental impacts from alternative 2 are combined with the impacts from present and reasonably foreseeable actions, the overall cumulative impact on visitor use and experience would be beneficial, with the incremental actions of alternative 2 contributing noticeable beneficial impacts.

### **Cultural Resources**

Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470 et seq.), and its implementing regulations under 36 CFR Part 800 require all federal agencies to consider effects of federal actions on historic properties, including historic structures eligible for or listed in the national register. The NPS determined that the GMP and restoration and rehabilitation of facilities could constitute an undertaking having a potential effect on national register resources. The proposed action would potentially affect resources listed in or determined eligible for the national register as a historic site, a contributing feature of a historic structure, or a cultural landscape.

### **AFFECTED ENVIRONMENT**

Cultural resources include a variety of resource types such as historic buildings, structures, objects, archeological sites, and ethnographic resources, which can also be grouped in broader districts or landscapes that have significant associations with prehistory or history. The significance of cultural resources is assessed by their eligibility for inclusion in the national register. To be eligible, resources must possess integrity and meet at least one of four criteria. The resource:

- A) is associated with events that have made a significant contribution to the broad patterns of our history; or
- B) is associated with the lives of persons significant in our past; or

- C) embodies 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) has yielded, or may be likely to yield, information important in prehistory or history.

Integrity is the ability of the resource to convey its significance by retaining several or most of its aspects of location, design, setting, materials, workmanship, feeling, and association. The NPS categorizes cultural resources as archeological resources, cultural landscapes, ethnographic resources, historic structures, and museum collections. As noted earlier in chapter 3, archeological resources, ethnographic resources, and museum collections have been dismissed from consideration in this analysis; the remaining resources are described below. The focus of the impact assessment, however, is the A.G. Gaston Motel, which is the only property owned by the federal government, with direct control over its preservation and use by the NPS.

### **Culture History**

The following narrative has been excerpted from the *A.G. Gaston Motel CLR* (2019), prepared for the Historical Preservation Authority of the city of Birmingham and NPS by WLA Studio, Birmingham, Alabama, and the *A.G. Gaston Motel Birmingham Civil Rights Historic District HSR* prepared for the Historical Preservation Authority of the city of Birmingham and the NPS by Lord Aeck Sargent (2016).

Though human use of the area likely extends back much further, American Indian presence in the area dates to at least 1000 Common Era, as evidenced by the Talley Mound site located 15 miles southwest of present-day Birmingham. During the 16th century, Spanish encroachment into the southeastern United States led to the integration of various Deep South American Indians known as the Creeks to form a confederacy of three distinct provincial groups. Internal hostilities among the Creeks and their European allies led to an outbreak of war, which ended in 1814 with the signing of the Treaty of Fort Jackson. The treaty forced the Creeks to cede an immense piece of land containing much of central and southern Alabama and Georgia to the United States. In 1830, the Creeks ceded their remaining territory to the United States with the signing of the Indian Removal Act.

European immigration into central Alabama began almost immediately after the signing of the Treaty of Fort Jackson. In 1815, the first wave of settlers of European descent established homes in Alabama. Many of these settlers were War of 1812 veterans from Tennessee and North Carolina. In 1819, Alabama became an official state of the United States, with Jefferson County among the new counties established within the state. By 1823, towns had developed along a roadway at the southern end of the county, including Salem, Carrollton, and the county seat, Elyton. Most early settlers were engaged in farming. The Civil War, however, disrupted the agricultural economy of the county, resulting in a shift in investments toward the extractive and manufacturing industries.

In 1871, the city of Birmingham was established by the Elyton Land Company, which was composed of 10 investors who recognized the potential wealth from the extraction of coal deposits and iron ore in the area. The company purchased 4,150 acres of land where the proposed South and North Alabama Railroad was expected to cross the existing Alabama and Chattanooga Railroad. The city was laid out at this railroad crossing, with several more railroads extending into the city over the next two decades. Development boons resulted in the rapid construction of industry and housing alike.

In 1880, the population of Birmingham was 3,086, and by 1890 it had grown to 26,178. The Black community in the city made up around 43% of the population in 1890 and roughly 90% of the industrial workers. Company executives enforced a policy of a racially segregated workforce from the outset throughout the city. Segregationist policies confined Black citizens not only in the workplace but also to specific geographic areas in the city. These neighborhoods became centers for the growth of Black self-empowerment and self-determination, which laid the foundation for the civil rights movement.

One of these predominantly Black neighborhoods was in the city's urban core within the area from 3rd to 5th Avenues North and from 15th to 18th Street, where a Black business district developed. By the turn of the 20th century, the Black community had its own bank, construction companies, fraternal organizations, and churches.

Perhaps the best-known businessman in the Black community was Arthur George (A.G.) Gaston. Born in 1892 in Demopolis, Alabama, Gaston grew up in a log house that his formerly enslaved grandparents had built. His father died working for a railroad company, and his mother, Rosie, worked as a cook for a wealthy family, the Lovemans. When members of the Loveman family relocated to Birmingham, Rosie and A.G. moved with them and lived on their estate. While there, Rosie sent A.G. to a new all-Black school, the Tuggle Institute, which was located in one of the growing Black middle-class neighborhoods. In 1910, Gaston left the Tuggle Institute and eventually enlisted in the Army and fought in France during World War I. After the war, Gaston worked in the mines before establishing a burial insurance service, the Booker T. Washington Burial Service. The venture proved successful, and he later changed the name to the Booker T. Washington Insurance Company. In 1938, Gaston purchased a residential property in one of the city's segregated neighborhoods at the corner of 5th Avenue and 16th Street where he opened the Smith and Gaston Funeral Home.

Between 1942 and 1953, Gaston purchased four additional lots along 5th Street North near the Smith and Gaston Funeral Home. Recognizing the need for a quality motel for Black travelers, Gaston decided to construct a motel on the four lots. He incorporated a new business, A.G. Gaston Motels, Inc., and consolidated the lots under its ownership. The motel was completed in 1954 and was designed in the midcentury modern style of the era.

During the Birmingham-based civil rights action of 1963, the A.G. Gaston Motel served as the headquarters for the Southern Christian Leadership Conference (SCLC) and other civil rights organizations. The motel was also where Dr. King and other civil rights activists stayed during this time to implement their strategy of direct confrontation, or Project C, and their protest marches in the streets to desegregate the city of Birmingham. On May 10, 1963, the courtyard of the A.G. Gaston Motel was the site where Dr. King and the Reverends Fred Shuttlesworth and Ralph Abernathy held a press conference to announce a moratorium on the street protests in Birmingham. The day after the truce was announced, the A.G. Gaston Motel was the site of one of several bomb attacks in the city that targeted African Americans. The bombings ignited a violent wave of protests that involved an 8- to 10-block area around the motel. On July 23, 1963, the Birmingham City Council repealed the city ordinance that required segregation in places of public accommodation. Although this action was welcomed by the organizers of the protests, it did not end the struggle for civil rights in Birmingham. Nevertheless, 1963 represented the most significant year in the history of the A.G. Gaston Motel because of the major role the motel played in the Birmingham civil rights movement.

Following desegregation, the motel's business began to decline. In 1968, Gaston made major improvements to the motel in an effort to stimulate business. The improvements, however, proved unsuccessful, and in 1982, Gaston repurposed the motel for senior housing and renamed the property as the A.G. Gaston Gardens. In 1996, Gaston Gardens closed, and the property remained vacant until 2015, when the city of Birmingham purchased the property.

The city of Birmingham officially recognized the importance of the civil rights movement in 1992 with the local designation of a six-block area as the Birmingham Civil Rights District, the opening of BCRI, and the rededication of Kelly Ingram Park. With BCRI to the north and the park in the block to the east, the A.G. Gaston Motel is an integral part of this district. In 2006, the national significance of the local area was recognized with the listing of the Birmingham Civil Rights Historic District in the national register.

In 2017, a proclamation from President Barack Obama designated an approximate four-block area within the national register district as the Birmingham Civil Rights National Monument. Federal ownership in

the area is centered around lands associated with the A.G. Gaston Motel, including approximately 0.23 acres in fee simple ownership by the federal government (NPS), and 0.65 acres in a historic preservation easement. The fee simple ownership area includes the original two-story motel and one-story lobby constructed in 1954, and a portion of the courtyard. The city of Birmingham owns the rest of the motel and courtyard, including the two-story 1968 addition. The federal government holds a preservation easement on the city-owned portion of the site.

### **Cultural Landscapes**

The NPS defines cultural landscapes as “a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural and aesthetic values” (NPS 1994).

As described in the CLR, the Gaston Motel is a cultural landscape composed of a variety of contributing elements, including land use, views, spatial organization, topography, buildings, small-scale features, and circulation (figure 4). The cultural landscape does not include any contributing natural systems or features, nor does it contain any natural vegetation or archeological resources because of the highly disturbed condition of this property.

Land use of the site from 1954 to 1982 was commercial-residential (motel). From 1982 to 1996, land use of the property was residential (senior housing), and from 1996 to the present, the site has been vacant. The site is part of both the historic district and the national monument, with public use and ownership on three sides and private commercial development on the fourth side.

The buildings on the site reflect two different construction periods from 1954 and 1968, as well as extensive remodeling in 1982. The site also contains two small auxiliary buildings—a guard booth and mailbox structure.

The original 1954 building is located on the west side of the site and includes a two-story, L-shaped structure containing guest rooms with a one-story section facing 5th Avenue North serving as the front facade. A porte-cochere within the front facade allows vehicular access to the parking court and separates the lobby, clerk’s office, and clerk’s room on the west from the coffee shop on the east. Exterior facades feature brick with tongue and groove siding on most of the facades facing the parking court. Exterior facades are mostly brick. The original building officially opened on July 1, 1954. Two additions to the motel were completed later that same year. The first addition included a small kitchen at the rear of the coffee shop; the second addition included an expanded kitchen and a restaurant.

A second building was added to the eastern section of the site in 1968. This building featured two sections. The first section is a two-story brick structure, originally containing a banquet hall and guest rooms. The second section, a two-story guest room wing, followed the design of the 1954 guest room building with a brick exterior and mostly tongue and groove siding on the parking court facades.

Small-scale features on the site include four raised planters along the 5th Avenue North facade. Three date from the original construction in 1954, and the fourth planter was part of the 1968 addition. One of the planters is made of brick, while the other three are stone.

Spatial organization of the site features two-story buildings arranged in a U-shaped configuration around an asphalt parking court featuring an open area at the north and enclosed by a single concrete masonry wall. Additions at the front of the 1954 building that included the coffee shop, kitchen, and restaurant are one-story high and face the parking court. The 1954 and 1968 motel room wings are in linear forms, one room deep with recessed corridors on both floors in front of the access doors. East of the porte-cochere and oriented to 5th Avenue North, building regimes dating from 1954, including the lobby, coffee shop, two additions to the kitchen and restaurant, and the 1968 addition, which also included a third kitchen expansion and a banquet hall and meeting space, appear as one structure. The only access into the site is from 5th Avenue North through the porte-cochere on the front facade.



The topography of the site is virtually flat. The topographic elevations at the site range from a high point of 591 feet at the southeast area of the parking court to a low point of 588.84 feet at the top elevation of the site's single catch basin located beneath the porte-cochere. Views within the site are expansive across the open parking court and from numerous vantage points, including the upper levels of the two guest room wings and the banquet hall/meeting space addition from 1968. The site's front facade faces 5th Avenue North with views along its entire expanse from the street. There are limited views to the parking court from 5th Avenue North through the porte-cochere. Exterior views of the east and west exterior facades are brick walls.

Circulation within the site accommodates both pedestrians and vehicles. The pedestrian network consists of approximately 5-foot-wide covered concrete walkways and uncovered concrete walkways. A covered concrete walkway extends under the roofline and along the first-floor parking court frontage of both guest room wings (1954 and 1968). The covered concrete walk at the 1968 guest wing has a sloped concrete curb separating the walk from the parking court. The concrete walkway along the facade of the 1954 building is flush with the pavement. Both guest wing buildings also have covered elevated walkways on their second levels. Access between the two floors is via metal stairs at the northwest, southwest, and northeast corners and proximate to the southeast corner on the north facade of the banquet hall addition.

One uncovered walk borders the parking court on the north and links the 1954 and 1968 guest room wings. This walkway has a raised concrete curb and gutter on its south that elevates the walkway from the parking court with a grassed open space on the north. A second uncovered walkway extends from the southeast corner of the parking court along the north facade of the 1954/1968 building containing the lobby, restaurant, and banquet hall.

Sidewalks in the public right-of-way of 5th Avenue North date from the early 1990s, as part of improvements in the historic district. These concrete walks are 5.5 feet wide and have a brick band every 30 feet. The brick band, a variation of a herringbone pattern, is composed of multi-color shades of red brick surrounding beige header breaks accenting the center. The sidewalk and the adjacent period lights are common design elements used throughout the historic district.

Vehicular circulation within the site is limited to the parking court. The current asphalt parking lot is being restored to its 1963 configuration. All four sides of the parking court have parking spaces perpendicular to the facades of the buildings on the east, south, and west, as well as the concrete walkway and open space on the north. Concrete parking stops prevent vehicles from encroaching into the adjacent pedestrian walkways. The single ingress and egress to the site is through the porte-cochere from 5th Avenue North.

Overall, the cultural landscape of the Gaston Motel retains sufficient physical integrity to convey its significance according to national register criteria. Although the landscape displays diminished integrity of design, materials, and workmanship, it does retain its integrity of location, setting, feeling, and association to reflect its period of significance (1954–1968) and its association with the events and individuals important in the civil rights movement under national register criteria A and B, as well as its architectural and design value under criterion C.

Since completion of the CLR in 2019, some of the recommended improvements for the courtyard and other landscape elements have been implemented by the city of Birmingham in the course of their initial work to repair and stabilize portions of the exterior of the Gaston Motel. This included removal of vegetation around the exterior of the motel, replacing some of the planters on the front facade, and repaving the courtyard. The "Environmental Consequences" section describes the full extent of improvements that are envisioned for the cultural landscape, some of which has already been completed.

## Historic Structures

The national monument contains a collection of historic buildings (e.g., the 16th Street Baptist Church) and places (e.g., Kelly Ingram Park) that stands as a reminder of the violent opposition to integration in Birmingham's segregated past. These places became a battleground for freedom during nonviolent protests that climaxed in 1963 and directly influenced the passage of the Civil Rights Act of 1964. The focus in this section, however, is the Gaston Motel, which consists of the original 1954 building and 1968 addition, and is the only property owned by the federal government with direct control over its preservation and use by the NPS. The following summary has been excerpted from the 2016 *A.G. Gaston Motel HSR* prepared for the Historical Preservation Authority of the city of Birmingham by Lord Aeck Sargent, as well as the 2019 *A.G. Gaston Motel CLR* prepared for the Historical Preservation Authority of the city of Birmingham by WLA Studio.

The motel is also a contributing historic property to the historic district, which was listed in the national register on October 19, 2006. The period of significance for the district ranges from 1956 through 1963. The overall period of significance for the Gaston Motel, however, is from 1954 (the year it was constructed) to 1968 (the year two major additions were completed and the culmination of Gaston's vision for the property and for African American-oriented lodging in the city). The property's primary period of significance is 1963, the year that the motel played a significant role in the civil rights movement in Birmingham. The character-defining features of the original 1954 motel and any subsequent changes to the property up to and including 1963 are, therefore, considered to be of primary importance to the interpretation of the motel. Changes to the property made after 1963 and up to the end of the motel's operation are important to the property's complete history but are secondary to the understanding of the motel's significance.

The Gaston Motel was established by African American entrepreneur and businessman A.G. Gaston (b. 1892-d. 1996). Gaston was born in Demopolis, Alabama, and moved to Birmingham with his mother Rosa at the age of 10. After graduating from the Tuggle Institute in Birmingham, one of the few schools for African Americans in Alabama at the time, Gaston enlisted in the Army and eventually established a funeral home in downtown Birmingham and burial insurance company that offered services that had not been previously available to the city's Black residents. Between 1942 and 1953, Gaston's insurance company, the Booker T. Washington Insurance Company, acquired four lots along 5th Avenue adjacent to his funeral home. On March 29, 1954, the Booker T. Washington Insurance Company sold the four parcels to the newly incorporated A.G. Gaston Motels, Inc., which constructed a new motel on the land.

As originally constructed the motel featured 29 guest rooms, a lobby, clerk's office, clerk's room, storage room, a basement mechanical room, and a coffee shop. A porte-cochere connected the motel lobby to the coffee shop along 5th Avenue. At the north end of the east-facing rooms, two rooms on each of the two levels, extended along the north elevation adjacent to a mid-block alley, creating an L-shaped configuration of the guest room portion of the motel before it terminated at the west wall of the westernmost preexisting one-story garage. A preexisting two-story building was located east of the garage.

The Gaston Motel was a representative example of the uniquely American 1950s motor hotel, or motel, as reflected through design elements that included its long, two-story blocks of guest rooms arranged in a L-shaped configuration, which were accessed via single-loaded, open corridors situated adjacent to a motor court and courtyard. While many of the motels of the 1950s were operated by motel chains, the Gaston Motel was independent. The HSR alludes to the Gaston Motel's contribution to the development of this property type by stating that the motel's "adoption of the popular motel form and the inclusion, and expansion, of amenity spaces was a testament to A.G. Gaston and architect Stanley Echol's responsiveness to the most current hospitality design trends of their time."

The Gaston Motel is also a representative example of a prospering African American entrepreneurship that catered to the needs of Black travelers during the segregation era. The Gaston Motel provided high-

end accommodations and a coffee shop for Blacks visiting the city during a time when racial segregation limited their access to the nicer motels in the downtown area. By 1956, the A.G. Gaston Motel was one of only four places of accommodation in Birmingham that accepted African Americans.

Despite the 1954 Supreme Court ruling in *Brown v. Board of Education*, which found that the “separate but equal” policies legalized by *Plessy v. Ferguson* in 1896 were unconstitutional, segregation and racial discrimination remained widespread, persisting in Birmingham and throughout the South. Following the ruling, the National Association for the Advancement of Colored People (NAACP), which had successfully argued the case before the Supreme Court, found itself being challenged not only by white segregationists committed to maintaining the “separate but equal” policies of the past, but also by new civil rights groups dissatisfied with the NAACP’s gradualist approach to ending racial segregation. The SCLC, the Student Non-Violent Coordinating Committee, the Women’s Political Council, the Congress of Racial Equity, and in Birmingham, the Alabama Christian Movement for Human Rights (ACMHR) were among the new civil rights groups that favored confrontation rather than the gradualist approach to change advocated by the NAACP. These new groups did not shy away from confrontation, and they utilized various forms of demonstration and disobedience—including sit-ins at lunch counters, business boycotts, and marches—to accomplish their aims. In Birmingham, Reverend Fred Shuttlesworth emerged as a key figure in organizing confrontational resistance to segregation and discrimination within the city. In 1956, Shuttlesworth founded the ACMHR, in part to fill a vacuum that was created when the state of Alabama banned the NAACP from working in the state. By 1962, the Reverend Dr. Martin Luther King, Jr. and others believed that the next stage for massive direct action should take place in Birmingham. King joined with Shuttlesworth, Reverend Ralph Abernathy (SCLC secretary), and other civil rights figures, who together conceived of a plan for massive demonstrations. They called their protest campaign Project C—the “C” standing for confrontation—and headquartered their operations at the A.G. Gaston Motel.

Although A.G. Gaston was also involved in the civil rights movement, his approach was far more conservative, mirroring that of Birmingham’s Black middle class and clergy. Immediately prior to King’s arrival in Birmingham, Gaston was involved in negotiations with city officials and merchants to implement a policy of phased desegregation. He viewed the impending protests with distrust and feared that it would give city officials—particularly the Commissioner of Public Safety, T. Eugene “Bull” Connor—free rein to retaliate forcefully against the protestors. Yet despite his opposition to the confrontational tactics of the protestors, Gaston offered a modest lodging discount to the organizers of Project C and provided additional meeting space in his nearby office building.

In April 1963, Project C began occupying lunch counters, followed by a number of sit-ins and marches. Then on Good Friday, King and Abernathy led a group of fifty marchers in defiance of a court order barring the demonstrations. They made it several blocks before police arrested and jailed many of the marchers, including King. While confined in the Birmingham Jail, King wrote his seminal “Letter from Birmingham Jail.”

Following the Good Friday march, the protest organizers launched a series of Children’s Marches throughout the city. Marching from Kelly Ingram Park toward City Hall and the Retail District, the marchers were met with outright brutality from the Birmingham police, who unleashed police dogs and water hoses on the young demonstrators, and arrested scores of other children. Televised coverage of the event put a new spotlight on civil rights issues in the South. The marches continued for six more days until the organizers of the march issued a temporary moratorium in order to negotiate a solution.

On May 10, 1963, King, Abernathy, and Shuttlesworth held a news conference in the courtyard of the Gaston Motel to officially announce that a truce had been negotiated with local business leaders. The truce produced a watered-down version of the original list of demands issued by the protest organizers. The original list called for immediate desegregation of lunch counters, restrooms, and other facilities, but

the compromise that was ultimately reached called for a more gradual timetable extending over several months.

While the main parties involved in the negotiations reluctantly accepted the truce, white terrorists in the city refused to accept the deal. The day after King announced the truce, terrorists detonated a bomb on the west side of the Gaston Motel, targeting the room where King and Abernathy had been staying. Both leaders, however, had just left for Atlanta, and the room was empty. After the bombing, protests spread throughout the city. The demonstrations in Birmingham inspired hundreds of solidarity protests throughout the country over the next ten weeks.

The Gaston Motel possesses associative significance under national register criteria A and B. Under criterion A, the motel is important for its association with the civil rights movement, a milestone in the evolution of the United States. Under criterion B, the property is significant for its association with the leaders of the movement who were present at the motel during the Birmingham operations, including Dr. King, Reverend Abernathy, and Reverend Shuttlesworth. The motel functioned as the headquarters for the SCLC and the ACMHR Project C campaigns in Birmingham. During the SCLC and ACMHR campaigns in spring 1963, the Gaston Motel played a significant role in the development of these events as highlighted below:

- Lodging for Dr. King, Reverend Abernathy, and other leaders of the civil rights movement, as well as the location for Project C strategy meetings.
- The starting point for the first march of the campaign began in the courtyard of the motel on April 6, 1963, with plans to reach City Hall. The protestors were stopped in Kelly Ingram Park by the “canine corps” of the Commissioner of Public Safety, T. Eugene “Bull” Connor.
- The site of daily meetings of a 25-person advisory committee appointed by Dr. King to review daily plans in response to some reluctance about the movement by local African American leaders following the march, including A.G. Gaston.
- The site where Dr. King, and the Reverends Abernathy and Shuttlesworth were served an injunction against further marches and other demonstrations on April 10, which led to Dr. King’s arrest during the march on April 12.
- The site of a press conference on May 10, 1963, to announce a compromise between local white business leaders and civil rights advocates that included the release of peaceful protestors, integration of the city’s lunch counters, and a promise for white businesses to begin hiring African Americans.
- The site of a press conference on May 8, 1963, of young civil rights demonstrators following the Children’s Crusade Marches in the city of Birmingham.
- The midnight bombing following the compromise announcement at the motel’s southwest corner targeting Dr. King, who was not in Birmingham at the time.

In addition to its importance under national register criteria A and B, the Gaston Motel is significant under criterion C for its architecture. The project architect was Stanley Echols, who was one of many African American architects who designed buildings throughout the area, and the builder was the Steel City Construction Company of Birmingham. The “ultramodern” design reflected the prevailing hospitality design trends of the time, including many of the characteristics of the International style, as expressed through the motel’s flat roof, smooth wall surfaces, and large expanses of windows on its front facade. Echols’s midcentury, International-style design aesthetics are also reflected in the contributing elements of the three principal historic structures at the motel site. Some of the motel’s exterior character-defining features have already undergone restoration as part of the Phase 1 of the restoration process. Restoration of the motel’s interior consistent with the treatment recommendations of the HSR and the proposed site plan is still pending.

Overall, the historic structures at the site retain sufficient physical integrity to convey their collective significance as the A.G. Gaston Motel, according to national register criteria. Although the motel displays diminished integrity of design, materials, and workmanship, it does retain its integrity of location, setting, feeling, and association to reflect its period of significance (1954–1968) and its association with the events and individuals important in the civil rights movement under national register criteria A and B, and architectural and design value under criterion C. Monument-specific preservation strategies and design guidelines developed in coordination with the city of Birmingham would protect the character-defining features of the national monument’s cultural landscape from incompatible development.

## **ENVIRONMENTAL CONSEQUENCES**

### **Cultural Landscapes**

Changes to cultural landscapes within the national monument would follow the recommendations in the GMP. Implementation of the GMP would allow for the preservation, rehabilitation, restoration, and reconstruction of the historic fabric and the treatment of cultural landscapes in a manner consistent with the desired conditions and public interpretive goals proposed for the national monument. The treatment recommendations for the cultural landscape at the Gaston Motel would consist of a combination of rehabilitation, restoration, and reconstruction treatments as described in the Secretary of the Interior’s *Guidelines for the Treatment of Cultural Landscapes* and *Standards for the Treatment of Historic Properties*

#### **Alternative 1 – No Action**

Under alternative 1, the GMP would not be implemented, and the plan’s desired conditions and management strategies for cultural landscapes within the national monument would not be realized. Under the no action alternative, there would be no management strategy in place to rehabilitate, restore, and reconstruct the cultural landscapes at the Gaston Motel in accordance with the Secretary of the Interior’s *Guidelines for the Treatment of Cultural Landscapes* and *Standards for the Treatment of Historic Properties* or to support a consistent interpretive experience for visitors at the site. Additionally, while the national monument would continue to operate through informal coordination meetings among its existing partner agencies and organizations, there would be no formal preservation strategy to guide the long-term management of cultural landscapes within the monument. Without an overall preservation strategy, there is the potential for incompatible development to adversely affect the national monument’s historic setting by diminishing important views. Additionally, the absence of a preservation strategy could result in the use of inappropriate treatments that could hasten the physical deterioration of landscape features. Alternative 1 would, therefore, increase the potential for direct, long-term impacts that would adversely affect the integrity of contributing landscape features and the ability of the national monument to convey its significance and association with the civil rights events that occurred in Birmingham.

#### **Cumulative Impacts**

Under the no action alternative, the GMP would not be developed, and there would be a greater potential for incompatible development and inappropriate treatments to adversely affect the cultural landscape features in the monument. Ongoing and future projects with the potential to contribute cumulative impacts on cultural landscapes include the Urban Impact Master Development Plan, Masonic Temple Building Redevelopment, Historic Bethel Baptist Expansion, City Center Master Plan, and the St. Paul United Methodist Church NPS Grant Project. The City Center Master Plan includes plans for the Civil Rights District with a concentration on preserving historic and cultural sites within the monument area. The Urban Impact Master Development Plan addresses how redevelopment should be consistent with the historic district and national monument historic fabric. The St. Paul United Methodist Church project would preserve and restore St. Paul’s historic church building exterior. The cumulative projects are

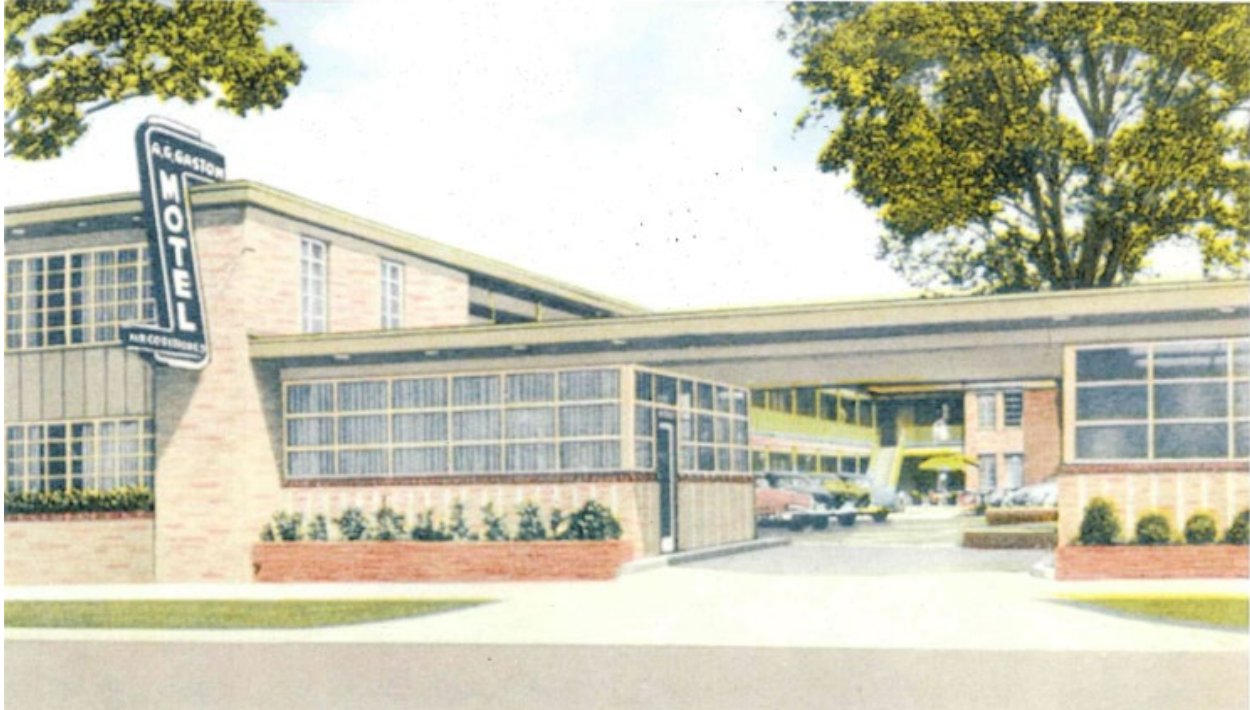
intended to have long-term, beneficial impacts on the cultural landscape features and the ability of the national monument to convey its significance and association with the civil rights movement in the city of Birmingham.

The impact from the no action alternative, when considered together with other cumulative projects would result in a greater potential for direct, long-term, adverse impacts on the monument's cultural landscapes. The primary driver of adverse cumulative impacts would be a continued lack of a preservation strategy, with the increased potential for incompatible development to adversely affect the national monument's historic setting by diminishing important views.

### **Alternative 2 – NPS Preferred Alternative**

Under alternative 2, all proposed development would adhere to the treatments recommended in the CLR and GMP, resulting in direct, long-term, beneficial impacts. The treatment recommendations for the cultural landscape at the Gaston Motel would consist of a combination of rehabilitation, restoration, and reconstruction treatments as described in the Secretary of the Interior's *Guidelines for the Treatment of Cultural Landscapes and Standards for the Treatment of Historic Properties*. Specific recommendations include the following (see figure3):

- Restoring the building's front facade along 5th Avenue North and restoring the porte-cochere and parking court to reflect the conditions of the site in 1954, the year that the motel was constructed. Specific elements proposed for reconstruction include the original Z-shaped sign, two planting boxes, and a metal gate at the porte-cochere.
- Reconstructing the original courtyard space and the adjacent area previously occupied by a one-story garage to reflect the landscape setting of the site as it appeared in 1963, a pivotal year in the civil rights movement in Birmingham. The goal of this reconstruction is to return the appearance of the courtyard to May 10, 1963, when Dr. King and the Reverends Abernathy and Shuttlesworth held a news conference in the courtyard of the motel to announce that a truce had been negotiated between city officials and the leaders of the SCLC/ACMHR campaigns. Specific elements proposed for reconstruction include the site's original 27-foot x 72-foot courtyard, the brick plaza, metal stairs, covered concrete walkway, metal furniture, curvilinear planting bed, concrete bird bath, vegetation, angled parking and drive lane, parking stop, chain link fence, and the footprint of a former two-story garage and apartment building.
- Rehabilitating the balance of the site, including the eastern section of the parking court and the buildings added to the site in 1968 to enrich the setting with tangible and interpretive elements that continue to tell the story of this site through 1968 and beyond. Specific elements proposed for rehabilitation include the various footprint options for the two-story garage and apartment building, the removal of the 1968 ground-mounted motel sign, and the removal of non-contributing vegetation.



1954 A.G. Gaston Motel Exterior, Source: A.G. Gaston Design, Inc.

Overall, alternative 2 would provide for a cohesive interpretive plan to help visitors understand the civil rights story in Birmingham during the 1950s and 1960s through the preserved and restored cultural landscapes that contribute to the national monument's historic setting. Monument-specific preservation strategies and design guidelines developed in coordination with the city of Birmingham would protect the character-defining features of the national monument's cultural landscape from incompatible development.

### **Cumulative Impacts**

Impacts on the monument's cultural landscapes from cumulative projects would be the same as those described for alternative 1. Alternative 2 would result in direct, long-term, beneficial impacts on the monument's cultural landscapes from the implementation of the GMP's desired conditions and management strategies. When the incremental impacts from alternative 2 are combined with the impacts from present and reasonably foreseeable actions, the overall cumulative impact on cultural landscapes would be direct, long term, and beneficial.

### **Historic Structures**

Changes to historic structures within the national monument would follow the recommendations in the HSR and GMP, which would allow for the preservation, rehabilitation, restoration, and reconstruction of the historic fabric and the continued use of historic structures in a manner consistent with the desired conditions and public interpretive goals proposed for the national monument. The recommendations in the GMP would adhere to the Secretary of the Interior's *Standards for the Treatment of Historic Properties, Guidelines for the Treatment of Cultural Landscapes*; Director's Order 28: *Cultural Resources Management Guidelines* (NPS 1998); and all applicable local, state, and federal codes, regulations, and policies. Changes to historic structures that adhere to the Secretary of the Interior's treatment standards would avoid adverse impacts on historic structures and result in direct, long-term, beneficial impacts.

### **Alternative 1 – No Action**

Under alternative 1, the GMP would not be implemented, and the plan's desired conditions and management strategies for historic structures within the national monument would not be realized. Under this alternative, there would be no management strategy in place to preserve, rehabilitate, restore, and reconstruct the historic structures at the Gaston Motel in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* or to support a consistent interpretive experience for visitors at the site. Additionally, while the national monument would continue to operate through informal coordination meetings among its existing partner agencies and organizations, there would be no formal preservation strategy in place to guide the long-term management of historic structures within the monument or important structures currently outside the monument's boundary, such as The Historic Bethel Baptist Church. Without an overall preservation strategy, there would be a greater potential for incompatible development to adversely affect the monument's historic setting. The absence of a preservation strategy would also increase the potential for inappropriate treatments to adversely affect various character-defining features that are important to understanding the architectural significance of the monument's historic structures and to the structures' historical associations with the civil rights events that occurred in Birmingham. Alternative 1 would, therefore, increase the potential for direct, long-term impacts that would adversely affect the integrity of contributing historic structures and the ability of the national monument to convey its significance and associations with the civil rights events in Birmingham.

### **Cumulative Impacts**

Under alternative 1, it is assumed that the GMP would not be implemented, and consequently there would be no cooperative management agreement between the NPS and the city of Birmingham to define specific roles and responsibilities for the management of the Gaston Motel or to oversee the preservation, rehabilitation, restoration, and reconstruction of the motel's historic structures. Without the GMP, there would be a greater potential for incompatible development and inappropriate treatments to adversely affect the historic structures in the monument. Ongoing and future projects with the potential to contribute cumulative impacts to historic structures include the Urban Impact Master Development Plan, Masonic Temple Building Redevelopment, Historic Bethel Baptist Expansion, City Center Master Plan, and the St. Paul United Methodist Church NPS Grant Project. The City Center Master Plan includes plans for the Civil Rights District with a concentration of preserving historic and cultural sites within the monument area. The Urban Impact Master Development Plan addresses how redevelopment should be consistent with the historic district and national monument historic fabric to prevent incompatible development. The St. Paul United Methodist Church project will preserve and restore St. Paul's historic church building exterior. The cumulative projects are intended to have long-term, beneficial impacts on historic structures by preserving the character-defining features that are important to understanding the architectural significance of the monument's historic structures.

The impact from the no action alternative, when considered together with other cumulative projects, would result in a greater potential for direct, long-term, adverse impacts on the monument's historic structure. The primary driver of adverse cumulative impacts would be the lack of an ongoing preservation strategy, resulting in the increased potential for inappropriate treatments and incompatible development to adversely affect the national monument's historic setting by diminishing important views.

### **Alternative 2 – NPS Preferred Alternative**

Under alternative 2, all proposed development would adhere to the treatments recommended in the GMP, resulting in direct, long-term, beneficial impacts. The treatment recommendations for the historic structures at the Gaston Motel would consist of a combination of preservation, rehabilitation, restoration, and reconstruction treatments as described in the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. Specific recommendations include the following:



- Preservation treatment. Preservation of the extant exterior and structural portions of the 1954 motel.
- Rehabilitation treatment. Rehabilitation of the exterior of the 1968 buildings to reflect their 1968 conditions. The interior spaces of the rooms in the 1954 motel would be rehabilitated, except for the historically significant Master Suite and other spaces that would be reconstructed. The interior of the 1968 buildings would be rehabilitated because of the substantial loss of historic fabric. These interior spaces would be configured to meet the future programmatic needs and interests of the city of Birmingham and the other stakeholder partnering sites. The rear wing of the 1968 addition would be configured like the 1954 motel rooms. The rehabilitation of the 1968 buildings would require the removal of non-contributing features, including the existing roofing system and flashing, a first-floor window on the south structure, all interior partitions, plumbing fixtures, and electrical wiring to the main panel.
- Restoration treatment. Restoration of the extant exterior and structural portions of the 1954 motel to reflect the conditions of the 1963 period of significance, when the property achieved national historic importance for its association with the civil rights movement and the planned actions of Project C. Restoration of the 1954 building would require the removal of non-contributing features, including the ashlar stone planters on the 5th Avenue elevation, aluminum windows, plumbing fixtures, electrical wiring to the main panel, and existing roofing system and flashing.
- Reconstruction treatment. Reconstruction of the interior spaces significant to the motel and the civil rights movement, including the Master Suite, lobby, coffee shop, restaurant, and at least one additional guest room, as well as the damaged and missing 5th Avenue elevations of the coffee shop and restaurant.



Master Suite Images, Source: 1954 Birmingham News File

In addition to the treatments proposed for the Gaston Motel, the implementation of the GMP would result in the following long-term benefits for the national monument and its interpretive goals:

- Preservation of the historic character of the neighborhood within the boundary of the national monument, to the extent practicable.
- Expansion of the national monument boundary to include The Historic Bethel Baptist Church, Parsonage, and Guard House.
- Protection and management of both NPS and partner museum collections per industry standards.
- A program to preserve and appropriately interpret the contributions of individuals associated with the history of the national monument through oral histories and written historical narratives.

- A process for ensuring appropriate development within the boundary of the national monument that includes the development of a consistent set of design standards that preserves the historic character of the area.
- Services that provide technical expertise and preservation guidance in the preparation of baseline cultural resource documentation for key resources at the monument, such as HSRs and CLRs.

Overall, the implementation of the proposed treatments for historic structures, combined with the expansion of the monument boundary to include The Historic Bethel Baptist Church, the preservation of the monument's historic setting through compatible development, a plan to manage and protect museum collections, and a program to document the contributions of individuals important in the Birmingham civil rights movement as described above, would provide for a cohesive interpretive experience for visitors to the national monument, thereby resulting in direct, long-term benefits.

### **Cumulative Impacts**

Impacts on the monument's historical structures from cumulative projects would be the same as those described for alternative 1. Alternative 2 would result in direct, long-term, beneficial impacts on historic structures and the national monument's ability to interpret the significance of these structures to the public. Development within the monument would adhere to design standards that would preserve the historic character of the area and provide visitors with a cohesive interpretive experience of the historic structures within the monument. When the incremental impacts from alternative 2 are combined with the impacts from present and reasonably foreseeable actions, the overall cumulative impact on the historic structures in the monument would be direct, long term, and beneficial.

### **Socioeconomics**

NEPA requires an analysis of impacts on the human environment, which includes economic, social, and demographic elements in the affected area. Restoration and rehabilitation activities associated with the proposed action would most likely bring a positive economic impact and additional interest to the region. Implementation of the proposed action could have a beneficial effect on the surrounding community's overall economies, population, income, local businesses, and employment opportunities.

### **AFFECTED ENVIRONMENT**

For this document, the study area (the area of consideration) for socioeconomic analysis is Jefferson County, Alabama. Jefferson County contains the national monument and several other prominent historic sites and landscapes pivotal to the civil rights movement in the 1950s and 1960s. Jefferson County is Alabama's most populous county, and Birmingham (Jefferson County seat) is the second-largest city in the state.

Jefferson County was largely rural until the 1870s; however, the discovery of coal, iron ore, and limestone transformed Jefferson County from a rural county of small farms and plantations into one of the country's major iron and steel producers. Industries in Birmingham and the rest of the country grew throughout the 1920s. In the 1960s, Jefferson County saw a shift in its economy as the county transitioned from being based on mining and turning to medical services, banking, financial services, and education. In addition, the construction of Interstate 65 and 20/59 positioned the county to be the geographic and economic hub of the state (Jefferson County Planning and Zoning Commission 2011).

According to the US Census, the population of Jefferson County in 2020 was 674,721. The population grew by almost 2% between 2000 and 2020, while the city of Birmingham's population in 2020 saw a 17.3% decline in population (to 200,733) during the same period (US Census Bureau 2000, 2010, 2020a). Population projections released by the University of Alabama estimate that by 2040 the population of

Jefferson County could increase by 1.4%, reaching 667,433<sup>1</sup> people, and the population of the Birmingham-Hoover Metropolitan Statistical Area could increase by 10.9% to 1,251,303<sup>2</sup> (University of Alabama 2022). The population density of Jefferson County is 607.2 people per square mile, and for Birmingham, 1,342 people per square mile (US Census Bureau 2020a). Birmingham is a majority-minority city with 68.4% of the population identifying as Black or African American.

In Jefferson County, the median household income is \$55,088, and the median house value is \$165,000. In comparison, Birmingham has a median household income of \$38,832 and a median house value of \$97,500 (US Census Bureau 2020b). The primary industries providing employment in Jefferson County are educational services, and health care and social assistance (25.8%); manufacturing (10.7%); professional, scientific, and technical services (10.6%); and finance and insurance, and real estate and rental and leasing (10.1%), and retail trade (8.9%). In Birmingham, the top industries providing employment are educational services, and health care and social assistance (28.5%); retail trade (10.1%), professional, scientific, and technical services (10.0%); manufacturing (9.9%), and finance and insurance, and real estate and rental and leasing (8.4%). The arts, entertainment, recreation, and accommodation and food services industries account for 5.9% of Jefferson County's industries and 7.2% of Birmingham's industries (US Census Bureau 2020b). However, the Alabama Tourism Department noted that total travel-related employment made up 12.27% of the total share in Jefferson County (Alabama Tourism Department 2020). In 2021, Jefferson County and Birmingham had unemployment rates of 3.6% and 5.0%, respectively, which is higher than the state unemployment rate of 3.4 percent (US Bureau of Labor Statistics 2021).

According to the Alabama Tourism Industry Economic Impact Annual Report, tourism contributed to 165,230 jobs in 2020; more than \$800 million of state and local tax revenue was generated by travel and tourism activities. In 2020, Jefferson County was noted as one of the five most visited counties in the state. It is estimated that 2,394,076 people visited Jefferson County in 2020, and 1,525,026 travelers stayed at a hotel or motel at an average room rate of \$82. Jefferson County received \$535,483,690 in travel-related earnings and had \$1,453,128,289 in expenditures in 2020 (Alabama Tourism Department 2020).

## **ENVIRONMENTAL CONSEQUENCES**

### **Alternative 1 – No Action**

Under the no action alternative, implementation of the GMP for the national monument would not occur, and the existing facilities would remain in their current conditions. In the short term, the socioeconomic impact of the no action alternative would likely result in visitation to the monument remaining at its current level, which is low. Long-term visitation to the monument would be susceptible to national and regional economic conditions and trends and how potential visitors respond to those conditions over time. In addition, the city of Birmingham and the rest of Jefferson County would forgo the direct economic

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<sup>1</sup>These projections are driven by population change between the 2000 and 2010 US Census, taking into account 2017 population estimates. Data on births and deaths for 2000 to 2010 and more recent data from the Alabama Department of Public Health were used to derive birth and death rates for the state and each county.

<sup>2</sup> These projections are driven by population change between the 2000 and 2010 US Census, taking into account 2017 population estimates. Data on births and deaths for 2000 to 2010 and more recent data from the Alabama Department of Public Health were used to derive birth and death rates for the state and each county. County projections are summed to their respective metropolitan areas.

effects of the potential increase in visitors, including spending in the local communities and any retained sales, income, and jobs resulting from visitor spending.

### **Cumulative Effects**

The no action alternative would contribute to adverse cumulative impacts on socioeconomics in the monument area. Visitor and tourism spending at the Gaston Motel would not occur, resulting in long-term, adverse impacts on socioeconomic conditions. Ongoing and future projects with the potential to contribute cumulative impacts on socioeconomics include the Urban Impact Master Development Plan, Masonic Temple Building Redevelopment, Historic Bethel Baptist Expansion, City Center Master Plan, Birmingham Sidewalk Master Plan, Wallace Rayfield Museum, 16th Street Baptist Church Expansion, St. Paul United Methodist Church NPS Grant Project, NPS Long-Range Interpretive Plan, and the Global Forum for Freedom and Justice Campus. The Urban Impact Master Development Plan, Masonic Temple Building Redevelopment, 16th Street Baptist Church Expansion, the Wallace Rayfield Museum, and the Global Forum for Freedom and Justice Campus would provide additional amenities and services for visitors to the monument including additional retail, entertainment spaces, food courts, a restaurant, meeting spaces, event and outdoor spaces, and a hotel and conference complex, all of which could enhance visitor experiences and increase tourism. The St. Paul United Methodist Church project and NPS Long-Range Interpretive Plan would develop additional interpretive and educational opportunities for visitors within the monument area. In addition, the parsonage at the 16th Street Baptist Church would be restored and repurposed for a museum, which would provide additional attractions. The City Center and Birmingham Sidewalk Master Plans would provide additional multimodal transportation options, streetscape improvements, and parking for visitors to access the monument area. All cumulative projects are intended to have long-term, beneficial impacts on socioeconomic conditions.

The no action alternative would contribute direct, long-term, adverse impacts to the overall socioeconomic conditions in the national monument. The primary driver of adverse cumulative impacts would continue to be the lack of an ongoing management strategy for the Gaston Motel, with no expanded visitor services or amenities at the motel. Increased visitor spending would not be realized at the monument, and the motel would not serve as an attraction for local and regional tourism.

### **Alternative 2 – NPS Preferred Alternative**

Under alternative 2, NPS would implement the GMP for the national monument, including its conditions and management strategies. Recent studies have examined the economic impact of national monument designation. Opponents frequently argue that monuments have a detrimental effect on local economies by restricting access to public lands. Recent studies, however, demonstrate that national monument designation can benefit local economies, particularly by increasing tourism and recreational spending (Walls et al. 2020; Rasker et al. 2013). According to the Walls et al. 2020 study, monument designation resulted in a 10% increase in new businesses and an 8.5% increase in jobs in the zip codes adjacent to 14 national monuments. The hotel, business services, health services, construction, finance, investments, and real estate sectors all saw job growth. Additionally, the study discovered that monument designations may help new businesses thrive.

National park system units welcomed more than 237 million visitors in 2020, with visitors spending nearly \$14.5 billion in local gateway regions.<sup>3</sup> Additionally, park units benefited the national economy by creating 23,000 jobs, earning \$9.7 billion in labor income, adding \$16.7 billion in value added, and generating \$28.6 billion in economic output. The lodging industry benefited the most directly, with \$5 billion in economic output directly benefiting this sector on a national scale, followed by the restaurant

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<sup>3</sup>Gateway Regions are the areas directly surrounding NPS sites. Gateway economies include the cities and towns where visitors typically stay and spend money while visiting NPS sites (NPS, 2021).

industry, with \$3 billion in economic output (NPS 2021). Also, in 2020, 1.3 million visitors visited national parks in Alabama during the same period, contributing an estimated \$61.7 million to the state's local gateway regions, supporting 940 jobs, \$24.8 million in labor income, \$42.6 million in value added, and \$78.2 million in economic output (NPS 2021).

Under this alternative, it is reasonable to believe that visitation to the monument would increase as a result of enhanced visitor experiences at a restored, accessible Gaston Motel and increased local and regional partnership opportunities. The subsequent increase in visits could be a catalyst for local job creation. Additionally, visitor spending would grow beyond the current levels, resulting in beneficial impacts on the local economy and, to some extent, neighboring counties.

### **Cumulative Effects**

The impacts from alternative 2, when considered together with other past, present, and reasonably foreseeable actions would result in positive beneficial impacts to the socioeconomic conditions of the study area. However, in the longer term, local, regional, and/or national economic and social trends could affect visitation to the monument.

Impacts on the socioeconomic conditions from cumulative projects would be the same as those described for alternative 1. Alternative 2 would contribute beneficial impacts on visitation and tourism from the implementation of the GMP's desired conditions and management strategies. Rehabilitation and restoration of the Gaston Motel would provide visitors with a cohesive interpretive experience of the historic significance of the monument and would have direct, long-term, beneficial impacts on visitation, tourism, and spending in the national monument. When the incremental impacts from alternative 2 are combined with the impacts from present and reasonably foreseeable actions, the overall cumulative impact on socioeconomics would be beneficial, with the incremental impacts of alternative 2 contributing noticeable beneficial impacts.

## **CHAPTER 4: CONSULTATION AND COORDINATION**

This “Consultation and Coordination” chapter describes the public involvement and agency consultation used during the preparation of the EA. A combination of activities, including internal scoping, helped guide the NPS in developing this EA. This chapter provides a detailed list of the various consultations initiated during the development of the EA, as well as a list of recipients for this document.

### **Public Participation and Scoping**

#### **INVOLVEMENT OF NATIONAL MONUMENT PARTNERS**

At the beginning of the planning process, the NPS conducted a series of interviews with national monument partners to get a better understanding of how each site is currently visited, plans for future interpretation visitation, and how partners could best benefit from the NPS’s involvement in the overall monument. In March and April 2020, interviews were conducted with:

- Urban Impact – March 31, 2020
- Historic Bethel Baptist Church – April 1, 2020
- City of Birmingham – April 2, 2020
- 16th Street Baptist Church – April 2, 2020
- BCRI – April 3, 2020
- St. Paul United Methodist Church – April 3, 2020

Partners were also invited to the public meetings during the civic engagement process as described below. Additional meetings were held with the city of Birmingham throughout the planning process including monthly coordination meetings.

#### **THE CIVIC ENGAGEMENT AND SCOPING PROCESS**

Civic engagement and scoping are essential components of the NEPA planning process. Public scoping and civic engagement were conducted to inform various agencies, community partners, and the public about the need to develop a comprehensive GMP at the national monument. Public scoping included a project scoping newsletter. The newsletter provided an overview of the project, described the planning process and the path forward, and included the 30-day public scoping period notice. The NPS solicited feedback on a series of questions included within the newsletter to assist with planning for the monument’s future and identifying preferred interpretive and educational experiences. Initial public comment on the GMP ran from June 7, 2021, to July 10, 2021, and included opportunities to be involved in the planning process for the monument and to submit written comments. The NPS held two virtual meetings on June 16, 2021, from 1:00 to 3:00 p.m. (Central Time), and on June 17, 2021, from 6:30 to 8:30 p.m. (Central Time) to provide members of the public the opportunity to learn more and ask questions about the GMP.

### **Agency Consultation**

#### **NATIONAL HISTORIC PRESERVATION ACT SECTION 106 CONSULTATION**

The National Historic Preservation Act section 106 consultation process related to the A.G. Gaston Motel, Birmingham Civil Rights Historic District, was initiated with the Alabama SHPO on August 31, 2018.

The SHPO reviewed the HSR and the report's Phase 1 design drawings in 2018. A summary of consultation efforts with the Alabama Historical Commission to date are listed below.

- On August 31, 2018, the NPS initiated formal consultation with the SHPO under section 106 of the National Historic Preservation Act, as amended. The NPS transmitted the HSR and draft design development drawings prepared by Lord Aeck Sargent for the A.G. Gaston Motel to the Alabama Historical Commission for review and comment. The HSR and design drawings were prepared in accordance with the preservation, rehabilitation, restoration, and reconstruction treatment standards outlined in the Secretary of the Interior's *Standards for the Treatment of Historic Properties*.
- On September 10, 2018, the Alabama Historical Commission provided formal comments on the design drawings for the Gaston Motel exterior restoration to the NPS in a letter addressed to Reginald Peoples, Acting Superintendent of the national monument at the time consultation occurred.
- On November 15, 2018, the NPS sent a letter to the Alabama Historical Commission requesting review and comment on the 100% design drawings, which the Commission required for the purposes of assessing effects on the property under section 106 of the National Historic Preservation Act.
- On February 5, 2019, the NPS sent a letter to the Alabama Historical Commission to inform the SHPO that the NPS had determined that implementation of Phase 1 of the undertaking will have no adverse effect on the Gaston Motel. The letter also included a matrix that addressed the SHPO's comments on the previously submitted design drawings for the motel.
- On February 21, 2019, the Alabama Historical Commission provided formal comments to the NPS in a letter addressed to Reginald Peoples, Acting Superintendent of the national monument. The letter acknowledged the NPS's responses to the SHPO's comments on the Phase 1 design drawings for the Gaston Motel. Additionally, the letter indicated that the SHPO agreed with the NPS finding that the Phase 1 exterior repairs and restoration work will have no adverse effect on the Gaston Motel.

The NPS will be continuing further consultation under section 106 associated with future design phases for the work on the Gaston Motel. In addition, the GMP would also provide management strategies for ensuring consistent development within the boundary of the national monument, guidance for the preservation of museum collections, and the development of an oral history collection. Some of the details associated with the desired conditions envisioned for the national monument, as well as the management strategies developed to achieve those conditions, require additional collaboration among the monument partners before the GMP can be finalized. The NPS will continue to consult with the SHPO as the project advances over the next several years.

## CHAPTER 5: LIST OF PREPARERS

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## CHAPTER 6: ACRONYMS AND ABBREVIATIONS

ABAAS	Architectural Barriers Act Accessibility Standards
ACMHR	Alabama Christian Movement of Human Rights
BCRI	Birmingham Civil Rights Institute
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLR	cultural landscape report
EA	environmental assessment
Gaston Motel	A.G. Gaston Motel
GMP	general management plan
historic district	Birmingham Civil Rights Historic District
HSR	historic structure report
NAACP	National Association for the Advancement of Colored People
national monument	Birmingham Civil Rights National Monument
NEPA	National Environmental Policy Act
NPS	National Park Service
national register	National Register of Historic Places
NRIS	National Register Information System
SCLC	Southern Christian Leadership Conference
SHPO	state historic preservation office
USC	United States Code

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for the public lands and promoting citizen participation in their care. The department also has major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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