



54 Howell Street, NE Historic Structure Report

August 2019
Cultural Resources, Partnerships and Science Division
Southeast Region

54 Howell Street, NE
Martin Luther King, Jr. National Historical Park
Atlanta, Georgia

Historic Structure Report

August 2019

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About the front cover: View of the 54 Howell Street, NE, looking north, September 2016.

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54 Howell Street, NE

Martin Luther King, Jr. National Historical Park

Atlanta, Georgia

Historic Structure Report

Approved by:  7/19/19
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Foreword

The telling of Dr. Martin Luther King Jr.'s life and legacy is larger than the historic structures within the park and cannot be told just through the preservation of the historic buildings within the Martin Luther King, Jr. National Historical Park. However, Historic Structure Reports (HSRs) are important treatment documents that help with preservation efforts on the historic structures throughout the park, through architectural assessments, historic background information for context, and chronology of development and use, all of which condensed provides the park a tool for repair, rehabilitation and preservation for those homes that Dr. King knew in his childhood. The reports will give the reader a better understanding of the architectural landscape of Dr. Martin Luther King Jr.'s Birth Home neighborhood and the people who lived there and helped shape the life of one of the greatest leaders of the civil rights movement.

This scholarly work is dedicated to the stewardship of thirty-five historic structures, four of which have historic significance as the places where Dr. King was born, lived, worked, and worshipped. These structures include 501 Auburn Avenue, the Birth Home of Dr. King, where he lived until he was twelve years old; Ebenezer Baptist Church, where his grandfather, father and later himself served as pastors; the Prince Hall building that housed the Southern Christian Leadership Conference (SCLC); and 234 Sunset Avenue where Dr. Martin Luther King Jr. and Coretta Scott King made a home and lived with their children, Yolanda, Martin, Dexter, and Bernice, from 1965 to his death in 1968 and until Mrs. King left the home in August 2004.

The HSRs began in 2016, when the park was awarded funds to complete thirty-one HSRs for historic buildings within the park's boundary.

We are grateful for the cooperation of all those who helped to make this document possible.

Judy Forte
Superintendent
Martin Luther King, Jr. National Historical Park
2019

Management Summary

At the request of the National Park Service (NPS), Panamerican Consultants, Inc. and its subconsultants, Wiss, Janney, Elstner Associates, Inc. (WJE) and WFT Architects (WFTA), have developed this Historic Structure Report (HSR) for 54 Howell Street at Martin Luther King, Jr. National Historical Park in Atlanta, Georgia. Refer to Figure 1 through Figure 3 at the end of this chapter for maps showing the location of 54 Howell Street and Martin Luther King, Jr. National Historical Park. Figure 1 is a map of the state of Georgia showing the location of Martin Luther King, Jr. National Historical Park. Figure 2 is an aerial photograph of Atlanta showing the location of Martin Luther King, Jr. National Historical Park. **Error! Reference source not found.** is a map of Martin Luther King, Jr. National Historical Park showing the location of 54 Howell Street, NE.

The apartment building at 54 Howell Street is listed on the National Register of Historic Places (NRHP) as a contributing resource to the historic district that comprises Martin Luther King, Jr. National Historical Park. The property is important as an example of changes that occurred in the “Sweet Auburn” neighborhood during the 1920s and 1930s as many of the larger homes in the community were converted into rooming houses and apartments as upper and middle-class African Americans moved to the suburbs. At the same time, small apartment buildings like 54 Howell Street were constructed in the neighborhood. Dr. King grew up in Sweet Auburn as the community was transitioning, and his introduction to those individuals struggling economically and socially happened within his own community. The occupants of 54 Howell Street were widows, retirees likely on small pensions, or workers who had jobs as waiters or day laborers, the type of

citizens for whom Dr. King would advocate as his ministry and out-reach grew.

Historical Data

Martin Luther King, Jr. National Historical Park is in the Old Fourth Ward and Sweet Auburn neighborhoods on the east side of the City of Atlanta. Sweet Auburn is centered on a mile and half stretch of Auburn Avenue which includes residential, religious, and commercial buildings associated with Atlanta’s African American community dating from the late nineteenth century through the early twentieth century. At the time of Martin Luther King Jr.’s birth on January 15, 1929, Auburn Avenue was a thriving center of African American commercial, social, religious, and political activity. John Wesley Dobbs (1882-1961), an African American civic and political leader, coined the name “Sweet Auburn” in reference to the prosperity and opportunity afforded by the neighborhood.

The park commemorates the life and accomplishments of Dr. King as a prominent leader of the American civil rights movement during the 1950s and 1960s. Toward this end, the park

preserves, protects, and interprets for the benefit, inspiration, and education of present and future generations, the places where Martin Luther King, Jr. was born, lived, worked, worshiped, and is buried; while interpreting the life experiences and

significance of one of the most influential Americans in the 20th Century [sic].¹

Much of King's civil rights activities occurred outside of Atlanta, but he resided in the city from 1960 until his death in 1968. Also within the National Historical Park is Ebenezer Baptist Church, which is associated both with King's childhood and his return to Atlanta as an adult. Earlier, in 1957, he established a base of operations in Atlanta for the Southern Christian Leadership Conference of which he was the first president.²

By the end of the nineteenth century, predominantly white, middle-class families had built new houses or moved into the recently constructed houses along Auburn Avenue east of Jackson Street.³ Built about 1886, the oldest building on the Birth Home block stands at 521 Auburn Avenue.⁴ By 1899, most of the lots along Auburn Avenue between Jackson and Howell Streets were developed, although denser residential development remained to the west. Single-family, one- and two-story houses principally line the avenue. Some multiple-family dwellings had been constructed, but the housing tended to be single-family, the majority of which were large, modestly decorated houses. Many of the properties had stables and wood and coal sheds in the rear.

Residences in the Birth Home block are representative of vernacular adaptations of popular domestic architectural styles of the 1890s and early twentieth century found in American cities. Most single-family houses on the Birth Home block erected in the 1890s exhibit Queen

Anne-stylistic elements. The residences are mostly two-story, wood-frame dwellings with one-story rear extensions. Only two buildings on the block constructed in the 1890s are one-story, wood-frame dwellings—515 and 546 Auburn Avenue. Typical characteristics of these houses include irregular massing, projecting bays, broad front porches carried on columns or posts, contrasting surface areas of shingles and clapboard siding, and decorative millwork. In 1894, the Romanesque Revival-style Fire Station No. 6 was constructed on the southeast corner of Boulevard and Auburn Avenue.

In 1905, The Empire State Investment Company developed the northeast corner of Auburn Avenue and Boulevard. Empire State purchased the unimproved property from Adolphus Tittlebaum for \$3,650 and constructed nine duplex buildings that occupied half of the block between Boulevard and Hogue Street. One of the lots was sold in November 1905 for \$1,800 as rental property.⁵ The one-story, frame, double-shotgun houses contrasted with the existing houses on the block, but were typical of the dwellings to the north. Inexpensive shotgun-type housing was a popular vernacular housing type built across the urban South. The double-shotgun house consisted of two shotgun houses joined by a party wall with separate front entrances. Detail was limited to turned post and jig-sawn porch decoration.

The first middle-class African American families to purchase single-family dwellings on the block were enticed by the appeal of living in one of the large attractive homes on Auburn Avenue. Following the construction of double-shotgun houses on the remaining undeveloped lots, the block acquired a distinct mixture of African American socioeconomic classes where middle-class professionals lived alongside working-class laborers. Differences in the length of occupancy also occurred as a result of the diverse socioeconomic status of the block's residents. Residents of single-family homes tended to stay in the neighborhood, forming close relationships with their neighbors. They established a support

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1. National Park Service, *Foundation Document Martin Luther King, Jr. National Historic Site, Georgia* (Atlanta: National Park Service, 2017), 5.
 2. Robert W. Blythe, Maureen A. Carroll, and Stephen Moffson, *National Register of Historic Places documentation for Martin Luther King, Jr., National Historic Site*, certified by the Keeper of the National Register on May 4, 1994, (NRIS 80000435; National Archives Identifier 93208246), 2.
 3. *Ibid.*, Section 7, 4.
 4. *Ibid.*, Section 8, 14.

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5. *Ibid.* Section 8, 57.

network and often relied on one another, especially for child care.

Members of the Williams-King family were among the middle-class families of this group who provided stability to the neighborhood. Their neighbors included the Shaw-Lightners at 514 Auburn Avenue, Charles and Annie B. Faison at 515 Auburn Avenue, the Reverend and Mrs. Alfred and Harriet Lawless at 518 Auburn Avenue, Antoine and Catherine Graves at 522 Auburn Avenue, and Frank and Eula Kirk at 526 Auburn Avenue.⁶ East of the Birth Home block on Auburn Avenue were the residences of other prominent black Atlantans including Charles L. Harper, the first principal of Booker T. Washington High School, at 535 Auburn Avenue, Reverend Peter James Bryan, pastor of Wheat Street Baptist Church, and Cornelius King, son-in-law of Bishop H.M. Turner, former Indian agent for the US government and pioneer realtor.⁷

The block's rental units exhibited a greater rate of turnover with short-term residents living mostly in the double-shotgun housing. Many of the short-term residents worked in unskilled trades, often relocating for employment opportunities. Children on the block played together regardless of their family's status, whereas, the same social mixing has been reported as not as common among the adults.⁸ The *National Register documentation* speculated that this might have been attributed to difficulty of entering into the long-established relationships among the middle class.

By 1929, the African American middle-class families in the neighborhood were in the minority among the total population of residents on the Birth Home block. During the Great Depression, Auburn Avenue and the Birth Home block

experienced the subdivision of many single-family dwellings, the deterioration of its existing stock, and increased tenancy.⁹ Several multiple-family dwellings were constructed on the Birth Home block and adjacent streets. Apartment houses were built at 509 Auburn Avenue (1925) and 506 Auburn Avenue (1933), and a quadraplex was constructed at 54 Howell Street (1931), which subdivided an already crowded house lot. A *Real Property Survey* conducted by the Works Progress Administration in 1939 reported that 100 percent of the Birth Home block was occupied by African Americans, though only 13.3 percent of the buildings were owner occupied and 67.4 percent needed major repairs or were unfit for use.¹⁰

The apartment building at 54 Howell Street was constructed in 1931 by C.E. Miller of Atlanta using day labor.¹¹ Like the other apartment buildings in the area, this quadraplex is relatively plain in style, although it does have exposed rafter tails and triangular braces in the gables, features often associated with the Craftsman style. It is a two-story, rectangular building with two-story porches, weatherboard siding, and a gable roof.

The US Congress created Martin Luther King, Jr. National Historic Site and Preservation District in October 1980. The purpose of the site was "to protect and interpret for the benefit, inspiration, and education of present and future generations the places where Martin Luther King, Junior, was born, where he lived, worked, and worshipped, and where he is buried."¹² When the NPS acquired the properties that make up the Historical Park,

6. Ibid., 21.

7. Michael Black Porter, *Atlanta: An Interdisciplinary Study of Blacks on the East Side of Atlanta, 1890-1930* (Ph.D. dissertation, Emory University, 1974), 10.

8. *National Register documentation*, Section 7, 7. Document includes information on neighborhood relationships from several oral histories.

9. Lucy A. Lawliss, *Martin Luther King, Jr., National Historic Site Cultural Landscape Report: Birth Home Block* (Atlanta: National Park Service, Southeast Regional Office, 1995), 13-14.

10. Ibid.

11. Division of Facilities Management, Series V, Subseries D, Box 5, Folder 10, 1981-1991, np.

12. Public Law 96-428, October 10, 1980.

the apartment house at 54 Howell Street is one of those properties.¹³

Actively rented through the 1980s, the apartment building burned in 1985 and was boarded-up for several years. In some areas of the building fire destruction was extensive; nevertheless, the NPS chose to rehabilitate the apartment and use it as rental housing for temporary staff. In 1992, it underwent a major stabilization and interior rehabilitation.

The apartment building at 54 Howell Street is now used by the NPS as housing for temporary staff.

Treatment and Use

Located in the vicinity of the Martin Luther King Jr. Birth Home, the building at 54 Howell Street is significant for its association with the neighborhood in which Dr. King grew up, and it is a contributing resource to the Martin Luther King, Jr. National Historic District. The apartment is part of the context of the Birth Home neighborhood. It is anticipated to remain in use for housing of park personnel, and its exterior will continue to be interpreted as part of the historic neighborhood. The recommended overarching treatment for the structure is therefore *Rehabilitation*.

The building at 54 Howell Street is generally in good condition, requiring maintenance-type repairs. Examples include repair of slipping windows sashes in most units, a lack of ground-fault circuit interrupter (GFCI) receptacles in the kitchen, non-functioning air conditioning in one unit, no fire sprinklers, and lack of Americans with Disabilities Act (ADA) accessibility.

13. Thomas J. Cassidy, Jr., Barbara Pahl, Sharee Williamson, Elizabeth Merrit, and T. Destry Jarvis, *Historic Leasing in the National Park System: Preserving History through Effective Partnership* (Washington, DC: National Trust for Historic Preservation, 2013), n.p.

Administrative Data

Locational Data

Building Name: 54 Howell Street

Location: Martin Luther King, Jr. National Historical Park, Atlanta, Georgia

LCS Number: 090044

Related Studies

Robert W. Blythe, Maureen A. Carroll, and Steven H. Moffson. *Martin Luther King, Jr. National Historic Site Historic Resource Study*. Atlanta: National Park Service, Southeast Regional Office, Cultural Resources Division, 1994.

_____. National Park Service, Southeast Regional Office. *National Register documentation for Martin Luther King, Jr., National Historic Site*. Certified by the Keeper of the National Register on May 4, 1994 (NRIS 80000435; National Archives Identifier 93208246).

Benjamin Levy, Historic Sites Survey, National Park Service, Washington, DC (based on the work of Elizabeth Z. Macgregor and Carole A. Summers, Historic Preservation Section, Department of Natural Resources, State of Georgia, and Joseph S. Mendinghall, Afro-American Bicentennial Corporation). *National Historic Landmark documentation for Martin Luther King, Jr., Historic District*, January 5, 1976. The historic district was designated a National Historic Landmark on May 5, 1977.

Elizabeth Z. Macgregor, Architectural Historian, and Carole A. Summers, Coordinator, Historic Sites Survey, Historic Preservation Section, Department of Natural Resources, Atlanta. *National Register nomination documentation for Martin Luther King, Jr. Historic District*, March 25, 1974. Entered in the National Register May 2, 1974.

Steven H. Moffson, Architectural Historian, Historic Preservation Division, Georgia Department of Natural Resources, with

John A. Kissane, Historic Preservation Consultant, Historic District Development Corporation, Atlanta, Georgia. *National Register documentation for Martin Luther King, Jr., Historic District Boundary Increase and Additional Documentation*, 2001.

Accepted by the National Register on June 21, 2001.

Hartrampf. *Condition Assessment Report for 13 Buildings in the Martin Luther King, Jr. National Historic Site, Atlanta, Georgia*. Atlanta: Hartrampf, October 2009.

Lawliss, Lucy A. *Martin Luther King, Jr. National Historic Site Cultural Landscape Report: Birth-Home Block*. Prepared under Cooperative Agreement between National Park Service and Georgia State University. Atlanta: National Park Service, Southeast Region Office, 1995.

In addition to the above studies and other publications and archival documents noted in the Bibliography, the *Martin Luther King, Jr. National Historic Site Long-Range Interpretive Plan* (2011) and *Martin Luther King, Jr. National Historic Site Foundation Document* (2017) were referenced in preparation of this report.

Cultural Resource Data

In 1974, National Register of Historic Places nomination documentation was prepared for the Martin Luther King, Jr. Historic District.¹⁴

Although 54 Howell Street was not specifically named, the apartment building was within the boundary of the district, which turned south at Howell Street and west at the south edge of Old Wheat Street. The building is located on a small

piece of land facing Howell Street between Auburn Avenue and Old Wheat Street.¹⁵

In October 1980, Martin Luther King, Jr. National Historic Site and Preservation District were established “to protect and interpret for present and future generations the area where Dr. King was born, where he lived, worked, and worshipped, and where he is buried.”¹⁶ In 1993, National Register nomination documentation was completed for the Martin Luther King, Jr. National Historic Site, comprising a district bounded by Jackson, Howell, and Old Wheat Streets and Edgewood Avenue. In this documentation, 54 Howell Street was listed as a contributing building under Criteria A and C.¹⁷

Period of Significance: 1931–1968.¹⁸ The period of significance of 1931–1968 begins with the date of construction of 54 Howell Street, and ends with the death of Martin Luther King Jr. This period addresses the local historical and architectural significance of the residence, as well as its association with the neighborhood in which Dr. King grew up. The National Register documentation prepared in 1994 identified a period of significance of 1880–1968, and a boundary increase and additional documentation prepared in 2001 identified a period of significance

14. Elizabeth Z. Macgregor, Architectural Historian, and Carole A. Summers, Coordinator, Historic Sites Survey, Historic Preservation Section, Department of Natural Resources, Atlanta, National Historic Landmark Documentation for Martin Luther King, Jr., Historic District (Landmark), March 25, 1974; entered in the National Register May 2, 1974 (National Archives Identifier 93208244).

15. Joseph Scott Mendinghall, National Register of Historic Places Registration Form: Martin Luther King, Jr. Historic District (Landmark) (Washington DC: Afro-American Bicentennial Corporation, 1973), 10.

16. Public Law 96-428, October 10, 1980.

17. *National Register documentation*, Section 8, 32 and 66.

18. Refer to the report chapter on Significance and Integrity for further discussion of the period of significance for 54 Howell Street. Note that the park interprets the Birth Home block to the period 1929–1941, Martin Luther King Jr.’s formative years in Atlanta.

of 1853–1968, for the overarching historic district.¹⁹

Proposed Treatment. Rehabilitation

Project Scope and Methodology

The goal of the HSR is to develop planning information for use in the repair, maintenance, and preservation of this historically significant structure. First developed by the National Park Service in the 1930s, HSRs are documents prepared for a building, structure, or group of buildings and structures of recognized significance. They are developed to record and analyze the property's initial construction and subsequent alterations through historical, physical, and pictorial evidence; to document the performance and condition of the structure's materials and overall physical stability; to identify an appropriate course of treatment; and, following implementation of the recommended work, to document alterations made through that treatment.²⁰

This HSR addresses key issues specific to 54 Howell Street, including the history and construction chronology of the building; the existing physical condition of the exterior envelope, structural systems, and primary interior spaces and features; and the historic significance and integrity of the building.

The following project methodology was used for this study.

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19. *National Register documentation, 4*; Steven H. Moffson, Architectural Historian, Historic Preservation Division, Georgia Department of Natural Resources, with John A. Kissane, Historic Preservation Consultant, Historic District Development Corporation, Atlanta, Georgia, *National Register documentation for Martin Luther King, Jr., Historic District Boundary Increase and Additional Documentation* (Accepted by the National Register on June 21, 2001), 30.
 20. Deborah Slaton, *Preservation Brief 43: The Preparation and Use of Historic Structure Reports* (Washington, DC: National Park Service, Technical Preservation Services, 2005).

Research and Document Review. Archival research was performed to gather information about the original construction and past modifications and repairs for use in assessing existing conditions and developing treatment recommendations for the building. Documents reviewed included maps, drawings, specifications, historic photographs, and other written and illustrative documentation about the history of construction and repairs to the apartment. The research for this study built upon prior historical and archival research completed by the National Park Service and others, as outlined in the bibliography provided with this report. Primary reference material for this study included documents available from Martin Luther King, Jr. National Historical Park and records held at the National Park Service Southeast Region. Additional research material was obtained from the NPS Technical Information Center (TIC) in Denver, Colorado, and Kenan Research Center of the Atlanta History Center, Atlanta, Georgia. The Auburn Avenue Research Library on African American Culture and History was consulted as were multiple online sites associated with the history of the City of Atlanta, Sweet Auburn, African American education in the South, and other pertinent cultural and social topics.

Condition Assessment and Documentation. Concurrent with the historical research, a condition survey of the apartment was performed and observations were documented with digital photographs, field notes, and annotation on baseline drawings. For purposes of the field survey, drawings were prepared by the project team. The condition assessment addressed the exterior and primary interior spaces and features of the building as well as the building's hazardous materials.

Development of History, Chronology of Construction, and Evaluation of Significance. Based on historical documentation and physical evidence gathered during the study, a context history and a chronology of design and construction were developed. An evaluation of the building's significance was also prepared, taking into consideration guidelines provided by

*National Register Bulletin: How to Apply the National Register Criteria for Evaluation.*²¹ This evaluation of history and significance provided the basis for the development of recommended treatment alternatives.

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

Treatment Recommendations. The Secretary of the Interior’s Standards for the Treatment of Historic Properties guided the development of treatment recommendations for the significant exterior and interior features of the buildings, as well as for the features of the landscape included in this study. Following the overall treatment approach of *Rehabilitation* for the building, the specific recommendations were developed to address the observed existing distress conditions and the park’s intended future use and long-term objectives.²²

Preparation of Historic Structure Report. Following completion of research, site work, and analysis, a narrative report was prepared summarizing the results of the research and inspection and presenting recommendations for treatment. The HSR was compiled following the organizational guidelines of NPS *Preservation Brief 43: The Preparation and Use of Historic Structure Reports*, with modifications to organizational structure for purposes of this project.²³

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21. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Washington, DC: National Park Service, National Register of Historic Places, 1997).
 22. Anne E. Grimmer, *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Washington, DC: US Department of the Interior, National Park Service, Technical Historic Preservation Services, 2017).
 23. Slaton.



FIGURE 1. Map of Georgia showing location of Martin Luther King, Jr. National Historical Park (black star) (not to scale). (Source: US Census Bureau, modified by the authors)



FIGURE 2. Aerial photograph of Atlanta showing the location of Martin Luther King, Jr. National Historical Park. (Source: Google Earth, annotated by the authors)



FIGURE 3. Martin Luther King, Jr. National Historical Park showing the location of 54 Howell Street. (Source: National Park Service baseline map, annotated by the authors)

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Developmental History

Historical Background and Context

Situated in the Sweet Auburn neighborhood and the Old Fourth Ward on Atlanta's east side, the building at 54 Howell Street is part of Martin Luther King, Jr. National Historical Park. The neighborhood comprises commercial, residential, and religious buildings associated with Atlanta's African American community from the late nineteenth century through the early twentieth century. At the time of Dr. King's birth in January 1929, Auburn Avenue was a thriving center of African American commercial, social, religious, and political activity.²⁴

The National Historical Park is an irregularly-shaped tract roughly bounded by Jackson Street on the west (and now includes Prince Hall Masonic Temple, where the Southern Christian Leadership Conference [SCLC] established its initial headquarters), Auburn Avenue on the north from Jackson Street to Boulevard, Wheat Street on the north between Boulevard and Howell Street, Howell Street on the east, and the rear property line on the south side of Edgewood Avenue (refer to Figure 3). The National Historical Park also includes the last Atlanta home of Dr. King and his family on 234 Sunset Avenue. The neighborhood surrounding the Birth Home on Auburn Avenue

includes a cohesive grouping of residential buildings constructed from 1893 through 1931. The block also contains Fire Station No. 6 and an extant circa 1920 store building.²⁵

African Americans in Nineteenth-Century Atlanta

In 1837, Western & Atlantic Railroad engineers staked a point at the end of the line they planned to build south from Chattanooga, Tennessee. First known as "Terminus," a small community grew around the railroad crossroads, later becoming Marthasville and, finally, Atlanta. By 1846, the town had two other railroad lines which connected it to other areas of the state and the Southeast. The railroad spurred the town's rapid early development. When incorporated in 1847, Atlanta's municipal boundaries included a one-mile radius centered on the terminus, or the zero-mile marker.²⁶ Beginning in the same year, Atlanta's City Council placed a number of restrictions on African Americans in the city that defined for them an inferior position and role in society.²⁷

24. A. Ambrose, V. Fort, A. Henderson, D. Rowley, C. Stevens, and B. Taggart, *Historic Resource Study Auburn Avenue Community of Atlanta 1865-1930* (Atlanta: Martin Luther King, Jr. National Historic Site and Preservation District, n.d.), n.p.

25. *National Register documentation*, Section 8, 32-33. For this context, the Birth Home Block includes the section of Auburn Avenue located between Boulevard NE and Howell Street NE.

26. Alexa Henderson and Eugene Walker, *Sweet Auburn: The Thriving Hub of Black Atlanta* (Atlanta: US Department of the Interior, National Park Service, 1983), 3.

27. Ambrose et al., *Historic Resource Study*, 1-1.

During the period before the Civil War, Atlanta had a relatively small black population in comparison to older and larger southern cities, such as Savannah.²⁸ With only a few exceptions, enslaved persons in Atlanta were forbidden to engage in entrepreneurial activity unless their owners or representatives were present.²⁹ Most of the enslaved population in Atlanta worked as general laborers and domestic servants. Others pursued skilled trades as brick masons, carpenters, and blacksmiths.³⁰ Free African Americans in antebellum Atlanta, though few in number, were also prohibited by law from participating in the city's commercial life. Census data reveals Atlanta's newly free black people did not own real estate or personal property.³¹

In 1860, 1,939 African Americans were reported to be living within Atlanta's municipal boundary, only twenty-five of whom were free.³² After the Civil War, the African American population of Atlanta increased as the newly freed from the surrounding countryside came to the city seeking opportunities for education and employment. By 1870, the city's 9,929 African Americans constituted more than 45 percent of the population.³³ Many in Atlanta's black communities continued to live in the post-bellum period as they had during the years of slavery: in servant's homes or quarters located to the rear of a white person's residence. An increasing number of others began to settle in developing African American tenements and settlements throughout the city. These clusters of black settlements developed along railroads and in low-lying areas where land was less expensive and generally considered by the greater population as

undesirable.³⁴ The railroad lines served as barriers between segregated neighborhoods. By 1883, at least six African American urban clusters were located in Atlanta's five wards. In the Old Fourth Ward, a large black community developed along Decatur Street east of Pratt Street in the formerly named Butler Street Bottoms, which is now the general area of the Martin Luther King, Jr. National Historical Park and Preservation District.³⁵

During the late nineteenth century, African Americans established a variety of successful retail trades and services. The most popular black enterprises in the city included grocery stores, dry goods stores, and eating establishments. In the 1880s and early 1890s, the largest number of African American businesses operated along Marietta Street in the central business area with others scattered along Alabama, Broad, Forsyth, Peachtree, Pryor, and Whitehall streets. Few black businesses were located on Wheat Street (Auburn Avenue) during this time, since it was still primarily a residential street; the few that did exist were mostly grocery stores. In 1896, the Old Fourth Ward had the greatest proportion of African Americans, who constituted 46 percent of the ward's population.³⁶

Atlanta experienced economic boom and growth during the last two decades of the nineteenth century, while during the same period, the city's African American community was in serious economic and political decline.³⁷ Retaliation by white supremacists at the end of Reconstruction and federal rule followed by the disenfranchisement of African American voters triggered a rise in racial segregation in the city. Booker T. Washington, president of Tuskegee Institute and an African American proponent of the "New South," gave his famous "Atlanta

28. *Ibid.*, 2-1.

29. *Ibid.*, 1-1.

30. Andy Ambrose, Karen Leathem, and Charles Smith, "Antebellum Atlanta," Atlanta; A National Register of Historic Places Travel Itinerary. National Park Service, accessed May 1, 2019, <https://www.nps.gov/nr/travel/atlanta/antebellum.htm>.

31. Ambrose et al., *Historic Resource Study*, 1-3.

32. *Ibid.*, 2-1.

33. *Ibid.*

34. *Ibid.*, 2-2.

35. *Ibid.*

36. *Ibid.*, 2-4.

37. Lawliss, 12.

Compromise” speech in Atlanta at the 1895 International Cotton States Exposition.³⁸

In September 1906, Atlanta erupted into a three-day race riot, the Atlanta Race Riot, resulting in the deaths of at least a dozen African American citizens and a large number of injuries. The Atlanta Race Riot of 1906 significantly affected the city’s black residential development. As the number of African American citizens residing in the city continued to grow, efforts to restrict them to well-defined areas of the city intensified. In 1913, Atlanta passed a segregation ordinance and became the first city in Georgia to legislate residential segregation.³⁹ Two years later, the Georgia Supreme Court ruled against racial zoning ordinances.⁴⁰ Increasing segregation during the years leading up to World War I resulted in the transformation of mixed neighborhoods, such as Auburn Avenue, into predominantly African American communities. Despite the earlier ruling, city officials focused on racial segregation, and it was again incorporated into the city’s first zoning ordinance in 1922.⁴¹ Even though the law was declared unconstitutional in 1925, zoning was authorized by the state legislature in 1927 and supported by a constitutional amendment in 1928.⁴² The ordinance did not recognize the African American business and residential neighborhoods which had developed in the Old Fourth Ward.

Development of Auburn Avenue

Opening in 1853 as Wheat Street, Auburn Avenue extends east from Whitehall Street in downtown

Atlanta.⁴³ Laura Lavinia (Kelly) Combs, a free black woman in pre-Civil War Atlanta, was the first African American property owner on Auburn Avenue.⁴⁴ One of two African American landowners in the antebellum period, Combs purchased a lot at the intersection of Wheat and Peachtree streets prior to 1854.⁴⁵ She sold the property in 1856 to buy her husband’s freedom from slavery.⁴⁶ Auburn Avenue and the surrounding area developed slowly until 1880 when John Lynch began subdividing his large landholdings, which encompassed property on both sides of Auburn Avenue between Jackson Street and Howland (now Howell) Street.

The area between Boulevard (then Jefferson Street) on the west and Randolph Street on the east and between Wheat Street on the south and Houston Street to the north was largely subdivided by the late 1870s and contained several dozen houses. Early residential development in the area occurred primarily north of Auburn Avenue. Several houses were constructed on and near Auburn Avenue in the 1880s, though only one house remains from the pre-1890 period. By 1892, the entire Auburn Avenue community was well established with the exception of a few sections. With increased development on Auburn Avenue, residents petitioned to have the street’s name changed to a more stylish one out of concern that their street might be confused with the adjacent, and less desirable, Old Wheat Street.⁴⁷ The Atlanta

38. Ibid. Information on the “Atlanta Compromise” speech gleaned from Lawliss.
 39. John Dittmer, *Black Georgia in the Progressive Era, 1900-1920* (Urbana: University of Illinois Press, 1977), 13–14. Information on the 1913 Atlanta Ordinance was gleaned from this document.
 40. Ibid, 14.
 41. Ambrose et al., *Historic Resource Study*, 2-10.
 42. Ibid.

43. Henderson and Walker, 5.
 44. Ibid. 6.
 45. Paul K. Graham, A Love Story Proved: The Life and Family of Laura Lavinia (Kelly) Combs of Atlanta and Augusta, Georgia, *National Genealogical Society Quarterly* 101 (December 2013):246-266.
 46. Ibid.; Cathy J. Kaemmerlen, *The Historic Oakland Cemetery of Atlanta Speaking Stones* (Charleston, SC: The History Press, 2013).
 47. Lawliss, 21. Most of the information on Auburn Avenue and the Birth Home Block is gleaned from this document.

City Council officially changed the name on April 17, 1893.⁴⁸

Expansion and improvement of Atlanta's transportation infrastructure in the late nineteenth century contributed to the commercial and residential development of the Auburn Avenue community. In 1884, Gate City Street Railroad Company constructed a horse-car line from downtown Atlanta along Auburn Avenue to Jackson Street, and then extending north on Jackson.⁴⁹ Atlanta's first electric street railway line opened along Edgewood Avenue in 1889, and in the early 1890s, the horse-car lines were electrified, and new electric lines were built.⁵⁰ By the mid-1890s, the Auburn Avenue community had direct transportation to downtown, where many residents worked and shopped.⁵¹

In the period from the 1850s to 1906, Auburn Avenue "developed as a primarily white residential and business district that included a substantial black minority."⁵² The majority of African Americans in the community were working class, while its black middle class were proprietors of grocery stores, meat markets, restaurants, wood yards, and other businesses.⁵³ African American professionals were primarily teachers, ministers, doctors, dentists, and lawyers. From 1884 to 1900, the racial make-up of the area bounded by Old Wheat, Howell, Edgewood, and Jackson streets (now a portion of the National Historical Park) remained substantially constant at approximately 55 percent white and 45 percent black.⁵⁴ An examination of Atlanta city directories from the 1880s and 1890s revealed the Auburn Avenue

community was closer to integrated than almost any other southern community at the end of the nineteenth century.⁵⁵

During the years following the Atlanta Race Riot of 1906 nearly all African American-owned businesses vacated downtown Atlanta as African American businesses were forced to leave the central business district as a result of rising rents and increased hostility. By 1911, a Sanborn Fire Insurance map showed the Auburn Avenue community almost entirely built out. Auburn Avenue was residential west to Fort Street, although several commercial establishments were situated between Hilliard and Fort streets. Industrial properties were located in the eastern section of the community along the Southern Railway, and Decatur Street to the south was primarily commercial with a few industrial facilities on Decatur toward downtown.⁵⁶ The section of Edgewood Avenue at the east end of the community consisted of both commercial establishments and some residential development.

Auburn Avenue reflected "the changing nature of southern race relations during the late nineteenth and early twentieth centuries."⁵⁷ From 1910 to 1930, Auburn Avenue became the center of African American business, institutional, religious, and social life.⁵⁸ However, during the 1920s, some African Americans started to migrate to the west side of Atlanta.⁵⁹ By the time Martin Luther King Jr. left in 1948 to attend Crozier Seminary in Chester, Pennsylvania, the majority of residential structures in the Auburn Avenue neighborhood had deteriorated. The West Side replaced the Auburn Avenue residential district as the preferred neighborhood by the 1950s.⁶⁰

48. Ibid.

49. *National Register Nomination*, Section 7, 3.

50. Ibid.

51. Ibid.

52. Ibid., Section 8, 24.

53. Moffson and Kissane, 30.

54. Robert W. Blythe, Maureen A. Carroll, Steven Moffson, *Martin Luther King, Jr. National Historic Site Historic Resource Study* (Atlanta: Cultural Resources Planning Division Southeast Regional Office, National Park Service, 1994).

55. Moffson and Kissane, 30.

56. Ibid.

57. *National Register documentation*, 8, 24.

58. Ambrose et al., *Historic Resource Study*, 1-24.

59. Ibid., 2-21.

60. Ibid., 2-36, 2-39, and 2-21.

Birth Home Block

By 1899, most of the lots along Auburn Avenue between Jackson and Howell streets were developed.⁶¹ Residences in the Birth Home Block are representative of vernacular adaptations of popular domestic architecture of the 1890s and early twentieth century found in American cities.⁶² Most single-family houses built in the 1890s exhibit Queen Anne stylistic elements. The residences are mostly two-story, wood-frame dwellings with one-story rear extensions. Typical characteristics of these houses include irregular massing, projecting bays, broad front porches carried on columns or posts, contrasting surface areas of shingles and clapboard siding, and decorative millwork. In 1894, the Romanesque Revival Style Fire Station No. 6 was constructed on the southeast corner of Boulevard and Auburn Avenue.

The Empire State Investment Company developed the northeast corner of Auburn Avenue and Boulevard in 1905 with the construction of nine duplex buildings.⁶³ The smaller, one-story, frame, double-shotgun houses contrasted with the existing houses on the block but were typical of the dwellings in the neighborhood to the north.

The first middle-class African American families to purchase single-family dwellings on the block were enticed by the appeal of living in one of the large attractive homes on Auburn Avenue.⁶⁴ Following the construction of additional double shotgun houses on the remaining undeveloped lots, the block acquired a distinct mix of African American socioeconomic classes where middle-class professionals lived alongside working-class laborers.⁶⁵ Martin Luther King Jr.'s maternal

grandfather, Reverend A.D. Williams purchased the circa 1894 single-family house at 501 Auburn Avenue in 1909.⁶⁶ Dr. King was born in the Auburn Avenue house on January 15, 1929. He lived in the Birth Home until 1941, when his family moved three blocks away to 193 Boulevard near Houston Street.⁶⁷

By 1929, African American middle-class families in the neighborhood were in the minority among the total population of residents on the Birth Home Block.⁶⁸ During the Great Depression, Auburn Avenue and the Birth Home Block experienced the subdivision of many single-family dwellings, the deterioration of its existing stock, and increased tenancy.⁶⁹ A *Real Property Survey* conducted by the Works Progress Administration in 1939 reported that 100 percent of the Birth Home Block was occupied by African Americans, though only 13.3 percent of the buildings were owner occupied and 67.4 percent needed major work or were unfit for use.⁷⁰

Beginning in the 1950s, physical changes occurred to the Auburn Avenue setting. In 1954, two brick apartment buildings were erected at 531 Auburn Avenue on a lot formerly containing four wood dwellings of the Baptist Memorial Institute School.⁷¹ The apartment buildings are no longer extant. During the 1970s and 1980s, the overall condition of Auburn Avenue area's historic housing stock continued to decline. Fire Station No. 6 closed in 1991, after being in service for nearly 100 years.⁷² With more than thirty years of

61. Sanborn Map Company, *Insurance Maps of Atlanta, Georgia* (1899), accessed May 22, 2019, <http://dlg.galileo.usg.edu/sanborn/CityCounty/Atlanta1899/Sheet48.html>.

62. *National Register documentation*, 8, 50.

63. *Ibid.*, 8, 57.

64. Lawliss, 17.

65. *Historic Resource Study*, n.p.

66. *Ibid.*

67. *Ibid.*

68. Lawliss, 21.

69. *Ibid.*, 14

70. *Ibid.*

71. *National Register documentation*, Section 7, 9.

72. National Park Service, *General Management Plan & Development Concept Plan, Martin Luther King Jr. National Historic Site & Preservation District, Atlanta, Georgia* (Atlanta: National Park Service, Southeast Region, 1986).

historic preservation efforts, the Birth Home Block has become a highly intact historic residential area.

Martin Luther King, Jr. National Historical Park

Martin Luther King, Jr. National Historic Site and Preservation District was established on October 10, 1980 to “protect and interpret for the benefit, inspiration, and education of present and future generations the places where Martin Luther King, Jr., was born, where he lived, worked, and worshipped, and where he is buried.”⁷³ Historic resources within the park include the houses on the Birth Home Block, Ebenezer Baptist Church, Fire Station No. 6, Our Lady of Lourdes Catholic Church, and commercial buildings along Edgewood Avenue.

The 1980 legislation creating Martin Luther King, Jr. National Historic Site authorized a 23.78-acre park. The Reclamation Projects Authorization and Adjustment Act of 1992, enacted October 30, 1992, expanded the park boundaries to include properties located between Jackson Street and Boulevard north to Cain Street. The Martin Luther King, Jr. Preservation District, also established by the 1980 legislation, adjoins the site (now National Historical Park) on the east, north, and west and embraces the larger Auburn Avenue African American community in which Dr. King grew up. The Preservation District links Dr. King’s career to the African American business, religious, social, and political organizations that flourished along Auburn Avenue prior to and during his lifetime.

Martin Luther King, Jr. Historic District was placed in the National Register of Historic Places on May 2, 1974, and it was designated a National Historic Landmark on May 5, 1977.⁷⁴ The Sweet

Auburn Historic District was designated a National Historic Landmark on January 8, 1976⁷⁵. The Martin Luther King, Jr. Historic District (Landmark) included some portions of the Sweet Auburn Historic District. On May 4, 1994, Martin Luther King, Jr. National Historic Site was administratively listed on the National Register of Historic Places.⁷⁶

In 2001, the original boundary of Martin Luther King, Jr. Historic District was increased.⁷⁷ The purpose of the addition was to expand the district’s boundaries to include contiguous and intact portions of the Old Fourth Ward neighborhood not included in the original National Register nomination. The boundary increase includes historically residential properties as far as the Interstate 75/85 corridor. The elevated interstate was rebuilt and widened three times its original width since 1980 and is a large visual and physical barrier between Martin Luther King, Jr. Historic District and the Sweet Auburn Historic District farther west. Historically, these two historic districts were once part of a single African American community. Sweet Auburn is now considered downtown, while the Auburn Avenue community is generally viewed as a residential neighborhood on the east side of Atlanta. Freedom Parkway forms the northern boundary of the historic district, and DeKalb Avenue forms the boundary on the south.

On January 8, 2018, President Donald J. Trump signed into law H.R. 267, the Martin Luther King, Jr. National Historical Park Act which redesignated Martin Luther King, Jr. National Historic Site a National Historical Park.⁷⁸ Additionally, H.R. 267 further modifies the

73. Public Law 96-428, October 10, 1980.
74. Macgregor and Summers; and Benjamin Levy, *National Register Landmark Documentation for Martin Luther King, Jr., Historic District (Landmark)*, 1976, designated May 6, 1977 (National Archives identifier 80000435_NHL).

75. *National Register documentation*.
76. *Ibid*.
77. See Moffson and Kissane.
78. The White House, “President Donald J. Trump signs H.R. 267 in law,” Statements and Releases, January 8, 2018, accessed January 12, 2018, <https://www.whitehouse.gov/briefings-statements/president-donald-j-trump-signs-h-r-267-law>.

boundaries to include the Prince Hall Masonic Temple, where the SCLC established its initial headquarters on Auburn Avenue in Atlanta, Georgia, in 1957. This will also “enable the National Park Service to provide technical assistance to the building's owners with respect to repairs, renovations, and maintenance to help preserve its historic integrity.”⁷⁹ Dr. King was one of the founders and first president of the SCLC, serving until his death in 1968.

Current land use within the National Historical Park is mostly residential on Auburn Avenue and largely commercial on Edgewood Avenue. The NPS has rehabilitated many of the dwellings on the Birth Home Block, restoring the exteriors to the 1929-1941 period. The historic streetscape features and the major spatial relationships that define the streetscape within the Birth Home Block have remained relatively constant since its development in the late nineteenth century. The residential buildings on the Birth Home Block are used as park offices or private residences. The exterior of Fire Station No. 6 has been restored to its appearance in the 1930s–1940s.

History of 54 Howell Street (LCS #090044)

The building at 54 Howell Street is located on the west side of Howell Street, at the corner of Auburn Avenue and Old Wheat Street, in the Martin Luther King, Jr. National Historical Park. Only a few feet of property separate the south foundation of 54 Howell Street from the foundation of 530 Auburn Avenue. It was constructed in 1931 as a four-unit apartment building. In 1980, when the apartment became part of the Martin Luther King, Jr. National Historic Site, the building was described as

Two-story frame apartment building containing four 3-room apartments. Screened 2-story porch with aluminum screen doors opening onto ground floor and central entry leading to 2nd story; brick porch supports. Paired double hung windows and entry door for each apt [sic]. Gable roof with 2 chimneys [Figure 4].⁸⁰

The look and style of 54 Howell Street was decidedly different from the larger, single-family homes with their later Victorian architectural details that had been built earlier in Sweet Auburn. In the 1920s and 1930s, reflecting the movement of African American upper and middle classes to the suburbs, a number of homes in Sweet Auburn were converted into rooming houses or apartments, and small apartment buildings were constructed like those built at 54 Howell Street and 491-493 and 506 Auburn Avenue.⁸¹



FIGURE 4. Front, east, and side, north, facades, 54 Howell Street (1931), originally a four-unit, now a three-unit, apartment building. (Source: All photographs by authors in 2016 unless otherwise noted)

The new apartment buildings were plain, two-story, rectangular buildings with two-story porches, weatherboard siding, and hip or gable roofs. These apartments were constructed for

79. 115th Congress Senate Report 115-49, Martin Luther King, Jr. National Historical Park Act 2017, May 9, 2017, accessed January 12, 2018, <https://www.congress.gov/congressional-report/115th-congress/senate-report/49/1?overview=closed>.

80. Division of Facilities Management, *Martin Luther King Jr. National Historical Park, Series V, Subseries D – 1944-2019, Building Inventory Files 1971-2004, Box 5, Folder 10 – 54 Howell Street, 1981-1991 (MALU 2016)*, n.p.

81. *Historic Resource Study*, 72.

working-class African Americans, which was reflected in their utilitarian form and lack of ornamentation. The apartments were generally small with those on the first floor having direct access to the street and those on the second floor having access to a central stair hall. Some of these apartments probably shared bathrooms when built. The building at 54 Howell Street has exposed rafter tails and triangular braces at the gable ends, decorative architectural features often associated with the Craftsmen style that was popular from about 1905 to 1930 (Figure 5).⁸²

According to NPS records, C.E. Miller, of 64 Linwood Avenue N.E., Atlanta, Georgia, had the apartment house at 54 Howell Street constructed using day labor under Atlanta Building Permit 2645 for which he applied on August 24, 1930. Four apartments with three rooms and a bath in each were contained within a frame, two-story apartment house with a composition roof. The apartments had electrical lighting. The estimated cost of the building was \$2,000. The project was completed on February 4, 1931.⁸³ The architect is not known.



FIGURE 5. Exposed, dog-eared rafter tails on 54 Howell Street.

Occupants of 54 Howell Street

Unlike most of the single-family homes of Auburn Avenue, 54 Howell Street was always occupied by African American residents. Although there are several residents who lived in the building for many years, their status in society and their working-class jobs (truck drivers, folders for a laundry service, waiter, etc.) make it almost impossible to trace their lives. No information could be found on any of the long-term residents.

Residents by date, name, employment, if known, apartment number, if known, are as follows:

82. *Ibid.*, 73.

83. Division of Facilities Management, Series V, Subseries D, Box 5, Folder 10, 1981-1991, n.p.

- 1935 Milton Jones (C⁸⁴ – Eddie L. Jones; Messenger of Haverly Stores)
- 1940 Matthews Grant (C – Carrie; Laborer)
- 1945 Daniel Gresham (C – Katie M.; Freight Handler, Atlanta Joint Terminals)
- 1950 Daniel Gresham (C – Katie M.; Trucker, Atlanta Joint Terminals)
- 1955 Daniel Gresham (C – Katie M.; no occupation listed)
Richard Mapp (C – Lavonia; Waiter L&N)
James Rowe (C – Dollie; Laborer, Fulton Cotton Mills)
- 1960 Daniel Gresham (C – Katie M.; no occupation listed)
James Rowe (C – Dollie; Driver, Fulton Cotton Mills)
Mrs. Savannah Rykard (Widow – Thomas; no occupation)
- 1965 Apt 1. Daniel Gresham (C – Katie M.; no occupation listed)
Apt 2. Mrs. Dollie M. Rowe (Folder, Apex Laundry Service)
Apt 3. Richard Mapp (C – Lavonia; Waiter L&N)
Apt 4. Mrs. Savannah Rykard (Widow – Thomas; no occupation)
- 1970 Apt 1. Daniel Gresham (C – Katie M.; no occupation listed)
Apt 2. Mrs. Dollie M. Rowe (Folder, Apex Laundry Service)
Apt 3. Richard Mapp (C – Lavonia; Waiter L&N)
- 1975 Apt 4. Mrs. Savannah Rykard (Widow – Thomas; no occupation)
Apt 1. Clarence Calloway (Retired)
Apt 2. Idella Tyler (no occupation listed)
Apt 3. Richard Mapp (C – Lavonia; retired)
Apt 4. Lucile Ponder (no occupation listed)
- 1980 Apt 1. Clarence Calloway (Retired)
Apt 2. Idella Tyler (no occupation listed)
Apt 3. Richard Mapp (C – Lavonia; retired)
Apt 4. Vacant⁸⁵

The National Park Service still uses 54 Howell Street as apartments for temporary staff. However, the two ground floor apartments were converted into one apartment at an unknown date.

Historical Recordations of 54 Howell Street

In 1974, a National Register of Historic Places Nomination Form for the Martin Luther King, Jr. Historic District was created. Although 54 Howell Street was not specifically named, the apartment house was subsumed within the boundaries of the district which then turned south at Howell Street and west at the south edge of Old Wheat Street. The apartment building is located on a small piece of land facing Howell Street between Auburn Avenue and Old Wheat Street.⁸⁶ Although 54 Howell Street was not like the Victorian houses of the larger district, it did represent a type of property existing when Martin Luther King Jr. was a child—multi-family dwellings.

In October 1980, federal legislation created Martin Luther King, Jr. National Historic Site and Preservation District to protect and interpret the area where Dr. King was “born, where he lived, worked, and worshipped, and where he is

84. Division of Facilities Management, Series V, Subseries D – 1944-2019, Building Inventory Files 1971-2004, Box 2, Folder 30, n.p. Handwritten notes in the file discussing census records indicate ethnicity (race) by letters – W = white, C=colored.

85. Division of Facilities Management, Series V, Subseries D, Box 5, Folder 10, 1981-1991, n.p.
86. Mendinghall, 10.

buried.”⁸⁷ When the NPS acquired the properties that comprise the National Historical Park, it was with the intention that part of them would enter into the Historic Lease Program; the apartment house at 54 Howell Street is one of those properties.⁸⁸ It is used by the NPS as housing for short-term employees.

A Cultural Landscape Report was initiated for the Birth Home Block in 1993 by Lucy Lawliss, and the yard at 54 Howell Street was included (Figure 6).⁸⁹ In 1994, a National Register Nomination was completed for Martin Luther King, Jr. National Historic Site and Preservation District, and 54 Howell Street is listed as a contributing building and described as

Utilitarian two-story frame apartment building with side gable roof and full-facade two-story porch supported by brick posts. Rafter ends and knee braces appear in gable ends. Partially enclosed back porch. Severely fire damaged, with doors and windows boarded up. Rehabilitation was ongoing at time of survey.⁹⁰

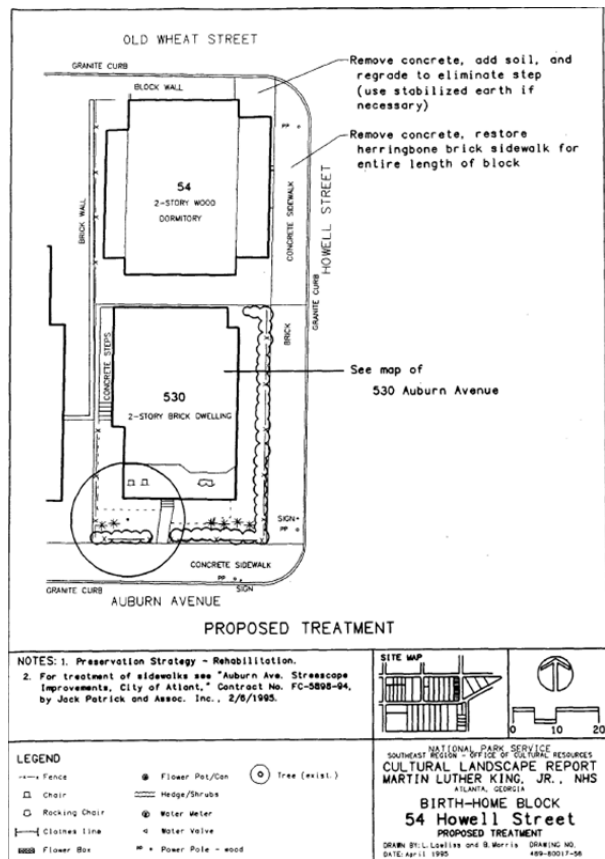


FIGURE 6. 1995 Proposed Landscape Treatment Plan, showing location of house, hedges, walls, fences, and other landscape elements at 54 Howell Street. (Source: Lawliss:182, Figure 101)

Although there are no written records, photographs from May 10, 1985, show what appears to be a newly burned property (Figure 7 and Figure 8).⁹¹ The front, east facade, shows heavy burn damage and piles of debris pulled from the building, while the rear, west facade, shows little to no damage.

In 1994, 54 Howell Street was included in a Historic Resources Study by Blythe, Carroll and Moffson.⁹²

87. National Park Service, *Foundation Document Martin Luther King, Jr. National Historic Site* (Washington, DC: US Department of Interior, 2017), 5.
88. Cassidy et al., n.p.
89. Lawliss, 182.
90. *National Register documentation*, 7-1.

91. Division of Facilities Management, Series V - 1944-2010, Subseries D -Building Inventory Files - 1972-2004, Box 5, Folder 10 - 54 Howell, 1981-1991 Photographs, n.p.
92. *Historic Resource Study*, Appendix B.

Rehabilitation was ongoing at the time of the survey. The NPS was involved in an exterior stabilization and an interior rehabilitation.⁹³

In 2009, 54 Howell Street underwent a Condition Assessment by Hartrampf, Inc., Structural Engineers. The assessment had a number of treatment recommendations for the immediate preservation of the building including:

- Consider providing weep holes in shared retaining wall with 526 Auburn Avenue or provide French drain along eastern edge of this wall to handle runoff;
- Stabilize stone and brick retaining wall separating 526 Auburn from 54 Howell and 530 Auburn – do not remove or rebuild until more work is done on landscape at 530 Auburn;
- Seal pipe penetration on west and east foundation walls;
- Monitor lean on north chimney in attic at the roof level to ensure no active cracking;
- Provide additional bracing to joist resting directly over crawl space door on east side of building to offset gravity so -it does not crack door frame;
- Secure / remove loose hanging pipe in crawl space;
- Repair parging and paint on east porch foundation;

93. Karen Rehm, *Section 106 Clearance for Stabilization of Structure at 54 Howell Street* (Atlanta: National Park Service, SERO, 1992); Paul Hartwig, *Section 106 Clearance Interior Rehab of 54 Howell* (Atlanta: National Park Service, SERO, 1992).



FIGURE 7. 54 Howell Street, front, east, facade after the 1985 fire. (Source: Division of Facilities Management, 1981-1991 – Photographs)



FIGURE 8. 54 Howell Street, rear, west, facade, after the 1985 fire showing what appears to be only smoke damage. (Source: Division of Facilities Management, 1981-1991 - Photographs)

- Repair or replace rotted siding on north elevation;
 - Repair damaged soffit at corners of east porch;
 - Re-putty second story windows;
 - Paint exterior walls;
 - Scrape and paint second story east porch floor;
 - Paint downspouts;
 - Repair wall stop on east door in Unit A;
 - Patch screening on north elevation;
 - Secure the south stair handrail to east porch;
 - Replace the existing electrical receptacle near kitchen sink with GFCI-style receptacle.⁹⁴
- Foundation infill: (NA)
 - Facade / Siding (novelty siding, probably not original): Good (Yellow)
 - Trim (wood, probably not original): Good (Dark Green)
 - Roof (HEX shingles): Excellent
 - Dormer (NA)Chimney (Brick – mortar parged): Good
 - Soffit / cornice (exposed rafter tails original): Good (Dark Green)
 - Windows (4/4): Good
 - Doors (not original): Good
 - Porch (Not original – enclosed screens and wood): Excellent (new brick columns)
 - Steps (concrete): Excellent (Painted Dark Green)
 - Front Walk (NA)
 - Sidewalk (concrete): Fair
 - Retaining wall (NA)
 - Driveway (NA)
 - Fencing (NA)
 - Curb (Granite): Fair.⁹⁶

Physical Changes to 54 Howell Street

The apartment house at 54 Howell Street has undergone a number of changes since its construction in 1931. According to NPS records, the apartment house was reroofed with asphalt shingles and rolled roofing in 1981.⁹⁵ Sometime between about 1980 and 1983 after the National Park Service assumed governance of Martin Luther King, Jr. National Historic Site, an exterior condition survey form was completed on 54 Howell Street. The NPS found the following:

- Foundation (Granite wall): Good

Two project cost forms, one for \$150,000 for work proposed to start 1 October 1990 and end 1 December 1990 and one of \$15,000 for work proposed to start 1 April 1991 and end 31 May 1991, are included in the records for 54 Howell Street. However, these forms do not have any information on them regarding the proposed work

94. Hartrampf, Inc., *Condition Assessment Report for 13 Buildings in the Martin Luther King, Jr. National Historic Site Atlanta, Georgia* (Atlanta: Hartrampf, Inc., 2009), 13.

95. Division of Facilities Management, Series V, Subseries D, Box 5, Folder 10, 1981-1991, np.

96. Division of Facilities Management, Series V, Subseries D, Box 5, Folder 10, 1981-1991, n.p.

Developmental History

to be performed aside from a cost center – 023. It is not known if these forms pertain to work on the building. If they do, the money spent was not reflected in any other 54 Howell Street records.⁹⁷

In 1985, the apartment building burned and was, according to reports from 1993-1994, boarded up for an extended period of time.⁹⁸ By 1992, it was involved in a stabilization project and an interior rehabilitation which was indicated in reports by Blythe, Carroll and Moffson in both 1993 and 1994.⁹⁹

In 2014, Northwest Pest Control cored holes, 3 to 4 inches deep, through the soil around 54 Howell Street in order to place Sentricon® within them as a termite treatment. Gray caps were placed on top of the holes.¹⁰⁰ Also during that year, new deadbolt locks were installed on the apartment doors as a safety precaution.¹⁰¹

97. Ibid.

98. *Historic Resource Study, Appendix B; National Register documentation, Section 7, 1.*

99. Rehm, n.p; Hartwig, n.p.

100. National Park Service, *Categorical Exclusion Form: Termite Treatment Throughout Historic District, PEPC Project No. 53364* (Atlanta: Martin Luther King, Jr. National Historic Site, 2014a).

101. National Park Service, *Categorical Exclusion Form: Replace Locks on 54 Howell, PEPC Project No. 51545* (Atlanta: Martin Luther King, Jr. National Historic Site, 2014b).

Chronology of Development and Use: 54 Howell Street Timeline

1931	54 Howell Street constructed as four-unit apartment complex.
1974	54 Howell Street listed as a contributing resource to Martin Luther King, Jr. Historic District.
1977	54 Howell Street listed as a contributing resource to Martin Luther King, Jr. Historic District (Landmark).
1980	Became part of the NPS Martin Luther King, Jr. National Historic Site and Preservation District.
1981	New roof- asphalt shingles and rolled roofing.
Circa 1983	NPS exterior conditions survey form created.
1985	Burned, boarded up.
1992	Stabilization of structure; interior rehabilitation.
1993	Named in CLR;
1994	Named as Contributing Resource to Martin Luther King, Jr. National Historic Site. Named in Historic Resources Study.
2009	Condition Assessment undertaken.
2014	Termite pest control with Sentricon®; new dead bolt locks installed.
2018	Martin Luther King, Jr. National Historical Park created.

The apartment house at 54 Howell Street is a contributing resource under NRHP Criteria A and C to the historic district that constitutes Martin Luther King, Jr. National Historical Park.¹⁰²

102. *National Register documentation*, Section 8, 32 and 66.

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Physical Description and Condition

Assessment

Site

Martin Luther King, Jr. National Historical Park is located in the Sweet Auburn neighborhood of southeast Atlanta in Fulton County, Georgia. The 38.38-acre historical park consists of one- and two-story residential, commercial, religious, and National Park Service buildings. The park is roughly bound by Edgewood Avenue to the south, Old Wheat Avenue to the north, Howell Street to the east, and Jackson Street to the west. Boulevard and Auburn Avenue run through the center of the district. In general, buildings are organized so that commercial structures are located along Edgewood Avenue; religious and NPS buildings, such as the Ebenezer Baptist Church, Martin Luther King, Jr. Center for Nonviolent Social Change, and the visitor center, are along the west end of Auburn Avenue; and residential buildings are concentrated along the east half of Auburn Avenue and Howell Street (Figure 9). The Martin Luther King Jr. Birth Home is located at the center of the residential portion of the historical park. In total, there are 67 historic structures within the site, most of which were constructed between 1890 and 1910.

The historical park is surrounded by the Sweet Auburn Historic District, which encompasses approximately 230 historic structures.

The multi-unit residential building at 54 Howell Street is situated at the east end of the Martin Luther King, Jr. National Historic Park along the west side of Howell Street. It is located approximately 400 feet east and around the corner from the Martin Luther King Jr. Birth Home. It sits

on a sloped, mown-turf corner lot, measuring approximately 50 feet by 35 feet (Figure 10). The site slopes approximately 4 feet to the west.



FIGURE 9. Overview of the Auburn Avenue streetscape looking west at the Martin Luther King, Jr. National Historical Park.



FIGURE 10. Overall view of the building looking southeast.

The front of the residence faces east onto Howell Street, from which it is separated by a 10-foot-wide brick sidewalk with granite curb. The brick sidewalk is laid in a herringbone pattern (Figure

11). In addition to the sidewalk, a fire hydrant and a streetlight with wood post are located at the northeast corner of the lot. The north elevation, along Old Wheat Street, is set back six feet from the street and consists of a dirt side yard and granite street curb. To the west of the residence is a residential lot with a two-story single-family house. The building at 54 Howell Street is adjacent to the mown-turf backyard of the property. The property line between the two lots consists of a chain-link fence on top of a brick knee wall. The brick knee wall has a stone foundation and is capped with a cementitious parge coating. The foundation of a previously existing 4-inch-wide concrete masonry unit (CMU) property wall remains. Immediately south of the residence, at 530 Auburn Avenue, is a two-story residence. It is separated from the 54 Howell Street residence by a 3-foot-wide dirt side yard (Figure 12).



FIGURE 11. Brick sidewalk paving along east elevation of the building. Paving set in a herringbone pattern.



FIGURE 12. Overview of Howell Street showing the residence at 530 Auburn Street in the foreground.

Residence

The structure at 54 Howell Street is a two-story, wood-framed, multi-unit residential building with a two-story covered porch (Figure 13). It is a symmetrical building with a rectangular plan oriented on a north-south axis, and the main entrances located on the east elevation. In addition to the building and front porch, a two-story wood-framed enclosed porch is found at the rear (west) elevation.

The main portion of the building measures approximately 37 feet wide north to south, and 24 feet deep east to west. It has wood siding with vertical wood trim at the corners and an asphalt-shingle gable roof. The building is elevated above grade on a part stone and part brick foundation wall. The building, from roof ridge to grade at the front elevation, is approximately 28 feet tall. The two-story front porch measures approximately 30 feet wide by 8 feet deep and is centered on the front (east) elevation. A portion of the roof structure from the main house extends over the porch. At the rear elevation of the building is a two-story enclosed porch measuring approximately 25 feet wide and 5 feet deep. The rear porch is clad with wood siding and vertical wood trim at the corners and has its own roof structure consisting of an asphalt-shingle shed roof.



FIGURE 13. Overview of the residence at 54 Howell Street looking northwest.

The primary entrances are centered on the east elevation of the main two-story portion of the

house and are accessed from the front porch (Figure 14). The east elevation includes three wood-framed doors centered at the first-floor level. The center door has an enclosed vestibule that projects approximately three feet beyond the rest of the elevation. On either side of the doors are paired multi-light double-hung windows. Wall-mounted lights are located at the top of center mullions between the window units. There is a similar arrangement of openings at the second-floor level. However, at the second floor, there is no projecting center vestibule or center door. The porch is centered on this elevation and provides access to all of the doors and windows. There are two chimneys located at the ridge of the roof.

The north elevation is the end gable elevation (Figure 15). The elevation features decorative wood brackets below the roof eave. Four window openings are on this elevation, two at the first floor and two at the second. The windows are vertically aligned between floors. The window at the west end of the first-floor level is smaller than the typical window opening. Centered on the attic level of the elevation is a small vent. From this elevation, the stone foundation is visible.

Centered on the west elevation is the two-story partially enclosed rear porch, which is accessed from a stair at the south end (Figure 16). The porch covers most of the elevation including some window and all door openings from the main portion of the building. The main portion of this elevation consists of six vertical bays, each distinguished by a window or door opening. Openings are aligned between the first- and second-floor levels. The end bays have window openings at the first- and second-floor levels. The window opening at the north end of the first floor is smaller than the typical window opening on the building. Physical evidence suggests that new infill siding was installed below the window. The remaining four bays are within the rear porch. The second and fifth bays have door openings at each floor that provide access to the rear of the individual residential units. The door opening at the north end of the first floor is within an enclosed portion of the porch. The enclosure has wood siding and a typical door opening at the

south-facing wall. The center two bays each have window openings. Between the center window bays and the adjacent door bays are wall-mounted light fixtures with enclosed glass lamps. At the center of the first-floor level, flanked by the window openings, is a double-leaf door opening. In addition to openings at the first and second floors, there are five door openings at the foundation wall that provide access to the crawl space. At the north end of the foundation is a wall-mounted electrical box.



FIGURE 14. East elevation of the residence.



FIGURE 15. North elevation.



FIGURE 16. West elevation with the two-story partially enclosed porch.



FIGURE 17. Partial view of the south elevation.

Like the north elevation, the south elevation features an end gable and has corner brackets, an attic vent, and four typical window openings positioned symmetrically on the elevation (Figure 17). This elevation also has a stone and brick foundation with a window opening at the east end of the elevation.

The building has been owned by the National Park Service since 1990. Shortly after the NPS acquired the property, the building was damaged as a result of fire. It was repaired and partially rebuilt in the early 1990s. Currently, the building serves as temporary housing for incoming NPS personnel or NPS personnel on temporary detail. NPS partners

have also used the apartments while working in the park.

Exterior

Description

Foundation. The building has a continuous masonry foundation wall that extends along the perimeter of the main portion of the building. The chimney foundations and supplemental wood posts on footings are located north-south along the center of the foundation plan and support the floor framing. The foundation wall raises the building approximately 66 inches and provides a crawl space under the structure.

It appears that the original foundation was constructed of stone; however, portions of the foundation have been replaced with brick. The north and east elevations have a coursed ashlar granite foundation (Figure 18). The granite units measure 6 inches tall, range from 4-1/2 inches to 18 inches wide, and are set in 1-inch bed joints. The south and west elevations have a red clay brick foundation set in an American bond (Figure 19). Vent openings, measuring 8 inches by 16 inches, are located at the brick portion of the foundation wall and have decorative cast-iron grates (Figure 20). In addition, there are five exterior access doors along the west foundation wall and a window opening at the south foundation wall.

The two masonry chimney foundations measure 48 inches by 16 inches and are notched to form pockets within which center 2x10 floor beams are supported (Figure 21). Supplemental wood posts on foundations are spaced 8 to 10 feet apart between the chimney foundation and perimeter foundation wall (Figure 22). The wood posts are 6x10 and have a foundation consisting of brick and a non-original concrete cap.

Within the crawl space are mechanical units with flexible ductwork as well as both cast-iron and polyvinyl chloride (PVC) plumbing pipes.



FIGURE 18. Coursed ashlar granite foundation at north elevation of building.



FIGURE 19. Red clay brick foundation visible from west and south elevations.



FIGURE 20. Decorative cast-iron vent grate at south elevation of foundation.



FIGURE 21. Brick masonry chimney foundation.



FIGURE 22. Wood posts on concrete cap provide supplemental support of the floor beams.

Walls. The exterior walls at the main portion of the building are clad with horizontal shiplap wood siding, painted yellow (Figure 23). The siding has a total 5-1/8-inch exposure with the upper 1-1/4 inches consisting of the exposed portion of the coved tongue. The siding is nailed with spiral nails spaced 16 inches on center. At corners of the walls, there are vertical trim boards that are 4-3/4 inches wide and painted dark yellow.

At the rear porch, the shiplap siding has a wider exposure than at the main portion of the building, measuring 7 inches (Figure 24). The siding at the rear porch is divided at the second floor level where floor decking extends beyond the face of the siding. The ends of the deck board are visible from the exterior and indicate that the upper floor level may have been a later addition.

At the north and south end gable elevations, there are decorative wood brackets (Figure 25). The brackets are constructed of 4x4 wood members and are mounted to the vertical trim boards and engage the wood roof fascia.

Much of the exterior siding, trim, and ornamental woodwork appears to have been replaced as part of the repair and rebuilding effort following the fire in 1993.



FIGURE 23. Typical horizontal shiplap wood siding at main portion of building.



FIGURE 24. Corner between main building (left) and partially enclosed rear porch (right). Note differences in width of siding.



FIGURE 25. Wood brackets at gable roof eaves.

Porch. The two-story front porch has been rebuilt and is centered on the east elevation (Figure 26). It is raised approximately 19 inches above grade and accessed from a concrete stair. The first floor consists of a brick foundation that has a cementitious parge coating, which is painted grey. The foundation supports a concrete slab that measures 4 inches thick and extends 1 inch beyond the face of the foundation wall (Figure 27).

The porch structure itself has full-height brick masonry piers that support a wood-framed second-floor structure and the extension of the gable roof. The piers are spaced approximately 12 feet apart and constructed of non-original, beige, wire-cut and rake-finished brick with a red brick foundation (Figure 28).

The second-floor framing includes a perimeter wood, box-framed beam that spans the brick piers as well as between the main portion of the building and the end piers. The box beam is painted light yellow and has dark yellow horizontal trim. It supports 3-inch-wide wood tongue-and-groove decking, painted light blue.

Similar to the second-floor framing, wood box-framed beams are at the top of the brick piers and painted dark yellow. They in turn support the edge of the roof. The first- and second-floor ceilings of the porch have bead board measuring 3 1/2 inches wide and painted light blue. Between the box beam and ceiling is crown molding, painted yellow (Figure 29). Vertical lines of sealant at the brick piers are what remains of a previously existing screen installed outboard of the balustrade at the second floor of the porch (Figure 30).



FIGURE 26. Front entrance porch at east elevation.



FIGURE 29. First-floor ceiling, including wood box beam, at front entrance porch.



FIGURE 27. Brick foundation with cementitious parge coating and concrete deck slab at front entrance porch.

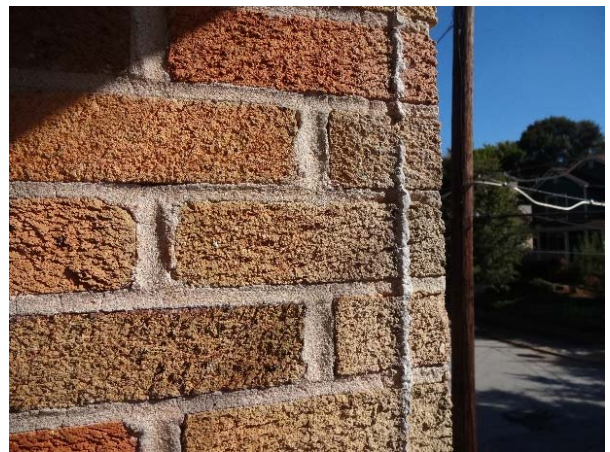


FIGURE 30. Remaining sealant at brick where previously existing screens had been installed outboard of the balustrade.



FIGURE 28. Brick piers at front entrance porch.

Wood balusters, consisting of a bottom and top rail, painted yellow, with 2-inch-square intermediate spindles spaced 8 inches on center and painted white, extend between the brick piers at each floor level. The railing is 34 inches tall (Figure 31).



FIGURE 31. Wood balusters at front entrance porch.

The two-story rear porch appears to have been constructed in phases and is not original to the structure. It is a wood-framed partially enclosed space that is raised approximately 5 feet above grade at the west side of the building. It is accessed from a wood-framed stair and wood-framed screen door located at the south end of the porch.

The porch is supported on brick piers that support the wood floor framing. Wood lattice is installed at the space between the piers (Figure 32).

The porch walls are mostly clad with shiplap wood siding, painted yellow. However, the upper portions of the wall at each floor level have mesh screening fastened to the framing members (Figure 33). As previously described, the shiplap siding at the rear porch is wider than at the main portion of the building.

The porch flooring consists of 3-1/4-inch tongue-and-groove decking, painted light blue. At the first- and second-floor ceilings, the wood-framed structure is exposed to view and has been painted light blue. A ceiling-mounted frosted glass globe light is centered on the ceiling (Figure 34).



FIGURE 32. Wood lattice at enclosed rear porch.



FIGURE 33. Enclosed rear porch interior walls consist of shiplap siding and mesh screening fastened to framing members.



FIGURE 34. The first-floor ceiling of the enclosed rear porch. Note exposed framing and lighting.

Other features of the rear porch include an enclosed area at the north end of the first floor (Figure 35). The enclosure houses the laundry facilities. The enclosure has shiplap wood siding and a door opening that provides access to the remaining portion of the porch. At the second floor, there is a wood-framed partition wall that divides the space in half and inhibits access between the two sides (Figure 36). The upper portion of the wall has mesh screening.



FIGURE 35. View of enclosed area at north end of first floor of porch.



FIGURE 36. Wood-framed partition wall that separates the north and south ends of the rear porch at the second-floor level.

Exterior Doors. The building has numerous exterior doors including the primary entrance doors at the first floor of the front porch. Other exterior doors are located at the second floor of the east elevation and at the first and second floor of the west elevation. These doors provide access for each residential unit to the porches. Exterior doors are also located at the entrance to the rear porch and at the west foundation wall.

Typical residential unit door openings have a flat wood trim at the jambs and headers measuring five inches wide and painted dark yellow. All doors, with the exception of those at the foundation wall and a double-leaf door at the west elevation, are interior swing doors. Many have exterior-mounted wood-framed screen doors. The screen doors, where present, have an intermediate rail that divides the doors into an upper and lower half and have mesh screening. Doors are mounted to the exterior face of the wood trim with spring-loaded self-closing hinges and have a metal handle (Figure 37). The door frame and handle are painted dark yellow.

Typical exterior doors to residential units are wood single-leaf hinged and consist of three recessed panels at the lower half of the door and a four-light glazed opening at the upper half (Figure 38). Door hardware includes a non-original deadbolt and a brass knob with mortise lock and escutcheon plate. The four residential doors at the west elevation vary slightly from the typical door in that the proportion between the upper glazed portion and lower recessed panels are slightly different. At these doors, the three recessed panels occupy the lower two thirds of the door and the four-light glazing occupies the remaining third (Figure 39).

The double-leaf door centered on the west elevation swings toward the exterior. It provides access to a stair that extends to the upper residential units. Each door leaf has a recessed panel at the lower third of the leaf and glazing at the upper portion. The glazing consists of diamond-shaped panes with wood mullions (Figure 40). The door has a raised threshold, six inches above the deck height, and a brass knob with escutcheon plate and mortise lock.



FIGURE 37. Typical screen door at exterior entrances.



FIGURE 39. Wood-framed exterior doors at the west elevation of the building differ slightly from typical doors on the east elevation.



FIGURE 38. Typical wood-framed exterior doors at the east elevation of the building.



FIGURE 40. Wood-framed double door with diamond-shaped glazing at west elevation of the building.

Other door openings include a screen door that provides access to the rear porch and wood plank doors, located on the west foundation wall, that provide access to the crawl space. The patio door is a typical wood-framed screen door divided into two sections by a wood rail (Figure 41). The west foundation doors have wood trim at the jambs and

header that measures approximately 2-1/2 inches wide. The doors are constructed of vertical wood plank and have strap hinges (Figure 42). The doors are secured shut with a metal latch and padlock.



FIGURE 41. Wood-framed screen door at south elevation of the rear porch.



FIGURE 42. Wood-plank access doors to basement area.

Windows. The existing windows are non-original wood-framed units installed as part of repairs performed in 1993. Most window openings are framed with wood trim at the jambs and header and have projecting sills. The trim consists of flat wood trim measuring approximately 5 inches wide. The wood sill is approximately 1-1/2 inches wide, projects approximately 1-1/2 inches from the face of the wall and extends 1/2 inch beyond the jamb trim on either side.

Window units are wood-framed with mortise-and-tenon joinery. Sash members measure approximately 1-3/4 inches wide with the bottom rail of the lower sash measuring approximately 2-1/2 inches. The glass is set with glazing putty. Where present, vertical wood mullions, measuring 1/2 inch wide, separate the glazing units.

With the exception of one window at the foundation level, all of the window units are either single or paired wood-framed, six-over-six double hung. Typical window units measure approximately 60 inches tall and 35 inches wide. At the east elevation, the double-hung windows are paired and separated by a center mullion measuring 8 inches wide (Figure 43). There is a wall-mounted exterior light fixture with brass and glass lamp centered at the top of the center dividing mullion. The south, west, and north elevations have all single unit double-hung windows (Figure 44). The two windows associated with the kitchen (on either side of the corner between the north and west elevations) are slightly shorter than the typical window, measuring 40 inches tall (Figure 45).

The screens are wood framed, have a horizontal mullion that divides the screen into two sections, and have a mesh screen. Frames are secured to the window sash with two exterior-mounted metal rotating clasps at the top of the opening.

A fixed window is located at the east end of the south foundation wall. The window is a wood-framed six-light unit with a projecting granite sill (Figure 46). The sill projects 1-1/2 inches beyond the face of the wall and extends 3-1/2 inches on either side of the window opening.



FIGURE 43. Typical paired six-over-six double-hung window on the building.



FIGURE 44. Typical six-over-six single double-hung.



FIGURE 45. Modified six-over-six double-hung window at kitchen.



FIGURE 46. Fixed window unit at south elevation of basement.

Roof. The roof was repaired or rebuilt in the 1990s. All roof areas are covered with asphalt shingles, including the gable roof at the main portion of the residence with an extension over the front porch and the shed roof at the rear porch (Figure 47). The ridgeline of the roof is oriented on a north–south axis and features overhanging eaves, wood rafters exposed to view, and a gutter with downspouts.

At the main gable roof, the eaves extend approximately 24 inches, and the underside of the decking and rafter tails are exposed to view. The roof decking consists primarily of wood plank (Figure 48). Bead-board decking was observed at some portions of the eave but is believed to be from a later repair (Figure 49). At the main gable, the rafter tails are spaced 24 inches apart and the ends have been cut and notched.

The main gable roof has two chimneys along the ridge line that have a cementitious parge coating and sheet-metal flashing. The chimneys are approximately 48 inches by 16 inches and extend approximately 32 inches above the roof. Attic fans and vent pipes project from the roof. The attic fans consist of low-profile fan boxes.

The shed roof at the front porch is a continuation of the roof slope from the main gable. It has a closed eave that extends approximately 18 inches beyond the support piers (Figure 50). The return face of the roof has a wood fascia board.

At the main gable and front porch roofs, a half-round hanging sheet-metal gutter is attached to the west and east sides of the roof (Figure 51). The gutter is supported on semicircular galvanized brackets and drains to circular sheet-metal downspouts located at the corners of the building that discharge at grade (Figure 52). The exposed roof framing, gutters, and downspouts are painted dark yellow to match the adjacent vertical wood trim.

The rear porch has a separate roof structure from the main gable that is located approximately 16 inches below the gable roof. The roof has eaves that overhang 16 inches. Similar to the gable and front porch, the west side of the roof has a semi-circular sheet-metal gutter with circular sheet-metal downspouts that extend to grade. The roof also features a capped vent stack.



FIGURE 47. Overview of building showing gable roof with shed roof at the front porch.



FIGURE 48. Underside of the eaves with the wood plank decking exposed to view.



FIGURE 49. Underside of the eaves with the non-original bead board decking exposed to view.



FIGURE 50. Closed eave at the front porch roof.



FIGURE 51. View of half-round hanging gutter and downspout.



FIGURE 52. The circular sheet-metal downspouts discharge at grade.

Condition Assessment

The following notable conditions were observed in September 2016 at the building exterior:

Masonry Foundation

- In general, the foundation and front porch piers are in good condition. The majority of the conditions described is associated with conditions at the south foundation wall or at the northwest corner, where there appears to be active water infiltration.
- Vertical cracking and moisture staining were observed at the northwest corner of the stone foundation wall, below the kitchen (Figure 53). The crack extends from grade through joints between stone units and is approximately 1/8 inch wide. The cracking appears to be active and is aligned with a kitchen sink and dishwasher at the interior of the building.
- Step cracking was observed at the brick foundation wall on the south elevation (Figure 54). The cracking extends the full height of the foundation and follows the joint between bricks. It appears that the cracks were previously repaired with mortar, but the repair has since cracked.
- Open, eroded, and deteriorated mortar joints were observed at the foundation of the brick piers and at the brick foundation wall at the south elevation of the building (Figure 55 and Figure 56). At open joints, the mortar was missing; however, the mortar setting bed appeared to be intact. Erosion and deterioration at joints consisted of loss of some of the mortar and bond separation between the brick and mortar. Eroded joints were typically located at the corners of the building or adjacent to downspouts where the brick is more susceptible to water runoff.
- Displacement was observed at one brick unit at the top of a brick pier on the front porch (Figure 57). The brick was located at the top course of the pier and was observed to be displaced approximately 1/2 inch from the adjacent brick.

- Missing and debonded parge coating was observed at the brick masonry foundation wall under the front porch (Figure 58). Areas of missing parge coat were located at the south end of the porch. At these areas, some of the brick was exposed to view, and there was evidence of previous repairs to replace the parge coat. The parge coat and exposed brick had been painted grey.
- Non-original penetration openings were observed at the south foundation wall (Figure 59). The penetrations consisted of removal of portions of one brick unit and installation of a flexible duct. There was no waterproofing for the masonry opening or sealant at the perimeter of the duct penetration.



FIGURE 53. Vertical cracking and moisture staining at stone foundation wall.



FIGURE 54. Vertical cracking at brick foundation wall.



FIGURE 55. Open and exposed joints are located at brick masonry pier.



FIGURE 56. Open and exposed joints are located at brick masonry foundation wall.



FIGURE 57. Displaced brick unit at top of pier.



FIGURE 58. Debonded parge coating at front porch foundation.



FIGURE 60. Biological growth at joints in foundation wall.



FIGURE 59. Non-original penetration at brick foundation wall.



FIGURE 61. Remnants of sealant from previously removed screen wall at front entrance porch.

- Biological growth was observed at some joints between stone units at the north foundation wall (Figure 60). The growth appeared to be under the most recent thin surface coat of mortar applied at the joints.
- A vertical line of sealant was observed at the brick piers and offset 1-1/2 inches from the edge of the pier (Figure 61). The sealant appears to be remaining from the removal of previously existing screens at the second floor of the balcony.

Concrete

- In general, the existing concrete located at the front porch landing was in good condition.
- Cracking at the concrete porch slab was observed to extend perpendicularly to the direction of the slab and was typically aligned with the brick piers or at the midpoint between piers. The pattern of cracking is characteristic of distress associated with concrete shrinkage. Most of the cracking had been previously repaired with sealant and had been painted over; however, these repairs had cracked and failed (Figure 62). Untreated cracks were also present and were typically 1/16 inch wide (Figure 63).
- Peeling and flaking of paint was observed at the concrete slab at the front porch (Figure 64).



FIGURE 62. Previously repaired crack in concrete deck at front porch deck has failed.



FIGURE 63. Untreated crack in concrete deck at front porch.



FIGURE 64. Peeling and flaking paint on concrete at front porch.

Wood Elements

- In general, the wood elements are in fair condition. Typical distress conditions include failure of surface coatings and mild deterioration of the wood.
- Twisting and buckling was observed at two locations on the front porch decking (Figure 65). The distress was typically located at the ends of the boards but has the potential to be a tripping hazard.
- Deterioration was observed at a few wood balustrade elements, particularly at the end grain of rails and vertical trim boards in contact with the concrete deck and brick piers (Figure 66). Where distress conditions were present, the wood was soft when probed or had partially disintegrated and was friable.
- Twisting was observed at the ends of a few wood siding boards (Figure 67). The twisting was most pronounced at joints between adjacent boards and consisted of a rotation of 3/8 inch at the end of the board so that the bottom extended beyond the face of the adjacent board.
- Displacement was observed at some of the vertical trim boards between the baluster and brick piers (Figure 68). At these locations, the joint between the trim and pier was open, indicating that the vertical trim had shifted or moved.

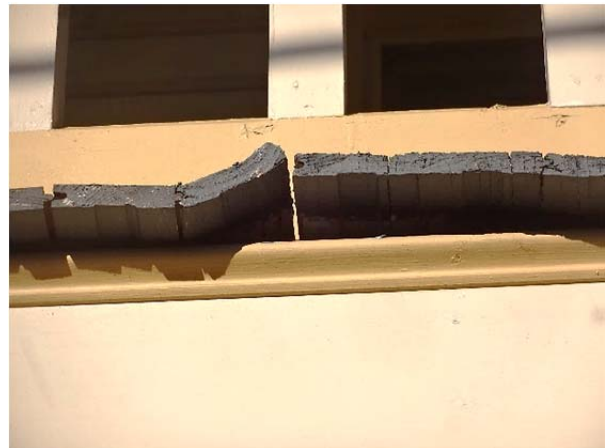


FIGURE 65. Twisted and buckling wood deck boards at front porch.



FIGURE 66. Deteriorated wood adjacent to brick piers and concrete decking at front porch.



FIGURE 67. Twisting of wood cladding was most pronounced the ends of the boards.



FIGURE 68. Displacement and open joints at vertical trim boards.



FIGURE 69. Biological growth on the underside of box beams at the front porch.

- Biological growth was observed on the wood on the underside of the box-framed beam at the front porch (Figure 69). The growth had a splotchy appearance and was black in color.
- Open joints were observed between some of the bead-board ceiling boards (Figure 70). Where present, the joints were typically 1/8 inch wide and the paint coating was cracked.
- Cracking, debonding, and peeling of paint were observed at the wood siding, trim, and underside of the decking at the overhanging eaves (Figure 71). The pattern of peeling paint typically followed the graining on the boards. At these locations, some of the wood was exposed to view. The paint failure may be related to poor surface preparation.



FIGURE 70. Open and displaced bead boards at the first-floor ceiling of the front porch.



FIGURE 71. Peeling paint at wood siding.



FIGURE 72. Infill siding below kitchen window opening.

- Physical evidence suggests that the siding below the kitchen window at the north end of the west elevation was installed to infill a portion of the wall where a previously existing window was located (Figure 72).

Windows

- The windows are in good condition. They are not historic and date from repairs performed in 1993.
- Deteriorated and decayed wood was observed at some wood windows sills (Figure 73). The deterioration consisted of mild decay of the wood at the upward-facing surface of the sill, and it was accompanied by chipped and cracking paint.
- Missing window screens were identified at two of the window openings. At both

locations, the rotating latches at the top of the window opening used to secure the screens were present.



FIGURE 73. Deteriorated and decayed wood at basement windowsill.

Doors

- The doors are in good condition. They are not original and date from repairs performed in 1993.
- Missing screen doors were identified at two of the door openings. At both locations, the receiver of the hinge was observed to be mounted to the door jamb.



FIGURE 74. Bird's nest at roof bracket and eave.

Other Elements

- Pest infestations were observed at the front porch and at the decorative brackets at the north elevation (Figure 74). The infestation included

what appeared to be a mud dauber nest at the front porch and a bird's nest on top of the front porch piers and at decorative brackets.

- There was no evidence of termite infestation during the survey.

Interior

Description

The apartment building at 54 Howell Street has a symmetrical four-apartment layout common to multi-family, vernacular residential structures of the 1930s. Originally, two four-room apartments were located on each side of the central stair core, for a total of four units, reflecting the exterior appearance of the building. The apartments have common porches at each floor along the front (east) elevation (Figure 75). A partially enclosed and screened two-story porch was added to the rear (west) of the building.

Ownership records indicate that the building was divided into four apartments throughout the period of significance of the district and as late as 1980.¹⁰³ A fire in 1985 damaged significant portions of the structure.¹⁰⁴ Prior to full rehabilitation of the building in 1993, the four apartments had identical layouts.¹⁰⁵ The floor plan of each apartment consisted of a central living room with access to the common east porch; a bedroom and kitchen to the west, opening directly to the living room; and a bathroom at the front corner, also entered from the living room. Chimneys at the center of each unit suggest that the apartments were likely heated by fireplaces or coal-burning stoves at the center of the living rooms. No such fireplaces or stoves remain.

Currently, the building is divided into three apartments. Brass signs on the front entry doors indicate the lower apartment as “A,” the south

second-floor apartment as “B,” and the north second-floor apartment as “C.” The first-floor apartment has a kitchen, dining room, and living room on the north side and two bedrooms, a bathroom, and a second living room on the south side. The two second-floor apartments, which are entered from a landing at the top of the central stair, have a living room, kitchen, bedroom, and a bathroom (refer to drawings in Appendix A).



FIGURE 75. Shared east porch opening from living rooms at the second floor.

During the 1993 rehabilitation, the ground-floor units were joined to create a single, two-bedroom apartment that is currently used to house visitors on short stays. Back-to-back closets under the stair were removed to create a hall between the two original units resulting in a single first-floor apartment. The two living rooms otherwise remain in their original configuration and are used as flexible living space. In the south portion, the kitchen was converted into a second bedroom, and the bathroom was expanded and updated. In the north portion, the former kitchen was remodeled as a dining room, and a contemporary kitchen was constructed at the original bedroom location along the north wall.¹⁰⁶ A cased opening

103. Ownership records.

104. Informed by observed conditions.

105. National Park Service. *The Rehabilitation of NPS Structures 54 Howell Street and 535 Auburn Avenue*, September 30, 1992 [blueprints]. Atlanta: National Park Service, 1992.

106. Ibid.

was added between the new kitchen and dining room (Figure 76).

The 1993 rehabilitation maintained the previous function of the rooms for the second-floor apartments. Kitchens and bathrooms were completely remodeled. The floor plan was modified to expand the bathrooms and bedroom closets.¹⁰⁷ Doors opening to the living room were relocated, and the interior kitchen doors were changed to cased openings. These units are currently rented to National Park Service personnel.

During the 1993 rehabilitation, most interior finishes, millwork, and hardware were replaced along with the installation of new heating, ventilation, and air condition (HVAC) systems; electrical wiring, fixtures and components; plumbing fixtures and piping; and fire alarm and security systems.¹⁰⁸



FIGURE 76. View from the lower unit kitchen to the dining room through cased openings created in the 1993 rehabilitation.

As mentioned in the exterior description above, the dates of construction and modifications to the porches on the rear (west) elevation are not known. The original building may have had a central open porch with a stair to the rear yard; however, no record or vestige of this construction

107. *Ibid.*

108. *Ibid.*

remains. A two-story, wood-framed structure was added shortly after the construction of the building, providing a private screened porch opening directly from the kitchen of each unit.¹⁰⁹ This work likely incorporated the central porch and stair. Demolition plans from the 1993 rehabilitation indicate a screened room accessible from each kitchen except for the lower north unit which is identified as an enclosed “back room.”¹¹⁰ During the 1993 rehabilitation, this enclosed room was renovated as a shared laundry, and the center and south screened porches were converted to a common screened porch with a stair exiting to the south. At the second floor, a demising wall of the same construction as the porch walls divides the main porch in half, creating a portion for each living unit (Figure 77).



FIGURE 77. Demising wall at second-floor rear porch.

Interior Finishes. Although finishes are generally consistent throughout the building, most appear to have been replaced during the 1993 rehabilitation. It is not known from physical evidence or available archival documentation whether interior trim elements, doors, and windows are original or reproductions of original elements. Some distinguishing isolated elements remain, and they exhibit features characteristic of the original interiors.

As discussed above, the home was damaged in the 1980s and 1990s by fire. Evidence of fire damage is

109. Lawliss.

110. National Park Service, 1992.

apparent in the attic and appears to have been contained to the northwest corner of the building. An original beaded wood-panel ceiling remains at the southwest corner of the first floor (Figure 78). It is not clear whether the corresponding room at the northwest corner had a similar ceiling prior to the fire. Further destructive investigation of framing members could confirm whether the paneled ceiling was typical at the interior or whether the corner rooms were originally exterior and enclosed at some point.



FIGURE 78. An original wood-panel ceiling with crown molding remains in the south bedroom of the lower unit.



FIGURE 79. Textured plaster and beaded ceiling at upper unit closet.

The casing trim on several windows and doors exhibit multiple layers of paint, indicating that they may be original to the building or date to the period of significance of the district. Most, however, exhibit only recent paint and are likely

replacements from the reconstruction and rehabilitation projects. Original finishes, including plaster, beaded wood paneling, wood flooring, trim and millwork remain in the stairs and the central closets (Figure 79). Except at these locations, wall and ceiling finishes have been removed throughout and replaced with painted gypsum board.

Walls are consistently painted in a flat off-white color and appear to be in good condition. Ceilings are smooth gypsum board applied to the underside of framing members at approximately 8 feet 6 inches above the floor. Ceilings are typically floated into walls with no crown molding and are painted in a flat white or off-white. Where original beaded ceilings remain, a small crown molding is present at the junctures of ceilings and walls. This crown molding is painted to match the wall or ceiling color. Baseboards in the renovated areas are 5/4-inch by 7-inch painted wood with an ogee profile (Figure 80). Baseboards where original beaded wainscot remains in the stair is 5/4 inch by 7-1/2 inches with an ogee profile. Quarter-round base shoe is present at rooms with vinyl flooring. There is no base shoe in carpeted rooms. All original millwork, trim, and interior surfaces of doors, and windows are painted in a semi-gloss enamel matching the off-white color of the walls.



FIGURE 80. Typical baseboard and door plinth at first floor.

Nearly all floors have been covered with contemporary finishes. Where it could be observed, the subfloor is plywood most likely installed in the 1993 rehabilitation (Figure 81). No indication was found of original floor finishes inside the units; however, painted wood tongue-and-groove

flooring remains at the upper landing of the rear stair (Figure 82). Flooring in most rooms, including living rooms and bedrooms, is a broadloom cut-pile carpet. Kitchens, bathrooms, and the laundry have contemporary vinyl composition tile (VCT) or sheet flooring. The front stair has a looped pile broadloom carpet over painted wood treads and risers.



FIGURE 81. Plywood subfloor with carpet at the lower unit.



FIGURE 82. Painted tongue-and-groove wood flooring at rear stair landing.

Door and window casings are painted wood and are consistent throughout the units. The interior jamb casings consist of a 5-1/2-inch symmetrical profile trim with a convex panel (Figure 83). Doors have flush 10-1/2-inch by 5/4-inch plinth block with a radiused top edge set in plane with the base

board (Figure 84). Head casings and window aprons are 5-1/2-inch flush boards with no profile or rosette (Figure 85). Window stools are 5/4 inches thick painted wood with a radiused top edge returning to the wall.



FIGURE 83. Typical casing trim at window.



FIGURE 84. Typical base and door trim at second floor.



FIGURE 85. Typical window head casing.

Interior doors are painted wood stile and rail with a single panel at the first floor and two panels at the second floor. Some doors may be original to the building;¹¹¹ however hardware appears to have been replaced throughout during the 1993 rehabilitation. Typical exterior door hardware consists of reproduction mortise locks with brass or brass-finish steel escutcheons and knobs, chain security guards and brass-finish contemporary deadbolts. The deadbolt interiors are keyed at the first floor and thumb-turn at the second-floor apartments. Interior passage and privacy doors have contemporary brass knobs. Most hinges have been painted. Louvered closet doors are non-original. Bedroom closets have paired, sliding louvered doors and pantry and coat closets have single, bi-fold louvered doors.

As noted in the exterior description above, window sash are consistent throughout the building and do not appear to be original. Interior ogee sash stops appear to have been replaced. Typical units are 6-over-6, double-hung, with weights and painted rope sash cords. Replacement window frames in the laundry and above cabinets in the kitchens have coil-spring balances. Most windows appear operational; however, many have visible gaps between sash units and frames. Weather-stripping is not apparent at meeting rails, sills, or jambs. Window hardware consists of two lifts at the lower sash and a brass sash lock; most have been painted. Treatments at windows and door lights are typically contemporary metal mini-blinds.

111. Hartrampf.

Stairs. The apartment units are organized around a central back-to-back stair core which divides the building into units along an east-west axis. The main (east) stair projects beyond the plane of the east wall of the lower, front units, distinguishing the door to the stair vestibule from the adjacent entry doors to the lower units. The rear (west) stair door is flush with the rear wall of the building, opening to the lower-floor screened porch. A single, non-original handrail is mounted on wall-brackets on the south side of the front stair and the north side of the rear stair.

The front (east) stair functions as a public vestibule, providing access to the upper apartments from the second-floor landing (Figure 86). The first tread serves as the threshold for the door with the nosing painted to match the thresholds of the adjacent entry doors. On the interior, the treads and risers and second-floor landing are covered in a contemporary grey-brown carpet (Figure 87).



FIGURE 86. Front stair vestibule.



FIGURE 87. Wainscot at upper landing of front stair.

Walls at the front stair are finished with vertical, double-bead wood paneling rising to a wood paneled ceiling at the first floor and terminating at the second floor as a wainscot with a simple rail cap. The wall above the wainscot and the ceiling are painted gypsum board (refer to Figure 87).

The door entering the front stair is a three-panel stile and rail door with a four-pane divided light. It matches the entry doors to the lower living units. The door is secured with a deadbolt keyed on the interior and exterior. It is unclear whether this lock is keyed for one, both, or neither of the upstairs apartments.

The rear stair provides access from the lower west porch to the second-floor apartments. The stair retains original painted wood treads, risers, and painted tongue-and-groove flooring at each landing (Figure 88). Walls at the first floor are painted a cream color and are horizontal, single-bead wood paneling which continues to wainscot height at the second floor where it is capped with ogee trim (Figure 89). The wall above the wainscot at the second floor is white painted plaster. The ceiling of the stair is finished with painted double-bead wood paneling, and there is an attic access scuttle above the second-floor landing. A pair of doors at the base of the stair has diamond lattice lights above a single raised panel (refer to Figure 89). The doors are a particularly unique feature of the building and appear to be original.

Each stair has three non-original surface-mounted light fixtures in the ceiling above the second-floor

landing and a single wall mounted fixture at the first floor.



FIGURE 88. Threshold at kitchen door to rear stair.



FIGURE 89. Rear stair with horizontal beaded siding and diamond lattice lights at doors below.

First Floor – Living Rooms. In each unit, living rooms are located on the Howell Street (east) side of the structure and open directly to the common front porch with a single door adjacent to a pair of joined double-hung windows in the original configuration (Figure 90). Under the 1993 rehabilitation project, the two living rooms in the lower apartments were joined by reworking the back-to-back closets below the central stair to

create a narrow passage between the two living rooms (Figure 91). Both living rooms are used as flexible living spaces when temporarily housing NPS employees or visiting guests.

This change also resulted in a new single closet on the west side of passage with a wooden louvered bifold door. On the interior, the walls and ceiling are finished in painted gypsum board. Carpet from the living room continues into the closet. A painted wood shelf and clothes rod are supported at each end by short sections of door casing trim.

Carpet in the living rooms appears relatively new and is in good condition. The wood base, door, and window casings are consistent with those found throughout the building. Walls and ceilings are gypsum board painted an off-white color. A non-original ceiling fan with lights has been added at the center of each living room. Openings for an original fireplace or heater at the center of the unit have been covered with gypsum board.



FIGURE 90. Overall view of south living room.



FIGURE 91. Reworked closet below front stair at connection between north and south lower units.



FIGURE 92. The window in the north wall of the living room remains where the bathroom was removed from the northwest corner.

In the north unit, the original bathroom and closet on the north wall was removed, and a contemporary closet with sliding, louvered doors was added on the west wall, adjacent to the kitchen. A double-hung window remains in its original location at the north end of the living area (Figure 92). Also, in the west wall, a single-panel wood door opens into the kitchen, and a cased opening provides access to the dining room.

Modifications in 1993 to the living room of the south unit were virtually the same as those made to the second-floor apartments. The bathroom wall was continued west to intersect the bedroom wall in order to enclose a larger closet. The bathroom door was relocated to the south wall of the living

room (Figure 93), and the door to the south bedroom was moved slightly to the north. The door to the north bedroom remains in its original location.



FIGURE 93. Single panel wood door leading to renovated bathroom at the south living room.

First Floor – Kitchen. The kitchen for the lower unit is in the northwest corner of the first floor. Originally, the space was a bedroom with direct access from the living room. During the 1993 rehabilitation, it was converted to a kitchen, and a wide cased opening was made in the wall between the new kitchen and the adjacent dining room (refer to Figure 76).¹¹² The door between the kitchen and the living room remains in its original location.

Walls and ceilings are gypsum board painted an off-white color. Wood baseboards and door and window trim are consistent with the typical house rehabilitation, except for the west wall, where there is no base. The flooring is 8-inch by 8-inch vinyl tile with a faux-slate pattern that appears relatively new. A quarter-round base shoe along the walls and along cabinet end panels and toe spaces protects the termination of the vinyl flooring. Where vinyl flooring meets the carpeted floors of the dining and living rooms there are aluminum transition strips.

Base and wall cabinets installed in kitchen are contemporary wood veneer face-frame units with standard wooden overlay doors and drawer fronts. Countertops are grey solid surface with a matching

4-inch solid surface backsplash. Wall cabinets do not extend to the ceiling. Lighting is provided by a single, round, ceiling-mounted fixture in the center of kitchen. Contemporary appliances are white and include a gas range with vent hood above it and a refrigerator. A single bowl, stainless steel, drop-in sink is mounted under the window on the north wall. Common 4-inch by 4-inch beige ceramic wall tile occurs at the backsplash next to the sink and continues to the floor behind the range. A fully recessed electrical sub-panel serving the apartment is located on the south wall of the kitchen to the east of the cased opening.

The sills of the two kitchen windows are raised from their original height, apparently to accommodate cabinets below; although there is no cabinet located under the window on the west wall (Figure 94). The north window has weighted counterbalances with sash cords consistent with others in the building. The window in the west wall has vinyl sash guides with coil spring balances indicative of a contemporary window.

Door casings in the kitchen are consistent with those found throughout the building; however, the head trim and base plinth blocks are not as thick as those found elsewhere in the house, and they are recessed slightly back from the jamb casing trim.



FIGURE 94. Overall view of the kitchen at the first-floor apartment.

First Floor – Dining Room. As part of the 1993 rehabilitation project, the kitchen adjacent to the

112. National Park Service, 1992.

stair was removed, and the space was renovated into a dining room. A cased opening was added to the wall between the kitchen and the dining room, and the original door opening to the living room was also enlarged. On the west wall, an original double-hung window overlooks the screened porch, and an exterior door opens to the shared laundry. Finishes in the dining room are consistent with those found in the building, and carpet is continuous from the living room.

Another feature of the dining room is a cabinet with open shelves above it that is built into the south wall in the space below the rear stair (Figure 95). This cabinet and shelf unit is likely original to the building. Demolition plans from the 1993 rehabilitation project indicate a similar unit existed in the south apartment.¹¹³ The exposed surfaces are painted off-white to match the wall color. Casing on the internal jamb and head matches that of typical door in the unit. A painted wood top consisting of two 12-inch by 5/4-inch boards with a bullnose edge is supported by a 2-inch by 4-inch face rail and perimeter frame. Two flush inset doors have a profiled panel, brass pulls, and butt hinges. Above the countertop, three painted 1-inch by 8-inch wood shelves above mounted on 1-inch supports. Textured and painted plaster walls remain at the back of the cabinet. The underside of the wood top is unfinished with remnants of an earlier green over-paint from the wall (Figure 96). Carpet from the dining room continues under the cabinet doors and into the cabinet's interior. A non-original 12-inch by 12-inch grey VCT below the carpet and quarter-round shoe molding were likely installed prior to the current carpet and kitchen tile (Figure 97). The soffit of this built-in unit consists of beaded tongue-and-groove paneling, which is on the underside of the stair framing.



FIGURE 95. Original built-in shelving and cabinet at dining room.



FIGURE 96. Underside of cabinet at dining room.

113. Ibid.



FIGURE 97. Original plaster wall and non-original VCT flooring at cabinet interior.

First Floor – Bathroom. During the 1993 rehabilitation project, the bathrooms were completely remodeled and expanded to include the space of the previous bedroom closet.¹¹⁴ The bathroom door was relocated to open directly from the south living room (refer to Figure 93). Except for the location of the windows, no original features of the original bathrooms remain.

The floor in the bathroom is a 2-inch by 2-inch beige porcelain ceramic tile with a 4-inch beige ceramic cove base. Walls and ceilings are painted gypsum board except at the tub where there are 4-inch by 4-inch glazed ceramic wall tiles on the two end walls and back wall of the tub, extending approximately 5 feet 6 inches above the tub, where they terminate with 2-inch by 6-inch bullnose tiles (Figure 98).

Bathroom fixtures consist of a wood veneer vanity cabinet with a solid surface top and molded sink. The tank-type water closet, porcelain-coated steel bathtub, and all plumbing fittings appear to relatively new, likely replacements for outdated fixtures and fittings when the building was updated in 1993. Toilet accessories have a chrome finish and consist of a shower bar mounted over the tile, a towel ring mounted between the vanity, and the window and a toilet tissue holder mounted near the center of the window apron. A plastic towel bar with ceramic supports is tiled into the south end of the shower. Plumbing for the shower,

bath, and water closet is in the north wall, and plumbing for the sink is in the exterior south wall. The type and condition of insulation around piping in the exterior south wall could not be determined.



FIGURE 98. Updated and enlarged bathroom at the first-floor apartment.

First Floor – Bedrooms. The two bedrooms in the apartment open directly off the south living room. During the 1993 rehabilitation, the kitchen in the south unit was converted into a bedroom, and the door to the original bedroom was moved to the north to accommodate renovations to the bathroom and construction of a new closet (Figure 99). Finishes in the bedrooms are painted gypsum board walls and ceilings with carpet, wood base, and wood trim consistent with finishes in other areas of the building.

An exception to these typical finishes occurs in an original bedroom on the south side of the building where a tongue-and-groove, beaded board ceiling remains (Refer to Figure 99). The room was originally open to the exterior and later enclosed.¹¹⁵ It is possible that the ceiling of the corresponding room on the lower northwest corner was treated similarly; however, no records were found to indicate whether the ceiling was removed after the fires or during the 1993 rehabilitation. There is a single, double-hung window at the center of the

114. National Park Service, 1992.

115. Observed conditions.

south and west walls. During the 1993 rehabilitation project, the closet was expanded to contemporary size with two sliding, louvered doors.



FIGURE 99. The relocated bedroom door (left) and remodeled closet (right) at south bedroom.



FIGURE 100. The internal bedroom at the lower unit was a kitchen for the south unit prior to its rehabilitation in 1993.

The second bedroom, adjacent to the stair, was formerly the kitchen for the south apartment prior to 1993.¹¹⁶ A door and one double-hung window in the west wall open to the porch (Figure 100). On the north wall, the original built-in millwork was removed and replaced by a closet with sliding,

louvered doors, a single painted wood shelf, and a clothes rod (Figure 101).

Non-original ceiling fans are installed at the center of each bedroom. The south bedroom fan has a wood grain finish and a four-globe light kit. The north bedroom has a white fan with a single globe light.



FIGURE 101. Interior bedroom door to living room (center) and sliding closet doors (left).

Laundry. At the north end of the lower rear (west) porch, a previously enclosed room was converted into a shared laundry in 1993.¹¹⁷ Two exterior doors provide access to the laundry, one from the first-floor dining room and a second one from the screened porch to the south.

A coin-operated commercial washer and electric dryer are located on the north wall (Figure 102). The vent from the dryer runs below the floor and out through the brick skirt wall of the crawl space. In the southwest corner of the laundry is a gas water heater, which serves the first-floor living unit. Water and gas piping serving the heater penetrates the floor from the crawl space below. A vent flue rises through the wood-framed, screened porch above to a flue cap on the roof. The only light in the laundry is a single porcelain fixture with an exposed bulb and a pull string switch.

116. National Park Service, 1992.

117. Ibid.

The sloping floor of the laundry was raised above the adjacent screened porch floor and leveled at an unknown date. Finishes in the laundry are the same as in the apartments except for off-white sheet vinyl flooring. A single, non-original four-over-four double hung window in the west wall does not match the other windows in the building.



FIGURE 102. Coin-operated washer and dryer in the shared laundry.

Second Floor – Living Rooms. The two apartments on the second floor of the building at 54 Howell Street are currently rented to National Park Service employees. Both units were occupied at the time of the site visit. The layouts and finishes of the two second-floor units are nearly identical and retain the arrangement of the original construction. The living rooms are located on the street (east) side and have access directly to a shared porch overlooking Howell Street (refer to Figure 75). A pair of joined, six-over-six double-hung windows and an exterior door open to the porch the same as the units below (Figure 103). The primary entrance to each apartment is directly into the living room from the central stair vestibule (Figure 104).

Similar to the first floor, the doors along the west wall of the living rooms are non-original, and fireplace openings are concealed with gypsum board. The doors from the living room to the bedrooms were relocated slightly, and the doors to

the kitchens were changed to cased openings.¹¹⁸ The bathroom is located on the exterior wall of each apartment and is accessed directly from the living room.



FIGURE 103. Joined double-hung windows at living room of the north apartment.



FIGURE 104. Two-panel door at entry to north apartment from the central stair.

A coat closet in the living room of each apartment appears to be original. Textured plaster walls and beaded panel ceilings remain at each of the back-to-back closets. Furred enclosures built above the stair retain original vertical beaded panels and a solid wood top (Figure 105). A single shelf is supported by a wood ledge with several bent wire coat hooks (Figure 106). These hooks were noted in other buildings in the district. They are likely

^{118.} Ibid.

original and a common feature of the period. The exposed interior surfaces are painted an off white, matching the color of other interior walls.

Except for the coat closets, the original wall and ceiling materials in the living rooms have been removed and replaced with painted gypsum board. Wood base, door, and window trim are painted to match the wall color resulting in a monochromatic appearance. Wood trim is consistent with the moldings throughout the building. Floors in the living rooms have carpet which is in serviceable condition.



FIGURE 105. Beaded wood paneling in the closet above the north stair appears original.



FIGURE 106. Bent wire coat hooks consistent with homes of the period.

A wall-mounted flat-screen television is on the wall between the living room and the bathroom in each apartment. A ceiling fan with a light is in the center of each living room.

Second Floor – Bedrooms. Bedrooms in the second-floor apartments remain in their original locations along the outside corners of the rear (west) elevation. A single 6-over-6 double-hung window is in the center of each exterior wall (Figure 107). When the building was rehabilitated in 1993, bedroom doors were relocated when bedroom closets were enlarged. The closets are non-original with a single painted wood shelf and sliding louvered doors with round brass pulls. Finishes in the bedrooms are also non-original. Door and window casings and baseboards are consistent with other rooms in the building, and carpet is continuous from the living rooms into the bedrooms.

The electrical subpanel for each apartment is in the bedroom on the wall adjacent to the kitchen. The recessed electrical subpanels are unpainted. A non-original white ceiling fan with a single globe light is mounted in the center of each bedroom.



FIGURE 107. Overall view of the bedroom at the north apartment.

Second Floor – Kitchens. Kitchens in the second-floor apartments remain in their original locations, approximately near the center and to the rear (west) of each unit and adjacent to the back stair. Each kitchen has access to the rear stair that separates them, and there is a door and a 6-over-6 double-hung window in the west wall which opens to a rear screened porch. Adjacent to the exterior west wall of each kitchen is a small

pantry that takes up the space above the ceiling of the rear stair (Figure 108). In both apartments, this small pantry closet has non-original louvered bifold doors and conceals an electric water heater. On the east wall, the original door to the living room has been replaced with a cased opening. No original features remain in the kitchens from the time prior to their complete remodeling in 1993.¹¹⁹

Wall and ceiling finishes are consistent with other rooms in the units. Gypsum board walls and ceilings are painted off-white, matching the doors, windows, casings, and base moldings. Floors in the kitchens are covered with sheet vinyl that has a grey faux-stone pattern, and the quarter round base shoe at the perimeter is painted off-white.

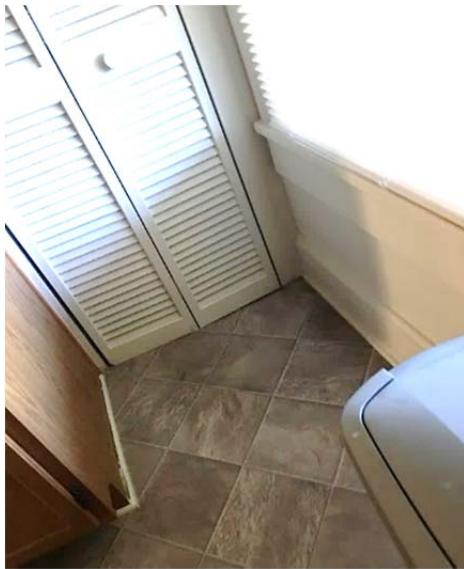


FIGURE 108. Non-original floor and pantry door at north apartment.

Both kitchens have base and wall cabinets along the north and south walls. In each apartment, along the wall between the kitchen and the bedroom, a shallow single-bowl, drop-in, stainless steel sink with a dishwasher below it is centered in the group of base cabinets, and a refrigerator is to the east (Figure 109). The group of cabinets along the opposite wall is separated by an electric range with a vent hood above it (Figure 110). All cabinets are pre-manufactured face frame units with a stained oak, wood-grain finish. The upper cabinets have standard raised panel overlay doors with a

matching stained wood finish and no pulls. Base cabinet doors have a single recessed, flat panel design and drawer fronts are flush. Countertops are white, post-formed plastic laminate with integral backsplashes.



FIGURE 109. Typical kitchen cabinets along the bedroom wall of the second-floor apartments.



FIGURE 110. Typical kitchen cabinets along the stair wall of the second-floor apartments.

Appliances in the kitchens include a dishwasher installed directly below the sink, as noted above, a refrigerator with top freezer, and an electric range with vent hood above it. A linear, ceiling-mounted fluorescent light fixture is positioned in the center

119. National Park Service, 1992.

of each kitchen. The vent hood also has an integral light.



FIGURE 111. Non-original door to the bathroom from the living room of the north apartment.

Second Floor – Bathrooms. During the 1993 rehabilitation project, the bathrooms were completely remodeled and expanded to include the space of the previous bedroom closet.¹²⁰ The bathroom door was relocated to open directly from the living room (Figure 111). Except for the location of the windows, no original features of the original bathrooms remain.

The flooring in the bathrooms is a 2-inch by 2-inch beige porcelain ceramic tile with a 4-inch beige ceramic cove base. Walls and ceilings are painted gypsum board except at the tub where there are 4-inch by 4-inch glazed ceramic wall tiles on the two end walls and back wall of the tub, extending approximately 5 feet 6 inches above the tub where they terminate with 2-inch by 6-inch bullnose tiles (Figure 112).

Bathroom fixtures consist of a wood veneer vanity cabinet with a solid surface top and molded sink. The tank-type water closet, porcelain-coated steel bathtubs, and all plumbing fittings appear to be relatively new, probably replacements for outdated fixtures and fittings when the building was updated in 1993. Toilet accessories have a chrome finish and consist of a shower bar

mounted over the tile, a towel ring mounted between the vanities and the windows, and a toilet-tissue holder mounted near the center of the window aprons. A plastic towel bar with ceramic supports is tiled into the ends of the tub / shower. Plumbing for the showers, tubs, and the water closets is in the interior walls between the bathrooms and living rooms; plumbing for the sinks is in the exterior walls. The type and condition of insulation around piping in the exterior walls could not be determined. A surface-mounted light fixture, an exhaust fan, and a heating and air conditioning register are on the ceiling (refer to Figure 112).



FIGURE 112. Non-original ceiling and fixtures at the north apartment bathroom.

Attic. The attic is accessed through a hatch in the ceiling of the kitchen in the south apartment. It was installed during the 1993 rehabilitation. An original hatch observed in the ceiling of the rear stair landing at the second floor was not confirmed to be serviceable. Second-floor apartments are insulated with fiberglass batt insulation laid between ceiling joists. This insulation appears continuous and in good condition (Figure 113). Roof framing members and original decking are exposed to view and are in sound condition; although, some exhibit evidence of previous fire damage to the attic. There is no continuation of the demising wall between the apartments above the second-floor ceiling.

A brick chimney rises through the attic from the center of each apartment below. Mortar joints in the masonry appear to have been repointed and

120. Ibid.

are in good condition. The 2009 Condition Assessment Report noted a curvature of the chimney to be monitored. The curvature of the chimney remains and appears to be in stable condition (Figure 114).¹²¹

HVAC equipment for each second-floor unit is in the attic. Conditioned air is supplied through insulated, round ducts to registers in the ceilings. At the time of the survey, the HVAC system serving the north apartment was not cooling.



FIGURE 113. Overall view at attic.



FIGURE 114. Curvature at chimney.

Condition Assessment

The interior of the house is in good condition overall; the following items represent minor concerns or localized distress.

Finishes

- There are separations between trim elements and the gypsum wall at the wood baseboards, door and window casings, and window aprons (Figure 115). These appear to be related to contraction or warping of the wood members after installation. It is not known if the trim is back primed.
- There is a linear crack in the plaster on the west side of the second-floor landing of the rear stair (Figure 116).
- A hole in the gypsum board at the north wall of the north second-floor apartment is patched with a thick gypsum patch material. The patch is crudely installed and appears not to have been sanded or painted (Figure 117).



FIGURE 115. Typical separation between trim elements and gypsum board.

121. Hartrampf, np.



FIGURE 116. Linear crack in plaster at rear stair.



FIGURE 117. Patch at living room wall.

- Water damage noted on the exterior of the north elevation could be related to a leak at the dishwasher in the first-floor kitchen. The extent of damage to wall finishes behind dishwasher and cabinets could not be determined.

Windows and Doors

- Several exterior doors have missing knobs, and most exhibit signs of corrosion at non-original escutcheons. Corrosion of the latch-set components, set screws, splines, etc. causing loosening of the knobs could pose an egress security hazard (Figure 118). Skeleton key holes at exterior doors allow air infiltration and have been taped over at some locations.
- Doors do not have perimeter weather stripping. Significant gaps were noted at the perimeter of exterior doors (Figure 119).
- Windows do not have weather-stripping along sash jambs, at meeting rails or at the bottom of the lower sash. Gaps were apparent at these conditions. At some windows the upper sash had slipped in the frame, and an air gap was noted at the top of the window (Figure 120). Some lower sash do not seat fully against the sill and interior stool, allowing air infiltration at the bottom of the window.
- At some locations, the interiors of windows exhibit signs of decay due to moisture infiltration at the glazing pocket and / or condensation (Figure 121 and Figure 122).
- Paint was delaminating at some interior muntins (Figure 123).
- Windows appeared operable at some locations. Others were painted shut and inoperable. At some, the sash locks did not align at the meeting rail and could not be secured (Figure 124). Several lifts were missing.
- Deadbolts at first-floor units and stair vestibule doors are keyed on each side. It is not clear whether tenants share keys for these locks. Use of keyed deadbolts could present an egress risk for occupants in the event of a fire or security emergency.



FIGURE 118. Typical non-original hardware at entrance doors. Knobs are loose and / or missing due to wear and deterioration.



FIGURE 121. Moisture damage at interior of window sash.



FIGURE 119. Air gaps at perimeter of exterior door.



FIGURE 122. Separation of components at interior of window.



FIGURE 120. Tape covering points of air infiltration at perimeter of sash.



FIGURE 123. Paint delamination at muntin.



FIGURE 124. Alignment of meeting rail does not allow sash lock to close.

Other

- The apartment units are not ADA accessible. There is no accessible path to the first-floor porches. Threshold conditions at exterior grades are elevated several inches above the porch surfaces. Bathrooms and kitchens do not meet ADA Accessibility Guidelines (ADAAG) requirements. Knobs at door latch sets do not meet ADAAG requirements and could be an obstacle for otherwise mobile occupants with grasping difficulties.
- Refer to Hazardous Materials Report included in Appendix B.

Structural Systems

Residence. The floor is constructed of 2x6 joists which span east–west and rest on the foundation wall and a center, 2x10 floor beam that spans north–south along the center of the crawl space. The floor joists have wood bridging at the midpoint. Each joist pocket has been filled with batt insulation and a non-permeable vapor barrier (Figure 125).

During the survey, no inspections openings were made, and the existing wall framing was not visible. Thus, existing conditions could not be documented or assessed. However, based on the date of construction, it is most likely a platform-

framed building. As was the case at 518 Auburn Avenue, there is evidence that portions of the exterior cladding had been removed and either replaced or reinstalled. As evidenced at 518 Auburn Avenue, this repair may have also included the installation of a weather barrier.

The second-floor ceiling is constructed of 2x6 joists spaced 24 inches on center. The joist pockets are filled with batt insulation.

The roof at the main two-story portion of the building is constructed of 2x6 rafters spaced 24 inches on center. Diagonal 1x6 cross bracing extends from the midpoint of each rafter to the center of the 2x6 ceiling joints (Figure 126). Also, a diagonal 1x6 cross bracing spans between rafters and extends to the end gable (Figure 127). On top of the framing is 1x6 wood plank roof sheathing overlaid with ¾-inch plywood (Figure 128). In addition to the plywood sheathing, other non-original bracing includes 1x6 diagonal collar ties that extend at the midpoint between opposing rafters on opposite sides of the ridge (Figure 129).



FIGURE 125. View of floor joists. Pocket between joists has been filled with batt insulation.



FIGURE 126. Overview of roof framing.



FIGURE 129. Non-original collar ties at roof framing.



FIGURE 127. Diagonal cross bracing at roof framing.



FIGURE 128. View of wood plank roof sheathing. Note plywood sheathing applied over plank.



FIGURE 130. Typical brick pier that supports the rear porch.

Porch. As previously stated, the front porch structure has a brick pier structure with a wood-framed second-floor structure. The structure of the roof was not accessible during the survey.

The two-story rear porch is supported on 12-inch by 12-inch brick piers, spaced 10 to 12 feet apart, that support the wood floor framing (Figure 130). The porch has 2x4 platform-framed walls. The studs are exposed to view and support 2x6 floor joints with cross bracing for the floor above (Figure 131). The ceiling at the second floor consists of 2x4 rafters that support wood plank roof decking (Figure 132).



FIGURE 131. Wood framing for second floor of rear porch is exposed to view.



FIGURE 132. Wood roof framing for the rear porch is exposed to view.



FIGURE 133. Severe fire damage at diagonal cross bracing at north end gable roof framing.



FIGURE 134. Fire damage observed at wood rafters at north end of roof.

Condition Assessment

- In general, the structure is in fair condition. Distress conditions were associated with damaged roof framing members.
- Fire damage was observed at wood rafters and roof sheathing at the north end of the roof structure (Figure 133). The rafters were observed to have surface charring; however, appeared to retain their structural integrity.
- Severe fire damage was observed at the diagonal cross bracing at the north end gable (Figure 134).

Mechanical, Electrical, and Plumbing Systems

Mechanical and Electrical Systems

- During the site visit, the mechanical system at the second floor north was not cooling. Fans were being used by the occupant to control temperature.
- Electrical cut-off for HVAC units is a toggle switch located in a junction box near the unit (Figure 135).
- Mechanical supply grilles are typically located directly in front of window openings. During the cooling season, air flow from these vents cools the glass below the exterior dew point, resulting in extensive condensation on the exterior face of the glass.
- Several issues were noted for comment at hot water heaters. Water heaters were mounted directly on the floor level with no overflow pans. Water lines typically penetrated gypsum walls with no insulation or escutcheons to protect and seal the wall cavity. The gas line serving the unit penetrates the floor in front of the unit with a valve at the floor and a flexible gas line above. This valve location is unprotected and vulnerable to traffic or in the working space in front of the dryer (Figure 136). At the second-floor water heater, gypsum wall board had been removed at the water and electric line penetrations the wall had not been patched (Figure 137).
- Receptacles above countertops in the proximity of sinks and bathrooms do not have ground-fault circuit interrupter (GFCI) receptacles. This condition was noted in the 2009 Condition Assessment Report.
- At the laundry room, the face plate of the receptacle for the washer is broken, exposing the conductors within the junction box. The location is potentially wet as it is adjacent to the recessed water supply and drain connection for the washer. The receptacle

between the washer and dryer is not GFCI (Figure 138).

- Electrical panels at the second-floor apartments are installed in the interior wall of the bedrooms (Figure 139). This location is problematic as the space in front of the panel is the most convenient location for the beds. The National Electrical Code (NEC) requires 36-inch minimum clear floor space in front of an electrical panel.



FIGURE 135. Toggle switch for HVAC unit.



FIGURE 136. Floor penetration of gas service line at laundry hot water heater. Water supply piping entering wall is uninsulated.



FIGURE 137. Opening in gypsum wall board at hot water heater, north second-floor apartment.



FIGURE 138. Broken face plate at washer receptacle adjacent to washing machine water and drain outlet box.



FIGURE 139. Electrical panel above bed at north apartment.

Heating and Air Conditioning. The apartments at 54 Howell Street are conditioned by three forced-air, split, direct expansion (dX) HVAC systems with gas-fired furnaces. The unit serving the lower apartment is installed in the crawlspace. Floor registers are a contemporary, stamped metal coated in a dark bronze color and typically centered on windows along the exterior wall of each room. Units serving the second-floor apartments are installed in the attic with ceiling registers of white stamped metal (Figure 140). Insulation at ductwork is in good condition. Thermostats are digital, located in the living areas (Figure 141). Overflow drain pans are installed in the attic; however, drainpipe from the pans were not noted. Power disconnect for the units is provided by a toggle switch in a junction box mounted near the unit (refer to Figure 78).

Condensing units for the three systems are located under the rear (west) porch (Figure 142). Electrical disconnects are mounted on the crawlspace wall. Refrigerant lines are routed through the crawlspace and internal walls and did not appear to be insulated between the unit and the crawlspace wall.

At the time of the survey, the units in the lower apartment and the second-floor south apartment were functioning serviceably; however, the unit in the second-floor north apartment was not cooling.

A power exhaust vent is installed in the ceiling of each bathroom. Vents from the second-floor bathrooms are ducted through flexible foil connections to metal vent caps on the east side of the roof. A similar flexible foil connection leads from the first-floor bathroom to the crawlspace, exiting through the brick skirt wall. No cap or screen protection was present at this location (Figure 143).



FIGURE 140. Forced air furnace in attic.



FIGURE 143. Flexible foil exhaust vent from first-floor bathroom at penetration of south skirt wall.



FIGURE 141. Typical digital thermostat in living room.



FIGURE 144. Gas meter at southeast corner of building (service from Howell Street).



FIGURE 142. A/C condensing units under the rear porch.

Plumbing. Plumbing fixtures and piping throughout the building appear to have been replaced in the recent rehabilitation project. Water and gas service enter the crawl space from Howell Street, on the west elevation (Figure 144). Water piping appears to be copper where exposed to view in attics, crawl spaces, and at lines serving hot water heaters. Insulation was not consistently present on exposed-to-view water lines (Figure 145).

A natural gas, tank-type hot water heater serves the lower unit from the common laundry space (Figure 146). The flue for the unit extends vertically through the porch flooring and screened porch roof above with a vent mounted on the roof. Tank-type water heaters serving the second-floor apartments are 40-gallon (north) and 65-gallon (south) 240 volt electric units located in the

kitchen pantry closets (Figure 147). All water heaters are metered where pipes exit the water heater. Exposed to view hot and cold pipes were not insulated. Drain pans with secondary drains were not noted to be present at units. The gas water heater in the laundry did not appear to be elevated above the floor. The gas connection to this unit is through a valve in the floor (refer to Figure 136). The valve and gas line are vulnerable to traffic in the workspace in front of the dryer. Gas-fired appliances are vented to caps on the west side of the roof.

Sanitary waste and vent pipes are PVC where exposed to view in attics, crawl spaces, and below cabinets (Figure 148).



FIGURE 145. Drain and supply piping at crawl space.



FIGURE 146. Gas hot water heater at first-floor apartment (located in laundry).



FIGURE 147. Typical electric hot water heater at second-floor apartment.



FIGURE 148. Drain piping below kitchen sink at first-floor apartment.

Electrical. Electrical components, including power receptacles, light switches, and fixtures, appear to have been completely replaced during the 1993 renovations with grounded equipment. Face plates are of standard ivory color plastic with no decorative profile. Switches are typically toggle type. Most rooms have at least one power receptacle per wall.

The primary electrical service for the building enters overhead from the northwest corner of the building along Old Wheat Street. Electricity is metered separately for each unit by the electric utility at a combined service-entrance / meter-base

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Significance and Integrity

National Register of Historic Places

The National Register of Historic Places is the official list of the nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Park Service's National Register of Historic Places is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.¹²³

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

Significance Criteria

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

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of

location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That has yielded, or may be likely to yield, information important in prehistory or history.

Criteria Considerations

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

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

123. National Park Service, "National Register of Historic Places" accessed May 22, 2019, <https://www.nps.gov/subjects/nationalregister/index.htm>.

structure most importantly associated with a historic person or event; or

- c. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life; or
- d. A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- g. A property achieving significance within the past 50 years if it is of exceptional importance.¹²⁴

National Register Status of 54 Howell Street, NE

National Register of Historic Places documentation pertaining to Martin Luther King, Jr. National Historical Park reviewed for purposes of this project includes the following:

- *National Register nomination documentation for Martin Luther King, Jr. Historic District*, bounded approximately by Irwin, Randolph, Edgewood, Jackson, and Auburn Avenues. Documentation prepared by Elizabeth Z. Macgregor, Architectural Historian, and Carole A. Summers, Coordinator, Historic Sites Survey, Historic Preservation Section, Department of Natural Resources, Atlanta,

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

March 25, 1974; entered in the National Register May 2, 1974.¹²⁵

The National Register form used at the time allowed preparers to select date ranges as significant periods. The preparers of the National Register documentation selected 1800—1899 and 1900—as significant periods. The form identifies areas of significance including Architecture, Education, Political, Religion/Philosophy, and Other: History. The nomination documentation cites several structures that together “comprise an identifiable and definable historic district”; these structures include Ebenezer Baptist Church, the gravesite of Martin Luther King Jr.; King’s birthplace and boyhood home at 501 Auburn Avenue; shotgun row houses and Victorian houses on Auburn Avenue; the Alexander Hamilton House at 102 Howell Street; the Atlanta Baptist Preparatory Institute at 535 Auburn Avenue; Our Lady of Lourdes Catholic Church Mission; and Fire Station No. 6.¹²⁶

- *National Historic Landmark documentation for Martin Luther King, Jr. Historic District*, including Auburn Street between Jackson and Howell streets. Documentation prepared by Benjamin Levy, Historic Sites Survey, National Park Service, Washington, D.C. (based on the work of Elizabeth Z. Macgregor and Carole A. Summers, Historic Preservation Section, Department of Natural Resources, State of Georgia, and Joseph S. Mendinghall, Afro-American Bicentennial Corporation), January 5, 1976. The historic district was designated a National Historic Landmark on May 5, 1977.

The National Historic Landmark nomination was prepared using a National Register form, as was the convention at the time. As noted above, the form allowed preparers to select

125. Macgregor and Summers. The nomination form notes that the Atlanta Baptist Preparatory Institute site was, at the time the nomination documentation was prepared, occupied by apartments.

126. *Ibid.*

date ranges as significant periods. The National Historic Landmark documentation cites the period of significance as 1800–1899 and 1900–, and relevant areas of significance as Architecture, Education, and Religion. An inventory of individual buildings provided with this documentation is entitled, “Martin Luther King National Historic Landmark – Inventory.” The 54 Howell Street building is included in the inventory with the following notation: “54 Howell Street. 1931. These apartments have been occupied by a series of black tenants, including Daniel Gresham (1945–70) and Richard Mapp (1955–present).”¹²⁷

- *National Register documentation for Martin Luther King, Jr., National Historic Site*, comprising a historic district approximately bounded by Jackson, Howell, and Old Wheat streets and Edgewood Avenue. This documentation was prepared by Robert Blythe, Maureen A. Carroll, and Steven H. Moffson, National Park Service, Southeast Regional Office, and certified by the Keeper of the National Register on May 4, 1994.¹²⁸

The 1994 documentation indicates that the historic district is significant under Criteria A, B, and C, and Criteria Considerations A, C, and G. Areas of significance cited include the following: Ethnic Heritage, black; Social History, Commerce, and Architecture. The period of significance is given as circa 1880–1968, and specific significant dates cited include 1929, 1968, and 1906. The documentation explores three historic contexts, as further discussed below.

The documentation notes that the district includes thirty-five contributing buildings. It

includes 54 Howell Street as a contributing building and offers the following specific commentary:

54 Howell Street, 1931 (IDLCS #090044). Utilitarian two-story frame apartment building with side gable roof and full-facade two-story porch supported by brick posts. Rafter ends and knee braces appear in gable ends. Partially enclosed back porch. Severely fire damaged, with doors and windows boarded up. Rehabilitation was ongoing at time of survey.¹²⁹

The 54 Howell Street apartment is included as a contributing building under Context A, “The Development of a Black Community and Leader: Atlanta’s Auburn Avenue Neighborhood and Martin Luther King, Jr., 1906–1948.” Under this context, 54 Howell Street—together with other residences in the historic district—is listed as contributing to the district’s national significance.

In this documentation, 54 Howell Street is also listed as a contributing building under Context C, “Architecture Resources of the Martin Luther King, Jr., National Historic Site, circa 1880–1950.” This context addresses buildings within the historic district possessing local architectural significance. The documentation notes that although these buildings do not represent high-style architecture, they do “. . . represent residential and commercial buildings common in urban areas in the late nineteenth and early twentieth centuries” and also “serve as good examples of local adaptations of popular methods of construction which often incorporate elements of nationally popular architectural styles.”¹³⁰

The building at 54 Howell Street is included under the category “vernacular houses and apartment buildings,” together with several other buildings nearby on Howell Street, Auburn Avenue, and Hogue Street.

127. Levy.

128. *National Register documentation*. Blythe, Carroll, and Moffson also prepared a *Historic Resource Study for the Martin Luther King, Jr., National Historic Site*, which includes a significance assessment consistent with that provided in the 1994 National Register nomination documentation.

129. *National Register documentation*, Section 7-18.

130. *Ibid.*, Section 8-21.

The 54 Howell Street building and other neighborhood residences are not contributing under Context B, “Martin Luther King, Jr.’s Leadership of the American Civil Rights Movement, 1955–1968.” This context includes as contributing resources the nationally significant Ebenezer Baptist Church and Martin Luther King Jr. grave site.

- National Register documentation for Martin Luther King, Jr. Historic District Boundary Increase and Additional Documentation, for an area approximately bounded by Freedom Parkway and John Wesley Dobbs Avenue on the north, Decatur Street on the south, the Southern Railway line on the east, and Interstate 75/85 on the west. This documentation was prepared by Steven H. Moffson, Architectural Historian, Historic Preservation Division, Georgia Department of Natural Resources, with John A. Kissane, Historic Preservation Consultant, Historic District Development Corporation, Atlanta, Georgia. It was accepted by the National Register on June 21, 2001.

The 2001 documentation cites a period of significance of 1853–1968, beginning with the opening of Auburn Avenue (then called Wheat Street), and citing specific dates including 1906, the Atlanta Race Riot; 1917, the Atlanta fire; 1929, the birth of Martin Luther King Jr.; 1964, the strike at the Scripto plant and the opening of the Wheat Street Gardens I Housing Complex; 1968, the death of Martin Luther King Jr.; and 1976, construction of the Martin Luther King Jr. grave site.

The Boundary Increase and Additional Documentation indicates that there are 443 contributing buildings, 1 contributing site, and 1 contributing structure (not including 37 previously listed resources) and 79 non-contributing buildings. The building at 54 Howell Street is not specifically addressed in this documentation, as it is within the

boundaries of the previously established historic district.¹³¹

The findings of this Historic Structure Report concur with those of previous National Register and National Historic Landmark documentations. The 54 Howell Street building is a contributing structure to the historic district, as a part of the Sweet Auburn neighborhood and as a resource present during the years in which Martin Luther King Jr. lived, grew up, and visited in the neighborhood. The 54 Howell Street building survives with sufficient integrity to convey its historic associations.

Period of Significance

The period of significance for 54 Howell Street is associated with the development of the Auburn Avenue neighborhood and surrounding community, as well as with Martin Luther King Jr.’s life there. The park interprets resources including the fire station and the residence on the Birth Home Block to 1929–1941, representing Martin Luther King Jr.’s formative years living at 501 Auburn Avenue, NE. As noted above, National Register documentation prepared in 1994 identified a period of significance of 1880–1968, and a boundary increase and additional documentation prepared in 2001 identified a period of significance of 1853–1968, for the overarching historic district. A period of significance of 1931–1968 is relevant for 54 Howell, as the building was constructed in 1931. This period addresses the local architectural significance of the building, from its date of construction through the death of Martin Luther King Jr.¹³²

131. Moffson and Kissane.

132. Prior National Register documentation, including most recently the 2001 Boundary Extension and Additional Documentation, indicates a period of significance for the historic district ending in 1968, with the death of Martin Luther King Jr.

Character-Defining Features

The historic nature of significant buildings and structures is defined by their character, which is embodied in their identifying physical features. Character-defining features can include the shape of a building; its materials, craftsmanship, interior spaces, and features; and the different components of its surroundings.¹³³

The following list identifies existing character-defining features found on the exterior and interior of 54 Howell Street:

Exterior

- General configuration and orientation
- Stone foundation walls
- Horizontal, shiplap wood siding
- Two-story covered porch on east elevation, including shed roof, brick piers, and wood railings
- Massing of the enclosed rear porch on the west elevation, including the shed roof
- Wood-framed exterior doors
- Double-hung wood windows
- Gable roof over main portion of the residence
- Masonry chimneys located at the peak of the gable roof

Interior

- Symmetrical multi-unit layout, including the central stair core
- Original finishes including plaster, beaded wood paneling, wood flooring, wood trim and

millwork that remain in the stairs and central closets

- Original wood panel ceiling at the southwest corner room on the first floor
- Original built-in shelving at a first floor dining room
- Original wood two-panel doors

Assessment of Integrity

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

Location is the place where the historic property was constructed or the place where the historic event occurred. . . . Design is the combination of elements that create the form, plan, space, structure, and style of a property. . . . Setting is the physical environment of a historic property. . . . Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. . . . Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. . . . Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. . . . Association is the direct link between an important historic event or person and a historic property.¹³⁴

The property must retain the essential physical features that enable it to convey its historical significance. The essential physical features are

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

134. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, 44–45.

those features that define both why a property is significant (National Register criteria) and when it was significant (period of significance). The *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* defines integrity as “the ability of a property to convey its significance.”¹³⁵

The historic integrity of 54 Howell Street has been assessed within the context of the contribution of the building to the Martin Luther King, Jr. National Historical Park.

Integrity of Location. The building at 54 Howell Street retains a high degree of integrity of location in relationship to its site. The location of the building has remained unchanged since it was originally constructed.

Integrity of Design. The building at 54 Howell Street retains a high degree of integrity of design, despite alterations that have been made to the interior of the structure as well as to the rear porch. The building was constructed as a vernacular multi-unit residence, a building type that would have commonly been modified to meet the changing needs of its residents.

Integrity of Setting. The building at 54 Howell Street retains a high degree of integrity of setting. The Sweet Auburn neighborhood continues to consist of single family and multi-unit residences, as it did during the building’s period of significance. Additionally, most of these residences date to the period of significance.

Integrity of Materials and Workmanship. The building at 54 Howell Street retains a moderate degree of integrity of materials and workmanship. While the historic appearance of the exterior of the building is generally intact, some exterior materials were replaced during rehabilitation work that occurred circa 1994 in response to a fire. Modifications to the interior, including replacement of many of the original finishes, have also resulted in a diminished integrity of materials and workmanship.

Integrity of Feeling. The building at 54 Howell Street retains a high degree of integrity of feeling. The structure was originally constructed as a multi-unit residence and retains that function today. Additionally, alterations to the building have not significantly altered the character of the residence.

Integrity of Association. An important aspect of the significance of the building at 54 Howell Street is its association with the Sweet Auburn neighborhood during the time Martin Luther King Jr. resided in the area. The residence remains an integral part of the neighborhood and helps to strengthen the connection to the neighborhood’s period of significance. As a result, 54 Howell Street retains a high degree of integrity of association.

135. Ibid.

Treatment and Use

Requirements for Treatment and Use

The following discussion of treatment and use for the 54 Howell Street has been prepared based on historical research, condition assessment, and discussion with the National Park Service to understand intended current and future use of the building. The building is considered a contributing structure to the immediate neighborhood of the Martin Luther King Jr. Birth Home and survives with sufficient integrity to convey its historic associations.

As such, treatment and use of the house should be considered within the context of the legal mandates and policy directives established by National Park Service Cultural Resources Management Guideline (Director's Order 28), as well as the *Secretary of Interior's Standards for the Treatment of Historic Properties*, for the protection of cultural resources. The house should be understood as a contributing context structure for the Birth Home neighborhood, although it is not in itself individually significant. The exterior of the house is therefore more important in providing historic context than the interior, although original features of the interior are character defining. The building at 54 Howell Street is expected to remain in use as housing for park personnel.

Laws, Regulations, and Functional Requirements

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

- National Park Service Cultural Resources Management Guideline (Director's Order 28), which requires planning for the protection of cultural resources on park property.
- Section 106 of the National Historic Preservation Act, which mandates that federal agencies, including the National Park Service, take into account the effects of their actions on properties listed or eligible for listing in the National Register of Historic Places and give the Advisory Council on Historic Preservation a reasonable opportunity to comment.

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

- *Secretary of Interior's Standards for the Treatment of Historic Properties*
- National Park Service Management Policies, 2006
- Architectural Barriers Act Accessibility Standards (ABAAS)
- International Building Code (IBC), 2018
- International Existing Building Code (IEBC), 2018
- International Plumbing Code (IPC)
- National Electrical Safety Code (NESC)
- National Fire Protection Association (NFPA) 101: Life Safety Code (LSC), 2015 and NFPA 1 Uniform Fire Code
- NPS Guiding Principles of Sustainable Design

The State of Georgia has adopted the 2012 IBC with Georgia Amendments (2018) for statewide applicability. The State of Georgia has also permitted local jurisdictions the option of adopting the 2012 IEBC with Georgia State Amendments (2015); however, based on information available on the county web site, Fulton County has not adopted this code. (Based on the county web site, Fulton County has adopted the National Electrical Code [NEC] with Georgia State Amendments.) The National Park Service is self-regulating in terms of enacting and enforcing building code standards. Martin Luther King, Jr. National Historical Park is therefore not legally subject to local or state building code requirements. When undertaking repairs to buildings structures, the National Park Service endeavors to have the work comply with model building code standards. At this time, the 2018 IBC is the model building code used by the National Park Service for design and construction. The NPS Denver Service Center also references the 2018 IEBC, with appendices and Resource A.

With historic structures, attempts to achieve strict conformance with model building code standards that are intended for new buildings can lead to destruction of the historic fabric. Alternative compliance procedures, such as Chapter 12 of the IEBC relating to historic buildings, should be referenced in determining code compliance. For 54 Howell Street, alternatives to full prescriptive legislative and code compliance should be considered where such compliance would compromise the integrity of the structure.

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

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

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

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

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

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

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

Exceptions:

1. The *code official* shall be authorized to accept existing floors and existing live loads and to approve operational controls that limit the live load on any floor.
2. Repair of *substantial structural damage* is not required to comply with Sections 405.2.3, and 405.2.4. *Substantial structural damage* shall be repaired in accordance with Section 405.2.1.¹³⁵

The IEBC exceptions noted above pertain to Martin Luther King, Jr. National Historical Park as a property listed in the National Register. In addition, the National Park Service provides

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

guidance on sustainability in work on historic structures, in terms of energy efficiency, technology, and sustainable preservation in practice, as described in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*.¹³⁶

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

Alternatives for Treatment and Use

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

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

Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or

features which convey its historical, cultural, or architectural values.

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

Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.¹³⁷

Of the four treatment approaches, *rehabilitation*, which involves making possible a compatible use through repair, alterations, or additions, is most appropriate for the 54 Howell Street building. This treatment would allow for the repairs necessary to stabilize and preserve the buildings, while permitting minor renovation to meet the needs of contemporary park visitation, interpretation, and National Park Service management needs.

Preservation, which involves sustaining the building in its existing form, is to some extent in progress as a result of ongoing repair and cyclical maintenance implemented by the park, and is considered overly limiting for a contributing but not individually significant building within the historic district. Further, similar preservation efforts would be incorporated in the overarching rehabilitation treatment approach. *Restoration*, which would return the building to its appearance during the period of significance, is also considered overly limiting for a contributing but not individually significant structure. In addition, sufficient documentation has not been discovered to support accurate restoration of the building.

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

137. Grimmer.

Retention of original materials and character-defining features during rehabilitation work is practical and appropriate, and will also assist in the use of 54 Howell Street to interpret the Birth Home neighborhood to the public.

Ultimate Treatment and Use

Guidelines for Treatment

Guidelines and recommendations for treatment for 54 Howell Street have been defined based on the preservation objectives and requirements for treatment and use outlined above. All treatment guidelines and recommendations were developed in accordance with the Secretary of Interior's Standards for Rehabilitation.

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

1. A property will be used as it was historically, or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the

severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and special relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.¹³⁸

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

- Undertake all work on the structure in compliance with the *Secretary of the Interior's Standards for Preservation*.
- Undertake all work on the landscape in compliance with the *Secretary of the Interior's Standards for Rehabilitation*.
- Retain the character of the historic structure and environs by protecting the building and significant site features.

138. Ibid.

- Ensure that proposed new elements or construction are compatible with the historic character of the structure and its site.
- Protect adjacent natural resources during construction activities.
- Document through detailed as-built drawings, photographs, and written narrative all changes and treatments to the building and its immediate site. Maintain records of treatments and preserve documentation according to professional archival standards. Maintain a copy of records in NPS archives.
- Retain features and materials at both the exterior and interior of the buildings that survive from the period of significance to the greatest extent possible.
- Incorporate sustainable design principles in all future projects that respect the preservation principles listed above.
- Twisted and displaced wood siding and trim boards should be repaired where possible or be replaced with matching new boards.
- Buckled and twisted tongue-and-groove deck boards should be removed and replaced. Prime boards on all faces prior to installation and paint to match existing.
- Cracked and spalled cementitious parge coating at the foundation walls should be removed, repairs performed to the underlying brick, (if required), and a new cementitious parge coating installed and painted to match existing.
- Displaced masonry at the top of the front porch pier should be removed and reset.
- Cracked, eroded, and open mortar joints in the foundation wall should be repaired. Depending on the type and extent of cracking, repairs may include routing and repointing cracks and open joints with mortar or creating vertical expansion joints with elastomeric sealant. Prior to repairs, potential sources of water leakage, such as plumbing from the kitchen sink and dishwasher, should be investigated and repaired.
- Cracks and crack repairs in the concrete slab at the front porch should be routed with a grinder and repaired with sealant.

Recommendations

The following specific recommendations for treatment of 54 Howell Street respond to the overarching treatment approach of *rehabilitation* to allow for modification for continued use, while retaining and protecting historic and character-defining features.

Exterior.

- At locations where damaged structural framing members such as roof rafters and cross bracing were observed, framing member should be sistered or replaced.
- Decay at wood siding, trim, window and door frames, and decorative elements should be removed and new wood dutchman or replacement units installed. The dutchman should match the existing wood in profile and primed and painted to match the existing. Wood deterioration at window sash, if observed, will require more extensive repairs.
- At locations where loss of paint are observed, the wood or concrete substrate should be scraped to remove loose material and the substrate primed and painted to match the original color scheme, using alkyd-based paints formulated for the particular substrate. A paint analysis should be performed prior to the removal of paint to bare wood to determine the historic paint color of the building.
- Biological growth and mildew at the foundation wall and wood elements at the front porch should be washed with a biocide.

Treatment and Use

- Penetrations through the wall should be properly treated to prevent water infiltration. Depending on the type of penetration opening, waterproofing may include installation of flashing or sealant at the perimeter. If the opening is no longer required, it should be infilled with new masonry or wood siding to prevent water infiltration.
- Install concrete splash pads or drain leaders at each downspout to keep rainwater away from the building foundation. While not a historic element, leaders and splash pads have a low visual impact and can be effective in diverting water away from the building.
- The asphalt-shingle roof should be maintained and periodically monitored for indications of water infiltration. Plant debris that accumulates on the roof should be removed and gutters and downspouts should be cleaned and routed seasonally.
- The building should be inspected and treated regularly for termites and other pests that are endemic in the region.
- Insect and bird nests should be removed from the exterior walls regularly.
- Loose wood baseboards and trim should be secured into place with finishing nails. Clean dirty baseboards. Sand and repair scuffed or damaged areas and paint. Remove caulk and replace after tightening trim work to wall.
- Stained, loose, cracked, and blistered paint should be removed, sanded as needed to prepare the surface, then primed, and repainted.
- When undertaking future repairs to wet areas, such as the bathrooms, kitchens and laundry room, and at exterior walls, consider replacement of non-original gypsum board with moisture-resistant gypsum board. Walls and ceilings at bathrooms can be protected with an anti-microbial paint.
- Minor damage to gypsum board surfaces should be patched, sanded and painted to match adjacent surfaces.
- Minor cracks and deterioration in plaster finishes should be repaired in place by filling cracks or damaged areas with compatible new material. Hairline cracks in plaster finishes (generally less than 1/32 inch wide) are not cause for concern; however, minor cracks should be monitored and repaired if they widen over time because of interior environmental changes, moisture intrusion or structural problems.

Interior.

- Guidelines and recommendations for interior conditions address issues resulting from general wear and tear, focusing primarily on sustained maintenance, essential repairs, and code compliance.
- Future interior alterations and changes should not contribute to the loss of the remaining character-defining features and materials listed in Chapter 4.
- Preserve the character-defining floor plan configurations of both floors, which appear to be compatible with the current residential use of the building.
- Linear cracks in plaster finishes that are wider than 1/16 of an inch should be patched with a compatible patching plaster mixture, sanded, and painted. Patching plaster can be reinforced with fiberglass glass mesh when repairing cracks that tend to reappear. Patching should be done after the conditions causing the crack have been addressed.
- Evaluate extent and condition of wood floors when carpet is replaced to determine feasibility of refinishing original wood floors, where present. Repair isolated rotten or damaged areas and replace flooring boards with new material to match original size,

species, and grain pattern. Repair holes from abandoned penetrations.

- Repair split or damaged stile and rail doors. Refurbish original hardware where it remains.
- Replace existing reproduction hardware sets with latchsets, knobs, and locks suitable for exterior entry application. Provide deadbolt locks for security at each apartment unit.
- Provide weatherstripping at all exterior doors.
- Seal joints between baseboards and floor tile in the bathrooms.
- Evaluate water damage associated with the dishwasher at the first-floor kitchen on the north wall.
- Accomplish programmed cyclic maintenance and essential repairs, such as painting, carpet replacement, and sheet flooring replacement, and cleaning.
- Conduct a code compliance assessment of 54 Howell and address compliance issues.
- Consider alterations and upgrades as needed to make the first floor accessible and to comply with the requirements of the Architectural Barriers Act Accessibility Standards (ABAAS). For example, a ramp or a lift for first-floor accessibility (the second floor is not accessible without an elevator or a lift, but that may not be necessary depending on the use of the building and the second floor). The kitchens and toilet rooms will require significant modification to meet the requirements of the ABAAS.
- Provide airtight seals around all piping, conduit, and cable penetrations at walls and ceilings.
- Provide watertight and airtight seals, such as applied exterior-grade sealants, at all penetrations through the exterior envelope. For example, where television, internet, and data cables enter the building.
- Plan for future installation of an updated wireless, monitored security system to include intrusion detection, fire, smoke, and carbon monoxide alarms.
- Evaluate wall and floor-ceiling assemblies between apartment units and augment as required to meet IBC fire separation requirements for multi-family housing. Fire-seal all penetrations with sealant systems designed to maintain the fire ratings required.

Mechanical and Electrical Systems.

- Accomplish programmed cyclic maintenance and essential repairs, particularly for mechanical and electrical systems, fixtures, equipment, and devices.
- Monitor HVAC equipment for proper and efficient operation and plan for replacement of failing equipment with modern, energy-efficient systems.
- Conditioning and dehumidifying the interior of a historic structure can result in unexpected consequences that may accelerate the deterioration of interior materials and finishes and the potential for mold and mildew. Consider factors such as air and moisture infiltration and vapor and moisture barriers at the building envelope when new HVAC systems are required. Evaluate whether paint delamination at window interiors could be related to cold air flow from adjacent floor registers. Install weatherstripping to prevent the flow of humid air through the window unit and reduce the dewpoint temperature.
- Evaluate and repair the HVAC unit that serves the north apartment on the second floor.
- Provide overflow pans at hot water heaters.
- Reroute the gas line or protect it from possible damage where it penetrates the floor in the laundry room.
- Provide GFCI receptacles in wet areas like kitchens, bathrooms, and the laundry room.

- Replace the face plate on the receptacle behind the washer and dryer in the laundry room.
- Evaluate furniture layout in the bedroom to provide a minimum of 3 feet of code required clear space in front of the electrical panel.
- Insulate domestic hot water lines.
- Consider installation of a programmable thermostat for each apartment or each zone.

Recommendations for Further Research

1. Conduct finishes analysis of painted wood on the exterior of the house to identify historic original/historic color schemes.
2. Remove gypsum board to investigate extent of original fireplace surrounds remaining at each unit.
3. Conduct a detailed review of National Park Service regional and park archives, and other repositories, to identify further archival documentation of the origin and history of 54 Howell Street. Park archival records available for this study are incomplete. For example, known archival documentation of the fire that occurred in 1985 is limited to four photographs, which are not annotated with month and date. The date of acquisition of 54 Howell Street by the National Park Service is also not noted in documentation available for this study. A review of park records in all departments throughout the park is recommended to identify records and archival photographs. If offices and archival storage areas were moved in the past, these areas and any associated attics, basements, closed rooms, annexes, and storage facilities should be closely searched for remaining boxes, files, records, photographs, or any pieces of past record keeping. Park departments should be asked to search their files for historic materials—files, photographs, class schedules, log books, materials lists, contracts, contractors, etc.—pertaining to 54 Howell

Street (or any of the park’s historic buildings and structures). If found, these materials should be transferred to the park archives. National Park Service records held off-site records should also be reviewed for relevant information.

Resilience to Natural Hazards

Although the Martin Luther King, Jr. National Historical Park is located in urban Atlanta and is not sited in a coastal location, the park is still considered vulnerable to current and future threats associated with natural hazards.

Increasingly frequent strong storms and heavy rainfall have been noted for several years in the southeastern United States. Studies of effects of natural hazards on the State of Georgia and the Atlanta area have also indicated a predicted significant rise in average temperatures, coupled with periods of intense rainfall and associated flooding.¹³⁹ However, the more significant threat to the region may be drought, together with increased water demand in the Atlanta region.

Weather and climate related threats to resources have already been felt in the Atlanta area. For example, the remnants of Hurricane Frances caused extensive damage estimated at \$41 million in the region, primarily from flooding, and 2007 saw a severe drought and the largest forest fire in over a century, with damage estimated at \$1 billion.¹⁴⁰

Although threats are more immediate to coastal historic sites, inland historic sites similarly require identification of the resources anticipated to be threatened—both buildings and landscapes—and planning for protection as well as mitigation in the face of increased storms.

139. Judith Curry, “Local Warming: Consequences of Climate Change for Atlanta,” Georgia Tech University, http://curry.eas.gatech.edu/climate/pdf/atlanta_rev.pdf, accessed June 2017.

140. Ibid.

As loss of historic resource integrity may occur, suddenly or slowly, from conditions related to natural hazards, documentation is the first response to mitigate anticipated loss or diminishment, or to plan for the impacts associated with natural hazards. This Historic Structures Report, including the historical narrative, condition assessment, and recommendations, together with photographs and measured drawings, is an important part of the documentation process.

As part of future efforts to build on and update the documentation provided in this Historic Structures Report, the National Park Service should consider such approaches with more detailed documentation resulting from new three-dimensional scanning technology, monitoring weather-related deterioration, updating emergency and disaster planning to address resiliency to natural hazards, and strategic planning for mitigation of the effects of natural hazards on park resources. The latter may include special protection, documentation, and interpretation measures to address resources that are especially vulnerable to damage or loss due to climate change-related conditions.

In addition to threats to the historic resources, natural hazards will affect visitation patterns. A park-specific brief has been prepared on this issue, and notes the historical relationship between visitation and temperature, finding that temperature was a significant predictor of visitation. The brief further notes that understanding this relationship, and taking advantage of continued study, will help park management “adapt to the effects of climate change and remain effective resource stewards while promoting visitor experience.”¹⁴¹

Efforts conducted for Martin Luther King, Jr. National Historical Park, will benefit from coordination with other planning and documentation projects to address effects of climate change under consideration or in the process of being implemented by the National Park Service in the Southeast Region. Future severe weather events, rising sea levels, and other impacts related to natural hazards should be anticipated and considered in planning for protection and maintenance of the site and its resources.

141. “Martin Luther King, Jr. National Historic Site: How might future warming affect visitation?” Park Visitation and Climate Change, Park-specific Brief (U.S. Department of the Interior, National Park Service, Natural Resource Stewardship & Science, 2016).

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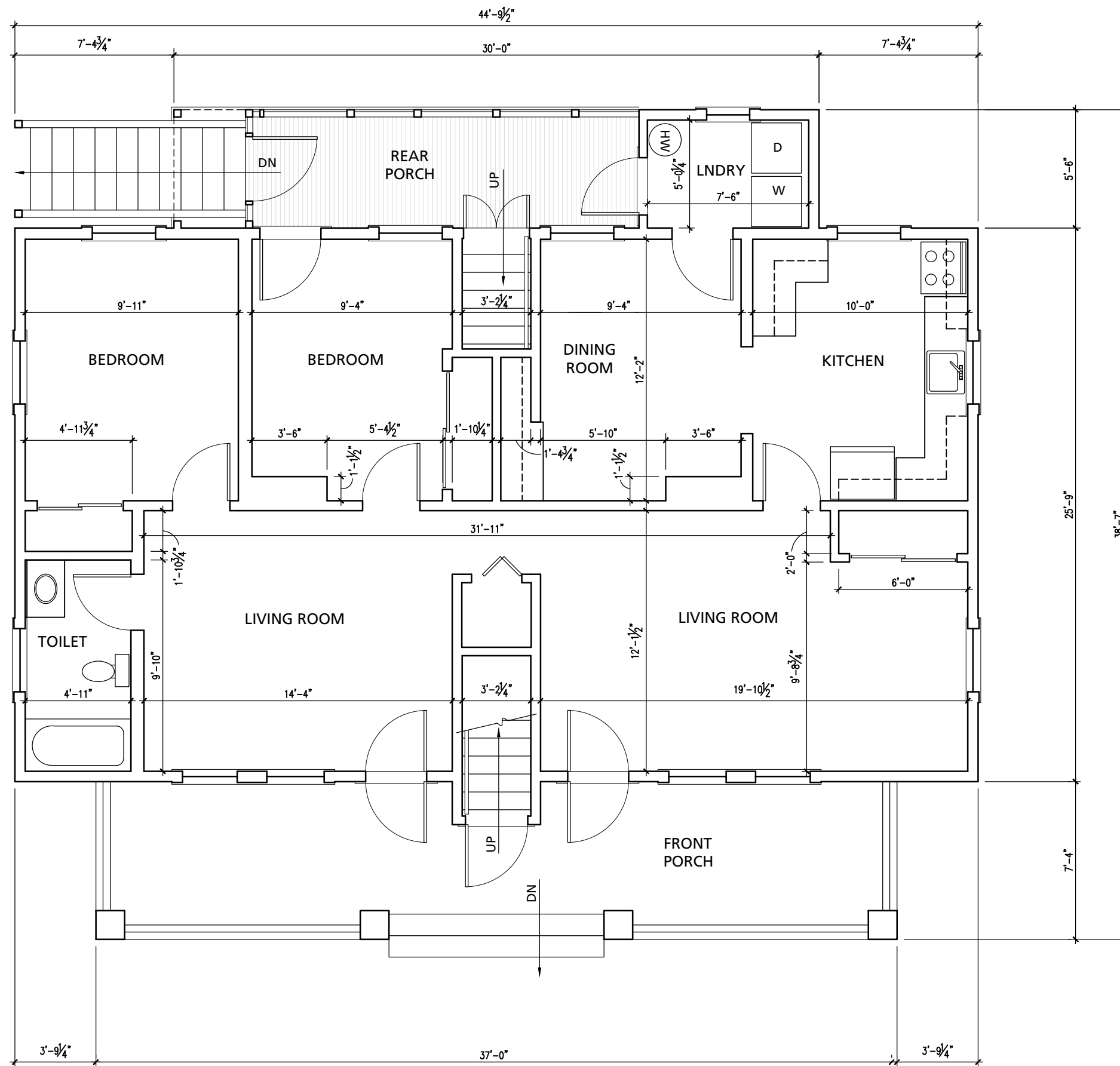
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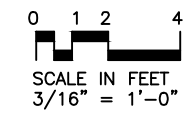
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Appendix A: Measured Drawings



FIRST FLOOR PLAN



DRAWN BY: WFT, JUNE 2019

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SOUTHEAST REGIONAL OFFICE

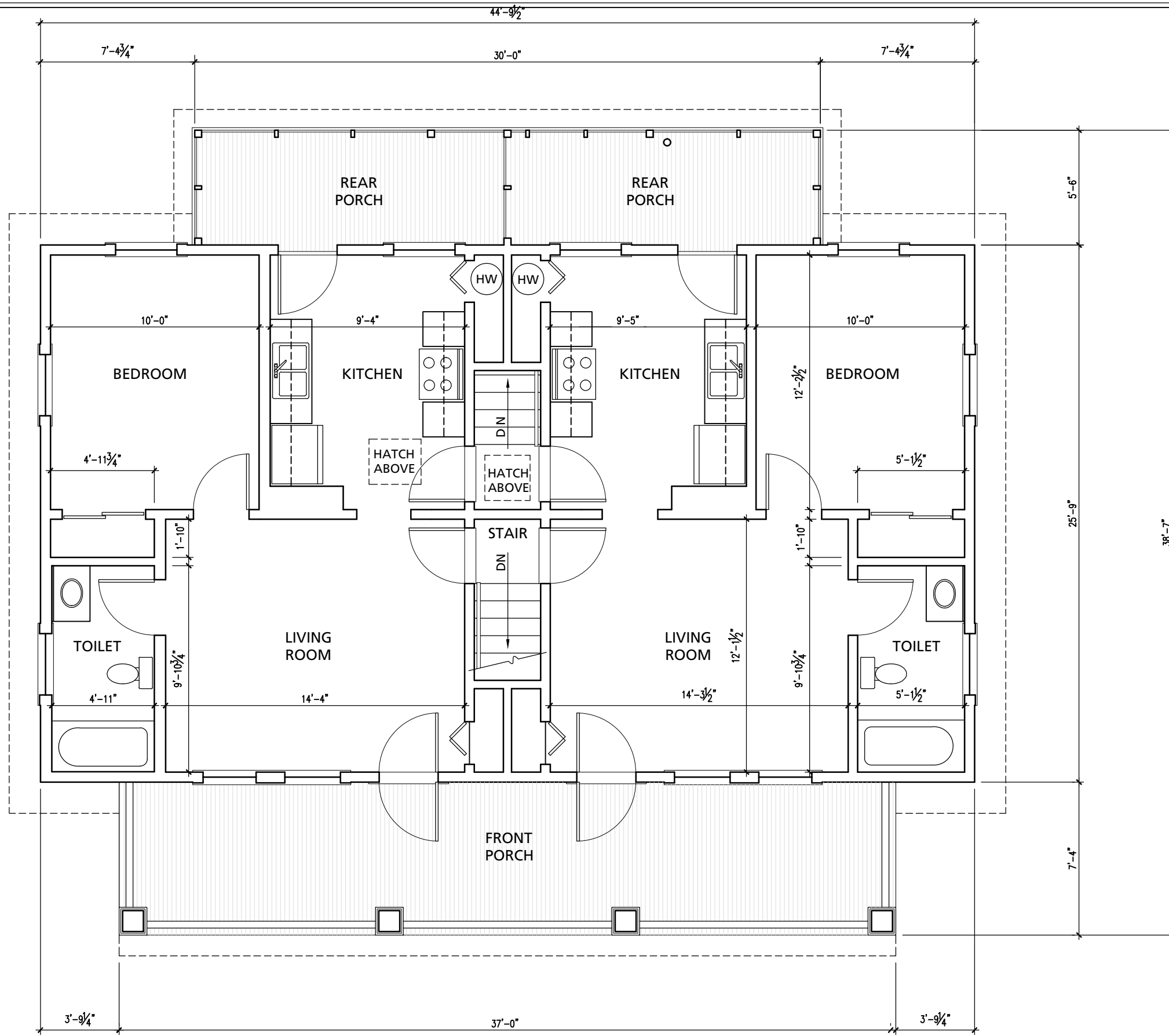
ATLANTA
FULTON COUNTY

54 HOWELL STREET, NE
MARTIN LUTHER KING, JR. NATIONAL HISTORICAL PARK

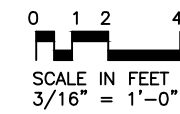
GEORGIA

HISTORIC STRUCTURE REPORT

SHEET
1 OF 7



SECOND FLOOR PLAN



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SOUTHEAST REGIONAL OFFICE

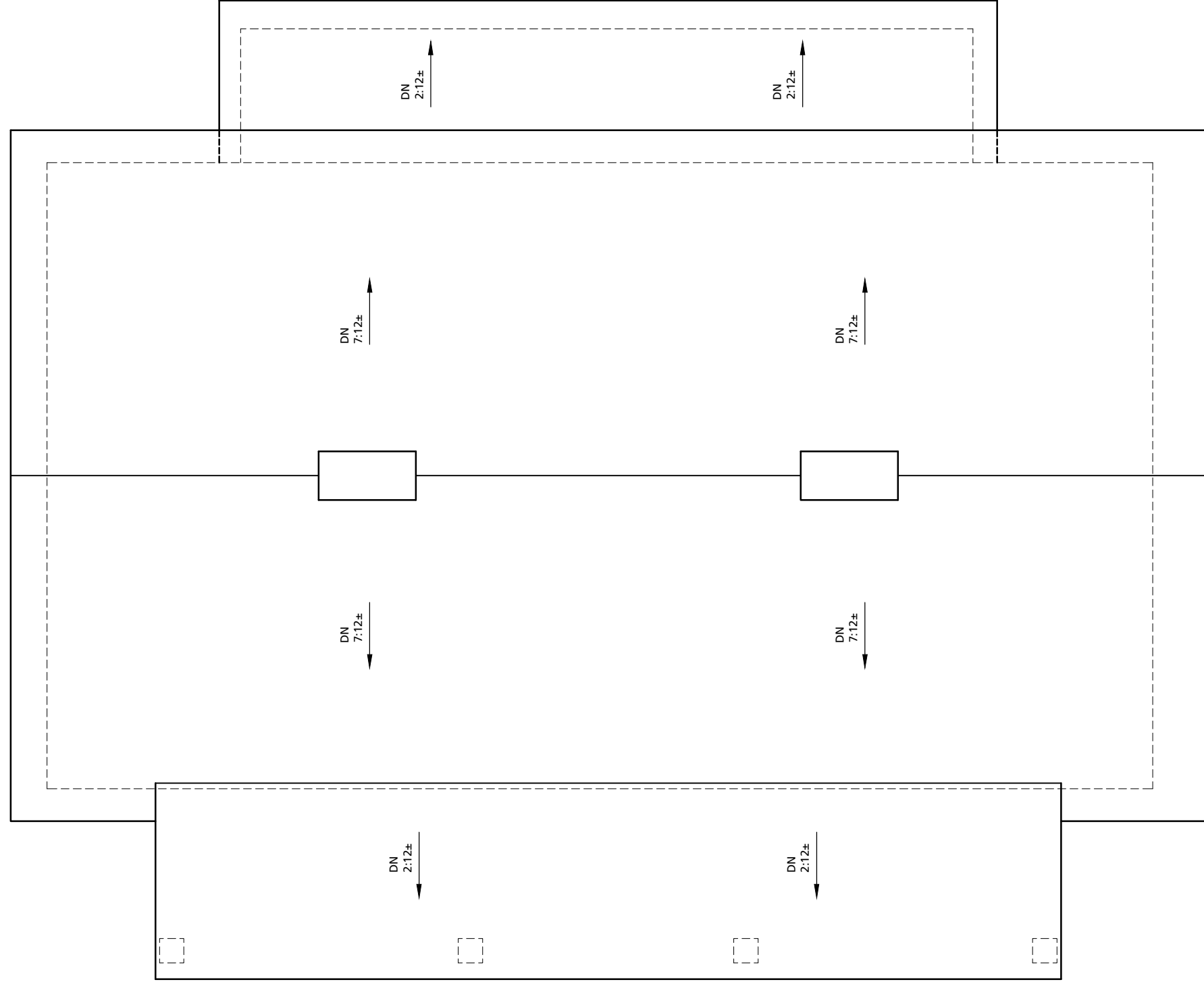
ATLANTA
FULTON COUNTY

54 HOWELL STREET, NE
MARTIN LUTHER KING, JR. NATIONAL HISTORICAL PARK

GEORGIA

HISTORIC STRUCTURE REPORT

SHEET
2 OF 7



ROOF PLAN

0 1 2 4
 SCALE IN FEET
 3/16" = 1'-0"



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54 HOWELL STREET, NE
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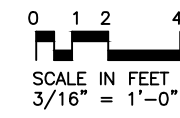
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HISTORIC STRUCTURE REPORT

SHEET
 3 of 7



EAST ELEVATION



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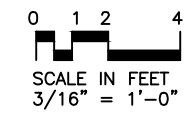
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SHEET
4 OF 7



NORTH ELEVATION



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MARTIN LUTHER KING, JR. NATIONAL HISTORICAL PARK

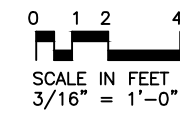
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SHEET
5 OF 7



WEST ELEVATION



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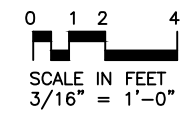
GEORGIA

HISTORIC STRUCTURE REPORT

SHEET
6 OF 7



SOUTH ELEVATION



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ATLANTA
FULTON COUNTY

54 HOWELL STREET, NE
MARTIN LUTHER KING, JR. NATIONAL HISTORICAL PARK

GEORGIA

HISTORIC STRUCTURE REPORT

SHEET
7 OF 7

Appendix B: Hazardous Materials Survey Report

A REPORT FOR A QUALITATIVE SURVEY
FOR
SUSPECT ASBESTOS-CONTAINING MATERIALS,
LEAD-CONTAINING MATERIALS
AND
HAZARDOUS MATERIALS AND UNIVERSAL WASTE AND OTHER
ENVIRONMENTAL CONDITIONS
OF
MARTIN LUTHER KING JR., NATIONAL HISTORIC SITE
54 HOWELL STREET
ATLANTA, GEORGIA

MLK HSR PCI # 36145

Requested by

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HAZCLEAN Report No. 18.1813.01.05

May 2018

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Asbestos-Containing Materials

1.0 PURPOSE AND SCOPE OF SERVICES

HAZCLEAN ENVIRONMENTAL CONSULTANTS, INC. (HAZCLEAN) was retained by Panamerican Consultants, Inc., Nashville, Tennessee to conduct a facility Qualitative Survey to identify suspected Asbestos-Containing Materials (ACM) at a residential-type building located at 54 Howell Street, Atlanta, Georgia at the Martin Luther King Jr., National Historic Site.

Specifically, the scope of services rendered included the following:

Scope of Work:

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

2.0 SITE DESCRIPTION

HAZCLEAN, under the direction of Panamerican Consultants, Inc., Nashville, Tennessee conducted a site investigation on September 21, 2016, to identify suspected Asbestos-Containing Materials (ACM) at 54 Howell Street, Atlanta, Georgia at the Martin Luther King Jr., National Historic Site. 54 Howell Street is a four unit residential building with a total area of approximately 2900 square feet. The structure is a wood frame covered by wooden siding with a shingle pitched roof. The interior is finished with drywall and hardwood flooring or vinyl tile of roll sheet flooring.

3.0 DISCUSSION OF OBSERVATIONS

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

This is a four unit residential building and is not subject to compliance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61 Subpart M, as given in the Definitions § 61.141.

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

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

Material	Location	Comment
Roofing System (new)	Roof	No documentation was provided to refute the presence of Asbestos or that ACM was installed during renovation.
Walls and Ceilings	Interior	No documentation was provided to refute the presence of Asbestos or that ACM was installed during renovation.
Insulation (Plumbing and Building)	Interior and Attic (inaccessible during the site visit)	No documentation was provided to refute the presence of Asbestos or that ACM was installed during renovation.
12" Tile Flooring	Kitchens (First Level)	No documentation was provided to refute the presence of Asbestos or that ACM was installed during renovation.

Material	Location	Comment
Roll Vinyl Sheet Flooring	Kitchens (second level)	No documentation was provided to refute the presence of Asbestos or that ACM was installed during renovation.
Glazing Putty	Window Frames	No documentation was provided to refute the presence of Asbestos

This building has had renovated interior walls, trim and finishes throughout the building in 1996. There was no documentation provided to address previous asbestos inspections or abatement of asbestos-containing materials.

Inspection Report Limitations

This report shall not be used as a substitute for National Emissions Standards for a Hazardous Air Pollutants (NESHAP) thorough inspection prior to renovation of demolition activities (40 CFR Part 61 Subpart M) if this building is converted to public or institutional use.

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

4.0 SUMMARY OF RECOMMENDATIONS

The following recommendations are made concerning the suspect building materials located at the residential structure, 54 Howell Street, Atlanta, Georgia at the Martin Luther King Jr., National Historic Site.

1. **HAZCLEAN** recommends that in the event this building is converted to public or institutional use that prior to demolition or renovation of any of the listed suspect building materials that will be disturbed by these

activities that a "thorough inspection" as referenced in NESHAP 40 CFR Part 61, Subpart M, be conducted by a Georgia Certified Asbestos Inspector. The inspector should sample the suspect materials and have them analyzed at an accredited National Institute of Standards and Technology (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) laboratory to determine the absence or presents of asbestos in the building materials. Additionally, the Occupational Safety and Health Administration (OSHA) requires bulk sample analysis to declare that a material is not asbestos-containing (29 CFR 1910.1001 and 29 CFR 1926.1101).

2. **HAZCLEAN** makes no further recommendations at this time regarding the study site; however, **HAZCLEAN** reserves the right to modify our opinion should additional information, not available during the time of this investigation, be presented to **HAZCLEAN**.

Lead-Containing Materials

1.0 PURPOSE AND SCOPE OF SERVICES

HAZCLEAN ENVIRONMENTAL CONSULTANTS, INC. (HAZCLEAN) was retained by Panamerican Consultants, Inc., Nashville, Tennessee, to conduct a Qualitative Survey to identify suspected Lead-Based Paint (LBP) or Lead-Containing Materials (LCM) at a residential building located at 54 Howell Street, Atlanta, Georgia at the Martin Luther King Jr., National Historic Site.

Specifically, the scope of services rendered included the following:

Scope of Work:

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

2.0 DISCUSSION OF OBSERVATIONS

This building is considered a Target Housing, Child-Occupied Facility or pre-1978 Housing and is subject to comply with Housing and Urban Development (HUD) 24 CFR Part 35 and USEPA 40 CFR Part 745. This building is subject to compliance with OSHA 29 CFR Part 1926.62 and 29 CFR 1910.1025 for renovation and demolition projects.

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

Component	Location	Comment
Window Components	Perimeter walls (interior and exterior)	No documentation was provided to refute the presence of Lead Based Paint
Door and Door Frames	Interior and Exterior	No documentation was provided to refute the presence of Lead Based Paint

Component	Location	Comment
Walls and Ceiling (Replaced 1996)	Interior and Exterior	No documentation was provided to refute the presence of Lead Based Paint
Wood Trim, Stairway, Bathroom tile floor and walls	Interior	No documentation was provided to refute the presence of Lead Based Paint
Siding; Crawlspace Hatch; Porch floor, ceiling, railing, columns	Exterior	No documentation was provided to refute the presence of Lead Based Paint
Eaves, Overhangs and Trim	Exterior	No documentation was provided to refute the presence of Lead Based Paint

This building is currently occupied; however, children under the age of six (6) years old are not in the family population. This building has had renovated interior walls, trim and finishes throughout the building in 1996. There was no documentation provided to address previous LBP or LCM inspections or abatement of LBP or LCM.

Inspection Report Limitations

This inspection report shall not be used as a substitute for a HUD Lead-Based Inspection and Risk Assessment Inspection Report or as a removal specification.

3.0 SUMMARY OF RECOMMENDATIONS

The following recommendations are made concerning the building materials for the residential-type building located at 54 Howell Street, Atlanta, Georgia at the Martin Luther King Jr., National Historic Site:

1. **HAZCLEAN** recommends that prior to demolition or renovation of any of the listed suspect building materials that will be disturbed by these activities that a X-Ray Fluorescence (XRF) multi-spectrum analysis or laboratory paint-chip analysis confirm if lead is present or absent. The

inspection should be in compliance with HUD 24 CFR Part 35, EPA 40 CFR Part 745, and the state of Georgia LBP Abatement and Certification Rules Chapter 391-3-24, GA, DNR, (2002).

2. **HAZCLEAN** recommends that if any painted surfaces are confirmed to be LBP or LCM that all personnel performing work on the lead-containing materials be aware of the presence of lead and to implement the Occupational Safety and Health Administration (OSHA) safety measures. OSHA regulation 29 CFR 1910.1025 and 29 CFR 1926.62 establishes protection guidelines for workers who may be exposed to airborne lead, including a permissible exposure limit (PEL) for airborne lead particles averaged over an eight (8)-hour time-weighted average (TWA) period. OSHA has identified manual demolition of structures with lead content as a potential health hazard in the Construction Safety and Health Outreach Program.

Hazardous Materials and Universal Waste and Other Environmental Conditions

1.0 INTRODUCTION

HAZCLEAN ENVIRONMENTAL CONSULTANTS, INC. (HAZCLEAN) was retained by Panamerican Consultants, Inc., Nashville, Tennessee, to conduct a Qualitative Survey for potential hazardous waste and universal waste and environmental conditions identified at a residential building located at 54 Howell Street, Atlanta, Georgia at the Martin Luther King Jr., National Historic Site.

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

Background:

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

1.1 Hazardous Materials

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

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

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

1.2 Universal Waste

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

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

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

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

a. Batteries

A battery is defined in Title 40 CFR 273.9, "Definitions," as a device designed to receive, store, and deliver electric energy that consists of one or more electrically connected electrochemical cells. The term also includes an intact, unbroken battery from which the electrolyte has been removed. In short, many kinds/types of batteries are covered under the universal waste regulations as long as they are hazardous waste. Spent lead-acid batteries, which are managed under Title 40 CFR Part 266, Subpart G, "Spent Lead-Acid Batteries Being Reclaimed," are exempt from universal waste regulations. However, if spent lead-acid batteries are not managed under Title 40 CFR

Part 266, Subpart G, then they are subject to management under universal waste regulations.

b. Lamps

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

c. Pesticides

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

d. Mercury-Containing Equipment

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

2.0 PURPOSE AND SCOPE OF SERVICES

HAZCLEAN proposed to conduct a Qualitative Assessment for potential hazardous waste, universal waste and environmental conditions located at a residential-type building located at 54 Howell Street, Atlanta, Georgia at the Martin Luther King Jr., National Historic Site.

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

Scope of Work:

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

3.0 DISCUSSION OF FINDINGS

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

3.1 Hazardous Materials

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

1. **HAZCLEAN** determined by site interview and a records search and verification of Georgia Environmental Protection Division records that no underground storage tanks were registered to the City of Atlanta for this site.
2. **HAZCLEAN** did not observe areas of chemical/hazardous materials or waste storage in the form of bulk containers on the property

3.2 Universal Waste

1. **HAZCLEAN** did not observe any batteries that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.

2. **HAZCLEAN** observed lamps as defined as a universal waste. The common universal waste lamps were noted throughout the facility included standard fluorescent lighting units. These units potentially contain mercury and appear to be in good condition; however, all fluorescent lighting units should be handled with caution when removing.
3. **HAZCLEAN** did not observe any pesticides that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.
4. **HAZCLEAN** did not observe one zone control thermostats that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.

4.0 SUMMARY OF RECOMMENDATIONS

The following recommendations are made concerning universal waste and environmental conditions identified at a residential-type building located at 54 Howell Street, Atlanta, Georgia at the Martin Luther King Jr., National Historic Site:

1. **HAZCLEAN** recommends that all fluorescent lamps, be managed during renovation activities as provided in USEPA 40 CFR 273 Standards for Universal Waste Management. All other bulbs, lights and components may be recycled or disposed of as solid waste in accordance with 40 CFR Parts 260 and 261.
2. **HAZCLEAN** makes no further recommendations at this time regarding the study site; however, **HAZCLEAN** reserves the right to modify our opinion should additional information, not available during the time of this investigation, be presented to **HAZCLEAN**.

QUALIFYING STATEMENT

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

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

National Park Service
U.S. Department of the Interior

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Atlanta, Georgia 30312
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