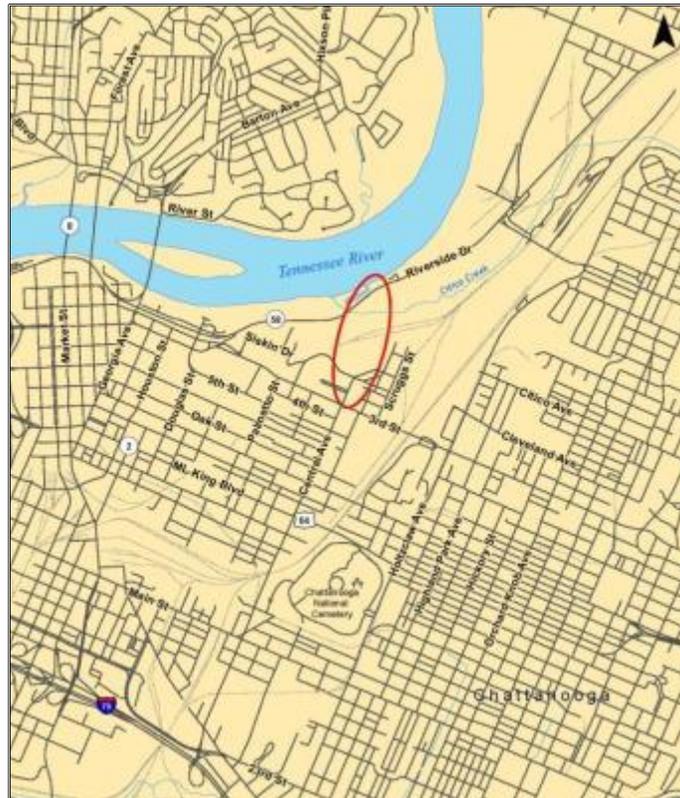


ASSESSMENT OF
HISTORICAL/ARCHITECTURAL RESOURCES

**PROPOSED EXTENSION OF
CENTRAL AVENUE
FROM EAST 3RD STREET TO RIVERSIDE DRIVE
CHATTANOOGA, HAMILTON COUNTY, TN**



Prepared Pursuant to Section 106 of the National Historic Preservation Act

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**Prepared For:
Ragan Smith Associates and City of Chattanooga**

October 2014

Management Summary

The City of Chattanooga is proposing to extend Central Avenue from 3rd Street north to Riverside Drive in Chattanooga, Hamilton County. The proposed project is to receive funding assistance from the Federal Highway Administration and the Tennessee Department of Transportation is acting as the flow-through agency for the federal funding. Due to the federal involvement, the project is subject to the requirements of the National Environmental Policy Act (NEPA) and regulations that fall under the NEPA umbrella. To meet the requirements of NEPA, the City is preparing a NEPA Categorical Exclusion document. Additionally, the City is overseeing the preparation of this documentation to meet the requirements of Section 106 of the National Historic Preservation Act in regard to historical/architectural resources.

This report, prepared by URS Corporation and TRC (Consultant, hereinafter) for Ragan Smith Associates and the City of Chattanooga, identifies National Register of Historic Places (NRHP)-listed or -eligible historical/architectural resources in the project's Area of Potential Effects (APE). The archaeology study is being undertaken separately and TDOT will coordinate the study findings with the State Historic Preservation Office (SHPO).

The identification process involved a records search, research and a field review. Three resources were identified and evaluated for NRHP eligibility:

- Former Lincoln City Park;
- Lincoln Park Neighborhood containing about 100 primarily residential properties; and
- Cumberland Corporation.

Lincoln Park, dedicated in 1918, was said to be the first park for African Americans in the City. The park was a popular spot and drew people from throughout the region until the 1960s. At that time, the importance of the park waned and in 1979, the City traded the park land to Erlanger Hospital for land elsewhere in the City. A small portion of the original park was redeveloped for park use and rededicated in 1996. But, by that time, most of the park's historic features (e.g., pool, carousel, lighted baseball field, roller rink, and dance hall) were all gone. In the opinion of the Consultant, as the park has lost the majority of its historic features and about half of its original land, it does not possess sufficient integrity to be eligible for the NRHP.

The Lincoln Park neighborhood is a historically African American neighborhood. While the existing homes in the neighborhood are mostly in good shape, development has eroded the neighborhood edges to the west and south; numerous homes have been demolished leaving vacant lots throughout the neighborhood; a number of new houses have been built; and historic structures have been altered by renovations and additions. Additionally, the small neighborhood lacks a cohesive feel architecturally as it was built out in different eras and there are many vacant lots and paved parking lots. Most of the architecture on Scruggs Street is new and has replaced the original buildings on the lots, including the Citico Hotel. For these reasons, in the opinion of the Consultant, the Lincoln Park neighborhood is not eligible for the NRHP.

The Cumberland Corporation represents Chattanooga's industrial history in the 1940s. The resource is a good example of a middle-twentieth century railroad-related industrial and manufacturing facility and one of few remaining in Chattanooga. The 1941 manufacturing building and the two 1947 structures appended to it retain integrity and are good examples of utilitarian industrial design from the mid-century.

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1.0 Background

The City of Chattanooga is under contract to the Tennessee Department of Transportation (TDOT) Local Programs Office to develop a project to extend Central Avenue from East 3rd Street to Riverside Drive in Chattanooga, Hamilton County. Figure 1 is a general project location map.

The proposed project is to receive funding assistance from the Federal Highway Administration. Due to the federal involvement, the project is subject to the requirements of the National Environmental Policy Act (NEPA) and regulations that fall under the NEPA umbrella.

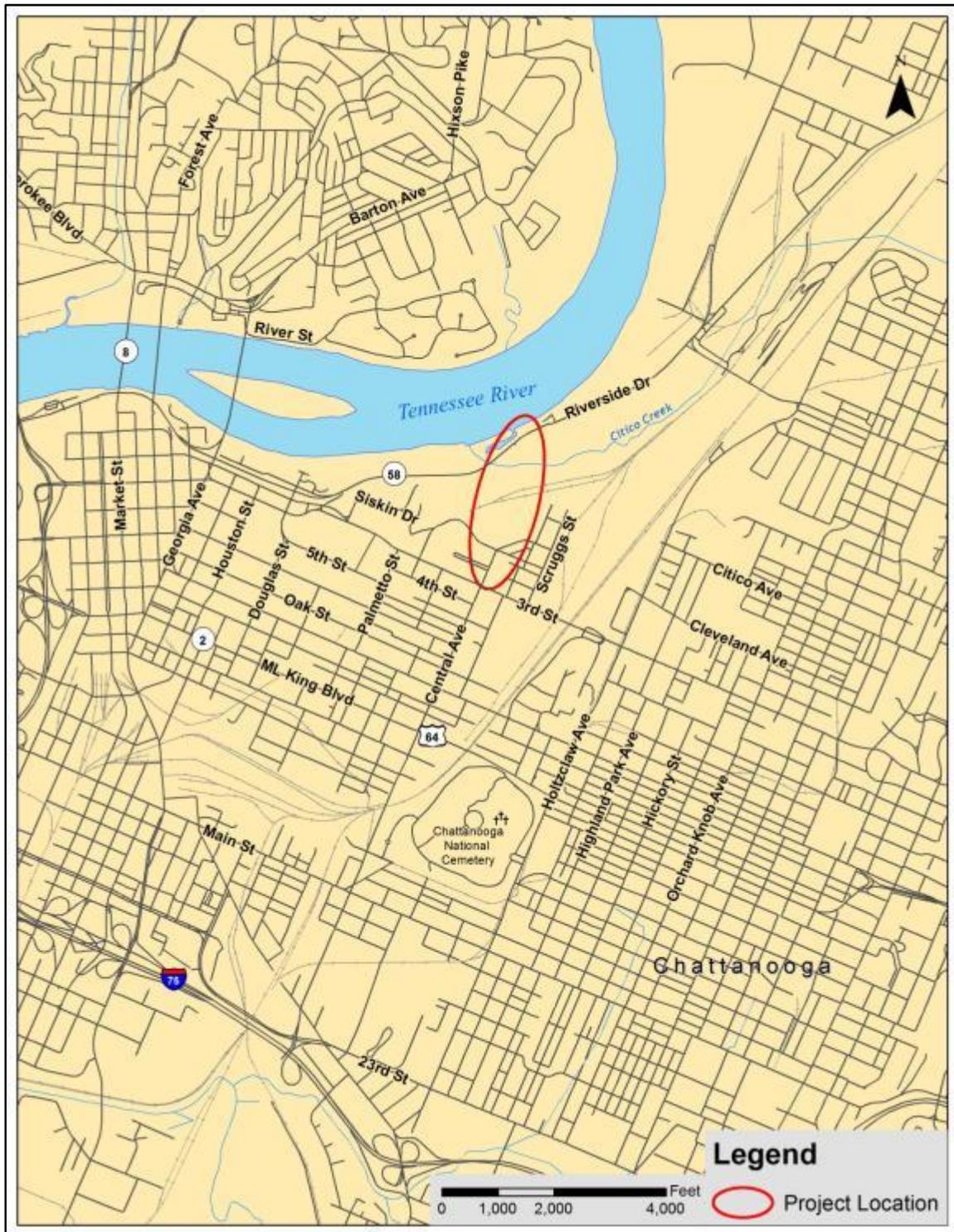
To meet the requirements of NEPA, the City is preparing a NEPA Categorical Exclusion document. Additionally, the City is overseeing the preparation of this documentation to meet the requirements of Section 106 of the National Historic Preservation Act in regard to historical/architectural resources. This document has been prepared to identify historical/architectural properties listed in, or eligible for, the National Register of Historic Places (NRHP) that are located within the project's Area of Potential Effects (APE) and to identify effects to such resources pursuant to Section 106. The requirements of the Act are outlined in 36 Code of Federal Regulations (CFR) 800. This report also addresses Section 4(f) of the Department of Transportation Act, as amended.¹

Pursuant to Section 106, the project is being coordinated with local government, local interested parties and Native American tribes, as well as the State Historic Preservation Office (SHPO). The archaeology study is being undertaken separately and TDOT will coordinate the study findings with the SHPO.

The principal investigator for this historical/architectural resource assessment was Margaret Slater of URS Corporation. She was assisted by historian Jessica Burr of TRC, who evaluated the Cumberland Corporation complex for NRHP eligibility and developed the general history and industrial history section of the report's historic context (Consultants, hereinafter). Ms. Slater and Ms. Burr meet the Secretary of Interior's Professional Qualification Standards for working on historic preservation projects. Their resumes are in Appendix B.

¹ Fact sheets containing information about applicable federal regulations are in Appendix A .

Figure 1. General Project Location Map.



2.0 Project Description

The proposed project would extend Central Avenue from East 3rd Street to Riverside Drive. Various alternative alignments have been evaluated. Figure 2 shows the proposed corridor that is being considered for an alternative alignment that best meets the purpose and need of the project. Figure 3 shows the proposed typical section being considered as a two-lane divided road with curb and gutter, raised landscaped median, sidewalks, street lights and dedicated bicycle lanes. Other design features could include a roundabout and road extension to Blackford Street. The proposed corridor would cross the Norfolk Southern railroad and Citico Creek.

Additional environmental studies must be completed before a preferred alternative is selected. Once it is selected, the impacts to the natural and human environment can be assessed.

Figure 2. Project Study Corridor.



Figure 3. Proposed Typical Section.



3.0 Methodology

3.1 Area of Potential Effects

A project's APE is defined in 36 CFR 800.16(d) as "the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The project's APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

Considering the land use and topography of the project area, the following is proposed as the APE:

- All areas within the nearby viewshed of the proposed roadway,
- Properties with land within or abutting the right-of-way,
- Properties within the noise impact area, and
- Areas within or in proximity to the roadway corridor that may experience development pressures or changes in land use or traffic patterns.

The APE is illustrated as "roads driven" on the USGS quadrangle map in Appendix C.

3.2 Records Check

The Consultants conducted a preliminary records search at the Tennessee Historical Commission (THC) in Nashville, Tennessee. The purpose of the records search was to identify previously recorded architectural/historical resources listed in, or eligible for inclusion in the NRHP. An examination of THC survey records revealed no previously recorded architectural/historical resources located within the project's APE. A copy of the applicable section of the THC survey map is in Appendix D.

The Consultants undertook research at the Tennessee State Library and Archives (TSLA), the Nashville-Davidson County Public Library and the Chattanooga History Center. Marie Bourassa, Curator of Collections for the Chattanooga History Center; Paul Archambault, Preservation Planner with the Southeast Tennessee Development District; and Peggy Nickels and Claudette Stager of the THC were consulted and assisted with information. A 2011 report by Alexander Archaeological Consultants, Inc., and entitled *Phase I Archaeological Survey of the Proposed Central Avenue Extension in Hamilton County, Chattanooga, Tennessee*, provided significant historical information. Lastly, records of NRHP-listed individual industrial properties and such properties within NRHP-listed districts were identified to provide context for evaluating an industrial property in the APE.

The Consultants also conducted reconnaissance of the surrounding area and a records review to determine if there were any industrial properties of a similar style and period and to determine the presence and overall condition of the

city's industrial resources that represent Chattanooga's major period(s) of industrial growth.

3.3 Field Review

In December of 2012, the Consultants conducted a field review of the project area (which at that time had numerous alternative corridors) and identified three properties in the potential APE that warranted evaluation for NRHP eligibility (Chapter 5.0).

- Lincoln Park;
- Lincoln Park Neighborhood; and
- Cumberland Corporation.

The owner of Cumberland Corporation provided access to the now-vacant property, including access to the interior of the buildings in the complex.

The Fort Wood NRHP-listed district is several blocks south and west of 3rd Street, the project's southern terminus, and is considered outside the APE (See the THC survey map in Appendix D).

4.0 Historic Context

4.1 General History

Chattanooga was minimally occupied until the late 1700s when it was claimed as a vacant area important to both the Cherokee and Creek as a hunting territory (Alexander 2011). At the time of European contact, the Cherokee lived in over sixty distinct communities along the waterways below the Smoky Mountains (Govan 1977). By the late seventeenth century, the Cherokee had already been interacting in trade and commerce with the English. It was not uncommon for the Cherokee to marry traders who circulated among them. John Ross, principal chief of the Cherokee Nation for forty years, was born in 1790 and was the great grandson of the union between Ghi-goo-u, a Cherokee of the Eagle or Bird Clan, and William Shorey, a Scotch trader (Armstrong 1993). As a young man, Ross worked at a store in Maryville, Tennessee while attending school and thus gained business experience. He later decided to open a ferry trading operation and selected a site on the Tennessee River. The site he selected, which came to be known as Ross's Landing, is the current location of downtown Chattanooga (Armstrong 1993).

In 1830, the federal government passed the Removal Act, forcing approximately 17,000 Cherokee from North Georgia and surrounding areas to move west to make room for new settlers (Eicenthal 2008). Ross's Landing was one of the three principal points where the Cherokee began their journey along the Trail of Tears. Once the Cherokee had been removed, lots and deeds were issued, streets were numbered, and the new community decided it was time for a new name (Desmond 1996). John P. Long, town commissioner and postmaster, proposed the ancient Indian word "Chattanooga" which, literally translated, meant "mountains looking at each other." In 1838, the local post office adopted the new name and by 1839, the Tennessee Legislature approved it. By 1840, the Chattanooga population was over 8,000 and the growing population of steamboats had contributed to its economic prosperity (Eicenthal 2008). Many of the facilities used by soldiers during the forced removal of the Cherokees were later used for commerce, and the majority of business transactions during this time were completed on the river.

While the river remained important to Chattanooga, the railroad would change the face of its economy. The first Western and Atlantic train would travel through Chattanooga in 1850, followed soon after by an extension of the railroad to Nashville. Other major railroads would follow, including a line to Cincinnati and a line from Memphis to Charleston, giving Chattanooga access to the Mississippi River, and further enhancing river trade (Livingood 1981).

During the Civil War, Chattanooga was strategically important to both sides due to its location and surrounding geography awarding it the title of the "gateway to the deep south" (Eicenthal 2008). In 1863, however, the city was captured by Union forces and remained in Federal hands through the remainder of the war (Alexander 2011). Following the Civil War, Chattanooga's economy was devastated. Businesses had burned and many of the railroad tracks were destroyed. The soldiers cut down vast numbers of trees for

firewood, homes were badly damaged or destroyed, and most prominent families fled at the beginning of the war and never returned. The city did, however, begin to rebuild under the aid of the occupying Union soldiers who remained in Chattanooga until the end of Reconstruction (Eicenthal 2008).

In 1867, while the city was slowly recovering, the largest recorded flood on the Tennessee River swept military bridges downriver, leaving the ferry as the only means of crossing. That same year, fires burned what remained of businesses. Soon after an outbreak of cholera, measles, and smallpox occurred. Despite the setbacks, Chattanooga experienced a sudden flux of Union soldiers that decided to become permanent residents hoping to take advantage of the area's natural resources. In 1870, two former Union soldiers established the Roane Iron Works. Within one year, the city's iron industries were valued at approximately \$1 million (Eicenthal 2008).

In 1878, Chattanooga suffered another setback when the majority of its residents fled the city to avoid a yellow fever epidemic. Again, however, the city recovered and advanced. In 1891, the Walnut Street Bridge was completed, allowing the crossing of the Tennessee River to occur by means other than the ferry for the first time since the flood of 1867 (Eicenthal 2008).

While manufacturing continued to grow, two Chattanooga residents, Ben F. Thomas and Joseph Brown Whitehead, traveled to Atlanta, Georgia in 1899 to seek the bottling rights from a pharmacist who owned the rights to a new drink called Coca-Cola (Desmond 1996). By 1909, there were 400 Coca-Cola bottling plants, all tracing their rights back to Chattanooga. The city's early role in Coca-Cola brought both immediate prosperity and the opportunity for long-term civic investment and by the early 20th century, Chattanooga was known as the "Dynamo of Dixie." Labor unions began forming as early as 1897 with the Central Labor Union, and the Chattanooga Manufacturers Association, the nation's first, formed in Chattanooga in 1902 (Eicenthal 2008).

With the rise of the automobile, Chattanooga opened its first auto sales establishment and the Lookout Mountain Automobile Club was formed. In 1909, the club held a national race up the unpaved mountain road. The race focused attention on better roads and a new bridge to cross the Tennessee River. The Dixie Highway Association was formed as a result of the race, which was ultimately responsible for a major highway running through Chattanooga connecting Detroit and Miami (Eicenthal 2008).

By 1904, Congress had turned its attention to hydroelectric energy and Congressman John A. Moon sponsored legislation to build a dam on the Tennessee River. By 1913, the dam was completed and located just 33 miles outside of Chattanooga in Marion County (Govan 1977). While the construction of the dam temporarily provided job opportunities, manufacturing remained the primary source of local employment. By the 1920s, Chattanooga was also home to a variety of large textile mills and, by 1930, Chattanooga was considered the regional leader in "the manufacture of foundry, oil well, and other iron and steel equipment, and in hosiery, furniture, and patent medicines" (Wilson 1980).

Although the city was enjoying post-World War I prosperity, Chattanooga residents were already beginning to move beyond the city limits (Govan 1977). Additionally, like the rest of the country, Chattanooga was hit hard by the Great Depression. In 1933, President Franklin D. Roosevelt created the Tennessee Valley Authority (TVA), which provided the area with low cost, hydroelectric power. In 1940, TVA completed the nearby Chickamauga Dam that created short term jobs in construction, engineering, and administration and aided in the reigniting of Chattanooga's economy. During World War II, manufacturing plants turned out "textiles, blankets, shells, artillery parts, boilers, and alloys of steel products" (Wilson 1980). Immediately following the war, in 1945, Dupont chose the Chattanooga area to construct a major facility due to its proximity to the Tennessee River and TVA's Chickamauga Dam. Between 1940 and 1950, the city continued to prosper with the population growing from 128,163 residents to 131,041 while the size of the city only increased from 27.4 to 28 square miles (Eicenthal 2008).

Between 1950 and 1970, Chattanooga's population dropped over 9 percent while the adjacent parts of Hamilton County increased by 75 percent. Like other cities, Chattanooga was experiencing the first effects of suburbanization that would accelerate in the decades to come as racial tensions, affordable land, and expanded roadways pulled middle-income, mostly white residents from the urban core (Eicenthal 2008). The city's population decline was also influenced by environmental conditions resulting from the continued concentration of manufacturing within the city limits. In 1969, the federal government declared that Chattanooga had the dirtiest air of any city in the United States (Govan 1977). In the 1970s, the city's population decline had reversed but only due to the annexation and consequent increase in the city's physical size. By the 1980s, Chattanooga was in both an economic and population free-fall. However, by the mid-1980s, Chattanooga's civic leadership recognized this and began a process of planning and recovery. By 2006, Chattanooga's population trend reversed and employment increased by over 13 percent (Eicenthal 2008). Chattanooga's upward trend continues today with development focused more on education and tourism while maintaining its backbone in manufacturing.

4.2 Industrial Context

Chattanooga's physiographic location made it an ideal place for settlements, trade, and commerce by Native Americans, European explorers, white settlers, and post-Civil War industrialists. Its location on the banks of the Tennessee River surrounded by lush forests, gave the local population an abundance of raw materials and a navigable river for transportation and business connections with the middle and northern United States. Following the advent of the railroad during the 1840s and 1850s, Chattanooga became even more attractive to industrialists with its increased connections throughout the United States. From Wheland Machine Works to the U.S. Pipe & Foundry Company, Chattanooga was among the leading cities in the southeast in manufacturing and iron production during the late nineteenth and twentieth centuries (Figures 4 and 5).

Chattanooga and southeast Tennessee's early industries were grist mills and sawmills. In addition, blacksmith shops, carpenter shops, and shoe shops were present in Chattanooga before the Civil War. Chattanooga's leading industry revolved around lumber from the 1850s through the 1870s. Sawmills and planing mills were located along the Tennessee River bank (Livingood 1981).

Figure 4. Ca. 1950 aerial photograph of Wheland Machine Works and U.S. Pipe & Foundry Co. Photo Courtesy of the Chattanooga History Center.



Figure 5. U.S. Pipe & Foundry Co. Date unknown. Photo Courtesy of the Chattanooga History Center.



Iron production in Chattanooga began in 1847 by local entrepreneurs that included Robert Craven, of the East Tennessee Iron Manufacturing Company, following the construction of a bluff furnace for iron smelting (Council 1992). Several years later, the development of the Roane Iron Company (Figure 6) created an economic boom for East Tennessee. Pig iron products soon after developed primarily from the Chattanooga and Citico blast furnaces. Local businesses that succeeded from this product development included the following: Wheland Foundry Company, Chattanooga Plow, Ross-Meehan Foundry, Eureka Foundry, Cahill Iron Co., Chattanooga Foundry & Pipe Company and several stove manufacturers (Livingood 1981).

Figure 6. Roane Iron Company (Eicenthal 2008). Date Unknown.



Iron-working, ore smelting, machinery manufacturing, and iron and metal casting production was the leading industry in Chattanooga in the early to mid-twentieth century. Behind iron production, the second most productive industry was lumber and furniture production. The textile industry filled the remaining gaps as the post-war need for heavy metals waned.

In 1913, the construction of a hydroelectric dam at Hale's Bar provided large amounts of electricity for the region, thus fueling further growth for Chattanooga's industry. Between WWI and WWII, many of the local manufacturing companies, like the Wheland Company, produced oil well drilling equipment. Following WWII, manufacturing attention was turned towards the automotive industry and the production of iron castings (Desmond 1996).

In summary, Chattanooga's industrial economy had a peak that was sustained from the late nineteenth century to the middle of the twentieth century. Although Urban Renewal and heavy pollution aided in the demise of the industrial prominence in Chattanooga, as well as the decline of the city's population, many early industrial resources remain today. While the majority of the resources have either been adaptively reused as part of Chattanooga's

redevelopment (Figure 7), others are in danger of demolition by neglect (Figure 8). Dozens of industrial buildings that represent this period have been surveyed and documented by the THC. Seven individual resources and two historic districts are listed in the NRHP (Tables 1 and 2). Very few of these recorded and listed resources function in their original capacity.

Figure 7. Current condition as a multi-use resource (antique mall and restaurant) of NRHP listed resource: Signal Knitting Mill.



Figure 8. Ross Meehan Foundries in ca. 1990 photograph. The former foundry has since been adaptively reused as an open-air market. Photo Courtesy of the Chattanooga History Center.



Table 1. Chattanooga's Individually NRHP-Listed Industrial Resources

Resource Name	Date Built	Criterion of Significance
East TN Iron Manufacturing Co. (Bluff Furnace)	1854	A, D
Southern Railway Freight Depot	1871	A, C
City Street Railway Co. (Chattanooga Car Barns)	1886	A, C
Chattanooga Plow Power House	1904	C
Crane Buildings (Cahill Iron Works)	1912	A, C
Signal Knitting Mills	1916	A, C
Turnbull Cone and Machine Company	1924	A, B

Table 2. Chattanooga's individual industrial resources within NRHP-listed districts

Individual Resource Name	District Name	Date Built	Criterion of Significance
Stagmaier & Fletcher Co.	Market Street Warehouse District (Stone Fort Block)	1905	A, C
Tom Fritts Hardware Co./Archer Paper Co.	Same as above	1906	A, C
Knox-Thomas-Spears Co.	Same as above	1909	A, C
Betterton-England Shoe Co.	Same as above	1910	A, C
General Electric Supply Corp.	Same as above	1929	A, C
Southern Railway Freight Building	Market & Main Streets District	1860	A, C
Southern RR Freight Depot	Same as above	1871	A, C
Unnamed, 1401-1407 Williams St.	Same as above	1900	A, C
Chattanooga Paper & Wooden Ware Co.	Same as above	1907	A, C
Unnamed, 1411 Williams St.	Same as above	1910	A, C
Unnamed, 1417-1419 Williams St.	Same as above	1910	A, C
Unnamed, 1426 Williams St.	Same as above	1910	A, C
American Lava Corp. & Mixing Plant	Same as above	1910	A, C
Unnamed, 1428 Williams St.	Same as above	1910	A, C
Unnamed, 1431 Williams St.	Same as above	1910	A, C
Unnamed, 1433 Williams St.	Same as above	1910	A, C
Unnamed, 1412 Cowart St.	Same as above	1920	A, C
Unnamed, 1215 King St.	Same as above	1920	A, C

4.3 Lincoln Park and Lincoln Park Neighborhood

The land within the project area that is east of Central Avenue and west of the railroad yard was once known as Citico City. According to a 2012 article on Chattanooga and its neighborhoods:

Citico City lies west of the railroad and north of E. 3rd St., and originally extended west to Wiehl Street. Erlanger Hospital used to occupy just the block immediately to the west of this suburb but now takes up everything to Central Ave. Lincoln Park, the park for which the neighborhood gets its modern name, once lay between East End Ave. and Wiehl St.

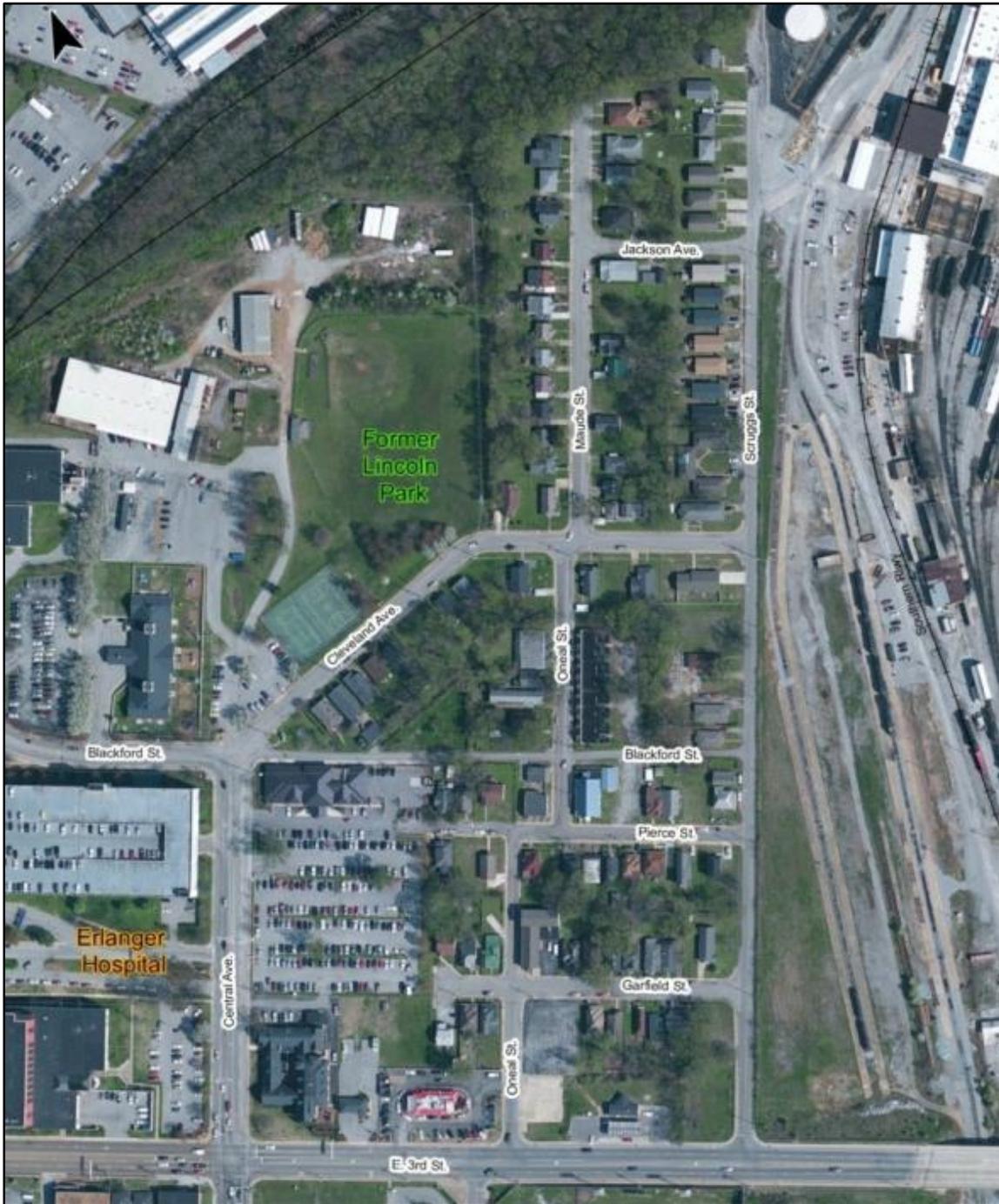
It [Citico City] was annexed [into Chattanooga] in 1886 (Hamilton July 2012).

The G.M. Hopkins 1889 Atlas of the City of Chattanooga, Tennessee and Vicinity shows the Lincoln Park area adjacent to the Citico Furnace as being subdivided and streets laid out in an area known as “Chandler’s Addition.” Some streets had different names, e.g., Central Avenue was East End Avenue and Johnson Avenue is today Scruggs Street, but the names of some streets within the neighborhood have not changed (e.g., Maude Street, Jackson Avenue, Cleveland Avenue, Pierce Street). Streets laid out east of Scruggs Street are gone as they are now within a massive railroad yard. According to Lawrence Alexander’s 2011 Phase 1 Archaeological Survey Report prepared in support of the proposed Central Avenue Extension project (Alexander 2011) “only a handful of structures were noted on” the lots in Chandler’s Addition. After the massive Citico Furnace ceased operations in 1911, the adjacent area began to develop. It appears that because of its location adjacent to two large railroad yards, one of which was the Citico Yards, and industrial concerns, the modest housing developing in the area was likely intended for workers in the rail yard and other surrounding industries.

Now within the City of Chattanooga, Lincoln Park and the neighborhood named for the park are surrounded today by Erlanger Hospital, the American Water Company, the massive railroad yard, commercial development along East 3rd Street and, industrial development to the north along Citico Creek.

Figure 9 is a current aerial photograph of the neighborhood and the surrounding environment.

Figure 9. Aerial Photograph showing Lincoln Park and its Environs.



5.0 Assessment of NRHP Eligibility

As stated in Chapter 3.0 of this report, the Consultants found that three resources warranted NRHP eligibility assessments: Lincoln Park, the Lincoln Park Neighborhood and the Cumberland Corporation. These resources are assessed for NRHP eligibility in this Chapter. The locations of these resources are shown in Figure 10.

Section 106 regulations state that if historic (NRHP-listed or -eligible) properties are present and may be affected by the proposed undertaking, an assessment must be made as to whether the proposed project will have an adverse effect on the property. This is accomplished by applying the Criteria of Adverse Effect, set forth in 36 CFR 800.5:

- (1) *Criteria of adverse effect.* An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.
- (2) *Examples of adverse effects.* Adverse effects on historic properties may include:
 - (i) Physical destruction of, or damage to, all or part of the property;
 - (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
 - (iii) Removal of the property from its historic location;
 - (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
 - (v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
 - (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
 - (vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The Criteria of Effect are applied to the surveyed resource that is recommended as NRHP eligible: the Cumberland Corporation.

Figure 10. Surveyed Property Location Map.



5.1 Lincoln Park

History: On April 12, 1918, City and County leaders dedicated an old cornfield near Citico as the first African-American designated park and recreational space within Chattanooga. Created during the days of segregation and the Jim Crow era, Lincoln Park opened on June 1, 1918, and quickly gained popularity and visitors came from as far as Atlanta to enjoy its amenities (Chattanooga Free Press April 12, 1918). Originally 10-acres, the park grew to 13-acres during its period of significance from the 1930s to the late 1960s.

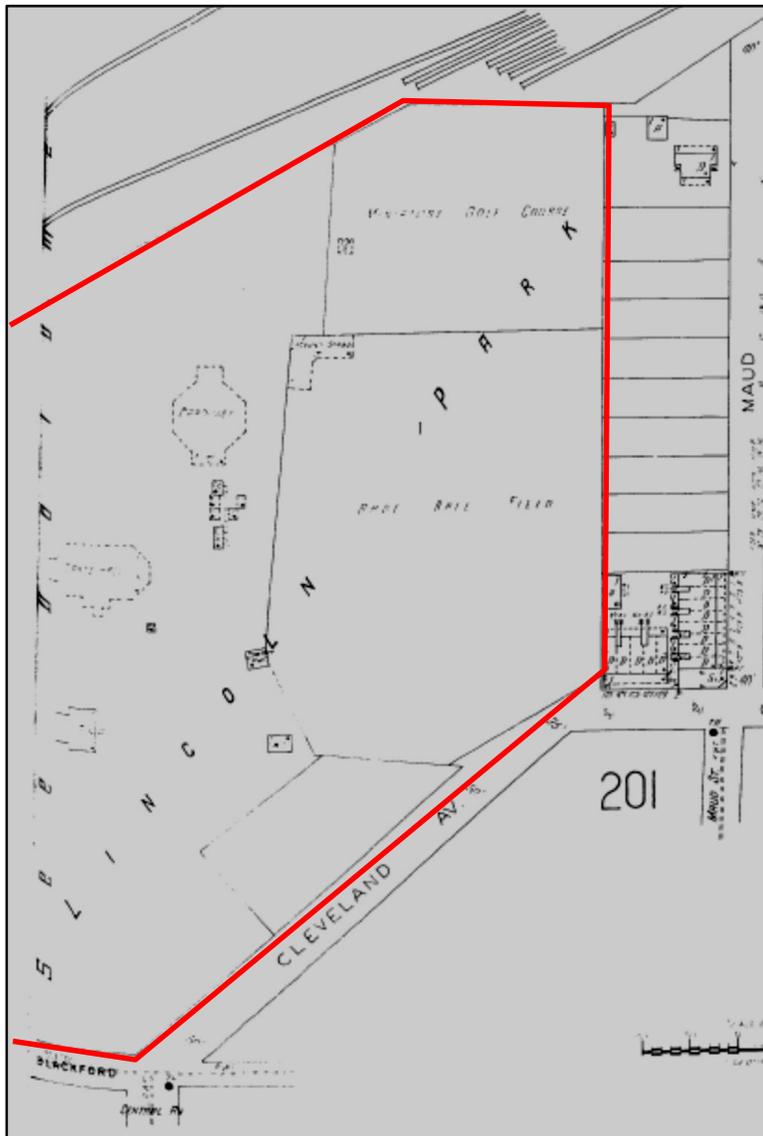
The historic 10-acre park included a fountain, and lily pond surrounded by a sunken garden. A horseshoe shaped roadway meandered through the middle of the park from the corner of Blackford Street and East End Avenue, back to Blackford Street (Figure 11). Eventually the roadway was removed and houses demolished to make room for other park amenities. The 1928 *Plat Book of Greater Chattanooga, Tenn.* is the first map to name the park and designate it as "Lincoln Park (Colored)" (Figure 12). As time passed, the park grew into a meeting area for the entire African-American community in Chattanooga, eventually encompassing thirteen acres. Lincoln Park once stretched west of where Central Avenue would extend today, to Wiehl Street, onto what now is occupied by Erlanger Hospital and its support facilities. Railroad tracks of the Southern Railway bound the park to the north.

Figure 11. Excerpt from 1936 USGS map showing original horseshoe road in Lincoln Park.



Figure 12: Excerpt from 1928 Chadwick Atlas showing original size of Lincoln Park.

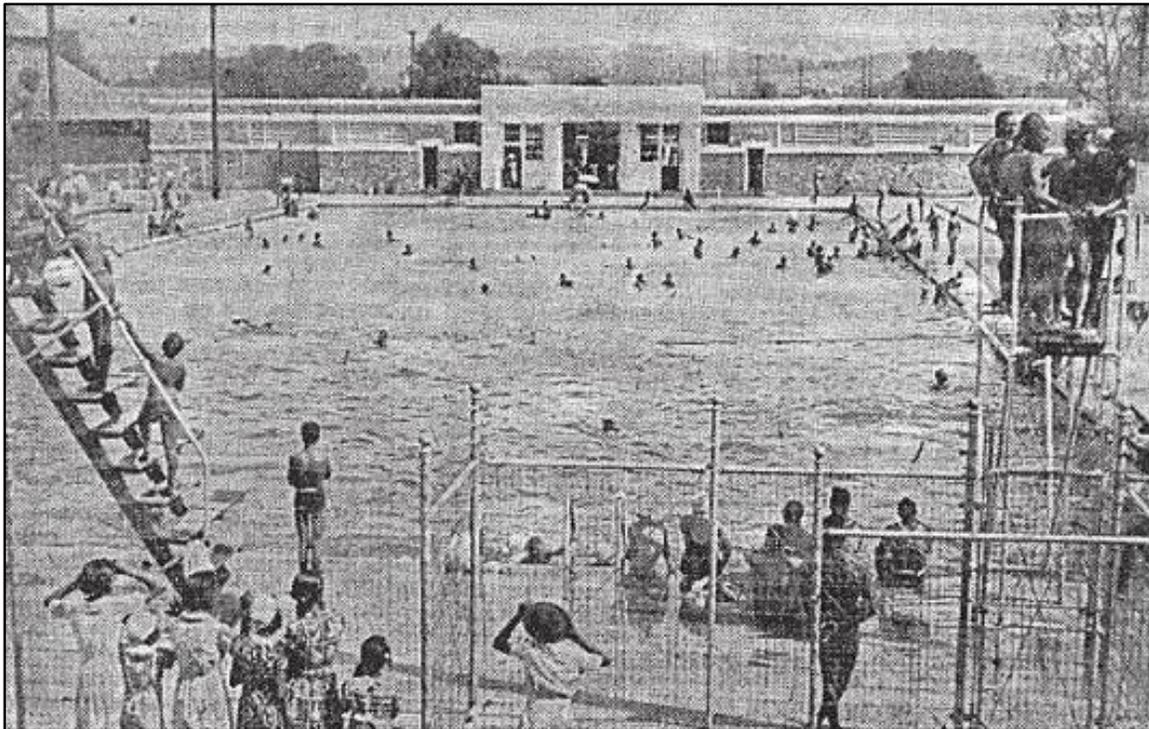
Shortly after Lincoln Park opened, many amenities were constructed throughout the grounds. Playground equipment; such as sandboxes, swings, and see-saws were installed within the first few years. A 1929 Sanborn Fire Insurance map of the area includes a miniature golf course, baseball field, carousel house, dance pavilion, and multiple auxiliary buildings (Figure 13). **Figure 13: 1929 Sanborn Map shows historic layout of east side of Lincoln Park.**



According to a recent newspaper article, Federal Works Progress Administration and City funds were used to build a swimming pool in 1937 (Figure 14). Completed in 1938 at a cost of \$60,000, the park was said to be “the largest for African-Americans in the segregated South”

(<http://www.examiner.com/article/lincoln-park-the-park-time-forgot>). The concrete swimming pool measured 80' x 200' and was accompanied by a brick and concrete bath house and office (Chattanooga Free Press August 3, 1937 & Chattanooga Times July 2, 1938). More than 5,000 people attended the dedication ceremony; including two major Lincoln Park advocates, Commissioner of Parks and Playgrounds R.M. (Bob) Cooke and Dr. Spencer J. McCallie (Evans 2009). Within a few years the pool was open seven days a week during the warm seasons. Operated by the Recreation Department, three experienced senior lifeguards and two bathroom attendants (one man and one woman for each restroom) were employed on a full-time basis. Children twelve or under paid ten cents to access the swimming pool area and all other attendees paid twenty-five cents (Clark 1947).

Figure14. Copy of photograph of Lincoln Park swimming pool
(<http://www.examiner.com/article/lincoln-park-the-park-time-forgot>).



The park continued to add attractions, including a mini-zoo which housed a grizzly bear and six monkeys in large steel cages (Clark 1947). By 1947, according to the Chattanooga Observer, Lincoln Park was expected to draw a crowd of 15,000 spectators for the Fourth of July activities. Carnival attractions, along with the carousel, included novelty games, a Ferris Wheel, the Loop-O-Plane, and the Chair-O-Plane. Lincoln Park offered a roller rink and a soul-food restaurant. There were also a softball field, a baseball field, and tennis courts. A big draw of Lincoln Park was the baseball field, which was the first lighted baseball field for African Americans in the “entire south.” According to author Rita L. Hubbard, African Americans came from all over the south to use the facilities and over 30 teams played there (Hubbard 2007). The Chattanooga Choo Choo’s, an African-American baseball team, played at Lincoln Park on many occasions. In 1947, the Chattanooga Choo Choo’s had a little known 16-year old playing for them by the name of Willie Mays (<http://www.examiner.com/article/lincoln-park-the-park-time-forgot>). [Known to use Lincoln Park’s fields for practice and games, Jackie Robinson and Satchel Paige also played for the African-American league \(Chattanooga Times Free Press August 24, 2013\).](#)

[According to a report on the Field Services of the Consultant in Social Group Work and Recreation in Chattanooga, by the summer of 1947 there were eight designated park areas within the city. Only one was used by African-Americans, Lincoln Park. During this time, the most popular and largest designated city park was Warner Park. Occupying sixty \(60\) acres, it was](#)

restricted to white citizens, housed the only other public swimming pool, and was privately operated by a concessionaire. Lincoln Park was operated and maintained by the City Recreation Department (Clark 1947).

Nine (9) community centers in Chattanooga, two of which were for African-Americans (Lincoln Community Center and College Hill Courts) were open to the public at this time. Formally located on Holly Street at the abandoned Lincoln High School, Lincoln Center was moved to the park after a fire in the 1940s. The recreational facility was housed in the carousel building, one of the original park structures (Figure 15). Lincoln Center was the only municipally owned indoor activity center serving African-Americans within Chattanooga (Clark 1947). It was converted to fit an auditorium, two small meeting rooms for local organizations, and a game room. During daytime hours children's school activities, arts and crafts classes, and dramatic plays occupied the space. At night adult activities, such as social gatherings, basketball games, and dances were held at Lincoln Center. A director and two assistants, all of whom were women, operated the facility. By November of 1946, Lincoln Center and the park were open year-round (National Urban League 1947).

Figure 15: Image of Carousel Building after it was converted into Lincoln Center from the Chattanooga Times, December 12, 1946.

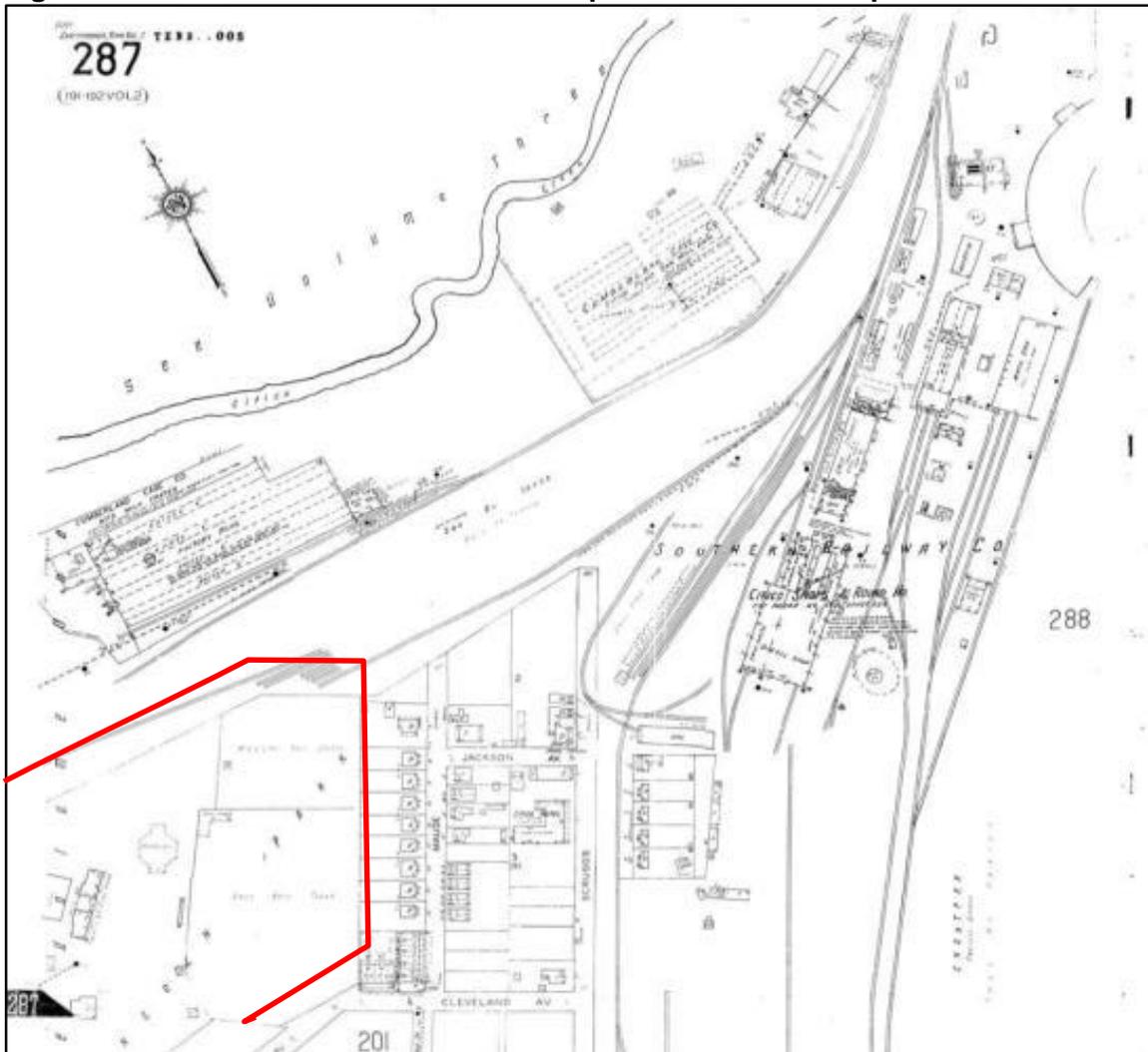


The 1951 Sanborn map (Figure 16) for the area east of the proposed extension of Central Avenue shows a baseball field, a carousel and a pool, along with several smaller auxiliary structures. A neighborhood resident told the Consultants that while neighborhood residents used Lincoln Park about 60 years ago, her parents told her that they could not use Warner Park, a white-only park across 3rd Avenue to the south.

During Lincoln Park's heyday multiple activities and attractions drew locals and out-of-towners to the area. Along with a softball and baseball field, a carousel eventually converted into the Lincoln Center, a pool, a mini-golf course, and a mini-zoo; the park was also equipped with clay tennis courts, a badminton and shuffleboard court, horseshoe pits, playground equipment, picnic areas, and multiple carnival rides. In 1945, the City of Chattanooga Recreation Department's First Annual Report documented annual attendance at the park and Lincoln Center to be approximately 55,810 guests (National Urban League 1947).

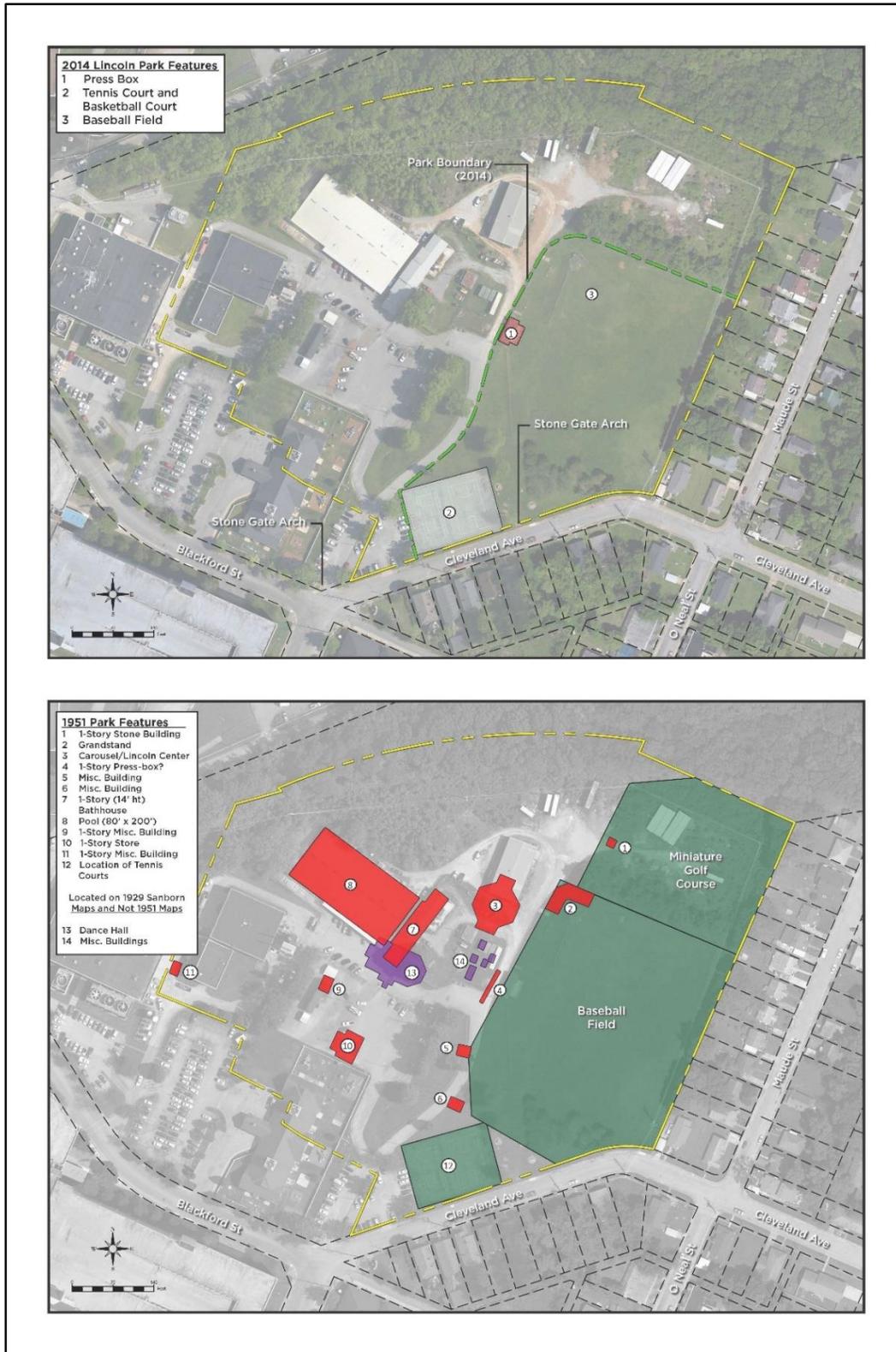
In the early to mid-1960s, desegregation resulted in changes to the usage of the park and its prominence within the African-American community. The adjacent community could now use the formerly "white-only" Warner Park across East 3rd Street to the south. Businesses at Lincoln Park began to close and in 1966, the City closed the swimming pool. According to a reporter from the *Examiner*, the City "government could not justify keeping two parks operating in the same area of town. In 1979, Chattanooga gave Lincoln Park to Erlanger Hospital in exchange for property located in Glenwood. Over half of the original 10-acre park has been developed for use by Erlanger Hospital.

Figure 16. Lincoln Park. 1951 Sanborn Map shows features of park.



Description: Approximately 4.2 acres of the former 10-acre City park remain. In 1996, Erlanger built a small playground and recreation area along Cleveland Avenue on the south edge of the park. The extant ball field, tennis courts, and basketball court; though rebuilt over the years, are located in the same historic areas as seen on the Sanborn Fire Insurance maps. The swimming pool has been filled, but the original length of the pool can be identified by the existing structure. Though most window openings and entrances have been boarded up, the original concrete, brick, and stone bathhouse still remains on-site. A reproduction stone arched gatepost is present at the corner of Blackford Street and Central Avenue; and another along Cleveland Street, to the east of the tennis courts. A marker on the site acknowledges the park as Chattanooga's first playground for the African American community. Refer to Figure 17 showing the historic layout of Lincoln Park and how it exists today.

Figure 17: 1929 – 2014 Lincoln Park Features.



Figures 18 – 22 contain photographs of the park.

Figure18. Lincoln Park. View west at Tennis Courts and Erlanger Hospital in background.



Figure19. Lincoln Park. View from Northwest corner of property at ball fields.



Figure20. Lincoln Park. Erlanger Buildings on left; Old Concession Stand on right.



Figure21. Lincoln Park. Modern Playground Equipment along Cleveland Avenue.



Figure22. Lincoln Park. Southern portion of park showing reproduction gate post.



5.2 Lincoln Park Neighborhood

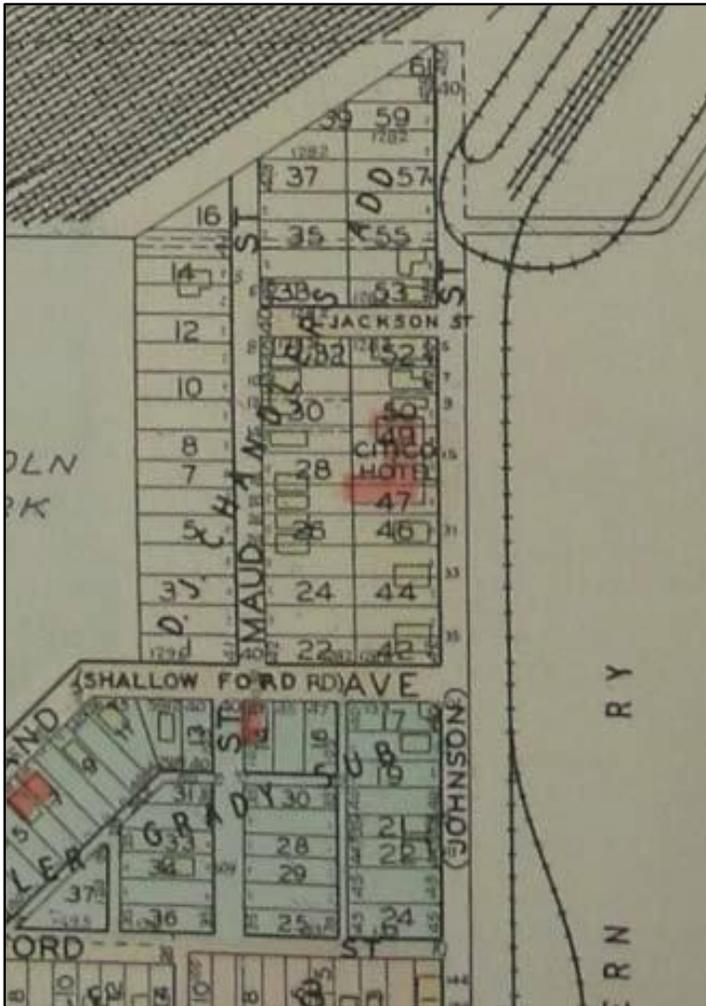
History: The neighborhood that developed adjacent to the park was occupied early in its development by minorities. Figure 19 depicts the historic stone marker at the entrance to the Lincoln Park neighborhood. A local neighborhood association leader said that perhaps the early neighborhood residents were employed by the railroads, with the massive yard located along the east edge of the neighborhood.

The 1928 Chadwick map (Figure 24) shows most of lots on Cleveland Avenue south of Lincoln Park had been developed, several lots were developed on the east side of Maude Street, but none on the west side, and some lots had been developed on the west side of former Johnson Street (now Scruggs Street) across from the railroad yard. On the west side of Scruggs, north of Cleveland Avenue and south of Jackson Avenue, stood the “Citico Hotel.”

Figure23. Late 20th century stone monument at neighborhood entrance. Text reads “Lincoln Park.”



Figure 24. Detail of 1928 Chadwick Map Showing Shallowford Road (Cleveland Avenue), Maude Street and Johnson Street (now Scruggs Street). The Citico Hotel is shown in red on Johnson Street.



By 1951, the Cumberland Case Company name industry had been constructed and the streets in the neighborhood had been primarily built out (Figures 25 and 26).

Figure 25. 1951 Sanborn Map. North Part of Lincoln Park Neighborhood.

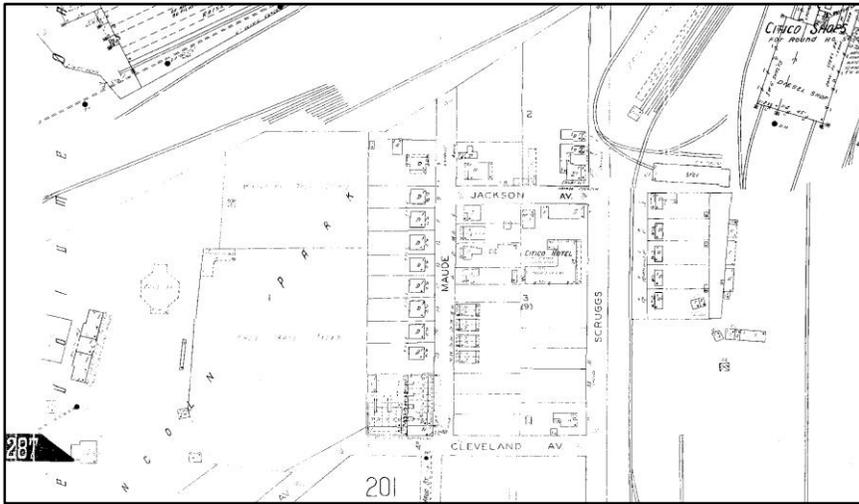
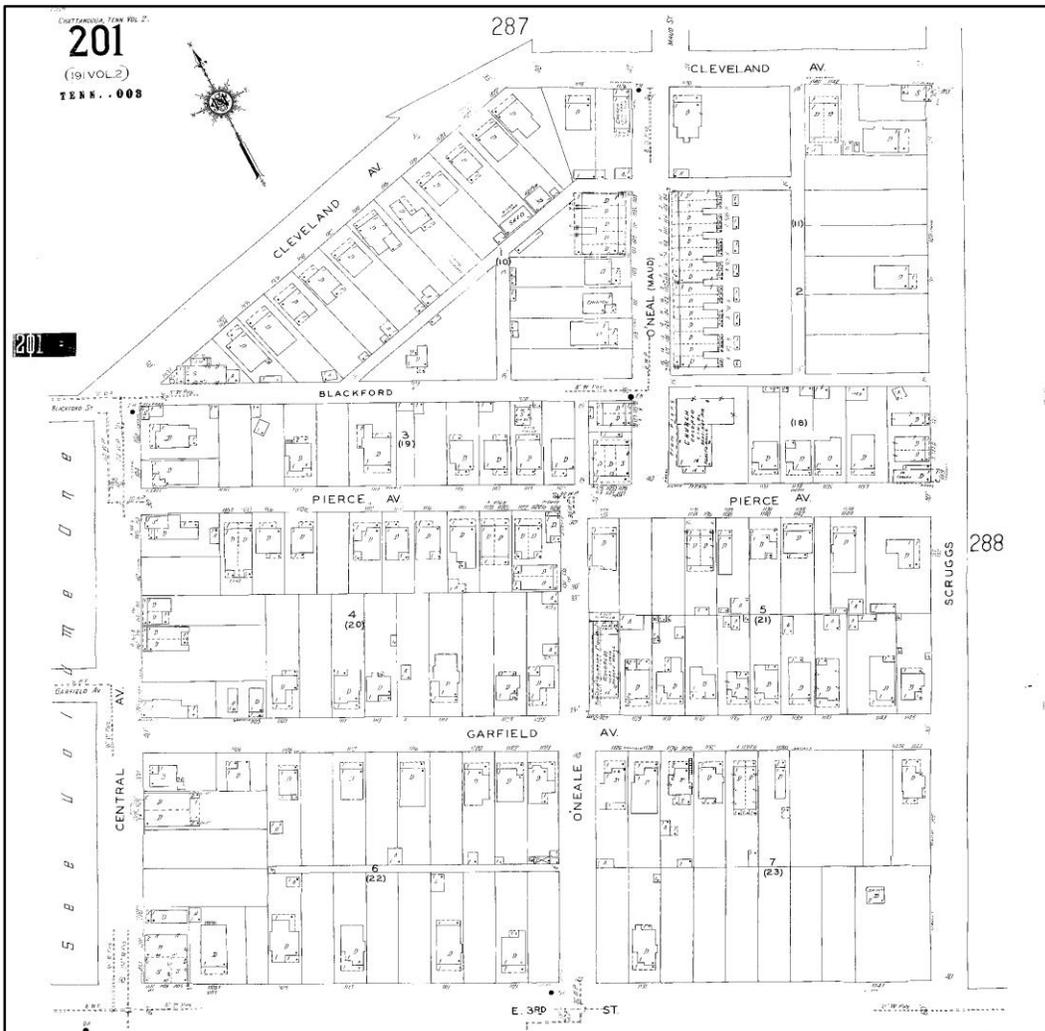


Figure 26. 1951 Sanborn Map. South Part of Lincoln Park Neighborhood.



Erlanger Hospital began in the 19th century and gradually expanded to encompass land west of Central Avenue and then in the third and fourth quarter of the 20th century, expanded east of Central Avenue, wherein a number of residences were razed to accommodate the Ronald McDonald House, the University Women's Services and associated parking. The hospital also expanded north of Blackford onto former Lincoln Park property to accommodate hospital services such as the power plant, the laundry and the grounds complex, as well as a Children's Learning Center.

Recent redevelopment activities include the recent renovation of post-1928 rowhouses on O'Neal Street and the construction of eight Habitat for Humanity houses on Scruggs Street, north of Cleveland Avenue.

Description: The Lincoln Park neighborhood contains about 100 buildings, primarily modest one-story houses developed on small, narrow lots. Numerous vacant lots interspersed throughout the neighborhood show where houses likely once stood. The west neighborhood boundary (along the east side of Central Avenue) is today encompassed by modern medical buildings with associated surface parking lots. Along the southern border, East 3rd Street, modern development has occurred on all of the lots (gas station, fast food establishment, medical office building). Figure 27 shows the survey findings.

Two historic churches are found in the neighborhood, the Pierce Avenue Baptist Church at the northeast corner of Pierce Avenue and O'Neill Street (Figure 28) and the Gethsemane Missionary Baptist Church at the corner of O'Neal and Garfield streets (Figure 29). Two other churches that once stood in the neighborhood are gone (east side of O'Neal north of Blackford and at the southwest corner of O'Neal and Cleveland).

Beyond the two churches, the neighborhood's extant buildings are residential structures, primarily single family, but with a few multi-family units. Most of the buildings are one-story in height and of wood frame construction. Original siding/facing appears to be weatherboard, asbestos and brick. Many of the buildings have been expanded and otherwise altered through addition of modern materials, such as siding, windows, doors, and new porches.

Styles and types from ca. 1918 through the 1930s include: gable-front cottages, L-plan, pyramidal roof or hipped roofed cottages, and the rowhouses on O'Neal Street. Figures 30 through 33 depict examples of neighborhood architecture built during this era.

Styles from the 1940 through the 1960s include simple, side-gabled cottages a hip-roofed duplex and a few modest scale Ranch Style homes. Examples of these are depicted in Figures 34 – 36.

Figure 27. Lincoln Park Neighborhood. 2012 Survey Map.

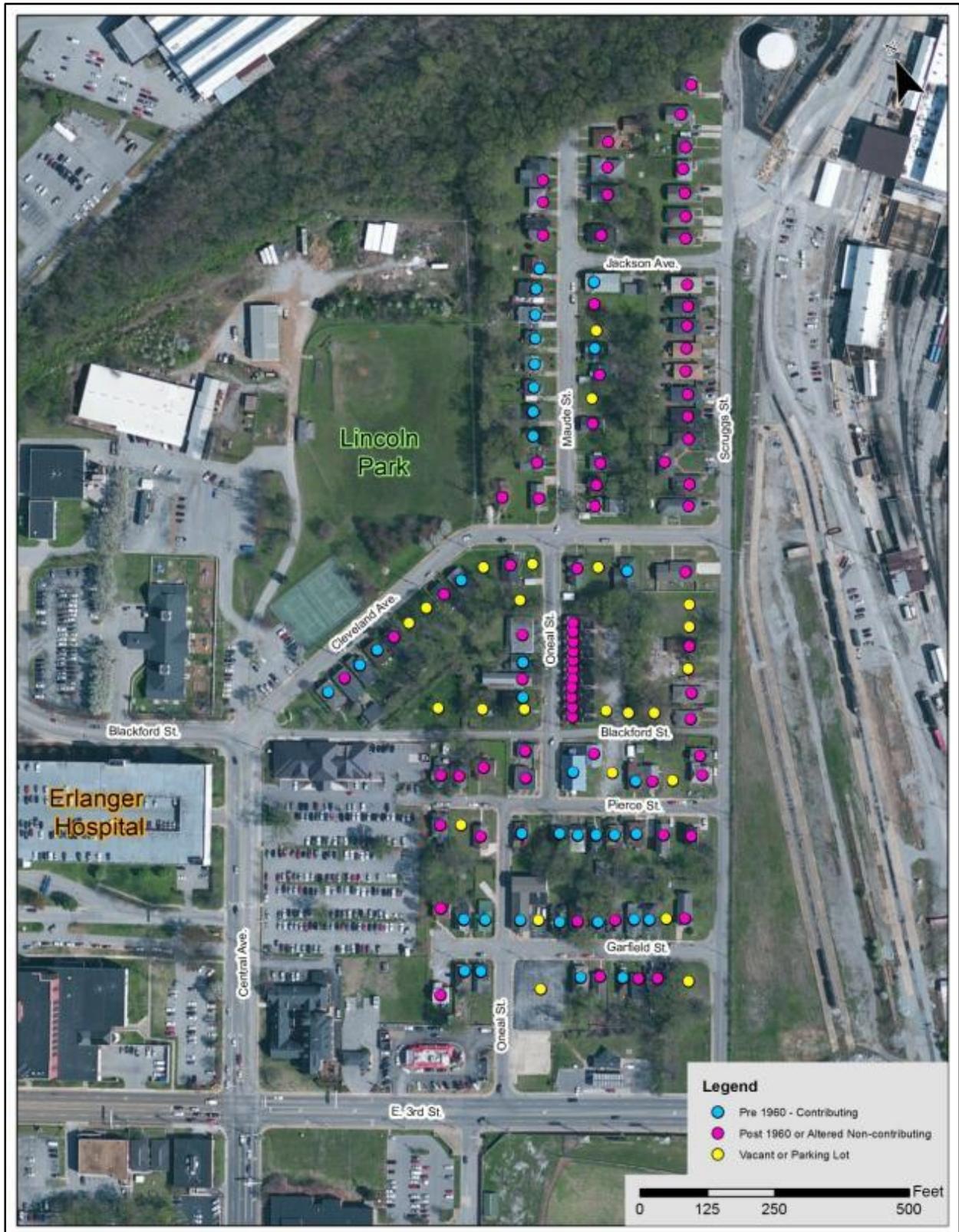


Figure28. Lincoln Park Neighborhood. Pre-1951 Pierce Avenue Baptist Church.



Figure29. Lincoln Park Neighborhood Pre-1951 Gethsemane Baptist Church (former Turner Baptist Church).



Figure 1230. Lincoln Park Neighborhood. Ca. 1920 House near north end of Maude Street.



Figure 1331. Lincoln Park Neighborhood. Ca. 1920 house near north end of Maude Street with 1950s ranch-style house next door.



Figure 1432. Lincoln Park Neighborhood. Ca. 1920s gable-front houses on Cleveland Avenue. View west toward Central Avenue and Erlanger Hospital.



Figure 1533. Lincoln Park Neighborhood. Ca. 1920s house on O'Neal Street.



Figure 1634. Lincoln Park Neighborhood. Side-gable cottages (ca. 1950) on west side of Maude Street.



Figure 1735. Lincoln Park Neighborhood. Ca. 1950s duplex.



Figure 1836. Ca. 1960s house at north end of Maude Street.



The neighborhood also contains new homes and radically altered older homes, some of which are so altered that dates cannot be determined. New houses include eight Habitat for Humanity homes on Scruggs Street.

Examples of new and altered resources are depicted in Figures 37 - 45.

Figure 1937. New two-story house at corner of Scruggs Street and Pierce Street. Rail yard across Scruggs on left of photograph.



Figure 2038. Lincoln Park Neighborhood. New (or radically altered?) house between two 1920s houses.



Figure 2139. Lincoln Park Neighborhood. Ca. 2008 Habitat for Humanity Houses on Scruggs Street.



Figure 2240. Lincoln Park Neighborhood. New building is out of character with ca. 1920s building on right of photograph.



Figure 2341. Lincoln Park Neighborhood. Three modern houses built on lots formerly occupied by older residences at corner of Cleveland Street and Maude Street.



Figure 2442. Lincoln Park Neighborhood. Example of altered house.



Figure 2543. Lincoln Park Neighborhood. Houses on north side of Pierce Street at Scruggs Street are a mixture of styles and eras and most have been altered.



Figure 2644. Lincoln Park Neighborhood. Altered house (right) and store (left) on O'Neal Street north of Pierce Street.



Figure 2745. Lincoln Park Neighborhood. Renovated rowhouses on O'Neal Street, north of Blackford Street.



In summary, only one concentration of pre-1960s houses is found in the neighborhood. That concentration is on Maude Street, north of Cleveland Avenue. There, six, small side-gable cottages with front porticos line the west side of street.

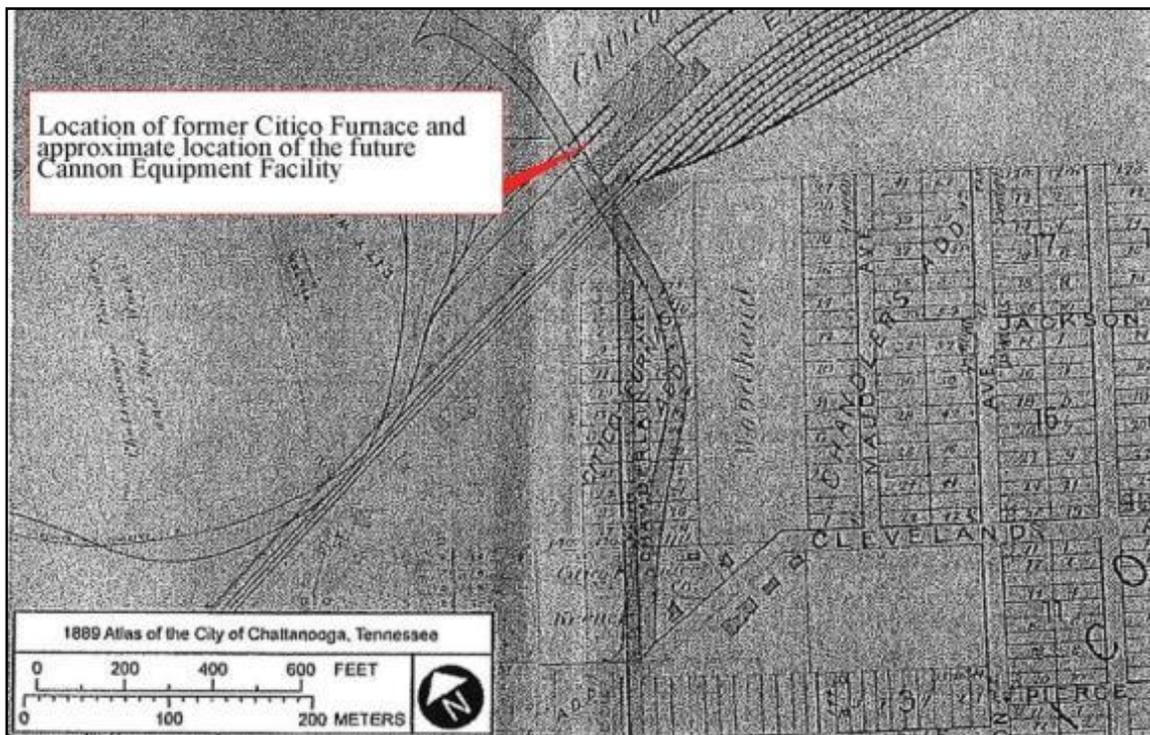
Elsewhere in the neighborhood is a mixture of styles and eras, altered and unaltered buildings and vacant lots.

5.3 Cumberland Corporation

History of Property: In 1988, the Cannon Equipment Company purchased the Cumberland Corporation along with its facility located at 950 Riverside Drive.

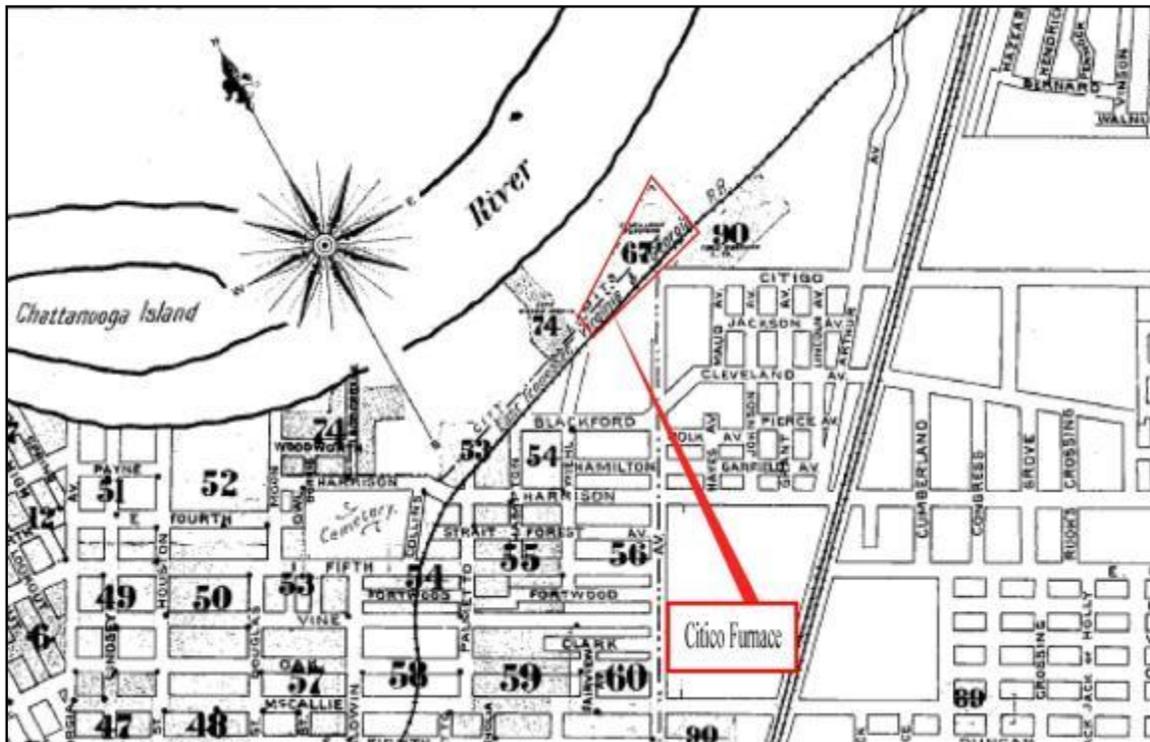
Prior to the Cumberland Corporation's occupation of the property, the 1889 G.M. Hopkins *Atlas of the City of Chattanooga, Tennessee and Vicinity* (Figure 46), shows that the parcel of land was owned by the Citico Furnace Company (Alexander 2011). Like the 1889 G.M. Hopkins map, the 1901 Sanborn maps show similar land divisions, railroad intersections, and a continuous route to the railroad and furnace (Figure 47). The furnace was in operation until 1911, and dismantling began several years later. The area immediately north of the furnace, and extending to Citico Creek, was listed as "vacant beyond." To the west of Citico Furnace was the City Water Works, a water treatment facility that was secured by the American Water Works and Electric Company in 1914, and remains the city's water provider to the present day (Alexander 2011).

Figure 2846. G.M. Hopkins map of resource area from 1889.



The 1928 *Plat Book of Greater Chattanooga, Tennessee*, published by C.W. Chadwick, lists Ms. Genevieve Allan Montague as the owner of the parcel abutting the former Citico Furnace site. The Montague land extended from the Tennessee River south across Riverside Drive and Citico Creek. However, Plate 21 in the plat book identified the lands directly north of the railroad and south of Citico Creek, where Citico Furnace formerly sat, as belonging to the Southern Rail Yards (Alexander 2011).

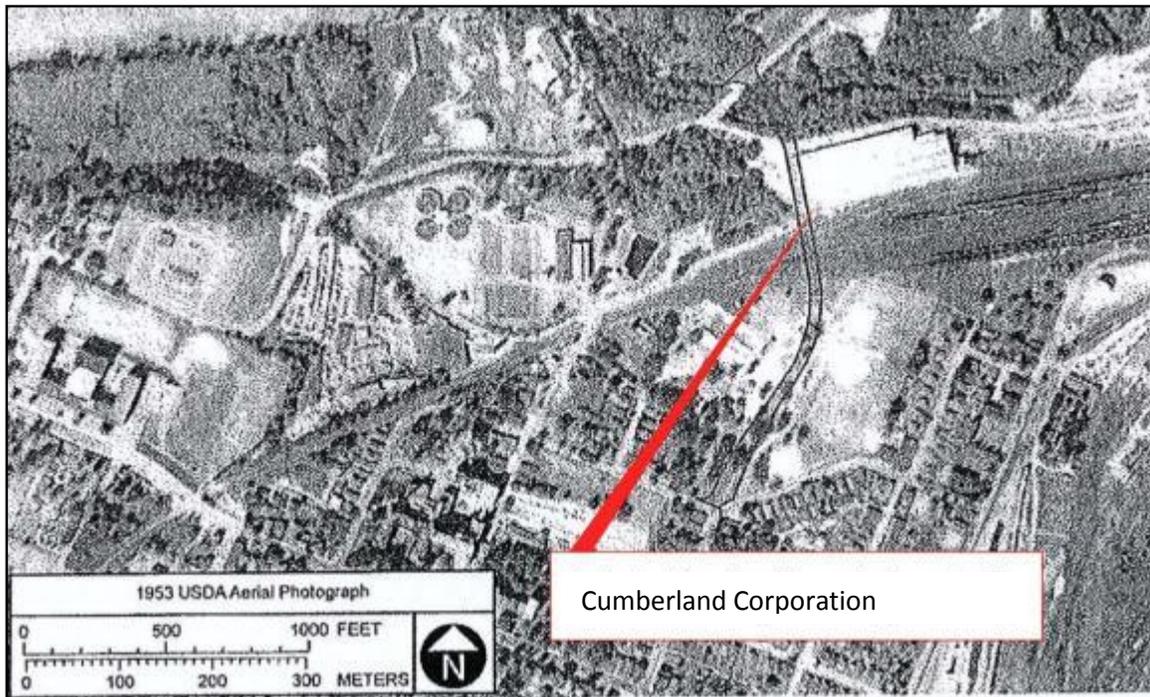
Figure 2947. Sanborn map illustrating resource area in 1901.



History of Resource: The Cumberland Corporation traces its roots to 1898 and the incorporation of the American Manufacturing Company in downtown Chattanooga. James B. Robinson founded the company as a manufacturer of harness hardware. In 1937, Robinson's two sons divided the company to meet changing manufacturing needs. The two companies were the American Manufacturing Co., run by Harry C. Robinson, and the Cumberland Case Co., run by W.W. Robinson, Sr. The two businesses shared one building at the corner of First and Chestnut Streets. In 1947, the two companies moved to a site near Citico Creek and merged to become the Cumberland Corporation (Alexander 2011). Although the company did not occupy the property until 1947, according to the Hamilton County Assessor of Property, the original manufacturing building was built in 1941 while the attached general administration building was completed in 1947. The Property Assessor report also recorded that all facility additions and "industrial improvements" occurred between 1954 and 2001.

Maps or photographs showing structures on the subject property were not available until 1953, when a United States Department of Agriculture (USDA) aerial photograph revealed that the building housing the Cumberland Corporation was present (Figure 48).

Figure 48. Aerial photograph from 1953 illustrating the location of the Cumberland Corporation and first concept for project alignment (now removed from consideration).

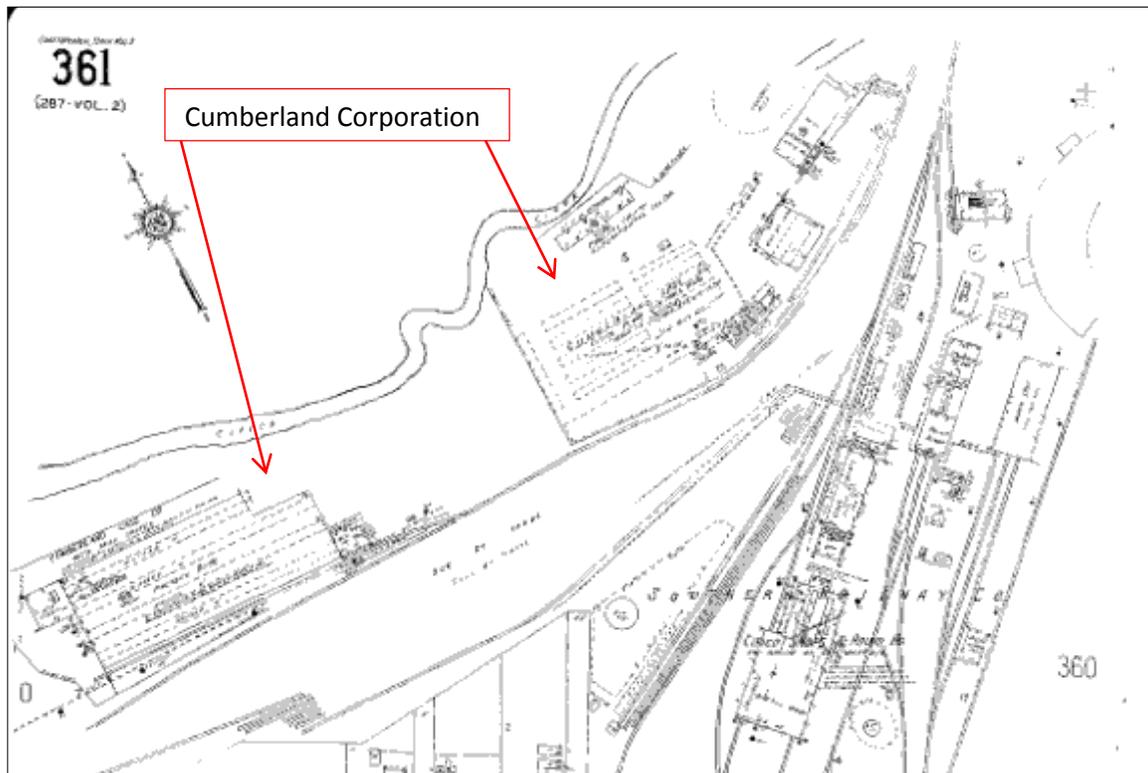


At this time, Riverside Drive ran along the city limits just north of the property. The 1955 Sanborn map illustrates the footprint of the “Cumberland Case Company” (Figure 49). Between 1956 and 1963, topographical maps and aerial photographs showed little change to the property. The Hamilton County Property Assessor card details the construction of multiple detached, pre-fabricated metal warehouse and storage structures that were added to the east end of the property starting in 1964. The rail lines between Lincoln Park to the south and the Cumberland Corporation were in operation until the late 1980s. In 1988, the Cumberland Corp. was purchased by IMI Group, Inc. and later renamed Cannon Equipment Southeast (Alexander 2011).

According to the 2011 report by Alexander Archaeological Consultants, Inc.:

At the time of the Cumberland Case Co.’s move to the Citico Creek site, Riverside Drive was not used as the access point for the site. Employees and deliveries had to enter the site through Wiehl Street. The company address was listed as 1 Wiehl Street until the 1980s. The Southern Railroad line also ran alongside the property and was surely used for the quick and easy transportation of products.

Figure 3049. 1955 Sanborn map illustrating the Cumberland Corporation Facility.



The Cumberland Case Co. began with a single product line – milk bottle cases constructed of wood and metal. Soon, however, the company greatly diversified its inventory. Through ever-evolving technology, the milk bottle cases eventually changed to a plastic-and-steel construction. By the mid-1950s, Cumberland Case Co. added products related to the poultry industry, such as wire chicken coops and mechanical feeders, and a saw mill division. As the company continued to grow, the executives decided a name change was in order to reflect the production of additional goods.

In April 1967, the Cumberland Case Co. officially changed its name to the Cumberland Corp. Just five months later, in September 1967, the Federal Trademark office registered a new logo to the Cumberland Corp. The description provided to the U.S. Patent and Trademark Office describing the company's product line was "poultry equipment – namely poultry feeders and bulk feed bins, and parts therefore; and doorstep dairy boxes and daily delivery cases." This trademark expired November 29, 1993. In the 1970s, the Cumberland Corp. added materials handling carts to its catalog. These carts were used in dairies and grocery stores across the country. Soon the company began to customize carts for different business and service industries throughout the United States, Canada, Latin and South America, Australia, and southern Europe.

In the fall of 1988, a Minneapolis-based organization, IMI Group Inc., purchased the Cumberland Corp. and ended its longtime family-owned status. Six years later, in 1994, the IMI-owned Cumberland Corp. adopted a new name, becoming Cannon Equipment Southeast. With integration into the multi-national company, the focus of production activities at the site shifted. The company's original product line of dairy cases was sold off, as well as the interests in agricultural equipment and wire cases. The company's new focus was on non-motorized metal delivery carts for use in the handling of dairy and bakery products, newspapers, and the horticultural industry. This continues to be the focus of Cannon Equipment's production, along with the design and creation of front-end merchandisers, or the racks near checkout counters at grocery stores. According to the company's website, the "stocked and custom material handling solutions are designed to reduce costs and deliver supply chain efficiencies to manufacturing and supply chain businesses" (Alexander 2011).

The building was recently vacated and totally cleaned out and there are no current plans for its reuse.

Description: The former Cumberland Corporation is on a 17.7-acre property (Tax Map # 1360 A 001), with Citico Creek as its northern boundary. The property contains the 1940s brick structures and numerous non-historic buildings on the east side of the property. Vehicular access to the property is from the north, via a local access road off Riverside and from the west on Wiehl Drive.

Figure 50 depicts and dates the surveyed buildings, as well as the additions to the buildings, on the Cumberland Corporation site. A description of each follows. Photographs accompany the description of the facility buildings on the following pages. It is important to note that Appendix E contains TRC evaluation of the Cumberland Corporation, which has many additional photographs.

Figure 3150. Cumberland Corporation. Dates and Contributing Status of buildings on site.



The complex consists of the ca. 1941 manufacturing building and additions to it and stand-alone mid-1960s through 2001 warehouses. The period of significance for the contributing components is from 1947, when Cumberland Corporation moved into the facility and began operations, to 1963, one year before the first pre-fabricated metal addition was attached to the original brick, manufacturing building and Chattanooga industry was beginning its steady decline.

Contributing Components: The contributing components of the Cumberland Corporation are the ca. 1941 brick Manufacturing Building and two of its attached ca. 1947 brick additions (the Administration Building and Utility Building). The ca. 1941 manufacturing building has several other non-historic, pre-fabricated metal additions on the north, south, and east facades. All other facility components are unattached, non-historic, prefabricated metal structures that are located on the east end of the resource area and are, therefore, non-contributing.

1. Ca. 1941 Manufacturing Building - Located on the western portion of the property, the only changes from the building footprint illustrated on the 1955 Sanborn map (refer to Figure 49), are pre-fabricated metal additions on the north, south, and east facades. The 13-bay wide, single-story, manufacturing building consists of heavy timber and steel framing clad in brick, using a Common or American bond. This masonry bond continues on the administration building attached at the northwest corner. The overall structure rests on a raised, continuous concrete block foundation.

The manufacturing building features four, raised clerestory monitors running the entire length of the building, less the northernmost monitor, which is approximately 115 feet shorter in length. According to the 1955 Sanborn map, each monitor is raised 6 feet. This particular roof design is sometimes called a flat Warren truss with flush skylights (clerestory) and monitor (Bradley 1999). The purpose for such a design is to provide maximum light and ventilation to the manufacturing space below via the curtain of metal, casement windows with operable hoppers. The roof of the monitors features a low-pitched gable with a slight overhang. The base of the monitors intersects the remaining, lower half of a low-pitched, gable roofline. The overall roof structure consists of steel and wood trusses and clad with sheet metal and built up tar and gravel. The east and west ends of the roof intersect with a brick, gable-shaped parapet, capped with a thin layer of concrete. Located symmetrically beneath the gable-shaped parapet of each monitor is a large, metal, multi-light window, the two window openings above the administration building on the west façade, however, were in-filled with brick at an unknown date. All window openings throughout the structure are paired with brick lintels.

Located centrally along the west-facing, main façade is a small protrusion which is approximately a quarter of the width of the administration building. This 6-bay wide protrusion features a one-story, inset entryway/loading dock with a metal, standing seam, shed roof with exposed eaves. The inset entryway of the protrusion also features an overhead, decorative wood balustrade. Other features of the west-facing loading dock include: five, metal, twelve-paned windows with operable hoppers; one, wooden, single-

leaf door with three lights; and two, metal awnings. South of the protruding loading dock of the west-facing, main façade features a set of three, eight-foot tall, metal, multi-light windows with operable hoppers.

The south façade features a small, unoriginal addition constructed after the period of significance and features corrugated metal siding, a shed roof clad with corrugated metal, and access via an open, single-leaf entry and a vinyl, overhead bay door. The south façade also features a large, open, overhang with a metal, shed roof supported by steel I-beams and posts. The remainder of the south façade is clad in a curtain of metal, multi-light windows that are pierced symmetrically by brick pilasters and wooden (original) and/or metal (unoriginal) bay doors.

The east façade of the manufacturing building mirrors the west-facing, main façade, less the administration building and the loading dock protrusion. The east façade also features one, pre-fabricated metal addition with a gable rear roof that has grown over the years with multiple, pre-fabricated metal, shed roof additions. Another prefabricated metal addition with a shed roof is attached to the east façade and housed the first aid room. Both prefabricated metal additions on the east façade were added after the period of significance.

The north façade features an unoriginal, raised, covered walkway along the eastern end with a metal, standing seam shed roof supported by wooden posts with a metal balustrade. Attached to the west-end of the covered walkway is the unoriginal, pre-fabricated metal addition that spans the majority of the north façade. The covered walkway and prefabricated metal addition on the north façade were added after the period of significance. The westernmost end of the north façade exposes a small portion of an original wooden, single-leaf door with four lights, as well as, the original north façade with its curtain of metal, multi-light windows. This exposed curtain of metal, multi-light windows had been partially in-filled with aluminum panels, plywood (or possibly synthetic) boards, and window-installed, air conditioning units at an unknown date.

Figures 51 - 56 contains photographs of the exterior of the ca. 1941 Manufacturing Building and its non-historic additions.

Figure 3251. Cumberland Corporation. Manufacturing Building (#1). View east at main (west) elevation.



Figure 3352. Cumberland Corporation. Manufacturing Building (#1). Northeast corner of building, unoriginal metal additions and unoriginal covered walkway at north facade; view is southwest.



Figure 3453. Cumberland Corporation. Manufacturing Building (#1). Southwest corner of building; detail of unoriginal, metal, shed roof addition and overhang at west end of south façade. View is east-northeast.



Figure 3554. Cumberland Corporation. Manufacturing Building (#1). Northeast corner of building and detailing east façade, unoriginal metal additions and unoriginal covered walkway at north façade; view is southwest.



Figure 3655. Cumberland Corporation. Manufacturing Building (#1). Detail of unoriginal covered walkway at east end of north facade; view is south-southeast.



Figure 3756. Cumberland Corporation. Manufacturing Building (#1). Detail of unoriginal metal addition at north facade; view is west.



The interior space of the manufacturing building is relatively unaltered and consists primarily of one, large open space with concrete floors and an exposed roofing system. Approximately thirty percent of the original doors and hardware are intact. Several interior spaces have been created within the open space using concrete blocks and/or drywall to create storage, offices, and bathrooms/locker rooms. A square, two-story, brick monitoring structure is located centrally within the space and appears to have undergone several renovations over the years (Figure 56). A conference room, first aid room, and several utility rooms are housed in the pre-fabricated metal additions and appear to be suffering from extensive deterioration. The basement reveals the large, concrete foundation piers, a storage space, and several bay door openings along the east façade. Figures 57 through 60 depict portions of the interior.

Figure 3857. Cumberland Corporation. Manufacturing Building (#1). Main interior space showing concrete floors, steel and wood structural support and trusses, and clerestory monitors; view is southeast.



Figure 3958. Cumberland Corporation. Manufacturing Building (#1). Main interior space directly beneath a monitor. Photograph shows truss work and brick columns to the north; view is east.



Figure 4059. Cumberland Corporation. Manufacturing Building (#1). Interior photograph of basement and structural foundation piers; view is northwest.



Figure 4160. Cumberland Corporation. Manufacturing Building (#1). View of original cargo bay doors at basement level; view is east-northeast.



2. Ca. 1947 Administration Building - The building is rectangular in shape and has a slight parapet on its gable side roof. The windows are also metal casements with operable hoppers, but are much smaller than those of the manufacturing building. Along the west-facing, main façade, there are four, brick pilasters and an elevated, enclosed, hipped-roof entry porch housing the main entrance. This enclosed porch is not original to the building and was constructed after the period of significance using wooden, square columns, paneling, and molding, along with vinyl, one-over-one, double-hung windows with faux panes. Figures 61 – 63 depict the exterior of the Administration Building.

The interior space of the administration building appears to have undergone several renovations over the years. The only original features that remain intact are the windows. Figures 64 and 65 are select interior photographs.

Figure 4261. Cumberland Corporation. Administration Building (#2). North and west elevations. Main entrance on right; view is southeast.



Figure 4362. Cumberland Corporation. Administration Building (#2). West elevation showing entrance.



Figure 4463. Cumberland Corporation. Administration Building (#2). Detail of main entrance within unoriginal enclosed porch.



Figure 4564. Cumberland Corporation. Administration Building (#2). Original window of office located along the north wall.



Figure 4665. Cumberland Corporation. Administration Building (#2). Interior view of partition at main entrance.



3. Ca. 1947 Utility Building - Attached to the southeast corner of the manufacturing ca. 1947, L-shaped, one-story masonry utility structure. The structure lacks windows on its east facade, but is pierced by multiple openings filled with wooden vents/louvers. The south façade of the utility structure is marked by five, brick pilasters with triangular, concrete caps and three, metal, multi-light windows. Figures 66 and 67 show the Utility Building.

Figure 4766. Cumberland Corporation. Utility Building (#3). Cumberland Corporation.



Figure 4867. Cumberland Corporation. Utility Building (#3), South façade; detail of windows; view is northwest.



4. Ca. 1964 Warehouse/Storage Building – This building is located east of the ca. 1941 Manufacturing Building. A steel framed, pre-fabricated metal structure featuring a concrete slab foundation and a low-pitched gable roof covered with sheet metal. The structure houses an open warehouse/storage space that is approximately two-stories in height. The west elevation features a pre-fabricated metal, one-story tall, one-bay wide and deep, shed roof addition with a corrugated plastic roof. The north elevation features a shed roof overhang covered with a metal roof and cladding, supported by a steel frame and I-beams. The east elevation features a pre-fabricated metal and flat roof ell housing five, metal and roll-up cargo bay. Figure 68 shows the building.

Figure 4968. Cumberland Corporation. Ca. 1964 Warehouse/Storage Building (#4). View is south-southeast featuring the west and north elevations.



5. Ca. 1964 Warehouse/Storage Building – Located northeast of building #4 is a steel framed, pre-fabricated metal structure featuring a concrete slab foundation and a low-pitched gable roof covered with sheet metal. The rectangular structure houses an open warehouse/storage space that is approximately two-stories in height. The west elevation is pierced by two cargo bay doors, one of which is much larger and features a shed roof awning and a metal, roll-up bay door. The south elevation is pierced by multiple single-leaf doorways accessed via concrete steps. The north elevation features a pre-fabricated metal, two-story tall, shed roof addition that spans the length of the north elevation, as well as a one-story, one-bay wide and one-bay deep, pre-fabricated metal shed roof addition. Figure 69 shows the storage building.

Figure 5069. Cumberland Corporation. Ca. 1964 Warehouse/Storage Building (#5). View northeast at west and south elevations.



6. Ca. 1967 Light Manufacturing Building – Attached to and located east of building #s 4 and 5, this structure is a steel framed, pre-fabricated metal building featuring a concrete slab foundation and a low-pitched gable roof covered with sheet metal. Inside is an open warehouse/storage space that is approximately two stories in height. The west elevation is attached to the cargo-bay ell of building #4. The east elevation features a shed roof awning and is pierced by one single-leaf door and two cargo-bay doors, one of which is accessed by a concrete ramp. Figure 70 shows the manufacturing building.

Figure 5170. Cumberland Corporation. Ca. 1967 Manufacturing Building (#6). View southeast at west and north elevations.



7. Ca. 2001 Warehouse/Storage Building – Attached to and located east of Building 5, this warehouse is a steel framed, pre-fabricated metal structure featuring a concrete foundation. The building

features a low-pitched gable and flat roof covered with sheet metal. The structure houses an open warehouse/storage and office space that is approximately two stories in height. The north elevation features metal casement windows at the east end. The east elevation reveals how the structure is built into a slope resulting in the northeast corner of the building sitting on raised concrete piers. The east elevation also features metal casement windows at the north end. The south elevation has a one-story shed roof addition and three, metal and fixed windows with nine lights. Figure 71 depicts the building.

Figure 5271. Cumberland Corporation. Ca. 2001 Warehouse/Storage Building (#7). View west at south elevation.



8. Ca. 1978 Light Manufacturing/Storage Building – This building is east of building #7. It is a wood framed structure featuring a continuous concrete foundation and a pair of parallel gable-front rooflines covered with standing seam metal. The rectangular structure houses an open one-story space that is clad with sheet and corrugated metal. The south elevation features a row of metal multi-light windows with hoppers and a concrete block shed roof addition. The west elevation is pierced by a single-leaf and bay opening. The east elevation features two metal and fixed multi-light windows, one metal awning, and one concrete block addition with a flat roof. The north elevation is pierced by a row of metal multi-light windows with hoppers. Figure 72 depicts this building.

Figure 5372. Cumberland Corporation. 1978 Light Manufacturing/Storage Building (#8). View northeast at west and south elevations.



6.0 Coordination

This project has been coordinated with parties pursuant to regulations defining Section 106 of the National Historic Preservation Act (36 CFR 800). TDOT will coordinate with the SHPO and this report will be sent to interested parties identified by TDOT:

Vilma Scruggs Fields, Director
Chattanooga Afro-American
Museum and Research Center
200 Martin Luther King
Boulevard
Chattanooga, TN 37403

Chattanooga Area Historical
Association
P.O. Box 8755
Chattanooga, TN 37414

Chattanooga-Chickamauga
National Military Park
Fort Oglethorpe, GA 30742

Dr. Daryl Black, Director
Chattanooga History Center
2 W. Aquarium Way, Suite 200
Chattanooga, TN 37402

Ann Gray
Cornerstones Inc.
736 Georgia Avenue #106
Chattanooga, TN 37402

Sabrina Carlson
Historic Preservation Planner
Planning & Design Studio
1250 Market Street, Suite 3010
Chattanooga, TN 37402

Hamilton County Mayor
Room 208 Hamilton County
Courthouse
Chattanooga, TN 37402

Dottie Ellis, Secretary
Hamilton County Historical
Association
100 James Blvd., Apt. A4
Signal Mountain, TN 37377-
1881

Mr. Paul Archambault
Historic Preservation Planner
Southeast TN Development
District
P. O. Box 4757
Chattanooga, TN 37405-0507

T. A. Harris, Director
Housing Authority
P. O. Box 1486
Chattanooga, TN 37401

Linda Mines
Hamilton County Historian
4733 Cummings Cove Drive
Chattanooga, TN 37419-2172

Tennessee Valley Authority
Cultural Resources
400 West Summit Hill Drive
Knoxville, TN 37902

Mary Helms
Chattanooga-Hamilton County
Bicentennial Library
Local History Department
1001 Broad Street
Chattanooga, TN 37402-2652

When completed, TDOT will send the report to the property owners of the two individual properties assessed for NRHP eligibility:

Lincoln Park Owner:
Erlanger Hospital
Hospital Authority of
Chattanooga-Hamilton County
975 East 3rd Street
Chattanooga, TN 37403

Cumberland Corporation Owner:
Cumberland Corporation
PO Box 1446
Chattanooga, TN 37401

Native American Coordination: TDOT is currently undertaking Native American coordination for this project.

Public Meetings: The City held a public meeting in the Lincoln Park Neighborhood on February 19, 2013. No comments were received regarding historic properties. The City held a second public meeting at the Chattanooga School for the Arts & Sciences on March 12, 2014. Multiple comments were made concerning the historic significance of Lincoln Park. A request for the Historic Report was made. A small group meeting was held on June 11, 2014 to discuss the project, including the Lincoln Park neighborhood and recreation area. At this meeting, a third public meeting specific to the NEPA process for historic and cultural resources was promised. That meeting was held on September 2, 2014 with a presentation by Claudette Stager of the Tennessee Historic Commission. Numerous comments and questions were made concerning the history of the park and its eligibility for the NRHP. Another request for the historic report was made.

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Appendix A Applicable Regulations Fact Sheets

Section 106 Review, National Historic Preservation Act of 1966

Eligibility Criteria of the National Register of Historic Places

National Register of Historic Places, TDOT Summary Sheet

Criteria of Adverse Effects, Codified at 36 CFR 800.5

Section 4 (f), TDOT Act of 1966, TDOT Summary Sheet

Section 106 Review, National Historic Preservation Act of 1966

Section 106 of the *National Historic Preservation Act* requires that Federal agencies consider what effects their actions and/or actions they may assist, permit, or license, may have on historic properties, and that they give **the Advisory Council on Historic Preservation (Council)** a “reasonable opportunity to comment” on such actions. The Council is an independent Federal agency. Its role in the review of actions under Section 106 is to encourage agencies to consider, and where feasible, adopt measures that will preserve historic properties that would otherwise be damaged or destroyed. The Council’s regulations, entitled “Protection of Historic Properties” (36 CFR Part 800) govern the Section 106 process. The Council does not have the authority to require agencies to halt or abandon projects that will affect historic properties.

Section 106 applies to properties that have been listed in the *National Register of Historic Places (NRHP)*, properties that have been determined to be eligible for inclusion in the NRHP, and properties that may be eligible but have not yet been evaluated. If a property has not yet been nominated to the NRHP or determined eligible for inclusion, it is the responsibility of the Federal agency involved to ascertain its eligibility.

The Council’s regulations are set forth in a process consisting of four basic steps which are as follows:

1. Initiate Section 106 Process: The Federal agency responsible for the action establishes the undertaking, determines whether the undertaking has the potential to affect historic properties (i.e., properties listed in or eligible for listing in the National Register of Historic Places), and identifies the appropriate State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO). At this time, the agency plans to involve the public and identify other consulting parties.
2. Identify Historic Properties: If the agency’s undertaking has the potential to affect historic properties, the agency determines the scope of appropriate identification efforts and proceeds to identify historic properties within the area of potential effects. Identification involves assessing the adequacy of existing survey data, inventories, and other information on the area’s historic properties. This process may also include conducting further studies as necessary and consulting with the SHPO/THPO, consulting parties, local governments, and other interested parties. If properties are discovered that may be eligible for the National Register, but have not been listed or determined eligible for listing, the agency consults with the SHPO/THPO and, if needed, the Keeper of the National Register to determine the eligibility status of the property.
3. Assess Adverse Effects: The agency, in consultation with the SHPO/THPO, assesses the potential effects to historic properties affected by the undertaking. The agency at this time will determine that the action will have “no adverse effect” or an “adverse effect” on historic properties. Consulting parties and interested members of the public are informed of these findings.

The regulations provide specific criteria for determining whether an action will have an effect, and whether that effect will be adverse. Generally, if the action may alter the characteristics that make a property eligible for the National Register, it is recognized that the undertaking will have an effect. If those alterations may be detrimental to the property’s characteristics, including relevant qualities of the property’s environment or use, the effects are recognized as “adverse.”

4. Resolve Adverse Effects: The agency consults with the SHPO/THPO and others, including consulting parties and members of the public. The Council may choose to participate in consultation, particularly under circumstances where there are substantial impacts to historic properties, when a case presents important questions about interpretation, or if there is the potential for procedural problems. Consultation usually results in a Memorandum of Agreement (MOA).

If agreement cannot be reached, the agency, SHPO/THPO, or Council may terminate consultation. If the SHPO/THPO terminates consultation, the agency and the Council may conclude the MOA without SHPO/THPO involvement. If the SHPO/THPO terminates consultation and the undertaking is on or affecting historic properties on tribal lands, the Council must provide formal comments. The agency must request Council comments if no agreement can be reached.

ELIGIBILITY CRITERIA OF THE NATIONAL REGISTER OF HISTORIC PLACES AS SET FORTH AT 36 CFR 60.4

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

- **CRITERION A.** that are associated with events that have made a significant contribution to the broad patterns of our history (history); or
- **CRITERION B.** that are associated with the lives of persons significant in our past (person); or
- **CRITERION C.** that embody the distinctive characteristic of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that components may lack individual distinction (architecture); or
- **CRITERION D.** that have yielded, or may be likely to yield, information important in prehistory or history (archaeology).

Ordinarily, cemeteries; birthplaces or 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 50 years are not considered eligible for the National Register of Historic Places; however, such properties will qualify if they are integral parts of historic districts that do meet the criteria or if they fall within the following categories:

- **EXCEPTION A.** a religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- **EXCEPTION B.** a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- **EXCEPTION C.** a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his productive life; or
- **EXCEPTION D.** a cemetery which derives its primary significance from graves or persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- **EXCEPTION 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
- **EXCEPTION F.** a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- **EXCEPTION G.** a property achieving significance within the past 50 years if it is of exceptional importance.

NATIONAL REGISTER OF HISTORIC PLACES

SUMMARY SHEET PREPARED BY TDOT

What is the National Register of Historic Places? The National Register, maintained by the Keeper of the Register within the National Park Service, Department of the Interior, is the nation's official list of districts, buildings, sites, structures, and objects significant in American history, architecture, archeology, engineering, and culture.

What are the benefits and restrictions of listing? In addition to honorific recognition, listing in the National Register results in the following benefits for historic properties:

- Section 106 provides for consideration of National Register listed or eligible properties in planning for Federal, federally licensed, and federally assisted projects;
- Eligibility for certain tax provisions for the certified rehabilitation of income-producing National Register structures such as commercial, industrial, or rental residential buildings;
- Consideration of historic values in the decision to issue a surface mining permit where coal is located in accordance with the Surface Mining Control Act of 1977; and
- Qualification of Federal grants for historic preservation, when funds are available.

Does National Register designation place any additional burdens or obligations on the property owner? Owners of private property listed in the National Register are free to maintain, manage, or dispose of their property as they choose, provided that no Federal moneys are involved.

How is a property nominated to the National Register? The first step is for the owner to contact the Tennessee State Historic Preservation Office (TN-SHPO), Clover Bottom Mansion, 2941 Lebanon Road, Nashville, TN 37243-0442; 615-532-1558. Ordinarily, private individuals (or paid consultants) prepare nomination forms. The TN-SHPO submits these nominations to a State Review Board, which meets three times a year. This body reviews the nominations and votes to recommend or deny National Register listing. If approved, the TN-SHPO submits the nomination to the Keeper of the Register in Washington, D.C. for consideration for listing. The Keeper's Office has 45 days to review the nomination, and its decision regarding National Register listing is final.

How long does the nomination process take? The process varies but typically takes between eight and twelve months.

CRITERIA OF ADVERSE EFFECT

Regulations codified at 36 CFR 800 require Federal agencies to assess their impacts to historic resources. The regulations provide specific criteria for determining whether an action will have an effect, and whether that effect will be adverse. These criteria are given below.

36 CFR 800.5 Assessment of Adverse Effects

(a) *Apply Criteria of Adverse Effect.* In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified historic properties, the Agency Official shall apply the criteria of adverse effect to historic properties within the area of potential effects. The Agency Official shall consider any views concerning such effects which have been provided by consulting parties and the public.

(1) *Criteria of adverse effect.* An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

(2) *Examples of adverse effects.* Adverse effects on historic properties include, but are not limited to:

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access that is not consistent with the Secretary's Standards for the Treatment of Historic Properties and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

SECTION 4(f), TDOT SUMMARY SHEET

WHAT IS SECTION 4 (f)? Codified at 49 USC 303 and 23 USC 138, "Section 4 (f)" refers to a section of the U.S. Department of Transportation Act which gives special consideration to the use of park and recreation lands, wildlife and waterfowl refuges, and historic sites by Federally assisted transportation projects. Section 4 (f) applies only to those projects using funds from the U.S. Department of Transportation. The law states:

(c) The Secretary may approve a transportation program or project (other than any project for a park road or parkway under section 204 of title 23) requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if -

(1) *there is no prudent or feasible alternative to using that land; and*

(2) *the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.*

WHAT IS THE SECTION 4 (f) PROCESS FOR HISTORIC PROPERTIES? To be considered "historic," a property must either be listed in the National Register of Historic Places or be determined eligible for such listing by the Keeper of the Register or the State Historic Preservation Officer (SHPO).

On any project, the primary objective is to develop a design that does not have Section 4(f) involvement. If such a design is not possible, then the Section 4 (f) documentation is prepared and circulated. Such documentation is circulated to all appropriate agencies or groups (consistent with the Section 106 process and the National Environmental Policy Act), and as applicable, to the U.S. Department of the Interior, Housing and Urban Development, and Agriculture. It is also circulated to the agency having authority over the Section 4 (f) property. For historic properties, such agencies are the SHPO and the Advisory Council on Historic Preservation (ACHP). After review of any comments received, the final Section 4(f) documentation is sent to the Federal Highway Administration (FHWA) which determines if the requirements of the Section 4(f) statute are met. If the requirements are satisfied, then the FHWA will approve the use of the Section 4 (f) property.

HOW ARE SECTION 4 (f) AND SECTION 106 RELATED? Section 106 is a provision of the National Historic Preservation Act of 1966, which requires all federal agencies to consider the effects of their projects on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on those effects. The ACHP has promulgated regulations at 36 CFR 800 that describe the procedures that agencies must follow in order to comply with Section 106. Many of the Section 106 documentation requirements overlap the Section 4 (f) documentation requirements for historic properties. For this reason, for projects having a 4(f) use of a historic site, the documentation for Section 106 and Section 4 (f) is usually combined into one document and circulated to the appropriate groups described above. The consent of neither the SHPO nor the ACHP is necessary for FHWA to approve a Section 4 (f) use, but FHWA gives great consideration to comments from these agencies.

Appendix B Resumes of Document Preparers



Margaret Slater, AICP

Principal Environmental Planner/Historic Preservation Specialist

Areas of Expertise

Cultural Resources Surveys
NEPA/Environmental
Planning
Historic Preservation
Public and Agency Outreach
Transportation Planning

Years of Experience

With URS: 1.5 Years
With Other Firms:
27 Years

Education

MA/Historic
Preservation/1987/ Middle
Tennessee State University

BA/Art History-Historic
Preservation/1981/
Michigan State University,
Minor in Planning

Registration/ Certification

1988/American Institute of
Certified Planners

Overview

Ms. Slater has over 27 years of experience in planning, the National Environmental Policy Act (NEPA), historic preservation, public and agency outreach, and staff and project management. During her career, Margaret has provided planning and historic preservation services as an independent consultant and for various public agencies, such as the Tennessee Department of Transportation (TDOT) and Metro Nashville's Planning Commission and Housing and Development Authority. While at Metro Nashville Government, she worked in urban and community planning. Over the last 116 years at transportation planning consulting firms, she managed transportation-related NEPA documents in several eastern states and contributed to NEPA documents in numerous other eastern states, as well as Colorado, California, Oklahoma, and Texas. She has developed NEPA documents under the guidance of the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and Department of Agriculture U.S. Forest Service.

Margaret has also participated in special transportation studies, such as alternatives analyses. Her specialty is preparation of documentation and consultation required by the historic preservation laws. During numerous assignments, primarily in the eastern United States, she has conducted Section 4(f) analyses and prepared National Register nominations, historic resource surveys, historic context studies, cultural resource surveys and effects assessments, Memoranda of Agreement, and minimization/mitigations plans. She has implemented the public involvement requirements of Section 106 on a number of projects and has led NEPA and alternatives analyses public involvement efforts. In addition, Margaret has contributed articles on historic preservation and environmental planning to various publications.

Selected Cultural Resource Experience

Task Manager, US 45 Bypass Architectural/Historical Assessment, Jackson, TN for City of Jackson, 2011: The study involved development of a historic context, research, records check, review of a historic architectural resources report for a project at the southern project terminus, field work and survey of resources that were NRHP listed (e.g., Bemis Historic District) and those that had not been previously surveyed. Using mapping, photography, review of the NRHP



nominations for areas of significance, examination of historic photographs and review of the City's proposed land use plan, a report was prepared for TDOT review and subsequent SHPO concurrence.

Task Manager, I-69 SIU 7, Architectural/Historical Assessment for TDOT, 2003: In support of an EIS, led development of the assessment for this 45-mile long project, partly on existing alignment and partly on new location. The project resulted in an adverse effect to one property and an MOA and mitigation was developed, including a landscape plan to minimize visual impacts.

Task Manager, Corridor K Architectural/Historical Assessment for TDOT, On-going: Building on three previous studies of resources in the vicinity of the proposed project. In 2011, URS began work on an updated historic architectural survey report to reflect the revised Area of Potential Effect. The study involved relooking at listed and previously determined eligible resources, surveying resources that had not been previously surveyed and assessed for NRHP eligibility and applying the criteria of effect. The above involved looked at approximately 60 recreational resources that had not been previously surveyed and an in-depth visual impact assessment being undertaken as part of the Section 106 effects analysis.

Task Manager, Eastern Connector Architectural/Historical Assessment, Mount Juliet, Tennessee, City of Mt. Juliet, 2006-08: Led preparation of NEPA environmental assessment and prepared Section 106 analysis and oversaw subconsultant work on technical studies.

Task Manager, Albert Gallatin Avenue/Hatten Track Road Extension, Gallatin, TN Architectural/Historical Assessment for City of Gallatin, 2009 - 2011. Project included preparation of an architectural historical assessment. The SHPO concurred to the "no historic resources affected" recommendation.

Task Leader, Improvements to Franklin Road (SR 6), Brentwood, Tennessee, City of Brentwood, 2007-2008: Prepared Section 106 analysis and consulted with SHPO to obtain a "no adverse effect" determination to a NRHP listed property.

Project Manager, Rutherford County Chamber of Commerce Visitors Center NEPA and Historic Resource Assessment, Murfreesboro, Tennessee, City of Murfreesboro, 2008: Developed NEPA categorical exclusion and historic resource assessment report. Coordinated closely



with the SHPO and Stones River National Battlefield under Section 106 with regard to potential impacts to the national battlefield. Studies resulted in a Section 106 finding of no adverse effect.

Project Manager, Beale Street Landing Historic Preservation Analysis, Memphis, Tennessee, Memphis Riverfront Development Corporation, 2008: Developed Section 106 analysis and coordinated with the SHPO in regard to the proposed project's impacts to the historic riverfront in Memphis. The SHPO concurred with the Section 106 effects analysis and TDOT/FHWA concurred with the Section 4(f) analysis on this controversial project.

Task Manager, Desire Streetcar Line AA/DEIS, New Orleans, Louisiana, RTA, 2004-2005: Advised on Section 4(f) issues and assisted with the Section 106 effects assessment, SHPO coordination, Section 106 public involvement process, and the Draft EIS text for this project, which affects a National Historic Landmark and numerous other historic resources.

Task Manager, I-73 DEIS, Franklin County, Virginia, Virginia Department of Transportation, 2002: Prepared an analysis of whether Traditional Cultural Property and Rural Historic Landscape existed in the project area. This report refuted the findings of an independent contractor and was concurred with by the SHPO.

Project Manager, Manson Pike/I-24 Interchange Land Use Study, Murfreesboro, Tennessee, Tennessee Department of Transportation, 2002: Oversaw a land use study, prepared a Section 106 effects assessment, and carried out the Section 106 public involvement program for this controversial project near the Stones River National Battlefield. Also prepared Section 4(f) analysis.

Project Manager, Historic Bridge Context Study, Transportation Research Board—National Cooperative Highway Research Program, 2004-2005: Prepared a study for most common historic bridge types in the United States. The study was distributed to all state Departments of Transportation.

Project Manager, Small Structures Context Report, Maryland Department of Transportation, 2002-2003: Prepared a study to facilitate compliance with Section 106 in projects involving replacement/ renovation of roadway structures less than 20 feet in length. This innovative study is posted on State Highway Administration's website, and has been widely distributed.



JESSICA R. BURR

EDUCATION

B.A., Historic Preservation, Savannah College of Art and Design, 2008

PROFESSIONAL EXPERIENCE

2007–2010 National Park Service, Fort Pulaski Nat'l Monument, Historic Preservation Specialist and Maintenance

2010–2012 Federal Emergency Management Agency (FEMA), Historic Preservation Specialist

2012–Present TRC Solutions, Inc., Architectural Historian

SELECTED RECENT PROJECTS:

2012 TRC, Tennessee Department of Transportation Alcoa Local Interstate Connector, Blount County, Tennessee (Architectural Historian). Ms. Burr served as an architectural historian for the Phase I cultural resource survey for the proposed construction of an interstate connector, carrying out all necessary reporting and documentation.

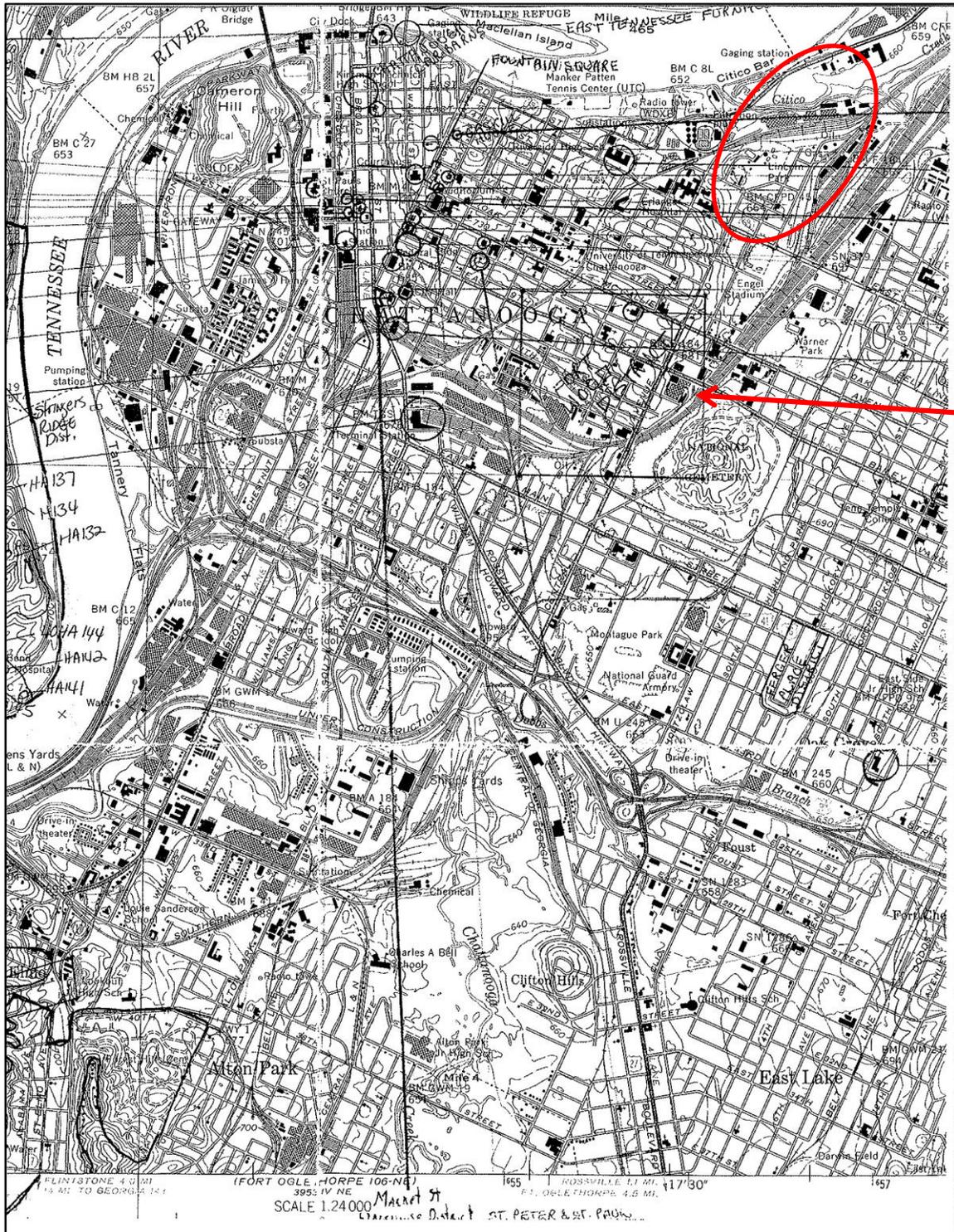
2012 TRC, Tennessee Valley Authority (TVA) Muscle Shoals Reservation, Historic American Building Survey (HABS) Level Documentation, Colbert County, Alabama (Architectural Historian). Ms. Burr assisted in the HABS level recordation of the TVA Muscle Shoals Reservation. The project was carried out to mitigate adverse effects to the property from planned demolition. In addition to field documentation, Ms. Burr was responsible for assisting in writing the historical context report.

2011 FEMA DR-1971-AL "2011 Alabama Tornados." Ms. Burr was tasked as Lead Historic Preservation Liaison to FEMA's Long Term Community Recovery (LTCR) Program to educate the public and private stake holders on identifying the local natural and cultural resources' needs and obstacles, the long term potential these resources could provide and the process of compliance if funding were to be granted from a federal agency.

2011 FEMA DR-1861-MS "Hurricane Katrina." In support of the Secondary Programmatic Agreement between FEMA and the MS SHPO, Ms. Burr conducted architectural surveys and research and used GIS Trimble units to conduct single, multiple and district nominations and to provide data for the construction of a GIS historic resources mapping program to be used by the MS SHPO and FEMA.

2010 FEMA DR-1909-TN "Nashville Floods." Ms. Burr was tasked as Lead Historic Preservation Specialist requiring the responsibility of management and consultation between FEMA Project Specialists, TN Division of Archaeology and the TN SHPO. In addition to this, over 25 Determination of Eligibility were written as required by Section 106 of the NHPA.

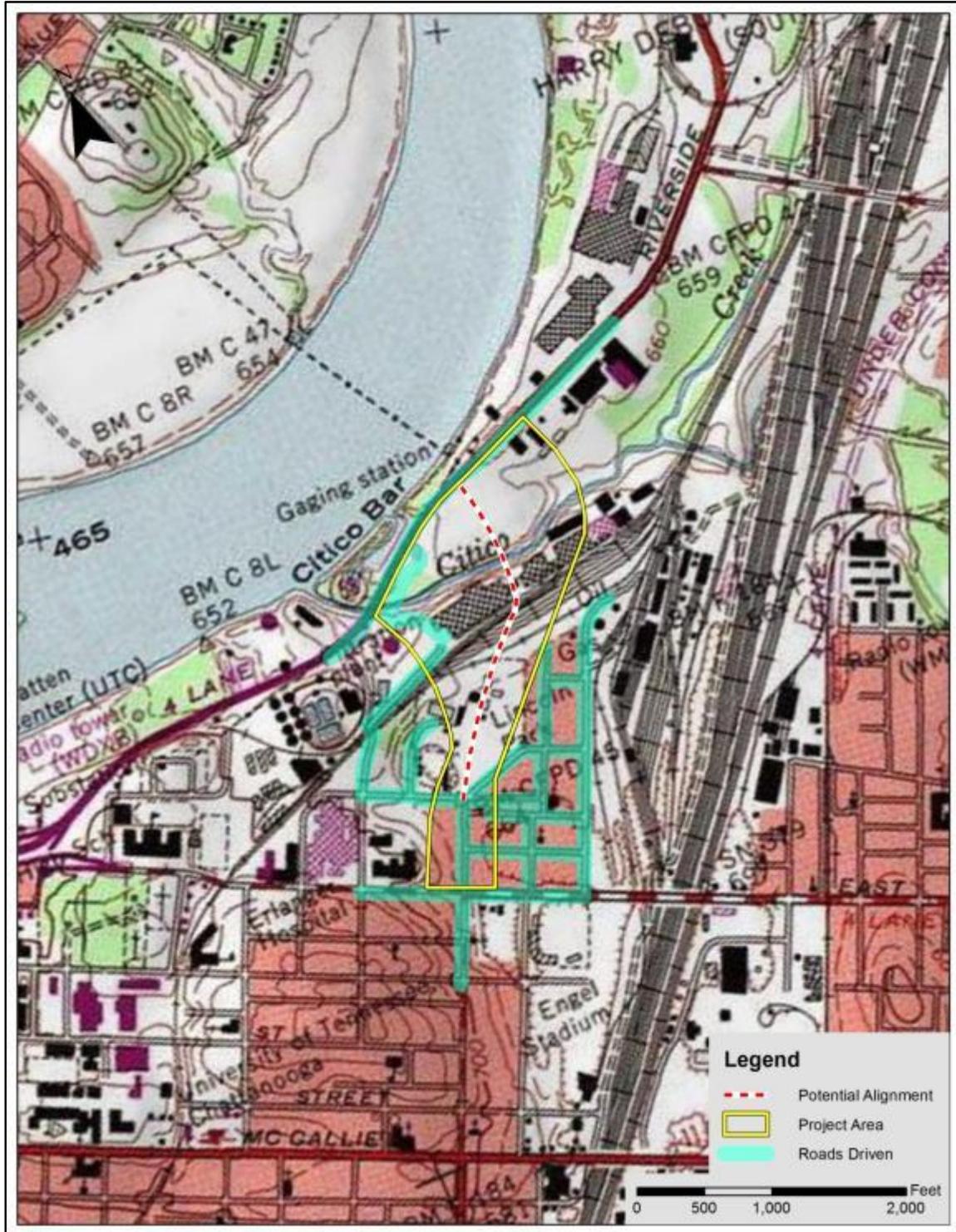
Appendix C THC Survey Map



Fort
Wood
H.D.

Chattanooga USGS Quadrangle, 105 SE.

Appendix D Roads Driven for Survey



Chattanooga USGS Quadrangle, 105 SE.

**Appendix E
Lincoln Park Aerials
1953, 1964, 1972**

