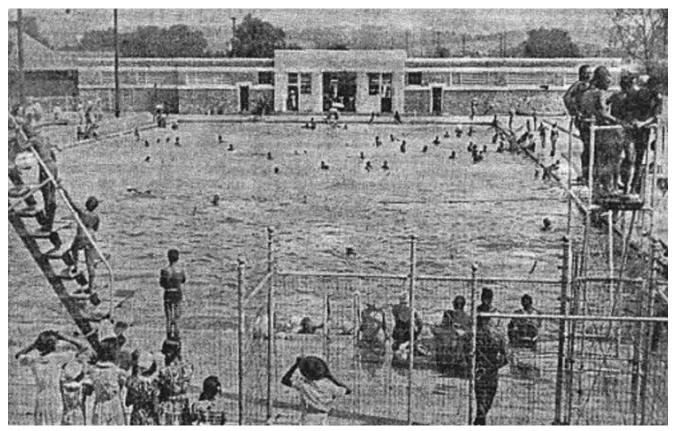
Assessment of Effects to Lincoln Park, Central Avenue Extension Project

Hamilton County, Tennessee







New South Associates, Inc.



Assessment of Effects to Lincoln Park, **Central Avenue Extension Project**

Hamilton County, Tennessee

TDOT PIN# 117216.00 **TDOT Region 2**

Report submitted to:

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MANAGEMENT SUMMARY

Under contract with Ragan-Smith Associates of Nashville, Tennessee, and on behalf of the City of Chattanooga, New South Associates, Inc. (New South) completed an assessment of effects (AOE) to the NRHP-eligible Lincoln Park from the proposed Central Avenue Extension project in Chattanooga in Hamilton County, Tennessee.

In 2017, the Keeper of the National Register determined Lincoln Park, a historic African American public park, eligible to the National Register of Historic Places (NRHP). The Keeper noted that while the entire park was significant under Criterion A for Social History and Recreation, only a portion retained sufficient integrity to convey that significance. The Keeper's office established a boundary that includes all remaining contributing resources. This boundary includes the original entrance pillar, two commemorative pillars, the baseball field, the tennis court, the concession stand, and remaining green space. A portion of the proposed Central Avenue Extension project will occur inside the NRHP boundary for Lincoln Park. Fieldwork for the AOE was conducted between April 30 and May 3, 2018.

The proposed project is being constructed in cooperation with the Tennessee Department of Transportation (TDOT) and Chattanooga Department of Transportation with funding from the Federal Highway Administration (FHWA). The project requires permitting through the FHWA and is subject to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended and under Section 4(f) of the Department of Transportation Act of 1966, as amended. New South followed all documentation, review, and compliance reporting standards for historic architecture surveys and Section 106 effect reports as specified in guidelines prepared by the Tennessee State Historic Preservation Office (TN-SHPO) and TDOT.

It is the opinion of New South that the proposed Central Avenue Extension project would have an Adverse Effect on the NRHP-eligible Lincoln Park and constitute a Section 4(f) use based on direct effects, as well as indirect and cumulative effects resulting from reasonable and foreseeable changes to the project area resulting from the project. Section 4(f) use of Lincoln Park would total approximately 1,137square meters of a total 19,174 square meters or 6 percent of the total acreage within the NRHP boundary based on Alternative K1.

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I. INTRODUCTION

New South Associates, Inc. (New South) completed an assessment of effects (AOE) to the NRHPeligible Lincoln Park from the proposed Central Avenue Extension project in Chattanooga in Hamilton County, Tennessee (Figures 1 and 2). This AOE was completed for Ragan-Smith Associates of Nashville, Tennessee, on behalf of the City of Chattanooga.

STATEMENT OF DETERMINATION

In 2017, Lincoln Park, a historic African American public park, was determined eligible to the National Register of Historic Places (NRHP) by the Keeper of the National Register (Appendix A). The Keeper determined that while the entire park was significant under Criterion A for Social History and Recreation, only a portion retained sufficient integrity to convey that significance. A boundary was established by the Keeper's office to include all remaining contributing resources. A portion of the proposed Central Avenue Extension project will occur inside the NRHP boundary for Lincoln Park.

The proposed project is being constructed in cooperation with the Tennessee Department of Transportation (TDOT) and Chattanooga Department of Transportation with funding from the Federal Highway Administration (FHWA). The project requires permitting through the FHWA and is subject to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended and under Section 4(f) of the Department of Transportation Act of 1966, as amended. New South followed all documentation, review, and compliance reporting standards for historic architecture surveys and Section 106 effect reports as specified in guidelines prepared by the Tennessee State Historic Preservation Office (TN-SHPO) and TDOT.

It is the opinion of New South that the proposed Central Avenue Extension project would have an Adverse Effect on the NRHP-eligible Lincoln Park and constitute a Section 4(f) use based on direct effects, as well as indirect and cumulative effects resulting from reasonable and foreseeable changes to the project area resulting from the project. Section 4(f) use of Lincoln Park would total approximately 1,137 square meters of a total 19,174 square meters or 6 percent of the total acreage within the NRHP boundary based on Alternative K1.

Figure 1. Project Location Map, Central Avenue Extension, Chattanooga, Hamilton County





NRHP-Eligible Lincoln Park Showing Contributing Resources

PROJECT DESCRIPTION

The following sections (project description, need and purpose, and public involvement) are quoted from the National Environmental Policy Act (NEPA) Enhanced D-List Categorical Exclusion Document prepared by AECOM for Ragan-Smith dated May 2, 2017.

The proposed project is located in Chattanooga, Tennessee, approximately 1.5 miles due east of downtown. The project would extend Central Avenue approximately 0.49 miles from East 3rd Street to Riverside Drive. It would also extend Wiehl Street approximately 0.19 miles from Blackford Street to the proposed Central Avenue.

The study area is located between the Erlanger Health System campus and Riverside Drive and is generally bound by the Tennessee River to the north, the Erlanger Health System campus to the west, Blackford Street and East 3rd Street to the south and the Norfolk Southern Railroad Yard to the east. Land uses in the study area include the medical facilities associated with Erlanger Health System, an industrial complex just south of Riverside Drive including the Tennessee American Water Treatment Facility and the Lincoln Park neighborhood, a single-family residential neighborhood.

EXISTING CONDITIONS

Central Avenue is a minor arterial from East 23rd Street to East 3rd Street where the project begins. North of East 3rd Street Central Avenue is a local road with five lanes that run along the southwest side of the Erlanger Health System campus and terminates at the five-points intersection with Blackford Street and Cleveland Street. Central Avenue currently has one northbound lane across East 3rd Street and two southbound lanes. To the east is the residential neighborhood of Lincoln Park. To the west and north is the Erlanger Health System campus. North of Erlanger Health System is the western end of the Norfolk Southern (NS) railyard. There are currently no rails, but NS has plans to redevelop this property. North of the NS property is where the Cumberland Corporation buildings once stood alongside Citico Creek. North of the creek is Riverside Drive where the project would end.

PROPOSED PROJECT

The proposed typical section for this local road is two 11-foot lanes with curb and gutter. A landscaped buffer is proposed behind each curb with a five-foot sidewalk along the southbound lane and a 12-foot shared use path along the northbound lane. The buffer would include plantings, street trees and pedestrian scale lighting. The proposed design speed is 25 mph.

The project would begin at the intersection of Central Avenue and East 3rd Street and continue along existing Central Avenue to Blackford Street, then continue northward to the new location along the existing driveway into the Erlanger Health System property. The alignment would remain to the east of the Erlanger Health System recreational area. Approaching the north end of the hospital property, an underpass with retaining walls and a new railroad bridge over Central Avenue Extension is proposed under the NS property. Continuing north, the alignment would curve to the west to avoid the Cumberland Corporation building (now demolished) and then cross over Citico Creek on a proposed bridge before tying into Riverside Drive where the existing driveway into the Chattanooga Rowing Center is located. A new traffic signal is proposed at this location.

The project would also include extending and widening Wiehl Street from Blackford Street to intersect the proposed Central Avenue extension just south of the proposed underpass. The proposed typical section for Wiehl Street is two 11-foot lanes with curb and gutter on both sides and a five-foot sidewalk along the westbound lane.

Blackford Street and Cleveland Street would tie to Central Avenue Extension and remain at their current widths. No improvements are proposed on these streets beyond the intersection. The existing driveways on the northern end of the project would be reconnected to maintain access to properties on both sides, including the Chattanooga Rowing Center and Tennessee American Water. Sidewalks are proposed along the western driveway to improve non-motorized access to the Tennessee River Walk.

The Central Avenue Extension typical section would narrow through the underpass and over the bridge with no landscaped buffer. The sidewalk and shared use path would run directly behind the curb. On street parking with landscape bump-outs are proposed along the Central Avenue Extension between Blackford Street and Wiehl Street adjacent to the Erlanger Health System recreational area.

This proposed extension has been a part of multiple transportation planning studies to improve access to Erlanger Hospital and the University of Tennessee, Chattanooga while reducing congestion on roads within the study area. The project has been included in the 2030 and 2035 Long Range Transportation Plans (LRTP) for Chattanooga-Hamilton County/North Georgia Transportation Planning Organization (TPO). The Central Avenue extension was listed in the TPO's 2035 LRTP as a Tier I priority in the 2015 horizon year. By incorporating the Central Avenue Subarea Plan, the LRTP states the Central Avenue extension would:

- alleviate congestion on East 4th Street, East 3rd Street, around UTC and Chattanooga School of the Arts and Sciences (CSAS), Mabel St. Interchange and Holtzclaw Avenue;
- reduce response time for emergency vehicles;
- improve access to the UTC campus, which is a major trip generator; and
- improve the Fortwood community with this direct connection to Riverside Drive.

The previous studies and plans assume the project will have a typical section consisting of five lanes, curb and gutter with sidewalks. During the NEPA process, stakeholder and public input requested a reduced typical section for the project. In 2013, the City of Chattanooga updated 2030 design year volumes. These were reviewed for this smaller typical section, and it was determined that two lanes could still provide the capacity needed as well as an acceptable level of service at the signalized intersections with the turn lanes proposed. The transportation planning studies are included in Appendix K of the NEPA Documentation.

PURPOSE AND NEED

The purpose of the proposed project is to improve mobility and roadway system linkage between Riverside Drive and East 3rd Street in Chattanooga with a transportation solution that meets current minor arterial design standards while minimizing impacts to the human and natural environment. The current westbound route options from Riverside Drive to the Erlanger Health System campus are non-direct routes with numerous intersections and traffic signals. The proposed project would improve access from a principal arterial route (Riverside Drive) to the Erlanger Health System campus without having to travel through neighborhoods and local, non-direct streets.

As proposed the project would:

- improve roadway system linkage between East 3rd Street and Riverside Drive;
- increase access and improve response times for emergency vehicles;
- accommodate growth and relieve current and anticipated traffic volumes on the existing street network;
- ensure consistency with metropolitan and regional transportation plans; and
- increase recreation opportunities through intermodal connectivity to an existing network of sidewalks and bike lanes along the Tennessee River.

PUBLIC INVOLVEMENT PRIOR TO AOE

Given the potential for a high level of interest in the project, a robust public involvement program was designed and implemented for the Central Avenue Extension project. Objectives of the program were to inform project stakeholders about the proposed project and to allow multiple opportunities for stakeholders to provide input. The City plans to hold another meeting prior to construction of the project.

Since the beginning of project planning, four public meetings and two neighborhood meetings were held to discuss the Central Avenue Extension Project. The meetings occurred on the following dates: 02/19/2013, 10/29/2013, 03/12/2014, 06/11/2014, 09/02/2014 and 08/11/2016. Meetings held in 2013 and 2014 provided information on the purpose and need of the project, alignments considered, and typical sections, as well as historic and cultural resources. The meeting held on 08/11/2016 presented project updates and the findings of the environmental technical studies. Opportunities for public comment were made available at the meetings and by comment forms outside of the meetings. Outreach for the meetings included door hangers in the Lincoln Park neighborhood and public notices in the *Chattanooga Courier* (a local newspaper that serves the African American community) and *Chattanooga Times Free Press*. A record of project public involvement activities including public notices for the 03/12/2014, 09/02/2014, and 08/11/2016 meetings, presentation materials, meeting summaries, sign-in sheets, and public comments are provided in Appendix A [of the NEPA document].

General comments/concerns received during the project planning are summarized as follows:

- scale of the project being too big wide lanes, high speeds;
- potential impacts to neighborhoods;
- traffic volumes truck and car;
- safety for pedestrians and bicyclists;
- loss of greenspace;
- disagreement with the historic resource assessment; and
- concern about Native American and archaeological resources.

Former Lincoln Park, which is now owned by Erlanger Health System, is a prominent concern for citizens. The Lincoln Park Neighborhood Association and other citizens view the property as a vital, historic community resource. During the environmental review, a historic/architectural assessment was conducted for this property. Lincoln Park and the Lincoln Park Neighborhood were found not to be NRHP-eligible due to loss of historic features and significant alterations.

Additional information is available in the Section 106 of the National Historic Preservation Act of 1966 section of [the NEPA CE].

Members of the public, including the Lincoln Park Neighborhood Association and Lincoln Park residents, disagreed with the results of the historic resources assessment. They consider the former Lincoln Park and the surrounding residential area as important resources to the history of their community.

In May 2013, the Coalition to Save Lincoln Park, a group of concerned individuals and neighborhood associations led by the Lincoln Park Neighborhood Association, made a formal complaint and request to deny the allocation of Federal highway dollars to the City of Chattanooga for the proposed project to the Chattanooga-Hamilton County/North Georgia TPO Executive Board. The reasons for the complaint were listed as follows:

- Sponsoring Entity (City of Chattanooga) failed to meaningfully include and exhibited pattern of purposeful exclusion against the most directly impacted community in the planning and decision-making process.
- Sponsoring Entity argued against historic status of directly impacted site during NEPA phase and did not consider the site's cultural significance in the African American community.
- Title VI of the Civil Rights Act of 1964 specifically prohibits the use of Federal funds that in any way promotes racial discrimination.
- Alternate routes could produce similar results accomplished by the Central Avenue extension.
- The City's plans for the extension came prior to the Third Street Corridor Study as proposed by the Regional Planning Agency.
- The City's plans for the extension completely disregard the current plans by the Lincoln Park Neighborhood Association towards community renewal.

In October 2014, the Lincoln Park Neighborhood Association filed a Title VI Civil Rights Act Discrimination and Retaliation complaint with the Tennessee Human Rights Commission against the City of Chattanooga. The complaint contended that the community was excluded from the project decision-making process and was not afforded opportunities for meaningful involvement in project planning, thereby constituting a pattern of discrimination on the part of the City of Chattanooga.

On 04/02/2015, the Tennessee Human Rights Commission notified the Lincoln Park Neighborhood Association that a determination could not be made at that time, but that the NEPA documentation would be reviewed when submitted.

In an email dated 03/30/2017, the TDOT Civil Rights Division stated that after reviewing the draft NEPA document and related materials with the Tennessee Human Rights Commission, they "agreed the actions and steps taken on the Central Avenue Extension, TN- PIN 117216.00, were performed in accordance with NEPA rules and regulations, EO 12989, and all applicable federal and state mandates." Record of the complaint and TDOT Civil Rights and the Tennessee Human Rights Commission coordination is included in Attachment 4.

As a result of comments received after the first public meeting, and subsequently throughout the project planning and development process, several changes were made to the project design concept for the Central Avenue Extension project. Also, as a result of public comment, additional coordination and stakeholder engagement was implemented to address the prominent issues that were raised and to provide multiple opportunities for public participation and involvement in the decision-making process.

The following actions were taken as result:

- The typical section was reduced from four to two lanes.
- To enhance safety and discourage truck traffic, the proposed posted speed limit was revised to 25 mph.
- The existing recreational features of the former park are avoided by the preferred alignment.
- The widening and extension of Wiehl Street from Blackford Street to a likely roundabout at the Central Avenue intersection was proposed.
- Street lighting and pedestrian accommodations have been added to the proposed project to increased safety.
- Streetscape elements were added to the proposed project to enhance aesthetics of the impacted area.

The City agreed that as a separate project from the Central Avenue Extension, the City would acquire a portion of the former park from Erlanger Health System and work with the community to redevelop Lincoln Park. While park planning with the community has begun, acquisition of land for the park would not occur until after land for the Central Avenue Project has been acquired.

Interested citizens and groups were provided an opportunity to participate in the Section 106 consultation process as documented under the Section 106 section of this D-List Categorical Exclusion and in the corresponding attachments and appendices.

AREA OF POTENTIAL EFFFECTS

The Area of Potential Effects (APE) for this project includes the NRHP-eligible boundary of Lincoln Park as well as the viewshed, looking from and towards historic Lincoln Park. The APE boundary was defined through consultation with TDOT and the TN-SHPO (see Figure 2). Although the AOE includes the entirety of the NRHP-eligible boundary for Lincoln Park, this AOE does not consider direct effects to any other eligible or potentially eligible historic resources in the larger project AOE other than Lincoln Park, as it exists as a historic twentieth-century recreational resource. It does however consider trends that are occurring in the adjacent Lincoln Park neighborhood, which is inexorably linked to the history of the park, in the analysis of indirect and cumulative effects that may occur based on project implementation.

As the AOE considers only the twentieth-century history of Lincoln Park, it does not include an assessment of belowground archaeological resources that may be present in Lincoln Park.

PROJECT REPORTING

Mary Beth Reed, Director of History, served as Project Manager and Julie Coco, Associate Director of History, completed the fieldwork, research, outreach, and reporting for this project. Graphics were produced by Qi (Lizzie) Yeung and Jennifer Wilson edited the report.

This report describes the objectives, methods, and results of this AOE, and is organized into five chapters, including this introduction. Chapter II presents a brief summary of the historical significance of Lincoln Park. The methods are presented in Chapter III, while results are provided in Chapter IV. Chapter V presents the summary and recommendations. All cited references are provided at the end of this report. Appendix A contains the Determination of Eligibility Letter provided by the Keeper of the NRHP.

II. LINCOLN PARK

HISTORIC OVERVIEW

The history of Lincoln Park is summarized in a number of previous reports completed for or in response to this project. First is the Historical/Architectural Resources Assessment for the Proposed Extension of Central Avenue from East 3rd Street to Riverside Drive, Chattanooga, Hamilton County, TN (Slater and Burr 2016). This survey report was prepared by Margaret Slater, URS, and Jessica Burr, TRC and was finalized/Revised in October 2016. Two additional documents were utilized: a NRHP Determination of Eligibility for Lincoln Park submitted by Tammy Sellers of TDOT on behalf of FHWA, and Sarah Calise's report filed with the Middle Tennessee State University (MTSU) Center for Historic Preservation titled Research Report: Lincoln Park in Chattanooga Tennessee (Calise 2015; Sellers 2017). These reports along with the Determination of Eligibility Notification from the Keeper's Office of the National Park Service (NPS) (Appendix A) provided the necessary context for understanding the historical significance of Lincoln Park to the social and recreational history of Chattanooga's African American population.

Lincoln Park was created as Chattanooga's first segregated African American park in 1918. As local African American residents were barred from using the city's premier park, Warner Park, Lincoln Park grew to be a major attraction not only for Chattanooga's African American residents, but from visitors from all over the South. In addition to the local community, busloads of tourists would visit to use the Olympic-size pool opened in 1937, watch a Negro league baseball game on a rare lighted field, roller skate, play tennis, ride a carousel, go to a zoo, or have picnics with family, neighbors, and coworkers. Wylma McGhee Reid rose to be Chattanooga's first National Championship player playing on Lincoln Park's tennis court and Satchel Paige and Jackie Robinson played on Lincoln Park's baseball field (Figure 3) (Calise 2015; Sellers 2017).

NRHP EVALUATION

Lincoln Park was determined eligible for the National Register by the Keeper of the NRHP (Appendix A). Citing its importance to the local African American community from its creation in 1918 through the recent past, the Determination of Eligibility (DOE) emphasized the following:

Its significance lies in its history as a product of *dejure* and *defacto* segregation in the city. As THE [emphasis original] official location for recreational activities in Chattanooga, Lincoln Park served not only as a place to play, but as a symbol of pride for the African American community during a time when other facilities were denied to them. Places like Lincoln Park are places that disenfranchised communities can claim unto themselves and continue to serve as touchstones to a past that is at once both proud and painful. The remnant of the Park is significant in the areas of Recreation/Culture and Social History. Its association with *dejure* segregation practices in Chattanooga, where it served as the colored park, is less evident in its physical characteristics but the integrity of association, feeling, setting, and design are strong (see Appendix A).

CONTRIBUTING FEATURES

As discussed in the Determination of Eligibility (Appendix A), the following are contributing features to the NRHP-eligible Lincoln Park. The NRHP boundary is shown in Figures 1 and 2.

Original Entrance Pillar at former park road and Blackford Street – This pillar is located at the original entrance to the park and it remains in its original location. Attachments for the original white metal gate can be seen on the east side. Visitors entered the park through this gate and its pillar mate, which is no longer extant (Figure 4).

<u>Commemorative Pillar along Cleveland Avenue</u> – This pillar was added later to commemorate the historic park and serve as a symbolic entrance (Figure 4).

<u>Commemorative on the point at Cleveland Avenue and Blackford Street</u> – This pillar was added later to commemorate the historic park and serve as symbolic entrance to the park and to the Lincoln Park neighborhood (Figure 4).

<u>Baseball Field</u> – The field is located in an original location and is still a contributing element even though the original bleachers and lights were removed (Figure 5).

<u>Concession Stand</u> – The historic period concession stand served spectators at the baseball games (Figure 5).

<u>Green Space</u> – Sidewalks are located along the park edges as well as the green space and mature trees in the area along Cleveland Avenue. This area contains recently added tables with benches and grills (Figure 6).

Tennis Court – The tennis court has been resurfaced but remains in its original location (Figure 7).

DRAFT REPORT

Figure 3. Historic Lincoln Park



A. The Olympic-Sized Swimming Pool at Lincoln Park in the 1950s



B. The Lincoln Center Building in 1946.

Figure 4. Photographs of Original Entrance Pillar and Commemorative Entry Pillars





A. Original Entrance Pillar at Corner B. Commemorative Pillar on Cleveland Avenue. of Blackford and Central.



C. Commemorative Pillar on Blackford Street and Cleveland Avenue.

Figure 5. Photographs of Baseball Field and Concession Stand



A. Lincoln Park Baseball Field.



B. Lincoln Park Concession Stand.

Figure 6. Photographs of Green Space in Lincoln Park



A. Lincoln Park Picnic Tables.



B. Green Space near Lincoln Park Neighborhood.

Figure 7. Photographs of Tennis Courts



A. Lincoln Park Tennis Courts.



B. Lincoln Park Tennis Courts (Currently Erlanger Parking).

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III. METHODS

BACKGROUND RESEARCH

As the scope of work for this project did not include any further historical research on Lincoln Park, research efforts were concentrated on understanding the possible effects to the historic Lincoln Park based on the Central Avenue Extension project. Research included reviewing all relevant documentation covering compliance with Section 106 of the NHPA, as well as the documentation associated with compliance with NEPA. Research was completed online and in Chattanooga to determine the potential indirect and cumulative effects on the Central Avenue Extension project on Lincoln Park.

FIELD METHODS

Fieldwork for this project consisted of pedestrian survey of Lincoln Park, as well as driving and pedestrian reconnaissance of the Lincoln Park neighborhood, Erlanger Campus, the University of Tennessee Chattanooga, Central Avenue towards I-24, and Riverside Drive, Riverfront Parkway, and Amnicola Highway. Photographs were taken throughout Lincoln Park with an emphasis on the intersection of the park and its contributing resources with the Central Avenue Extension APE. Photography was completed in the late afternoon in order to photograph the park with fewer cars parked along the park road, parking lot, and tennis court. Fieldwork for the AOE was conducted between April 30 and May 3, 2018.

CONSULTATION

While in Chattanooga, Historian Julie Coco met in person with numerous individuals from the Coalition to Preserve Lincoln Park and Citico (Coalition), as well as members of the Lincoln Park Neighborhood Association. Ms. Coco also interviewed other individuals who asked to be contacted or were recommended during another interview to understand how changes from the project may affect the historic park.

CRITERION OF ADVERSE EFFECT

Regulations codified in 36 CFR 800 require federal agencies to take into account the effect of their agency's undertakings on historic properties. The regulations used for assessing effects are outlined in 36 CFR 800 "Protection of Historic Properties." The Criterion of Adverse Effect under 36 CFR 800 is applied below to Lincoln Park.

An adverse effect is described in 36 CFR 800.5 as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, 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 reasonable foreseeable effects by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

IV. ASSESSMENT OF EFFECTS

A finding of **Adverse Effect** is recommended for Lincoln Park. In the area of the Lincoln Park, project implementation would consist of a two-lane road with 11-foot lanes with curb and gutter (Figures 8-10). A landscaped buffer is proposed behind each curb with a five-foot sidewalk along one side and a 12-foot shared use path along the other side. In alternates K1-K3 these are on differing sides of the roadway. The buffer would include plantings, street trees and pedestrian-scale lighting. Signalization would be added at the five-way intersection of Central Avenue, Cleveland Avenue, Blackford Street under the K2 and K3 alternatives and ADA, ramps, crosswalks, and crosswalks signals are proposed at the intersection across the west side of Blackford Street, the south side of Central Avenue, and across Cleveland Avenue. An additional crosswalk is planned without signals across the proposed Central Avenue extension near the northern end of Lincoln Park. Sewer line improvements will also be completed under the existing and proposed roadway along Central Avenue and the extension, within the slope limits (cut and fill limits) of the project. The proposed design speed is 25 mph. Alternatives K1, K2, and K3 are described individually with Figures 8-10, respectively, in the following section.

The proposed Central Avenue Extension bisects the original full extent of Lincoln Park, which spanned 13 acres on both sides of the former park road. Today, the portion of historic Lincoln Park that retains sufficient integrity to convey its historic significance is located fully east of the former park road. While the original bath house and swimming pool remain to the west of the road, they have undergone significant loss of integrity in their historic materials, workmanship, design, setting, and feeling. The area of direct effects lies in close proximity or adjacent to the entirety of the eastern boundary of the NRHP-eligible portion of Lincoln Park.

Lincoln Park has been determined eligible for the NRHP due to its historical significance under Criterion A for Social History and Recreation/Culture for the city's African American population. It is the opinion of New South that the proposed project would diminish the integrity of the historic property's location, design, setting, materials, workmanship, feeling, or association, through direct adverse effects in Alternatives K1 and K3, as well as indirect and cumulative effects for all three alternatives. Therefore, the proposed project would have an adverse effect to Lincoln Park under this criterion. It is also the opinion of New South that the proposed project would have a Section 4(f) use of the NRHP-eligible Lincoln Park. A Section 4(f) evaluation will be completed in a separate report.

ALTERNATIVE K1

Alternative K1 represents the alignment presented at the beginning of this AOE effort (Figure 8). This layout was shared during discussions with consulting parties during fieldwork in early May 2018. This alignment reflects incorporation of many early community concerns, particularly with regard to the scale of the road. Like the other alignments K2 and K3, K1 is single-lane road with 11-foot lanes and curb and gutters.

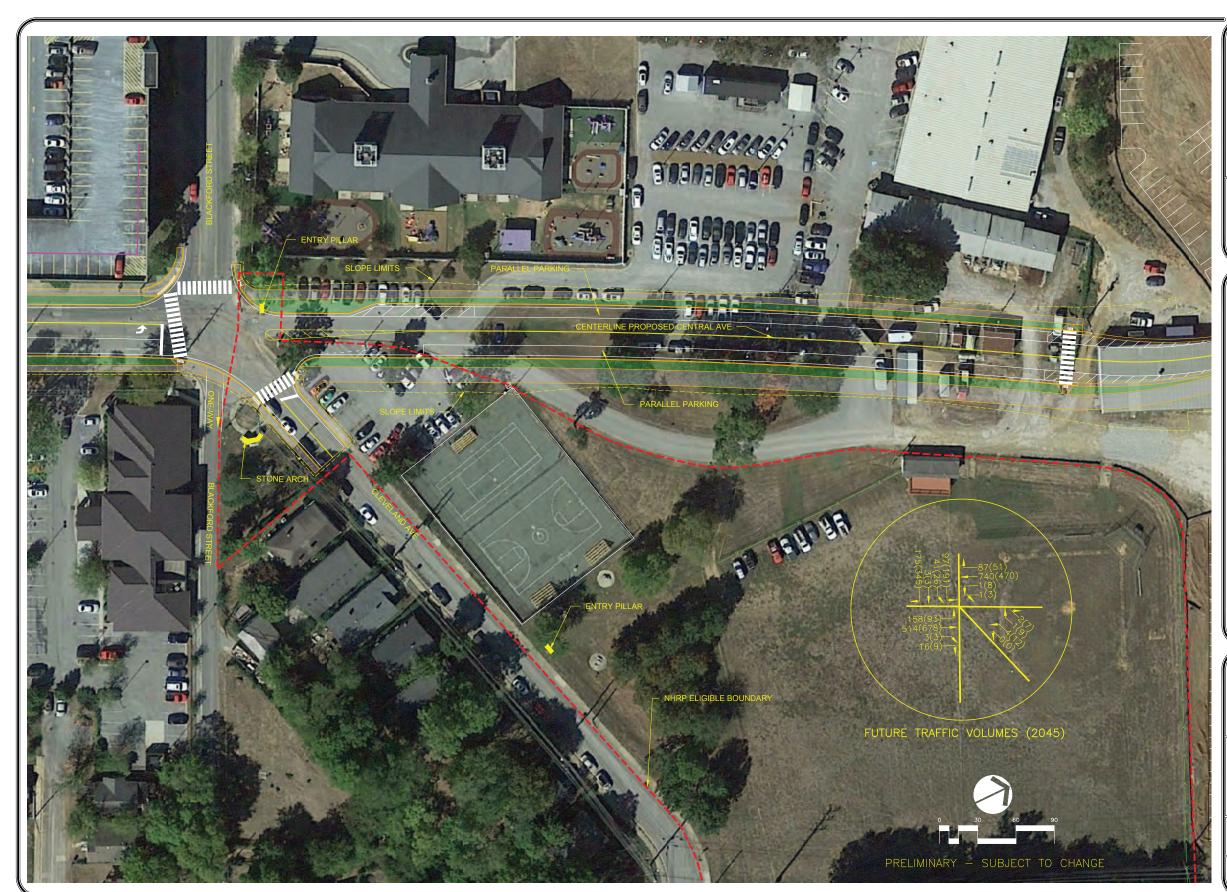
Parallel parking spaces line both sides of the road, beginning around the tennis courts and extending much of the length of the park. These spaces would seem to provide parking for approximately 30-35 cars.

On the west side of the proposed Central Avenue extension, a five-foot wide sidewalk extends from the intersection of Central Avenue and Blackford Street parallel to the proposed Central Avenue extension. It begins at the corner on the west side of the existing original entrance pillar. The sidewalk is separated from the proposed road by a grass strip that varies in width from about 10-foot wide near the intersection with Blackford Street, tapering down to approximately 4-5 feet for most of the length of the proposed road parallel to Lincoln Park. On the east side of the proposed road, an approximately six-foot wide grass strip with landscaping separates the proposed road from the 12-foot wide multiuse path, which extends past Lincoln Park.

Slope limits on the west side of the proposed road run alongside the proposed sidewalk. On the east side of the proposed road, the slope limits run close to the outer edge of the multi-use path except on the southern end between just north of the tennis court to Cleveland Avenue. In the area of the northwest corner of the tennis courts, the slope limits infringe on the northwest corner of the tennis courts.

Alternative K1 does not include signalization at the Blackford Street, Cleveland Avenue, and Central Avenue intersection and it does not include a right turn lane south bound from Central Avenue to Blackford Street. All the alignments involve changing Blackford Street at its intersection with Central Avenue to a one-way street eastbound.

Like Alternatives K2 and K3, Alternative K1 includes crosswalks across the proposed road near the Lincoln Park ball field, across Blackford Street on the west side of the intersection and across the south side of Central Avenue at the intersection.



CENTRAL AVENUE EXTENSION OF CHATTANOOGA

CITY

CENTRAL AVENUE LINCOLN PARK AREA

K1

Figure 8. Alternative K1 Layout

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ALTERNATIVE K2

Alternative K2 represents a revised alignment created after discussion with New South Associates' after their fieldwork for this AOE (Figure 9). This alignment reflects the concerns with impacts to the original entry pillar in Alternative K1 as well as discussions on keeping a "parklike appearance" as much as possible on the east side of the proposed road. Dr. Richard Brown, Executive Vice Chancellor for Finance and Administration at the University of Tennessee Chattanooga, who had been recommended to New South by the Coalition suggested switching the wider mixed-use path to the west side of the proposed road and retaining the sidewalk with an additional landscaping on the eastern, Lincoln Park, side of the proposed road. This option is presented as an alternative in both K2 and K3. Like K1 and K3, K2 is single-lane road with 11-foot lanes and curb and gutters.

For K2, parallel parking spaces line both sides of the road, beginning around the tennis courts and extending much of the length of the park. These spaces would seem to provide parking for approximately 30-35 cars.

As mentioned above, one difference between K1 and K2 and K3 is that the sidewalk and multiuse path are on different sides of the proposed road. For K2, on the west side of the proposed Central Avenue extension, an approximately six-foot wide grass strip with landscaping separates the proposed road from the 12-foot wide multiuse path, from a point directly across from the northwest corner of the tennis court along the full length of the western side near Lincoln Park. Along the section of the multiuse trail from the point opposite the northwest corner of the tennis court extending to the south, at the intersection of Central Avenue extension and Blackford Street, this grass strip widens to a maximum of approximately 15 feet. The original entrance pillar lies within this wide grassy area, with a slightly larger buffer between the pillar and traffic that exists today, allowing the pillar to remain in place. This is accomplished by shifting the proposed road at its intersection with Blackford to the southeast, changing the alignment at the intersection.

On the east side of the proposed road, the five-foot wide sidewalk, flanked on both sides by approximately five-foot wide grass landscaped strips, extends from the intersection of Central Avenue and Cleveland Street to almost the northern boundary of Lincoln Park.

Slope limits on the west side of the proposed road runs alongside the proposed multiuse path. On the east side of the proposed road, the slope limits run close to the outer edge of the approximately six-foot grass strip east of the sidewalk. In the area of the northwest corner of the tennis courts, work on the sewer lines necessitates work in close proximity to the corner of the tennis courts.

Alternative K2 differs from K1 in that it does include signalization at the Blackford Street, Cleveland Avenue, and Central Avenue intersection. Traffic signals poles with mast arms would be placed: (1) on the corner of Blackford Street and the proposed road; (2) near the terminus of Cleveland Street; (3) on the southeast corner of the intersection with Central Avenue and Blackford Street; and (4) on the southwest corner of Blackford and Central near the parking garage.

Unlike K3, K2 and K1 do not include a right turn lane south bound from Central Avenue to Blackford Street. All the alignments involve changing Blackford Street at its intersection with Central Avenue to a one-way street eastbound.

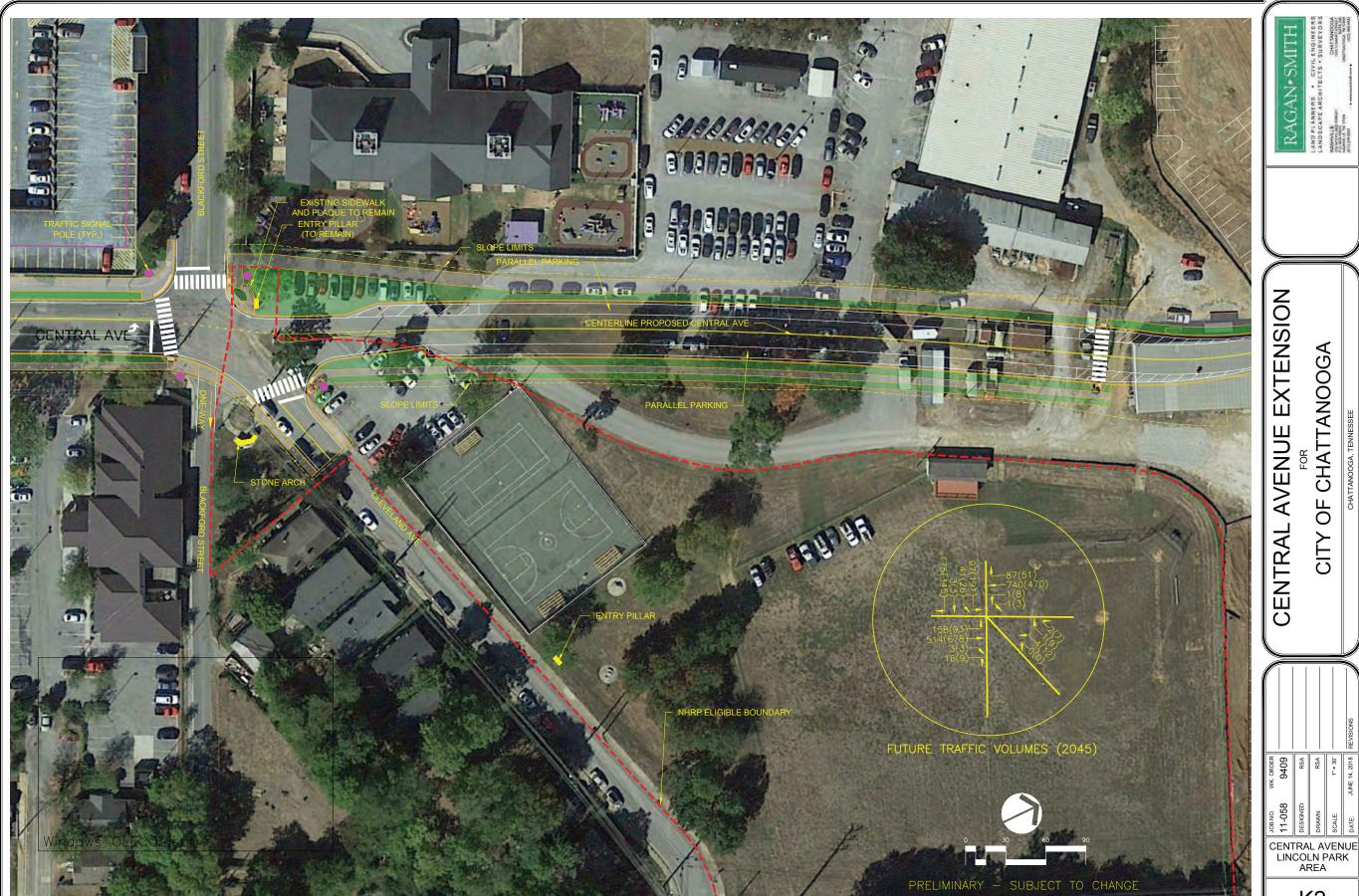
Like Alternatives K1 and K3, Alternative K2 includes crosswalks across the proposed road near the Lincoln Park ball field, across Blackford Street on the west side of the intersection and across the south side of Central Avenue at the intersection.

A note on the K2 alignment by Ragan-Smith notes:

The design alternative presented in this exhibit is preliminary in nature and subject to change. The alternative has been developed to assist in further Section 106 consultation related to an "Avoidance Alternative" to the portion of Lincoln Park determined to be eligible for inclusion in the National Register of Historic Places."

Design alternatives that will need to be further evaluated if the avoidance alternative is chosen include, but are not limited to, the following:

- Entry Pillar near daycare center is in the clear zone.
- Entry pillar has the potential to be impacted by large turning vehicles.
- In attempts to avoid the pillar near the day care center, the roadway geometry for north-south is designed per industry minimums. There are safety concerns related to southbound through vehicles, natural path natural path versus northbound left turners at Blackford Street intersection.
- Traffic analysis indicates a southbound right turn lane is warranted on Central Avenue [southbound] approaching Blackford Street.
- Utility construction
- Roadway drainage (storm sewer/stormwater) design
- Constructability
- TDOT review/approval
 - o OA Review
 - Design Exceptions



K2

CENTRAL AVENUE EXTENSION CITY OF CHATTANOOGA

Figure 9. Alternative K2 Layout

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ALTERNATIVE K3

Alternative K3 represents an alignment that seeks to preserve the "park-like" setting immediately adjacent to the proposed road while at the same time allowing for an alignment at the intersection of Cleveland Avenue, Central Avenue, and Blackford Street that addresses the concerns noted by Ragan Smith on the K2 layout (Figure 10). In this alignment, like K2, the wider mixed use path remains on the west side of the proposed road and the sidewalk with an additional landscaping on the east, Lincoln Park, side of the proposed road. As in all alternatives the proposed road is single-lane with 11-foot lanes and curb and gutters.

For K3, parallel parking spaces line both sides of the road, beginning around the tennis courts and extending much of the length of the park. These spaces would seem to provide parking for approximately 30-35 cars.

The major difference in Alternative K3 is that the location of the original entry pillar lies totally within the proposed path of the road and would need to be removed/relocated. K3 addresses the design concerns noted about the K2 avoidance alignment for the proposed road at the intersection, as well as the traffic analysis that noted a southbound right turn lane is warranted.

K3 includes a right turn lane southbound on the proposed road to Blackford Street westbound. On the west side of the proposed Central Avenue extension, an approximately six-foot wide grass strip with landscaping separates the proposed road from the 12-foot wide multiuse path. This strip is somewhat wider for a short section between the end of the parallel parking and the start of the right turn lane. On the east side of the proposed road, the five-foot wide sidewalk, flanked on both sides by approximately five-foot wide grass landscaped strips, extends from the intersection of Central Avenue and Cleveland Street to almost the northern boundary of Lincoln Park.

Slope limits on the west side of the proposed road run alongside the proposed multiuse path. On the east side of the proposed road, the slope limits run close to the outer edge of the approximately six-foot grass strip east of the sidewalk. In the area of the northwest corner of the tennis courts, work on the sewer lines necessitates work in close proximity to the corner of the tennis courts.

Alternative K3, like K2, does include signalization at the Blackford Street, Cleveland Avenue, Central Avenue intersection. Traffic signals poles with mast arms would be placed: (1) on the corner of Blackford Street and the proposed road; (2) near the terminus of Cleveland Street; (3) on the southeast corner of the intersection with Central Avenue and Blackford Street; and (4) on the southwest corner of Blackford and Central near the parking garage.

All the alignments involve changing Blackford Street at its intersection with Central Avenue to a one-way street eastbound.

Like Alternatives K1 and K2, Alternative K3 includes crosswalks across the proposed road near the Lincoln Park ball field, across Blackford Street on the west side of the intersection and across the south side of Central Avenue at the intersection.

CENTRAL

CITY

CENTRAL AVENUE LINCOLN PARK AREA

K3

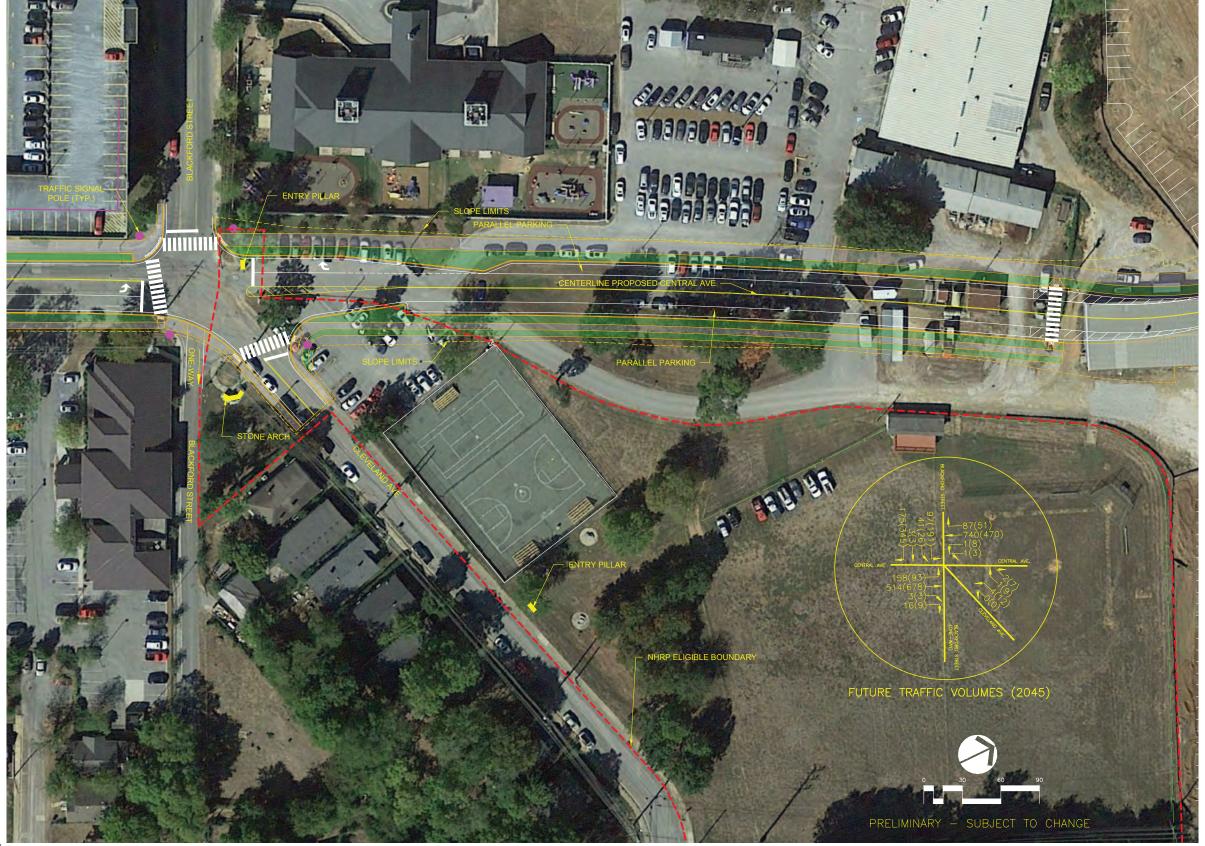


Figure 10. Alternative K3 Layout

Back of 11x17

DIRECT EFFECTS

This section discusses the projects' direct effects to Lincoln Park. The Criteria of Adverse Effect are applied below.

a) Alteration of the Property

Damage to part of the property would occur as a result of the project constructed with alternatives K1 and K3, resulting in a finding of **Adverse Effect**. Both K1 and K3 result in the removal of the historic entrance pillar from its original location. Although it is one of six contributing resources to the park, it is the one with the most intact historic fabric and is in its original location. The pillar was the attachment point for the western side of the entrance gate. According to community members that remembered the park while in use, park visitors entered through the pillar arches. The gates were opened for vehicle traffic as needed or were used during special events such as parades or holidays.

In K1, the pillar in its original location would extend partially into the proposed road. The existing road is immediately adjacent to the pillar (Figure 11); however, the road as historically designed and as currently used by Erlanger Hospital as an entrance to their parking, storage, and maintenance area, was not a through street and carries far fewer cars that the planned road extension. K1 results in a direct Adverse Effect to the entrance pillar (see Figure 8). Alternative K3, which installs a right turn lane southbound at the intersection of Central Avenue and Blackford Street, also results in a direct Adverse Effect to the pillar as the road will need to extend fully into the current location of the entrance pillar, roughly the center of the proposed right turn lane (see Figure 10). Under Alternate K2 (see Figure 9), the entrance pillar remains close to the edge of the pavement, but the road alignment is shifted to the east providing a 4-6 feet more buffer between the pillar and the traffic lanes.

Slope Limits at Tennis Court Corner

In the area of the west corner of the tennis court, an NRHP contributing resource, the fill lines cross very closely to the foundation wall on K1, K2, and K3 (see Figures 8, 9 and 10). The tennis courts have been resurfaced, but the foundation of the courts is original (Figure 12). Damage or fill placed against this wall would be considered an **Adverse Effect**, however, hand excavation in the immediate vicinity of the wall that does not damage the wall, or fill that does not abut the wall directly would be considered **No Adverse Effect or No Affect** depending on the work in the immediate area.

Figure 11. Original Entrance Pillar at Central Avenue and Blackford Street



A. View South. Under Alternatives K1 and K3 the Pillar would need to be relocated.



B. View South Showing Close Proximity to Existing Road.



C. Grass Area and Pillar inside the NRHP Boundary and Pillar that would be Affected in Alternative K3.



D. View of Current Entrance to Former Park Road Showing Existing Road Width Near Pillar.

Figure 12. Northwest Corner of Tennis Court Potential Effects





A. View South. Corner to be Affected by Alternative K1.

B. Detail of Tennis Court Corner.



C. Detail of Southeast Wall of Tennis Court Foundation Showing Historic Rock Construction.



D. Detail of Southwest Corner of Tennis Court.

Installation of Sidewalks and Landscaping

The sidewalks, as well as the mixed-use path, are constructed within a relatively small portion of the NRHP boundary constituting a use of the property and a direct effect. Alternatives K1, K2, and K3 provide different choices on the alignment of the mixed-use path and sidewalks that flank the proposed road, but as long as these paved paths do not impact a contributing resource such as the tennis courts or green space, they are not considered adverse. The addition of landscaping along the mixed use path and sidewalks will not result in a direct adverse effect. Although historic trees are present in the green space of the park, there are no historic trees with root systems in the APE that would be affected by ground disturbing activities from installation of the sidewalks or path with the NRHP boundary.

Crosswalks and Signals

The proposed Cleveland Avenue crosswalk and crosswalk signals are the only ones to be constructed within the Lincoln Park NRHP boundary. The crosswalk begins on the north side of Cleveland Avenue approximately 14 feet back from the intersection of Cleveland Avenue and the proposed road. It stretches across Cleveland Avenue intersecting the sidewalk on the other side at the circular sidewalk near the commemorative pillar on the point between Cleveland Avenue and Blackford Street. Sidewalks that may be damaged through installation of an American with Disabilities Act (ADA) ramp on the sidewalks on either side of Cleveland Avenue, will be an effect, but it will not be adverse as the sidewalks will be replaced in kind. A final layout has not been chosen between alternatives K1, K2, or K3, and the exact placement of crosswalks signals has not been determined (they are not shown on the layouts) therefore the determination of No Adverse Effect due to crosswalks and signals is preliminary at this time.

Signalization

Alternatives K2 and K3 include the installation of traffic signals at the intersection of Blackford Street, Central Avenue, and Cleveland Avenue. Within the NRHP boundary, two signal poles with mast arms will be either fully or partially constructed. The first at the corner of the proposed road and Blackford Street and the second near the corner of Cleveland Avenue and the proposed road. In both cases the poles are within the NRHP boundary and installation would possibly affect paved parking lot or sidewalk. This effect however would not be considered adverse as any sidewalk would be replaced in kind and the parking lot is not a NRHP contributing resource to Lincoln Park. A final layout has not been chosen between alternatives K1, K2, or K3, and the exact placement of a signal control box has not been determined (they are not shown on the layouts); therefore, the determination of No Adverse Effect due to traffic signals is preliminary at this time.

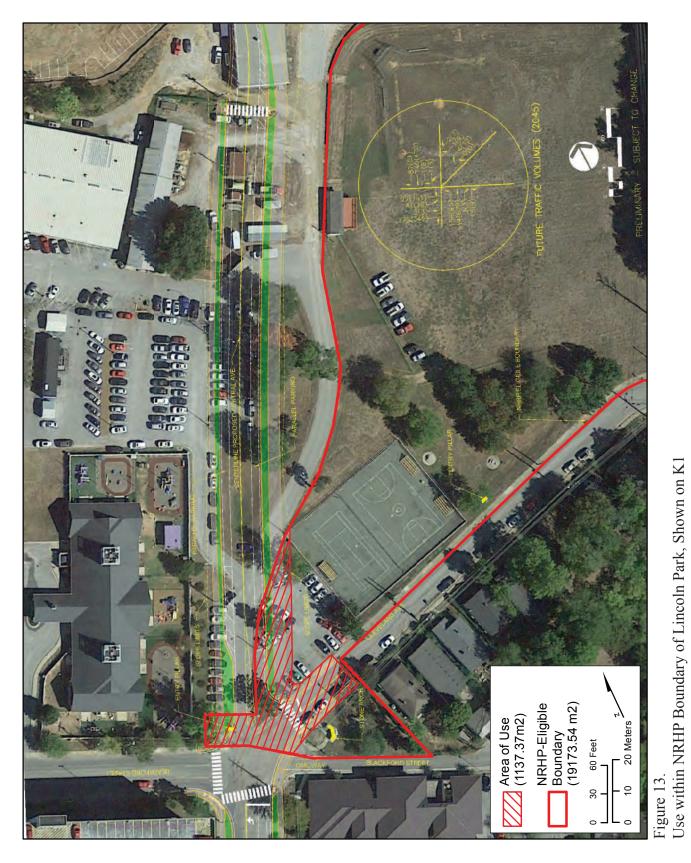
Use of Land within Boundary

The proposed project would require use of approximately 1,137 square meters of land within Lincoln Park's NRHP boundary (Figure 13). As the entire NRHP eligible portion of the park contains 19,174 square meters, this represents a use of approximately 6 percent of the total. The land being used is almost entirely associated with the changes to the intersection at Blackford Street, Central Avenue, Cleveland Avenue, and the proposed Central Avenue Extension. While this use is considered to be an effect, it would be considered **Not Adverse**. The use occurs on mostly paved land and involves landscaped areas that include: (1) the non-historic tree at the corner of Cleveland Avenue and the proposed road; and (2) the shrubs and grass planted on the corner of Blackford Street and the proposed road near the original entrance pillar. This assessment does not include use of the original entrance pillar, which is discussed in the earlier section on alteration or damage.

b) Removal of the Property from its Historic Location

Removal of part of the property would occur as a result of the project constructed with alternatives K1 and K3, resulting in a finding of **Adverse Effect**. Both K1 and K3 result in the removal of the historic entrance pillar from its original location. Although it is one of six contributing resources to the park, it is the one with the most intact historic fabric and is in its original location. The pillar was the attachment point for the western side of the entrance gate. According to community members that remembered the park while in use, park visitors entered through the pillar arches. The gates were opened for vehicle traffic as needed or were used during special events such as parades or holidays.

In K1, the pillar in its original location would extend partially into the proposed road. The existing road is immediately adjacent to the pillar (see Figures 8 and 11); however, the road as historically designed and as currently used by Erlanger Hospital as an entrance to their parking, storage, and maintenance area, was not a through street and carries far fewer cars than the planned road extension. K1 results in a direct **Adverse Effect** to the entrance pillar (see Figure 1). Alternative K3, which installs a right turn lane southbound at the intersection of Central Avenue and Blackford Street, also results in a direct **Adverse Effect** to the pillar as the road will need to extend fully into the current location of the entrance pillar, roughly the center of the proposed right turn lane (see Figure 10). Under Alternate K2, the entrance pillar remains close to the edge of the pavement, but the road alignment is shifted to the east providing a four to six feet of buffer between the pillar and the traffic lanes.



c) Change of the Character of the Property's Use or Physical Features Within the Property's Setting That Contribute to its Historic Significance

Use or Physical Features

Project implementation would result in a change in the character of the property's use. Because the west side of the historic park has been determined to be outside the NRHP boundary due to a loss of integrity from development and neglect by the property owner, the contributing entrance pillar can no longer function as the entrance to the NRHP-eligible portion of Lincoln Park. Under Alternative K2, the pillar, which was once on the other side of an access/park road, will now be on the opposite side of a through street from the remaining portion of the historic park. Therefore, project implementation would result in a change in the character of the property's use and this would be considered an **Adverse Effect**. Under Alternative K1 and K2, the pillar would be removed and/or relocated and therefore could also no longer function as an entrance to the historic park. This would also be considered an **Adverse Effect**. Outside of the change in the character of use for the original entrance pillar, none of the other aspects of project implementation would result in an effect to Lincoln Park under this criterion.

d) Introduction of Visual, Atmospheric or Audible Elements That Diminish the Integrity of the Property's Historic Features

Visual

Project implementation would result in the introduction of visual elements that diminish the integrity of Lincoln Park's significant historic characteristics or features (Figure 14). Namely, the feeling and association of Lincoln Park are adversely affected by the creation of a through street through the historic park and immediately adjacent to the NRHP-eligible portion of the park. The original road through the park was a loop. An important characteristic of the nature of Lincoln Park was that it was a destination. It was not on the way to anything else and the park road was of small scale and not a through street to another area of Chattanooga. The park has an intrinsic, deep, and lasting connection to the historic African American residential area known once as The Bottoms and a portion of that area that took its name from the park, the Lincoln Park neighborhood. While discussing the history of the park and neighborhood with the residents of Lincoln Park who remembered the park clearly from their childhood, one long term resident of Lincoln Park stated, "The park was freedom for me as a child. You could go there and be safe and your parents would know that you were safe." The feeling and association of the park are tied in part to the fact that the park, although it was segregated and a symbol of the opportunities denied to African Americans, was a place where their community values predominated and as a neighborhood and community, they felt safe. The setting of the park has been damaged steadily since the late 1960s and the construction of the proposed road permanently changes the setting by constructing a through street making it possible to drive from I-24 straight through Lincoln Park to Riverside Drive. This change in setting constitutes an **Adverse Effect**.

Figure 14. Visual Change in Character Resulting from Central Avenue Extension



A. View North of Former Park Road and Proposed Through Street, Central Avenue Extension.



B. View North of Former Park Road and Proposed Through Street, Central Avenue Extension.

Visually, the NRHP eligible portion of the park abuts the remainder of the historic park, which has been used for maintenance, storage, and surface parking by Erlanger Hospital. This area holds a combination of formal and informal storage structures, the former Lincoln Park bathhouse and pool (now covered and used for storage), dumpsters, heavy equipment, and overflow parking for both staff and construction staff working on the hospital expansion. As this is not a public area, no effort has been made to make the area visually appealing. While the construction of the proposed road will remove a number of mature trees in the oval area between the old park road and access road into Erlanger's storage area, the proposed project will add landscaping trees to the vegetated strips lining the mixed-use path and sidewalk on either side of the proposed road for the length of the road paralleling Lincoln Park. These actually will help shield the NRHP eligible portion of Lincoln Park from the maintenance area at Erlanger. Adding to this, the land slopes downward from the proposed road to the eligible portion of Lincoln Park. From the green space of the park, the slope and the new landscaping trees will help to screen the view of the maintenance area.

Blackford Street One-Way and Traffic Signals

The changing of Blackford Street to one way will result in No Effect visually as Blackford Street is already very narrow in this section (Figure 15). The installation of traffic signals at the intersection of Blackford Street, Central Avenue, and Cleveland Avenue will have a visual effect, but it will not be adverse based on the pole locations as currently shown. This No Adverse Effect assessment does not consider the location of the traffic signal control box as the location is not known as of the writing of this draft. Once an alternative is finalized and traffic signal plans finalized, the location of the signal box and any potential visual or physical effects will need to be addressed in the subsequent draft. Large utility poles are already present at three of the four proposed signal pole locations. The location, currently lacking a large wooden pole, has a shorter steel support pole. The poles are part of the current character of the intersection and the addition of poles with mast arms for signals will not have an adverse visual effect. The color of the proposed poles is unknown at this time (Figure 16).

Figure 15. Visual Changes Resulting from Shift of Blackford Street to One-Way Street



A. Blackford Street is currently more narrow than standard two-lane road.



B. Comparable Widths of Blackford Street and Adjacent Cleveland Avenue.



A. Signal Pole Location at Corner of Central Avenue and Cleveland Avenue.

B. Signal Pole Location at South Corner of Blackford Street and Central Avenue.



D. Signal Pole Location at West Corner of Blackford Street and Central Avenue.



Visual Changes Resulting from Installation of Signals Central Avenue. Figure 16.

C. Signal Pole Location at North Corner of Blackford Street and

Crosswalks

Crosswalks are not currently present at the intersection of Blackford Street, Central Avenue, and Cleveland Avenue. The introduction of crosswalk striping will have **No Adverse Effect** visually on Lincoln Park. This assessment does not however consider the location of the crosswalk signal poles as the location is not known as of the writing of this draft. Once an alternative is finalized and crosswalk plans finalized, the location of the signal box and any potential visual or physical effects will need to be addressed in the subsequent draft. Care should be taken to place the crosswalk signal on the point of Blackford Street and Cleveland Avenue in a location that is not immediately in front of the commemorative pillar. This area is within the NRHP boundary and installation of a crosswalk pole should not be in a location that visually obstructs the commemorative pillar (Figure 17).

Sidewalks, Mixed Use Path, and Landscaping

Visually, there will be No Effect from the installation of sidewalks, the mixed-use path, or landscaping at the park. Sidewalks and or paths would traditionally have been present within the park and are in keeping with the character of the historic resource as a recreational facility. Landscaping will serve as a visual barrier from the proposed road and the former park area now used as a storage and maintenance area by the hospital (Figures 18 and 19).

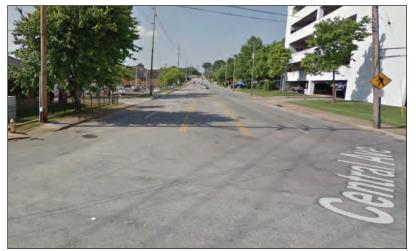
Parallel Parking

Parallel parking spaces visually will have No Effect as they will be fairly small in number and on either side of the road landscaping and sidewalk will be present on the opposite side of the parking spaces from the road (Figure 20).

Figure 17. Visual Changes Resulting from Installation Crosswalks and Crosswalk Signals



A. Crosswalk Location on Cleveland Avenue.



B. Crosswalk Location on Central Avenue.



C. Crosswalk Location on Blackford Street.

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A. Location of Proposed Sidewalk on K1 and Proposed Mixed-Use Path on K2 and K3.



D. Location of Proposed Mixed-Use Path on K1 and Proposed Sidewalk on K2 and K3



C. Location of Proposed Mixed-Use Path on K1 and Proposed Sidewalk on K2 and K3.

Visual Changes Resulting from Installation of Mixed Use Path

Figure 18.

DRAFT REPORT

Figure 19. Visual Changes Resulting from Installation of Sidewalks and Landscaping



A. Sidewalk in front of commemorative pillar on Cleveland Avenue will remain the same.



B. Sidewalk in front of tennis court on Cleveland Avenue will remain the same.



C. Sidewalk in front of commemorative pillar at Blackford Street will remain the same.

Figure 20. Visual Changes Resulting from Installation of Parallel Parking



Parallel parking spaces will be to the left and right of the trees in the middle of the image, which lie in the midline of the proposed road alignment

Atmospheric

Per the NEPA Enhanced D-List Categorical Exclusion Document, "This project qualifies as a categorical exclusion under 23 CFR 771.117 and, therefore, does not require an evaluation of Mobile Source Air Toxins (MSAT) per FHWA's *Interim Guidance Update on Air Toxic Analysis in NEPA Documents* dated October 2016.

Noise

Project implementation would not audibly affect Lincoln Park. Per the NEPA Enhanced D-List Categorical Exclusion Document:

A noise evaluation for the project was conducted in accordance with the FHWA noise standards, Procedures for abatement of Highway Traffic and Construction Noise, 23 CRF 772, the TDOT's Policy on Highway Traffic Noise Abatement effective July 2011. The noise technical report is included in Appendix D of the NEPA documentation.

The study identified noise sensitive land uses including a neighborhood, a park, with recreational uses, and a day care facility. The study concluded that the project will not create traffic noise impacts. Therefore, noise abatement was not evaluated.

e) Neglect of a Property which Causes its Deterioration

Lincoln Park is owned by Erlanger Health System and would not come under the jurisdiction of TDOT or the State of Tennessee at any time. Therefore, this criterion does not apply.

f) Transfer, Lease or Sale of a Property Out of Federal Ownership or Control

Lincoln Park is owned by Erlanger Health System and would not come under the jurisdiction of TDOT or the State of Tennessee at any time. Therefore, this criterion does not apply.

INDIRECT AND CUMULATIVE EFFECTS

Project implementation is anticipated to have an **Adverse Effect** on Lincoln Park and its closely tied neighborhood from indirect and cumulative effects (Figures 21, 22, and 23) Although the park is what has been determined eligible for the NRHP by the Keeper, its historical significance is tied to its significance to the local African American community and both Lincoln Park and the Lincoln Park community are likely to be adversely affected by indirect effects that are reasonable and foreseeable as a result of the Central Avenue Extension and cumulative through the adverse effects of the undertaking combined with other past, present, and future actions. These past, present or future actions can be federal, non-Federal, or private. A discussion of indirect and cumulative effects follows.

Erlanger Health System, who owns Lincoln Park and whose main campus abuts the park, is currently in the process of a multi-phase \$40 million expansion of Children's Hospital, which lies in close proximity to Lincoln Park on Blackford Street. Many of the current vehicles parking in the new parking surface lots constructed on the portions of Lincoln Park that have lost integrity belong to construction workers building the new expansion. Erlanger's parking needs have caused them to paint parking lot stripes on the tennis court in Lincoln Park, to open a section of fencing for vehicles to enter, and to add dirt and gravel to create a gravel roadbed to drive onto the tennis court. Based on aerial photography, it appears that sometime after the Keeper of the NRHP determined in July 2017 that only a portion of Lincoln Park retained the necessary integrity to convey its historic significance, a large chunk of former park property was converted to paved parking spaces. The new expansion will increase Erlanger's need for parking in the future, as well as during the construction phase. An April 2018 article in Business Trend by the Chattanooga Chamber of Commerce states that Erlanger is in the process of "developing a new Wellness and Innovation District along 3rd Street (a few blocks from Lincoln Park). In the past three years, over 30 new pediatric specialists have joined Erlanger's staff. Additional jobs and healthcare offerings will bring more people to the area, spurring new residential and retail development to transform downtown Chattanooga." Another article in the November 2017 Becker's Hospital Review cites \$1.5 billion in expansion and renovations are planned across Erlanger's facilities. While a worldclass children's hospital is certainly a benefit for the citizens of Chattanooga, its construction along with the development on nearby 3rd Street will undeniably bring development pressure to bear on Lincoln Park. Extending Central Avenue to connect to Riverside Drive allows for a direct connection from I-24 to the Chattanooga Riverfront. Additionally, residential development under construction where the proposed Central Avenue extension will exit onto Riverside Drive, the former Cannon Equipment/Cumberland Corporation Brownfield Site, is another reasonable and foreseeable example of the development pressures facing Lincoln Park and its closely tied neighborhood. Development of this parcel as well as an adjacent vacant site to the north on Riverside Drive are discussed in the 3rd to Riverside Neighborhood Plan created by the Chattanooga Hamilton County Regional Planning Agency (Chattanooga-Hamilton County

Regional Planning Agency 2015). The nearby University of Tennessee Chattanooga has also seen tremendous growth in the past decade. In understanding the potential for indirect adverse effects, one factor includes growth-inducing effects. To determine if there are growth-inducing effects, the question can be asked "Does the project enhance the attractiveness of surrounding land for development?" In the case of land surrounding Lincoln Park and the Lincoln Park neighborhood, the answer seems to be a resounding, yes (Figures 21-23).

One consulting party for this project under Section 106 of the NHPA is the Coalition to Preserve Lincoln Park and Citico. The coalition is a consulting party under Section 106 and is composed in part of members of the Lincoln Park Neighborhood Association (LPNA). While the full summary of the public involvement for the project is detailed in the NEPA documentation, as outreach to the consulting parties was included in the Scope of Work of this project, it is worth noting that the LPNA, has filed a Title VI Civil Rights Discrimination and Retaliation Complaint with the Tennessee Human Rights Commission. Two particular issues raised in the complaint are pertinent to a discussion of indirect and cumulative adverse effects at Lincoln Park that are both reasonable and foreseeable and cumulative from past, present, and future actions. The Coalition adamantly feels that Lincoln Park should become a public park again and they feel that their negative opinions on the desirability of the connection from Central Avenue to Riverside Drive have not been heard. They are concerned about traffic noise, development pressures and further losses to the fabric of their historic park and community. Another major concern of the Coalition is the stated plans in the 2035 Long-Range Transportation Plan to connect Central Avenue to Riverside Drive on the Central Avenue Extension, but later to connect it all the way to Georgia state line.

During discussions with residents of Lincoln Park neighborhood for this project, residents stated that almost weekly they have strangers stopping on their doorsteps offering to buy their homes. These real estate speculators are basing their purchases on the rapid gentrification being seen throughout Chattanooga and in particular in zip code 37403 and neighboring 37408. The Thomas B. Fordham report recently referred to these zip codes as two of the most rapidly gentrifying zip codes in the country (37408 was second in the nation).

Lincoln Park is currently owned by Erlanger Health systems who currently is under no obligation to protect the park unless future undertakings of their own that might affect the park involve federal funding or permitting subject to the NHPA. To this end, they have the ability to completely use the land currently occupied by the park for any other development purpose. Although Erlanger Health Systems and the City of Chattanooga have stated intent to swap parcels which include Lincoln Park in 2013 and 2014 this has not occurred to date. The City of Chattanooga had stated that they would reestablish a public park at Lincoln Park, and the City Council approved \$2 million for improvements to Lincoln Park in the fall of 2017, however, there is no formal, binding plan in place at this time.

In the period since the Keeper of the NRHP determined a portion of the park eligible for the NRHP, Erlanger has begun using one of the historic components of the park as a parking lot. Use such as this may compromise the integrity of the resource. While the bathhouse and pool remain in the other non-eligible half of the park, their historic integrity has been compromised by extensive alterations and neglect of the historic fabric of the structures.

While Lincoln Park is still called a "park," and the city has stated their intent to acquire the park and reopen it to the public, in practice at the time of this AOE, it is private property and is not open to the public. The Lincoln Park Neighborhood Association has stated that they have to purchase insurance to hold events at the park, when they are able to obtain permission, and that access to the park is difficult and not possible for casual use. Several members have stated that neighborhood residents were chased away from the picnic area, baseball field, and basketball/tennis courts. Today, *No Trespassing* signs are posted.

Traffic projections for the Central Avenue Extension are significant enough to warrant a right turn lane for the intersection of the proposed road with Blackford Street. The new entrance for the expanded Children's hospital is located one block away on Blackford Street. Current traffic for 2018 peak hours AM and (PM) are 9(24). Projected totals for 2045 are 87(51). This turn lane, which would address having a line of cars backed up and waiting to turn right at Blackford Avenue, would necessitate the removal/relocation of the original entrance pillar, as would Alternative K1 where the road alignment necessitates it pass through where the corner of the pillar lies closest to the road.

Figure 21. Erosion of Historic Park Footprint and Fabric from Development and Use by Erlanger Hospital



A. Current Use of the Historic Tennis Court as a Parking Lot. Removal of Fence and Driving Across Foundation.



B. Posted No Trespassing Signs at Lincoln Park.



C. Use of former park as storage and maintenance area has eroded the full extent of the historic park to the remnant NRHP-eligible piece today, which is no longer open to the public.

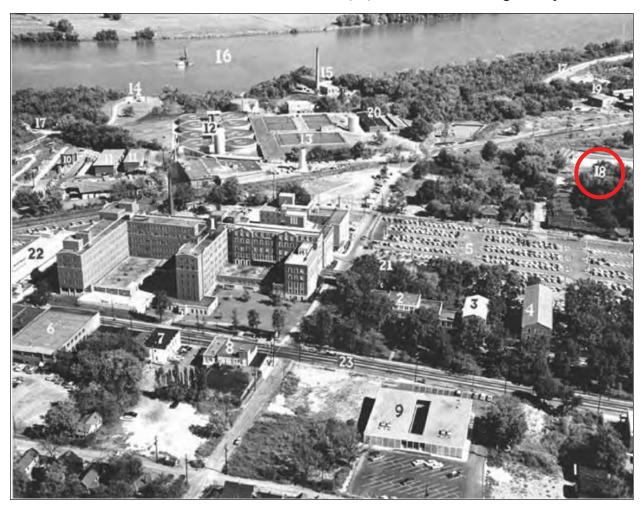


D. Following the release of NRHP Keeper's Determination of Eligibility for Lincoln Park, Erlanger constructed a parking lot in late 2017 early 2018 on land excluded from the boundary by the Keeper. This land was previously undeveloped.

Figure 22. Development Pressures on Lincoln Park Resulting from Central Avenue Extension



Figure 23. Cumulative Adverse Effects on Lincoln Park and Lincoln Park Neighborhood, Showing Extent of Lincoln Park (18) in Relation to Erlanger Hospital in 1964



Source: Calise 2015

AVOIDANCE AND MINIMIZATION

The following changes, which are detailed in the NEPA documentation were made as a result of Section 106 and NEPA consultation and constitute avoidance and minimization completed before this study:

As a result of comments received after the first public meeting, and subsequently throughout the project planning and development process, several changes were made to the project design concept for the Central Avenue Extension project. Also as a result of public comment, additional coordination and stakeholder engagement was implemented to address the prominent issues that were raised and to provide multiple opportunities for public participation and involvement in the decision-making process.

The following actions were taken as result of input received:

- The typical section was reduced from four to two lanes.
- To enhance safety and discourage truck traffic, the proposed posted speed limit was revised to 25 mph.
- The existing recreational features of the former park are avoided by the preferred alignment.
- The Widening and extension of Wiehl Street from Blackford Street to a likely roundabout at the Central Avenue intersection was proposed.
- Street lighting and pedestrian accommodations have been added to the proposed project to increased safety.
- Streetscape elements were added to the proposed project to enhanced aesthetics of the impacted area.
- The City agreed that as a separate project from the Central Avenue Extension, the City would acquire a portion of the former park from Erlanger Health System and work with the community to redevelop Lincoln Park. While park planning with the community has begun, acquisition of land for the park would not occur until after land for the Central Avenue Project has been acquired.

Avoidance and Minimization efforts since this project commenced include the creation of Alternative K2, which notably avoids a direct physical adverse effect to the original entrance pillar by shifting the alignment of the road at the intersection.

V. SUMMARY AND RECOMMENDATIONS

The following table summarizes the direct, indirect and cumulative effects on Lincoln Park from the Central Avenue Extension project.

	Physical Destruction/	Isolation/ Alteration of	Visual/ Audible/	Indirect and Cumulative
K1	Adverse Effect due to	Adverse Effect due to	Atmospheric There will be No	Adverse Indirect
K1	Adverse Effect due to removal/relocation of original entrance pillar. Adverse Effect or No Adverse Effect due to ground disturbing activity at northwest corner of tennis court if the court is damaged in this location. Although the project requires use of land within the NRHP boundary, this would be considered No Adverse Effect. Installation of sidewalks/paths, signal, crosswalks, parking, and landscaping, excepting possibly the tennis court	Adverse Effect due to change in character of use of original entrance pillar. Removal will alter the character of use for the pillar as it will no longer function as entrance to park, it will need to be removed/relocated.	There will be No Effect from Noise or Atmospheric changes resulting from proposed project. Visually, the alteration of the setting, feeling, and association of Lincoln Park with the addition of a through street carrying significant traffic will be an Adverse Effect.	Adverse Indirect and Cumulative Effects from growth induced effects and rapid gentrification of project area
	corner mentioned above, would result in No Effect .			
K2	No Effect from Physical Destruction/ Damage, or Alteration.	Adverse Effect due to change in character of use of original entrance pillar. Although the pillar remains in place, it will no longer function as entrance to park as the park has been bisected from the proposed road and permanently separated from its other half.	There will be No Effect from Noise or Atmospheric changes resulting from proposed project. Visually, the alteration of the setting, feeling, and association of Lincoln Park with the addition of a through street carrying significant traffic will be an Adverse Effect.	Adverse Indirect and Cumulative Effects from growth induced effects and rapid gentrification of project area

	Physical Destruction/	Isolation/ Alteration of	Visual/ Audible/	Indirect and
	Damage/Alteration	Setting	Atmospheric	Cumulative
K3	Adverse Effect due to removal/relocation of original entrance pillar. Although the project requires use of land within the NRHP boundary, this would be considered No Adverse Effect. Installation of sidewalks/paths, signal, crosswalks, parking, and			
	landscaping would result in No Effect.		be an Adverse Effect.	

It is the opinion of New South that the Central Avenue Extension project would have an **Adverse Effect** to Lincoln Park under Section 106 of the NHPA and would constitute a Section 4(f) use of Lincoln Park under the U.S. Department of Transportation (USDOT) Act of 1966. Consultation is recommended to determine if the adverse effects can be mitigated. A Section 4(f) evaluation will be completed in a separate report.

REFERENCES CITED

Calise, Sarah

2015 Research Report: Lincoln Park in Chattanooga, Tennessee. Essentials of Historic Preservation & Cultural Resource Management. Middle Tennessee State University.

Chattanooga-Hamilton County Regional Planning Agency

2015 Draft Report - 3rd to Riverside Neighborhood Plan.

Sellers, Tammy

2017 National Register of Historic Places Registration Form for Lincoln Park -Determination of Eligibility.

Slater, Margaret and Jessica Burr

2016 Historical/Architectural Resources Assessment Proposed Extension of Central Avenue from East 3rd Street to Riverside Drive Chattanooga, Hamilton County, TN. URS and TRC, Prepared for Ragan-Smith Associates and the City of Chattanooga.



APPENDIX A:

DETERMINATION OF ELIGIBILITY





United States Department of the Interior

COPY

NATIONAL PARK SERVICE 1849 C Street, N.W. Washington, DC 20240

(H32)2280

To: Leigh Ann Trimble

Environmental Program Engineer US DOT/Tennessee Division 404 BNA Drive, Suite508 Nashville, TN 37217

The Director of the National Park Service wishes to inform you of our determination pursuant to the National Historic Preservation Act, as amended, and Executive Order 11593 in response to your request for a determination of eligibility for inclusion in the National Register of Historic Places. Our determination appears on the enclosed material.

As you know, your request for our professional judgment constitutes a part of the Federal planning process. We urge that this information be integrated into the National Environmental Policy Act analysis to bring about the best possible program decisions.

This determination does not serve in any manner as a veto to uses of property, with or without Federal participation or assistance. The responsibility for program planning concerning properties eligible for the National Register lies with the agency or block grant recipient after the Advisory Council on Historic Preservation has had an opportunity to comment.

Attachment



United States Department of the Interior

NATIONAL PARK SERVICE 1849 C Street, N.W. Washington, DC 20240



DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places	
National Park Service	
Name of Property: Lincoln Park	
Location: Chattanooga, Hamilton County	State: TN
Request submitted by: Leigh Ann Tribble, US	
Division, 404 BNA Drive, Suite 508, Nashville,	TN 37217
Date received: 7/26/2017	
2	
Opinion of the State Historic Preservation Office	cer:
_Eligible X_Not Eligible _N	o ResponseNeed More Information
Comments: SHPO concurs with Federal agence	cy. DOE request submitted at suggestion of ACHP
The Secretary of the Interior has determined t	that this property is:
X Eligible	Not Eligible
Applicable criterion: A	
Comment: See attached comments	
7 /800 +	
Ind July	8-23-2017
eeper of the National Register	Date

WASO-28

DETERMINATION OF ELIGIBILITY NOTIFICATION
NATIONAL REGISTER OF HISTORIC PLACES
NATIONAL PARK SERVICE

Name of Property: Lincoln Park, Chattanooga, TN

The Keeper of the National Register finds that Lincoln Park, located in Chattanooga, Tennessee, is eligible for inclusion in the National Register of Historic Places under Criterion A for its importance in the social and recreational history of the city's African American population.

The eligible portion of Lincoln Park includes the entry located at the intersection of Blackford Street, Cleveland Avenue, and Central Avenue. The portion of the park is located east of Central Avenue extended (east of the existing park drive) to a point just north of the existing baseball field, and defined by the property line to the east and Cleveland Avenue on the south. The portions of the historic limits of the park that are located west of the park drive and north of the extant baseball field are not included within the eligible boundaries.

The documentation provided as part of this DOE request makes it clear that Lincoln Park had a significant role in the history of the African American community from the time of its creation in 1918 through the recent past. Although de-accessioned by the City as a formal, city-owned and maintained park, the eligible portion of Lincoln Park has continued to perform as and serve as a park for the local community until very recently. Its significance lies in its history as a product of dejure and defacto segregation in the city. As THE official location for recreational activities in Chattanooga, Lincoln Park served as not only a place to play, but as a symbol of pride for the African American community during a time when other public facilities were denied to them. Places like Lincoln Park are places that disenfranchised communities can claim unto themselves, and continue to serve as touchstones to a past that is at once both proud and painful. The remnant of the park is significant under Criterion A in the areas of Recreation/Culture and Social

History. Its association with *dejure* segregation practices in Chattanooga, where it served as the "colored" park, is less evident in its physical characteristics but the integrity of association, feeling, setting, and design are strong. In terms of recreation, despite the findings of the DOE documentation, two of the three major components of the formal recreational facilities are still readily evident in the eligible portion of the park. The tennis courts, although resurfaced, are still in their original locations and are easily read as tennis courts. The baseball field, a core element of the park, is still readily evident. The relatively recent removal of the bleachers does not severely impact the ability of one to identify the baseball field for what it is and what it once was. The concession building is also intact. The eastern portion of the park retains integrity of location, setting, design, association, and feeling. The third major recreational facility, the pool, does lack integrity and is not located within the eligible section of the park. The bathhouse has been altered to a point where it lacks sufficient integrity the either stand alone as a resource of to contribute to the park. The park road which divides the baseball field from the bathhouse thus serves as a logical boundary between the eligible (eastern) portion of the park and the ineligible (western) portion of the park.

The entry pillar (a reconstruction or replica) that is at the northwest corner of Blackford and Central, as well as the stone arch located at the point of the intersection of Blackford and Central, should be considered in the boundaries. These structures, along with the third one further up the north side of Cleveland Avenue, are and were part of the formal entry to the park. While one or all of them may have been moved at some point, they still function as identifying structures marking the entry and boundary of the historic park.