



UNITED STATES DEPARTMENT OF COMMERCE
National Institute of Standards and Technology
Gaithersburg, Maryland 20899

February 16, 2024

MEMORANDUM FOR THE RECORD

From: Mark Liao
NEPA Coordinator

Subject: Categorical Exclusion

Project Title: Phase I Renovation of Freeman Hall and Joyce Hall
Location: Champlain College
163 S. Willard Street
Burlington, VT 05401

The National Environmental Policy Act (NEPA) and associated implementing regulations (40 CFR Parts 1500-1508) require that all major actions by federal agencies be reviewed with respect to the environmental consequences on the human environment. The National Institute of Standards and Technology (NIST) is providing a congressionally directed funding grant for the project: Phase I Renovation of Freeman Hall and Joyce Hall at Champlain College. Consequently, NEPA and the associated implementing regulations apply to this project.

This memorandum summarizes the determination that the Phase I Renovation of Freeman Hall and Joyce Hall at Champlain College has been found to be categorically excluded from further environmental review under NEPA.

Description of the Action

This project includes the renovation of Freeman Hall and Joyce Hall, adjacent and connected buildings on the Hill Campus of Champlain College.

Joyce Hall was built in 1971. Past renovations have included:

- 2014 – Vestibule and exterior updates to modernize the appearance of the building. This included the addition of metal cladding to modernize

- 2017 – Interior gut rehab/reno in which all interior spaces on 2nd and 3rd floors were renovated to update classrooms, offices, and labs

Freeman Hall was built in 1903. Past renovations have included:

- 1960s – Building was raised and an additional floor was added underneath. Additionally, all new internal steel framing on first floor.
- 1971 – Renovation to attach the newly built Joyce Hall
- 2010 – Renovation of the third floor to fit up for new President’s suite
- 2023 – Exterior replacement of asphalt roof with new copper roofing

The current Phase I Renovation Project for Freeman Hall and Joyce Hall includes:

- An expanded vestibule at the front entrance of Joyce Hall
- Internal renovations of 7,800 sq. ft of Floor 1 in both buildings, to include:
 - Adding student collaborative spaces,
 - Adding new and revised lab and instruction space,
 - Renovating existing classrooms,
 - Providing better connection between the two Halls, and
 - Creating new entranceways

The only external renovation will be expanding the size of the existing vestibule that includes limited excavation for a slab foundation (approximately 500 sq. ft.) for the vestibule extension. The existing vestibule and extension are attached to the western elevation of Joyce Hall. All other renovations on the project are internal to both Freeman and Joyce Halls and limited to the first floor.

This project will be accomplished in accordance with all applicable state and federal environmental and safety regulations. No regulatory permitting is anticipated to be required.

Specific Considerations of this Action and any Extraordinary Circumstances

- Air Emissions, Stormwater, Wastewater, Critical Habitats

No significant impacts to air, water resources or critical habitats are expected.

- Building Staffing/Utilities

Staffing at Freeman Hall and Joyce Hall are not expected to increase significantly. Water consumption and electricity use are not expected to change significantly over the current use.

- Greenhouse Gas Emissions

The interior building renovations planned for this project may improve the energy efficiency somewhat and reduce greenhouse gas emissions resulting from the building.

- **Flooding Potential and Resilience**

Renovations to Freeman Hall and Joyce Hall are not expected to impact the flooding potential or flood resilience of this building. The Freeman Hall and Joyce Hall are not located within the 500-year floodplain.

- **Hazardous Materials**

Any hazardous materials (i.e., asbestos, lead based paint, polychlorinated biphenyls) that may be disturbed in the building renovations will be handled and disposed of in accordance with State and Federal regulations.

- **Historic/Cultural Significance**

The Vermont Division for Historic Preservation has made a determination that Freeman Hall and Joyce Hall are not eligible for the National Register of Historic Places (Attached). No impacts to historic or cultural resources are anticipated for this project.

- **Environmental Justice**

This renovation project is not anticipated to have any disproportional adverse human health or environmental impacts to overburdened and underserved communities, including minority, Tribal, or low-income populations.

Effects of the Action

No significant adverse impacts on the environment are expected from this action.

Categorical Exclusion

The activities associated with this project fall within the criteria of the following Department of Commerce Categorical Exclusion:

A-1 Minor renovations and additions to buildings, roads, airfields, grounds, equipment, and other facilities that do not result in a change in the functional use of the real property (e.g. realigning interior spaces of an existing building, adding a small storage shed to an existing building, retrofitting for energy conservation, or installing a small antenna on an already existing antenna tower that does not cause the total height to exceed 200 feet and where the FCC would not require an environmental assessment or environmental impact statement for the installation). This CE does not apply in instances where the project must be submitted to the National Capital Planning Commission (NCPC) for review and NCPC determines that it does not have an applicable Categorical Exclusion.

This project is considered a minor renovation of a building that does not change functional use of the real property. The project does not require review by the NCPC

The proposed activity: Phase I Renovation of Freeman Hall and Joyce Hall at Champlain College is categorically excluded from the need for further environmental review under NEPA. Any changes to the above project will require additional NEPA review.

Mark Liao
NIST NEPA Coordinator

Date

R.C. Vaughn
NIST Chief Facilities Management Officer

Date

Attachment A

Vermont Division for Historic Preservation Determinations

Vermont Division for Historic Preservation Determination of Eligibility (DOE) Form

A “Determination of Eligibility” is a decision regarding whether a district, site, building, structure, or object meets the State or National Register Criteria for Evaluation, although the property is not formally listed in the State or National Register.

Please complete this form by clicking in the checkboxes and entering text in the grey fields.

SECTION I

Property Address: 387 Maple Street, Burlington Vermont 05401

Property Name: Joyce Learning Center

This DOE is for the:

- State Register of Historic Places
 - State project – 22 VSA 14 review
 - Act 250 project – Criterion 8 review
 - State Tax Credits
 - Barn Grant Application
 - Historic Preservation Grant Application
 - VDHP staff request
 - Other _____
- National Register of Historic Places
 - Federal project – Section 106 review
 - Federal Tax Credits (RITC)
 - VDHP staff request
 - Other _____

Who is making this request?

Division for Historic Preservation Staff: Name, Title

-or-

Britta Tonn on behalf of Champlain College

VHB

802-391-5578 btonn@vhb.com

December 19, 2023

SECTION II

*for completion by State/Federal agencies and consultants only

Eligibility Recommendation

Evaluated under:

- Criterion A: Event
 Criterion B: Person
 Criterion C: Design/Construction
 Criterion D: Information Potential

Integrity: Setting Location Design Materials Workmanship Feeling Association

Period of Significance: 1971-1974

Level of Significance: Local State National

Justification for Eligibility Recommendation:

The Joyce Learning Center on the campus of Champlain College is an International style academic building that was built by Champlain College in 1971 and renovated over the past 25 years to appear more contemporary in style. The building was designed by Freeman French Freeman, Burlington's premier modernist architecture firm and named for Bishop Robert Joyce. The building was connected to nearby Freeman Hall by way of a partial hyphen and has functioned as a discreet building unrelated to Freeman Hall. Since 1971, Champlain College has continued to expand such that the Joyce Learning Center is now part of an area known as the Rozendaal Courtyard that is surrounded by various academic buildings. In 1998, a large renovation project created a new entrance on the west elevation. In 2014, a vestibule was added to the west elevation and in 2017, aluminum siding was installed on this façade. Interior renovations have also occurred and original features such as the college's library have been converted to classroom spaces.

The period of significance for the Joyce Learning Center is 1971-1974. This period of significance begins with the building's construction and ends with the 50-year cutoff for significance.

Integrity

The following integrity discussion will demonstrate that the Joyce Learning Center no longer retains integrity from its period of significance.

Location

The Joyce Learning Center has not moved since its construction. As such, it retains integrity of location.

Setting

At the time of its construction, the Joyce Learning Center was part of a small but growing college campus that consisted of a mix of newly built academic buildings and late nineteenth century residences which Champlain College had converted to academic use. Additionally, the surrounding area was a residential neighborhood filled with large Greek Revival, Italianate, Queen Anne, and Colonial Revival style homes and outbuildings. Since 1974, the college has embarked on significant

construction campaigns that have altered the character of the surrounding area. Buildings such as the IDX Student Life Center, the Hauke Family Student Center, Rozendaal Courtyard, and S.D. Ireland Family Center for Global Business and Technology have significantly altered the setting of Champlain College over the last 30 years. Given these continual changes, the Joyce Learning Center no longer retains integrity of setting.

Design

The Joyce Learning Center is an International Style academic building that appears more contemporary in style today due to several renovations completed over the past 25 years. As described in the Multiple Property Documentation Form (“MPDF”) *International Style in Vermont*, the International Style emphasized the following principles: architecture as volume, regularity of features, and an avoidance of applied decoration. In Vermont, the MPDF states that the International Style “is distinguished by smooth or vertically incised wood siding often mixed with sections of brick or stone, shallow gable roofs, massive rectangular brick chimneys that intersect rooflines, and bands of casement or awning windows.”¹ Freeman French Freeman’s architects also emphasized the development of a building program by which a building should be designed for a particular use, rather than have its function fit into a standard building form.

The design of the Joyce Learning Center was altered in 1998 when the interior of the building was renovated and a new entry was built on the façade. Alterations occurred again in 2014 when the vestibule was built onto the building’s façade. Three years later, the façade’s original siding was replaced with aluminum siding. Additionally, a large group of windows were added to the façade above the vestibule. Although the remaining three elevations of the building retain their original materials and arrangement, the changes to the façade, the only elevation fully visible, are significant. The loss of original materials and the disruption of the original fenestration pattern have impacted the building’s ability to read as an International Style academic building. Further, inside the building, formerly open spaces have been enclosed to create classrooms and modern computer labs. Given these changes, the Joyce Learning Center has lost integrity of design.

Materials

As stated, the wood siding of the Joyce Learning Center’s west façade has been replaced with aluminum. On the building’s remaining elevations, original brick and vertical wood siding remains. Additional material changes include the replacement of the asphalt shingle roof with a copper standing seam metal roof and the replacement of most the building’s original interior materials and finishes. Although the building retains its original siding on three elevations, these elevations are obscured by nearby buildings and the landscape. Due to these changes, the Joyce Learning Center has lost integrity of materials.

Workmanship

The International Style emphasizes restraint and limited ornamentation, instead allowing the form and innate beauty of building materials to convey a sense of workmanship and craft. As a result, the Joyce

¹ Evans, Jackson. “The International Style in Vermont.” National Register of Historic Places Multiple Property Documentation Form, July 10, 2007.

Learning Center's integrity of workmanship is intricately linked to its integrity of materials and design. Given the alterations that have occurred, alterations that have altered the building's expression of form and materials, the Joyce Learning Center has lost integrity of workmanship.

Feeling

When it was built, the Joyce Learning Center possessed the feeling of an International style academic building. This style was commonly employed during the mid-twentieth century on Burlington's college campuses for dormitories and administrative and academic buildings. Since then, the Joyce Learning Center has been altered such that it now possesses a more contemporary feeling. Given this, the Joyce Learning Center has lost integrity of feeling.

Association

Built in 1971, the Joyce Learning Center has been a critical part of the Champlain College campus since its construction. The building has served several roles and is currently an important lecture hall on campus. The building maintains its association with Champlain College's educational mission to this day and as a result retains integrity of association.

Significance

Overall, the Joyce Learning Center is recommended ineligible for listing in the National Register of Historic Places. Further research is needed to determine if the Joyce Learning Center would be considered a contributing resource to a historic district encompassing Champlain College which has not yet been formally evaluated. However, given that many of Champlain College's buildings are less than 50-years old, it is unlikely at this time that the college possesses enough eligible resources to be eligible for the National Register.

The Joyce Learning Center was evaluated for significance under Criterion A in Education. Built at a time when Champlain College needed to expand its academic offerings and provide more resources to students, the Joyce Learning Center initially served as the college's library and computer lab. The building has since been renovated into a lecture hall and is one of the main academic buildings on Champlain College's campus. Given its centrality to the growth of Champlain College, one of Vermont's largest institutes of higher learning, the Joyce Learning Center possesses significance. However, the building has lost integrity from its period of significance, and as a result it is recommended individually ineligible for the National Register under Criterion A in Education.

The Joyce Learning Center was also evaluated for significance under Criterion C in Architecture as an International Style academic building. During the mid-twentieth century, institutes of higher education across Vermont erected International or modernist style dormitories, libraries, and lecture halls. These buildings were characterized by restrained architectural details and an emphasis on materials such as concrete, brick, glass, and vertical wood siding. The Joyce Learning Center was designed by one of Vermont's premier modernist architecture firms, Freeman French Freeman, who designed over twenty modernist academic buildings in Burlington. The Joyce Learning Center possesses traits of the International Style such as its shallow pitch gable roof. However, the building has experienced several notable changes since 1998. These changes have resulted in a loss of integrity from its period of

significance. Because of this loss of integrity, the Joyce Learning Center is recommended individually ineligible for the National Register under Criterion C in Architecture.

- Meets the Criteria for Evaluation and is eligible for the State/National Register of Historic Places
- Does NOT meet the Criteria for Evaluation and is NOT eligible for the State/National Register of Historic Places

SECTION III

Required Attachments:

- Vermont Architectural Resource Inventory Form (VARI)
- Recent photographs of the property showing exterior views of each elevation; overall views of the property and the surrounding context. If available, include copies of historic views as well. For a historic district, include streetscape views showing how the properties relate to each other.
- Map showing the location of the property in relation to streets, intersections, or widely recognized features. For a historic district, include an approximate boundary showing the extent of the district.

Please email this form as a Word document (not PDF) and all required attachments to:

ACCD.projectreview@vermont.gov

Questions? Call Devin Colman at 802-585-8246

Section IV

*for completion by VDHP staff only

Division for Historic Preservation Determination or Concurrence:

Eligible Not Eligible Insufficient Information for Determination

Criteria: A B C D

Integrity: Setting Location Design Materials Workmanship Feeling Association

Staff Comments: Not eligible individually or as part of a historic district due to the extensive alterations made to the building since its construction in 1971. It does not retain integrity.

Requires Vermont Advisory Council Review? Yes No Not Applicable

Advisory Council Finding: _____

Recorded by: Devin Colman, State Architectural Historian

Date: 1/12/2024

Vermont Division for Historic Preservation Determination of Eligibility (DOE) Form

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SECTION I

Property Address: 381 Maple Street, Burlington Vermont, 05401

Property Name: Freeman Hall

This DOE is for the:

- State Register of Historic Places
 - State project – 22 VSA 14 review
 - Act 250 project – Criterion 8 review
 - State Tax Credits
 - Barn Grant Application
 - Historic Preservation Grant Application
 - VDHP staff request
 - Other _____
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-or-

Britta Tonn on behalf of Champlain College

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December 19, 2023

SECTION II

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Eligibility Recommendation

Evaluated under:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Criterion A: Event | <input checked="" type="checkbox"/> Criterion C: Design/Construction |
| <input type="checkbox"/> Criterion B: Person | <input type="checkbox"/> Criterion D: Information Potential |

Integrity: Setting Location Design Materials Workmanship Feeling AssociationPeriod of Significance: 1903-1941/ 1946-1973Level of Significance: Local State National**Justification for Eligibility Recommendation:**

Freeman Hall on the campus of Champlain College in Burlington is a former Queen Anne style carriage barn that was purchased in 1958 by Champlain College for use as their first academic building. The building was designed by Burlington architect Walter R.B. Willcox and built in 1903 as a carriage barn for Clarence Morgan, the treasurer of the Rutland Railroad, who owned the house at 246 South Willard Street. It then passed to Minnie Roberts, who left the house and carriage barn to the University of Vermont ("UVM") after her death in 1941. From 1941 to 1946, the carriage barn was used for storage and from 1946 to 1957, it served as a UVM women's dormitory. After Champlain College purchased Freeman Hall in 1958, the building was renovated, and two International Style additions were completed in 1961 and 1964. In 1972, the Joyce Learning Center was built just south of Freeman Hall and connected to the building by way of a partial hyphen. In 1989, the building was again renovated. During this renovation, the 1961 and 1964 additions were demolished, and a new lower level was excavated into the hillside to create an additional floor. Since then, Champlain College has continued to expand and remodel its campus such that Freeman Hall is now part of an enclosed walking area known as the Rozendaal Courtyard. The building's last notable modification occurred in 2023, when a copper standing seam metal roof was installed on the building.

The carriage barn has two discrete periods of significance reflecting its original use as a carriage barn and later its conversion to a dormitory and later academic building. The first period of significance is from 1903 to 1941. This period begins with the building's construction and ends with Minnie Robert's death and the barn's subsequent transference to the University of Vermont.

The building's second period of significance is 1946 to 1973. This period of significance begins with the building's conversion to a dormitory by UVM and ends with the 50-year cut off for significance. Freeman Hall remains an important resource on the campus of Champlain College and no discrete date prior to 1973 existed to justify terminating the period of significance before the 50-year cutoff for significance. The period between 1941 and 1946 marks a time when the building did not have any significant use that closely corresponded to its earlier history of a carriage barn and its later history as a college campus building.

Integrity

The following analysis demonstrates that Freeman Hall does not overall retain integrity.

Location

Freeman Hall has not moved since its construction. As such, it retains integrity of location.

Setting

When Freeman Hall was purchased by Champlain College, the surrounding area was a residential neighborhood filled with large Greek Revival, Italianate, Queen Anne, and Colonial Revival style homes and outbuildings. Over the following decades, many of these homes have been purchased by Champlain College and converted into academic use. However, the college has also embarked on significant construction campaigns that have altered the character of the surrounding area. Buildings such as the IDX Student Life Center, the Hauke Family Student Center, Rozendaal Courtyard, and S.D. Ireland Family Center for Global Business and Technology have significantly altered the setting of Champlain College over the last 30 years. Given these continual changes, Freeman Hall no longer retains integrity of setting.

Design

The design of Freeman Hall has been altered on four occasions. In 1961 and 1964, International Style additions were built on the west elevation and north elevation of the ell. In 1972, the building was connected to the newly constructed Joyce Learning Center by way of a partial hyphen, and in 1989, the 1961 and 1964 additions were demolished, and a third level was added by excavating the hillside to expose another story. This new first story, constructed with poured concrete walls, was clad in a stone veneer. Additionally, the interior of Freeman Hall has changed to meet the needs of Champlain College's evolving campus. As a result of these significant alterations that have occurred outside of the period of significance, the building has lost integrity of design.

Materials

Freeman Hall retains some historic materials such as its wood shingle siding. However, most of the original building materials have been replaced. The building has lost its original windows, doors, and in 2023, a new copper standing seam metal roof replaced the original slate roof. Inside, the building has modern finishes such as tile, drywall, carpeting, and acoustic drop ceiling tiles, all of which have been installed over the last 30 years. Given this, Freeman Hall has lost integrity of materials.

Workmanship

Freeman Hall has seen its design and materials altered significantly through additions and modernization efforts. Despite this, elements of the building's workmanship remain intact. These elements are most notable in the building's siding and the slight flair of its walls. However, because the building has changed so significantly, particularly since 1989, few finishes and elements remain intact enough to convey a sense of workmanship. Given this, the building has lost integrity of workmanship.

Feeling

Freeman Hall has experienced significant changes over the last 70 years as Champlain College grew and the building's role on the campus changed. The building's feeling in 1958 was that of an early

twentieth century carriage barn. By the 1960s, the construction of its two now nonextant additions gave the building a more academic feeling. This academic feeling was solidified as the Champlain College campus took shape around Freeman Hall and new resources such as the Joyce Learning Center and Rozendaal Courtyard were built. Excavation of the hillside in front of Freeman Hall to create another full story in 1989 altered its appearance to the point that it no longer possesses the appearance of a carriage barn, and there are no longer features left that convey the feeling of a mid-twentieth century academic building. Because of the nature of changes that occurred after 1973, the building has lost integrity of feeling.

Association

Freeman Hall remains an integral part of the Champlain College campus. Because of this enduring relationship to the college, Freeman Hall retains integrity of association from its second period of significance (1946 – 1973). It does not retain integrity of association with its first Period of Significance as a carriage barn.

Significance

Overall, Freeman Hall is recommended ineligible for listing in the National Register of Historic Places. Further research is needed to determine if Freeman Hall would be considered a contributing resource to a historic district encompassing Champlain College which has not yet been formally evaluated. However, given that many of Champlain College's buildings are less than 50-years old, it is unlikely at this time that the college possesses enough eligible resources to be eligible for the National Register.

Freeman Hall was evaluated for individual significance under Criterion A in Education. Freeman Hall was used as a women's dormitory by UVM from 1946 to 1957, providing women with a space to live and study while attending the university. Purchased in 1958 by Champlain College, Freeman Hall became the university's first academic building. In this context, Freeman Hall is of foundational importance to the history of Champlain College, whose campus has grown up around the former carriage barn. The renovation of Freeman Hall also demonstrated that formerly residential outbuildings could be successfully converted to academic facilities and student spaces. As a result, many of the neighboring mansions and houses were purchased by Champlain College in the late twentieth century and incorporated into the campus. Given its centrality to the growth of Champlain College, one of Vermont's largest institutes of higher learning, Freeman Hall possesses significance. However, as described above, the building has been substantially altered to the extent that its current appearance no longer resembles its appearance during its Period of Significance as an academic building. As a result, it is recommended individually ineligible for the National Register under Criterion A in Education due to a loss of integrity.

Freeman Hall was also evaluated for individual significance under Criterion C in Architecture. Built in 1903 as a Queen Anne style carriage barn, Freeman Hall has undergone many alterations since 1946 when it was first utilized as a campus building by UVM. The most significant of these changes, the 1989 excavation of a lower level to turn it into a three-story building and removal of the mid-twentieth century International style wings that were a good example of mid-twentieth century academic architecture, have significantly altered its historic appearance. and while the building retains elements of its Queen Anne design such as the prominent hexagonal tower and shingle siding, it has overall lost

integrity from both of its Periods of Significance. Because of this, Freeman Hall is recommended individually ineligible for the National Register under Criterion C in Architecture.

Freeman Hall was also evaluated within the context of the South Willard Street Historic District. Listed in the National Register of Historic Places in 1988, the South Willard Street Historic District was deemed significant under Criterion C in Architecture. At that time, Freeman Hall was listed as a noncontributing resource in the historic district due to alterations, namely the 1961 and 1964 International Style additions which did not fit the historic or architectural significance of the residential neighborhood. It is recorded as "Carriage Barn," a related resource (#32B) to the contributing A.B. Fisher House - C. R. Turrill Residence at 258 South Willard Street (#32); erroneously, its date of construction in the nomination is listed as 1889. The National Register form noted that if the additions were removed carefully, the carriage barn could be considered a contributing resource. Although the additions have been removed, additional alterations have occurred such that it no longer retains integrity. As a result, it is recommended that Freeman Hall remain a noncontributing resource to the South Willard Street Historic District.

- Meets the Criteria for Evaluation and is eligible for the State/National Register of Historic Places
- Does NOT meet the Criteria for Evaluation and is NOT eligible for the State/National Register of Historic Places

SECTION III

Required Attachments:

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Division for Historic Preservation Determination or Concurrence:

Eligible Not Eligible Insufficient Information for Determination

Criteria: A B C D

Integrity: Setting Location Design Materials Workmanship Feeling Association

Staff Comments: Freeman Hall, while important to the history of Champlain College, no longer retains sufficient integrity to be eligible for the National Register individually or as part of a historic district. Significant alterations have adversely affected its ability to reflect its significance as the carriage barn designed by architect W.R.B. Willcox. Likewise, the alterations have adversely affected its ability to reflect its significance as the original Champlain College building in 1958. The 1961 and 1964 additions have been removed, and the lower level of the building has been completely rebuilt and exposed. This work happened within the past 50 years and has yet to gain significance in its own right.

Requires Vermont Advisory Council Review? Yes No Not Applicable

Advisory Council Finding: _____

Recorded by: Devin Colman, State Architectural Historian

Date: 1/12/2024