CUYAHOGA VALLEY NATIONAL PARK

Environmental Assessment for

Church in the Valley Land Transfer

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1.0 Introduction / Purpose and Need

1.1 Background

The boundary of Cuyahoga Valley National Park lies within two counties and 15 communities. For several of these communities, the bulk of the community is either surrounded by or nearly fully encompassed by the national park. Predictably, the national park and the communities share many common interests from road maintenance and emergency services to zoning and resource protection. Also, within the boundary of the national park, there are 83 tracts of land (covering over 9,000 acres) that are also in public ownership. Nearly all of this land is held by two metropolitan park districts for use as parkland and open space. In addition, within the boundaries of the park there are an additional 17 properties, encompassing nearly 2,200 acres of land, that, while privately owned, provide recreational or educational facilities and services for the public in a manner compatible with park goals and values. Examples include ski areas, golf courses, the Blossom Music Center, Western Reserve Historical Society's Hale Farm and Village and several scout camps.

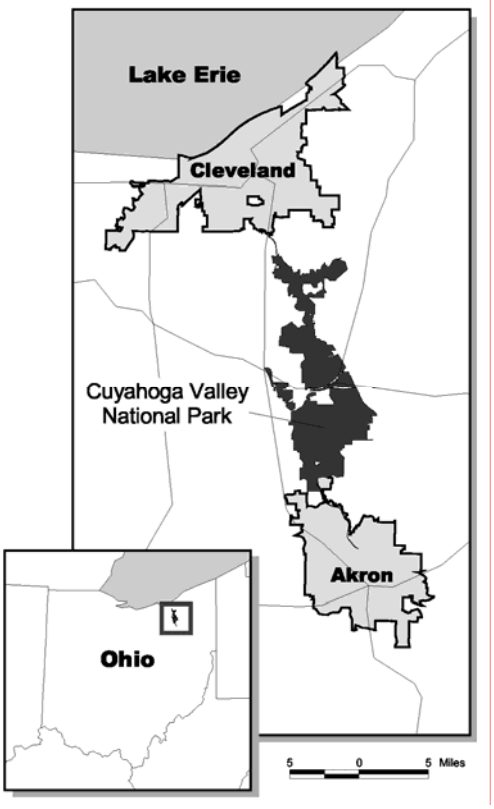

Figure 1. Location of Cuyahoga Valley National Park, Ohio.

Collectively, these lands represent nearly 35% of the total land mass of the CVNP. It follows that the success of Cuyahoga Valley National Park, is ultimately dependent not only on the direct management of NPS lands and facilities, but also on how other lands within the park are administered. NPS policies also recognize that parks are "integral parts of larger regional environments," and therefore direct managers to "work cooperatively with others to... address mutual interests in the quality of life of community residents, including matters such as compatible economic development and resource and environmental protection." For these reasons, the park regularly works with public and private entities for mutual benefit. Over the years, cooperative ventures include land consolidation through exchanges, financial assistance, joint participation in project development and cost sharing, community planning, development projects, restoration projects, etc. As a result, the park has been able to

- Secure land and long-term protection over sizeable private properties through conservation easements
- Construct priority public facilities
- Improve zoning of lands in and adjacent to the park,

- Expand services and programming for park visitors, etc.

When appropriate, the park has also responded to requests for assistance from communities and other partners. These have included:

- Financial assistance for communities for road maintenance, emergency services and other public services
- Use of NPS land for public facilities (recreational and otherwise), and community support uses
- Technical assistance in cultural and natural resource protection, development of visitor facilities and services, engineering guidance, etc.

The park evaluates each of these, considering the expressed need, whether or not legal authority exists for the action, that the action falls within the management policies of the NPS and the enabling legislation of the park, the magnitude of the request, etc. Furthermore, when NPS land is involved, the protection of natural and cultural resources and the public interest remains the principal focus.

The project associated with this Environmental Assessment (EA) responds to an expressed desire on the part of the Church in the Valley, a historic church located within the hamlet of Everett in the southwest portion of the park.

The crossroads community of Everett fronts a wooded valley wall and is bordered by river-bottom fields. It is located in the southwestern corner of Boston Township, in Summit County approximately nine miles north of the city of Akron. The street pattern of the community defines Everett as a crossroads. Buildings located within proximity of this intersection comprise the bulk of Everett. Today, the entire crossroads is listed in the National Register of Historic Places as the Everett Historic District (NR 3/94). The district is a locally important example of an unincorporated hamlet settlement type. The district is also listed for its historical archaeological significance based on the potential to yield important information on non-aboriginal cultures in the Cuyahoga Valley.

The Everett Church of Christ (now referred to as the Church in the Valley), was built in 1906 by the residents of Everett and the surrounding community following the loss of the original church to fire. The main sanctuary has a high ceiling with a single steeple. This building is on the List of Classified Structures (HS-478) as well as the Ohio Historic Inventory. In 1967, the building was enlarged in the rear to add rooms for the Pastor's office.

Since the creation of the park, the NPS has acquired nearly all of the properties located in the hamlet of Everett. The only developed property still in private ownership is the Church in the Valley (MetroParks Serving Summit County owns the land across Everett Road from the church). NPS ownership includes 29 buildings that were originally used as homes, a general store, barns and outbuildings, and other small commercial buildings. Also, since the early 1990's, the NPS has endeavored to rehabilitate all NPS-owned historic buildings and develop uses that are compatible with the park. The uses include offices, residences for park interns, the park library, archives and curatorial storage. Between land acquisition and rehabilitation costs, the NPS has invested more than 3.5 million in preserving the hamlet, and remains committed to protecting the area's resources, historic integrity and scenic values.

1.2 Project History

In 2001, leaders of the Church in the Valley (Everett Church of Christ) concluded, through an evaluation of their facilities and programs, that existing facilities are insufficient to serve the needs

of an active, growing congregation. Specifically, the existing structure does not have needed classroom, assembly and office space to meet the long-term needs of their congregation. Supporting this conclusion were several facts articulated in grant proposals by the Church for project funding. These included:

1. The Church's current active membership is approximately 300. The current building seats roughly 100 people using the 16 pews, and an additional 25-30 individuals using removable seating. The basement under the sanctuary is used as a fellowship hall and is supported by a small, adjoining kitchen. The basement can only accommodate 75-80 people and severely limits church-wide activities.
2. Unlike years past, the church no longer functions as a 'community church' serving neighboring residential properties. This is due, largely, as a result of NPS acquisition of most residential properties in the vicinity. This means the church must attract new members from a wider area and therefore compete with other churches which are often more convenient for potential members. While the church's setting and character are an important attraction, providing modern facilities and services remains important for attracting and maintaining membership.
3. The church's targeted level of community outreach activities is limited by the existing structure. They currently offer AA chapter activities, food and Christmas gift donation collection and coordination, Hiker and Biker church services for park users, and ministry to Native Americans (pastor John Fisk and his wife are both part Cherokee Indian). Beyond being able to conduct church-wide activities, additional services possible as a result of the addition would include: limited day care for children and the elderly, youth programming, community and organizational meeting space, and displays about area Native Americans.

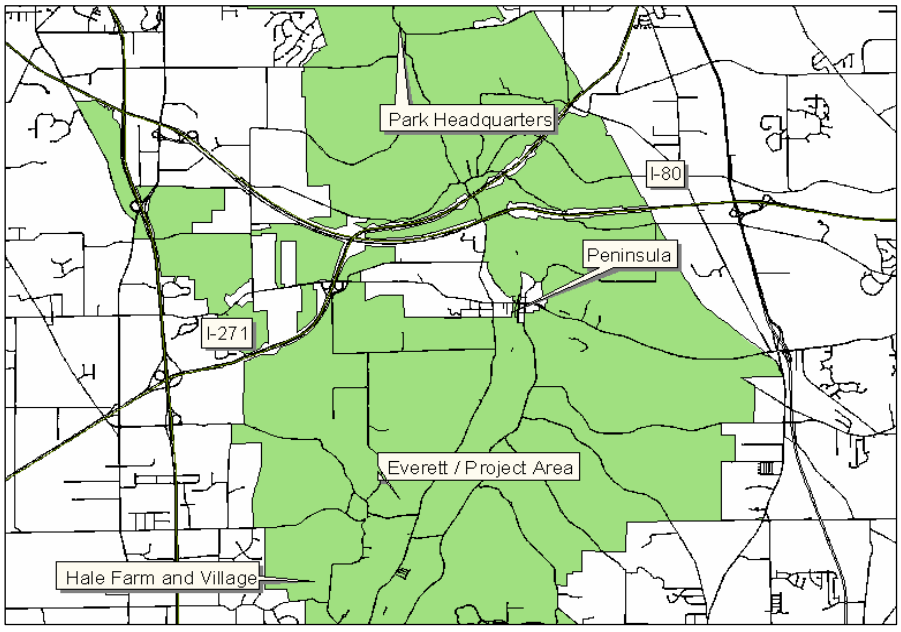

Figure 2. Location of Project Area

The noted shortcomings of the building were deemed to fundamentally undermine the long-term viability of the congregation. In studying these problems, church leaders identified two solution options: 1) expand at the current location; or 2) relocate to a new facility outside of the national park.

Unfortunately, under the current circumstances, expansion is practically impossible.

Because of the small size of their property, any addition to the existing church would practically occupy all 'build-able' land currently in church ownership. As a result, sufficient land would not remain to provide the needed parking and sanitary components needed for the expanded facility. A further complication was that all of the land surrounding this property is in public ownership (predominantly the National Park Service, but also MetroParks, Serving Summit County).

Ultimately, these conditions further frame the challenge facing the Church – secure additional land necessary for an expansion at the Everett location or relocate offsite to a larger parcel/facility.

1.2.1 Additional Information

1.2.3.1 Land Transfer Considerations

Some adjacent park land has been assigned to the Church for many years under two Special Use Permits. An SUP was first issued to the Church in 1992 to allow for the construction of additional parking for the existing facility. The second permit was issued in 1998 and provided for the passive recreational use of the balance of the field. Both permits have been consistently renewed by the NPS. Primary access to the field has been across church lands and for that reason, this portion of Tract 114-72 has not historically been used by the general public.

The National Park Service initially considered a Sellback and had received targeted, Congressional authorization for such in the Interior Appropriations for FY2002 (see language below).

> PUBLIC LAW 107–63—NOV. 5, 2001. DEPARTMENT OF THE INTERIOR AND RELATED AGENCIES APPROPRIATIONS ACT, 2002. .... Notwithstanding any other provision of law, the National Park Service may convey a leasehold or freehold interest in Cuyahoga NP to allow for the development of utilities and parking needed to support the historic Everett Church in the village of Everett, Ohio.

However, one requirement of the Sellback authority is that the property must be sold to the highest bidder. As this requirement could not provide any guarantee that the church would be the successful bidder, a Sellback was determined to be an imperfect tool for this circumstance.

At the same time, the NPS has long supported protection of the existing historic church - which is included in the listing in the National Register of Historic Places as part of the Everett Historic District. The NPS has previously flagged the property as needing a formal tool in order to protect the historic resources; the possibilities ranged from a cooperative agreement / technical assistance through full NPS fee ownership. Today, when considering how best to accomplish protection, the park has concluded that because a church – with its single purpose design, massing and floor plans – is not well suited to adaptive reuse, the best approach to protection of the property is its continued use as a church coupled with an NPS-held historic preservation easement. The park recognized that an exchange, unlike the sellback option, could further the NPS's long-held historic preservation objectives for the church property.

Should this environmental assessment support the land transfer alternative, the National Park Service would transfer 4.28 acres of land to the church (see map in Appendix D) in return for a historic preservation easement over the existing church (along with whatever amount of funds would be necessary to equalize the value between the incoming and outgoing land/interests).

1.2.3.2 Church Addition Design Requirements

The NPS requested, and the church agreed to design the new addition in a manner that was consistent w/ the Secretary of the Interior's Standards for Historic Preservation. This represented a considerable departure from already developed plans, yet the church re-employed their architects to

respond to the NPS re-design request. The re-design process employed members of the NPS, the Church and their architect, and the Cleveland Restoration Society. It is important to note that most of this work was completed prior to any discussion about an exchange.

1.3 Proposed Action

The Church in the Valley, to remain a viable community church, has a desire to expand in place, and for reasons stated below, has approached the NPS with a request for use or transfer of NPS land. In response, the park is considering the exchange of 4.28 acres of land located behind the existing church.

The desire for this project, at this time, is founded on the conclusion by Church officials that an expansion of the existing church structure is the only means of insuring long-term survival of the congregation at the current location. They report that this is mainly due to the fact that the church no longer functions as a community church because most the church's members moved away as a result of NPS land acquisition in the area. As a result, the church must attract members from the wider area, and, in doing so, must compete with other churches that are able to provide a broad range of services and facilities for their members. The church reports that among the problems with the existing building are: insufficient space for classes, church offices, day care during services and youth programming, and no means for larger church functions.

Unfortunately, this historic church lies on a small parcel of land entirely surrounded by public land (primarily NPS-owned), and, while sufficient church-owned land remains for the planned addition, there is insufficient land remaining for required, related improvements. Additional land is needed in order to provide a parking lot and sanitary system. As these are critical components of the project, the church cannot proceed with the planned addition until the additional land can be secured.

However, all land surrounding the church is in public ownership and, predominantly, owned by the NPS. A request for the use of land owned by MetroParks Serving Summit County, and currently under lease as farmland, was denied. As framed by church leaders, this leaves the congregation with only two long-term options: use of NPS land or relocation. If the NPS is unable to make land available for this project, the church anticipates relocating out of the valley in the near future.

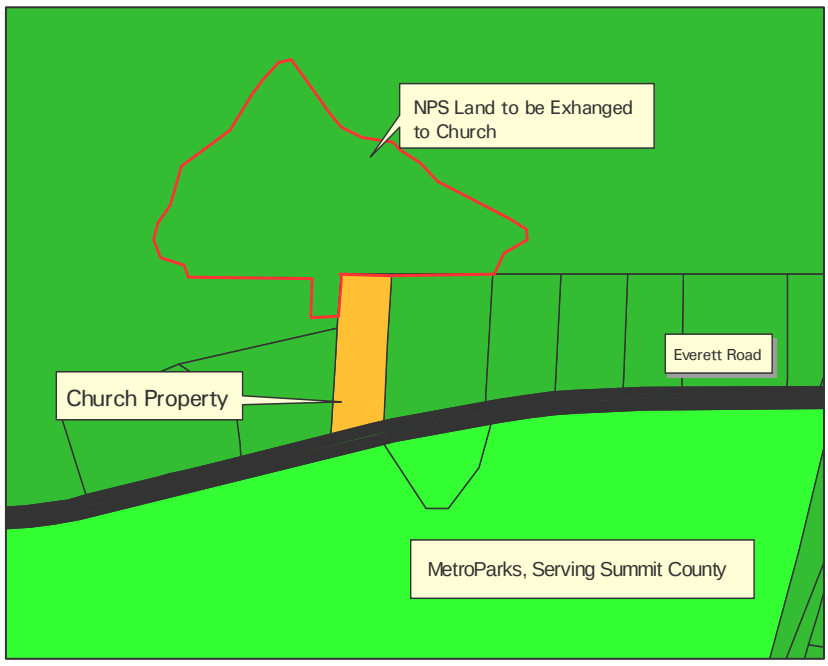

Figure 3. Project Area Land Ownership

1.4 Purpose and Need Statement

The purpose of this action is to provide for both the long-term protection of the historic and cultural resources associated with the Church in the Valley as well as promote the continued historic use of the property.

The need to which CVNP is responding is a request from the Church in the Valley for the transfer or exchange of NPS land to construct a parking lot and sanitary system. Such facilities would be in conjunction with the construction of an addition onto the existing church building to provide for additional, identified facility capacity.

1.5 Laws (Statutes), Executive Orders, Regulations, Policies and Guidelines

1.5.1 Cuyahoga Valley National Park enabling legislation (previously CV National Recreation Area)

The resources of CVNP are protected under the authorities of the National Park Service Organic Act of 1916 (16 U.S.C. § 1), the National Park System General Authorities Act (16 U.S.C. §§ 1a-1 et seq.), Part 36 of the Code of Federal Regulations (CFR), and the park's enabling legislation (Public Law 93-555).

The Cuyahoga Valley National Recreation Area was established by Public Law 93-555 on December 27, 1974 and was renamed Cuyahoga Valley National Park on October 11, 2000. Section 1 of PL 93-555 states the purpose of the Park:

> *For the purpose of preserving and protecting the historic, scenic, natural, and recreational values of the Cuyahoga River and the adjacent lands of the Cuyahoga Valley and for the purpose of providing for the maintenance of needed recreational open space necessary to the urban environment, the Cuyahoga Valley National Recreation Area.... In the management of the recreation area, the Secretary of the Interior shall utilize the recreation area resources in a manner which will preserve its scenic, natural, and historic setting while providing for the recreational and educational needs of the visiting public.*

Section 4 (d) of PL 93-555 addresses the duties of the Secretary of Interior:

> *The Secretary...shall inventory and evaluate all sites and structures within the recreation area having present and potential historic, cultural, or architectural significance and shall provide for appropriate programs for the preservation, restoration, interpretation and utilization of them.*

1.5.2 NPS Servicewide Laws, Executive Orders, Regulations and Policies

In addition to the language presented in PL 93-555 that created Cuyahoga Valley National Park (Recreation Area), general preservation and management direction is provided by the National Park Service Organic Act of August 25, 1916. This act established the NPS and, by extension, states the overall mission for areas managed by the NPS:

> *... promote and regulate the use of the Federal areas known as national parks, monuments, and reservations...by such means and measures as conform to the fundamental purpose of said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.*

Other laws, regulations and policies that have bearing on this action are referenced in Appendix A.

2.0 Issue Identification

Issues as discussed in NEPA, describe the relationships between the action being proposed and the environmental (natural, cultural and socioeconomic) resources. Issues describe an association or a link between the action and the resource. Issues are not the same as impacts, which include the intensity or results of those relationships. Internal scoping (defining the range of potential issues) was conducted for this EA to identify what relationships exist between the proposed action and environmental resources. An interdisciplinary team (IDT) was formed for the project and an Environmental Screening Form was prepared on April 10, 2003 (see Appendix B).

Scoping was also conducted in June and July 2003 with federal, state, and local agencies and organizations having direct and indirect jurisdiction, insight, knowledge, expertise or concern for CVNP resources. Copies of comments received from federal, state, and local agencies/governments/ organizations are included in Appendix C.

DO-12 requires an Environmental Assessment when the National Park Service plans a land exchange and when such an exchange will lead to 'anticipated changes in use of land.' In addition, the following issues were identified through the internal scoping process for further consideration in an EA:

- The fundamental purpose for preparing this Environmental Assessment stems from NPS plans to exchange lands which will be put to a use different from their current use.
- The project lies within the range of the Indiana bat (*Myotis sodalist*), a federally listed endangered species, and within the range of the federally threatened northern monkshood (*Aconitum noveboracense*).
- The addition of paved impervious surfaces will increase runoff for the site. Water from the parking area runoff could also carry contaminants from automobiles to the nearby Cuyahoga River. And, on-site waste water treatment could also potentially introduce biological or chemical contaminants into the environment.
- There may be impacts on cultural landscapes, historical and archaeological resources in the area.
- The area soils are soft and compressible when wet, which, at steep slopes can present overland drainage and soil erosion concerns when disturbed.
- There may be impacts on the visitor enjoyment to the national park because of anticipated land use changes.

2.1 Issues and Impact Topics Addressed in this EA

The issues identified above were translated and focused into impact topics, or a more specific description of resources that may be impacted by the action. These impact topics are then

At a Glance: Issues addressed

- Visual/Scenic Resources
- archeological Resources
- Historic Buildings
- Cultural Landscapes
- Land Use

carried through the analysis in the EA. The affected environment under each of the impact topics identified is presented in Section 4. An analysis of the impacts on these resources from each alternative is evaluated in Section 5.

2.1.1 Visual resources

Preservation of the natural and scenic values of the Cuyahoga River and adjacent lands is central to CVNP's legislative mandate.

The historic integrity and appearance of the hamlet of Everett remains very high, and, while no public attractions or facilities are located within the hamlet, the visitor appreciation for the area is considered noteworthy. Changes to land use or historic buildings not in keeping with the historic setting could impact visitor enjoyment of the park. This is true on a building by building basis, but it is equally true at the community level as well. Protecting the historic character of the hamlet at large is an equal consideration to any changes to individual features within the hamlet.

2.1.2 Archeological Resources

Sections 106 and 110 of the National Historic Preservation Act, as amended in 1992 (16 USC 470 et seq.) require the consideration of impacts on cultural resources. In addition, the NPS *Cultural Resource Management Guidelines* (Director's Order 28) and *NPS Management Policies* (2001) require the consideration of impacts on cultural resources listed on or eligible for listing on the National Register of Historic Places.

In general, most archeological survey work at CVNP occurs in conjunction with projects that require ground disturbance. The planning process in relation to these projects typically provides for archeological inventory work to be completed prior to the actual ground disturbing activity. This inventory work is the initial step taken to provide data about the location of resources and the level of significance. In turn, potential impacts on archeological resources are reduced through measures such as site avoidance, project redesign, or other site protection measures. Currently, the only long-term archeological monitoring occurs in relation to actively cultivated farm fields where the fields are inventoried annually to compare and record findings over time.

The site lies within Everett Village – a historic hamlet that has also been the location of widespread and important prehistoric sites as well. Historic and prehistoric archaeological resources could be affected by the proposed project.

2.1.3 Historic Structures/Buildings

The National Historic Preservation Act, as amended in 1992 (16 USC 470 et seq.) and the NPS *Cultural Resource Management Guidelines* (NPS 1997) and Policies (Director's Order 28) require the consideration of impacts on cultural resources listed on or eligible for listing on the National Register of Historic Places.

2.1.4 Cultural Landscapes

According to the *NPS Management Policies* (NPS 2001a) and *Cultural Resource Management Guidelines* (NPS 1997), all cultural landscapes are to be managed as cultural resources regardless of the type or level of significance. Management actions are to focus on preserving the physical attributes, biotic systems, and uses of a landscape as they contribute to historic significance.

The land proposed for transfer to the church was previously a farm field and while not included in the *National Register* nomination for the Hamlet of Everett, it none the less contributes to the character of the village as it is located immediately adjacent to the district. This is true because views north into the property from Everett Road further reinforce the historic rural character of the

hamlet. Land use changes associated with the field could impact the cultural landscape resources of the subject property.

2.1.5 Land Use

It was noted that adjoining properties could be affected by the proposed project. Two residential properties are directly adjacent to the land proposed for exchange. These properties are owned by the NPS. One is currently occupied by park interns while the other is expected to be reoccupied in the coming years. This project could affect the use of these properties.

2.2 Issues and Impact Topics Identified and Considered But Not Addressed in this EA

Some issues and impact topics were brought up in the scoping process because they were thought to be problematic, but after further consideration, were thought not to be worthy of an extended analysis. These issues and impact topics are therefore not considered further in this document.

Several resources do not exist on this property and, therefore, no further analysis was conducted. These included:

- Sole or Principal drinking water aquifers
- Traffic
- Prime Farmlands
- Indian Trust Resources
- Floodplains
- National Natural Landmarks
- Nationwide Rivers Inventory Status
- Ecologically Significant or Critical Areas

2.2.1 Water Resources and Wetlands

The NPS Management Policies (NPS, 2001a) state that the NPS will "take all necessary actions to maintain or restore the quality of surface waters and ground waters within the parks consistent with the Clean Water Act and all other applicable federal, state, and local laws and regulations." NPS Management Policies and Executive Order 11990 "Protection of Wetlands" also direct the NPS to minimize and mitigate the destruction, loss, or degradation of wetlands; preserve, enhance, and restore the natural and beneficial values of wetlands; and avoid direct and indirect support of new construction in wetlands unless there are no practicable alternatives and the proposed action includes all practicable measures to minimize harm to wetlands.

The action alternatives involve the construction of a parking lot and on-site waste water treatment, both of which could impact the quality and quantity of water resources. Among general concern for water resource protection, specifically noted concerns included riparian setbacks requirements, storm water management, and waste water treatment options. There is one stream located downslope east of the project site that drains approximately 35 acres. The distance from the field edge to the stream ranges from 200-250' along the northeast to approximately 80' from the eastern tip of the field. There are no wetlands within 150 feet of the project area.

The U.S. Environmental Protection Agency (US EPA) has developed national recommended ambient water quality criteria for approximately 120 priority pollutants for the protection of both aquatic life and human health (through ingestion of fish/shellfish or water) (US EPA, 1999a). The Phase II storm water regulations refer to storm water discharge associated with construction that must comply with the rules and regulations of the Ohio Environmental Protection Agency (Ohio EPA)'s recent

issuance of the National Pollutant Discharge Elimination System (NPDES) General Permit. The permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) prior to construction. Permitting for construction in Summit County also requires adherence to the Summit County Riparian Setback Ordinance 2002-154. This ordinance calls for development setbacks from streams in order to protect riparian areas. Using the 'normal high water levels' of the affected streams, the setbacks are graduated to account for the grade of the watercourse and the extent of its watershed. The Church will be required to meet these requirements in order to secure necessary construction permits. The NPS has adopted similar set-back requirements for both streams (NPS, 2002a) and wetland resources (NPS, 2002b).

These requirements have been taken into account in the design of the action alternatives. A 75-foot vegetated set-back area, starting at the forest edge (i.e., the top of the steep slope down to the stream) has been set aside to eliminate or minimize impacts to the stream. Currently that area is being mowed as lawn. Additionally, the design of the parking lots in the action alternatives has included minimizing impervious surfaces and promoting the use of grassy swales for improved storm water management.

The waste water treatment system proposed for installation would be located in the western portion of the field (see map in Appendix D). Treatment would be provided through a typical on-lot system including a septic tank followed by a leaching tile field which distributes the treated sewage evenly over an area for in-ground effluent dispersal. On land currently owned by the NPS, the component elements would include the necessary evapotranspiration field, a mounded sand filter and the connecting piping. This location provides sufficient, suitable land for the initial evapotranspiration field as well as the Ohio EPA-requisite replacement location. In addition to the evapotranspiration field, a mounded sand filter, approximately 25'x25,' would be included to provide additional treatment of effluent before entering the evapotranspiration field (see photo on page 56).

Such systems, under proper use and maintenance, are considered to be non-discharging systems – meaning that all waste water is properly treated on-site. Risks of failure/discharge are small and are largely associated with the evapotranspiration field. They include damage to piping, clogging from solids, and age. However, because the field is surrounded by lawn and other vegetation, any discharge is expected to be contained on site and not jeopardize the surface water quality of the area.

For these reasons, any short-term or long-term adverse impacts to water resources under any alternative are expected to be negligible. The increase in riparian set-back area under the action alternatives will provide negligible-minor benefits (i.e., increased erosion control at the field edge) to water resources. No cumulative effects in this area are anticipated. Therefore this issue will not be analyzed further in this document.

2.2.2 Threatened, Endangered, or Special Concern Species

The Endangered Species Act of 1973, as amended, requires federal land managers to consider the effects their planned activities may have on species listed as endangered or threatened. In response to the Scoping Letter, the U.S. Fish and Wildlife Service indicated concern for the federally endangered Indiana Bat (*Myotis sodalist*) and the federally threatened northern monkshood (*Aconitum noveboracense*).

The federally-endangered Indiana bat (Myotis sodalis) was recently found in the park. The park contains an abundance of apparently suitable roosting tree habitat. However, no such habitat is located within the project area. This project involves only the removal of seven exotic spruce trees which are not considered potential habitat.

Detections of the federally-threatened bald eagle (Heliaeetus leucocephalus) have been limited to 1-2 non-breeding individuals seen perched near the Cuyahoga River during winter months. No nests have been found within the park. Piping plover (Charadrius melodus) is a federally listed endangered species that occurs in Cuyahoga County, but is not found within the park. No suitable breeding habitat for piping plovers exists within park boundaries. The park is also within the range of the eastern massasauga (*Sistrurus catenatus catenatus*) rattlesnake, a candidate species for listing under the Endangered Species Act (ESA) and listed as endangered by the State of Ohio. While the type of wet habitat this snake prefers is found in CVNP, there is no record of this species occurring within the park.

Habitat within the study area is not considered suitable for any of these species and none of these species would be expected to occur on at the site or the immediate vicinity. There are no federally-designated critical habitats or wilderness areas within the vicinity of the park.

There are no known occurrences of northern monkshood (*Aconitum noveboracense*) in the park. Over twenty-nine other state-listed rare plant species are known to occur in CVNP. These plants occur in various habitats in CVNP. Field inspection of the project site (a large mowed lawn) indicates no signs of threatened, endangered, or rare plant species, whether federally or state listed.

This issue will not be analyzed further in this document.

2.2.3 Vegetation and Wildlife

Impacts on vegetation and wildlife may be expected from any construction project. However, the limited size of this project and the fact that it is currently managed as a large, mowed lawn reduces any impacts to negligible levels. The conversion of a portion of this lawn area to a parking lot may have negligible impacts white-tailed deer and a few species of generalist songbirds. The loss of seven exotic spruce trees would provide negligible benefits to the overall integrity of natural park vegetation. This issue will not be analyzed further.

2.2.4 Invasive Species

EO 13112 requires that federal agencies act to prevent the introduction of invasive species and provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause. Less than ten plant species known to be in CVNP are considered invasive. The location and extent of ground disturbance expected by the proposed project will be very limited and temporary thereby greatly reducing any risk of an invasive exotic species outbreak.

2.2.5 Air Quality

The 1963 Clean Air Act (42 USC 7401 et seq., as amended) requires federal land managers to have an affirmative responsibility to protect a park's air quality from adverse air pollution impacts. The construction alternatives would involve the use of construction equipment that would result in emissions. Additional emissions would be realized as the additional vehicles enter and leave the expanded facility. However, any such emissions would be localized, temporary and inconsequential to the park's air quality.

2.2.6 Soundscapes

NPS Management Policies (NPS 2001a) state that the parks will strive to preserve the natural quiet and the natural sounds associated with the physical and biological resources for the parks. Activities which cause excessive or unnecessary unnatural sounds in and adjacent to parks should be minimized so as not to adversely affect park resources, values, or visitor's enjoyment of them.

Only a short-term increase in unnatural sounds is expected during the installation of parking and waste water treatment facilities expected with this proposal. Any continuing changes to the level of unnatural sound in the national park are expected to be temporary, localized and insignificant.

2.2.7 Energy resources

There will be temporary use of energy resulting from any of the 'construction' alternatives. However, these impacts are considered negligible and will not be discussed further.

2.2.8 Geologic Resources

NPS regulations and NPS Management Policies provide guidance on geologic resources and processes. There are no geologic resources or processes involved with the action. A small tributary is located northeast of the subject property. This stream drains approximately .45 square miles or 29 acres and will be protected by a minimum 30 foot riparian setback (Summit County Ordinance 2002-154). No alternative considered in this EA will affect this natural geologic process, because no ground disturbance will take place within the required protection limits.

2.2.9 Ethnographic Resources

NEPA requires the consideration of possible conflicts between the proposal and land use plans, policies or controls for cultural groups including Indian Tribes. The park received a number of replies to the Scoping Letter from the Delaware tribe indicating general interest in project but not the identification of any ethnographic resources.

2.2.10 Economic factors

NEPA requires that not only cultural and natural factors be analyzed but also the "human environment" which includes economics. This may also include land use (occupancy, income, values, ownership and type of use) and socioeconomics (employment, occupation, income changes, tax base, infrastructures, etc.). There could be minor temporary contributions to employment and business in the surrounding area from the construction of one of the 'build' alternatives. However, these impacts are considered negligible and will not be discussed further.

2.2.11 Visitor Experience

The Management Policies (NPS 2001a) state that the enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks and that the National Park Service is committed to providing appropriate, high-quality opportunities for visitors to enjoy the parks.

While visitor experience was noted in the internal scoping process, further study indicated that the issues were largely those of visual resource protection. There currently are no public facilities in the hamlet of Everett, nor plans to develop such. Therefore, no existing or planned visitor activities/facilities are expected to be impacted by this proposal.

2.2.12 Environmental Justice

Executive Order 12898, Environmental Justice in Minority and Low-Income Populations directs federal agencies to assess whether their actions have disproportionately high and adverse human health or environmental effects on minority and low-income populations. There are no identifiable minority or low-income populations within CVNP or influenced by CVNP. It is therefore concluded that the actions of CVNP will have no disproportionately high and adverse human health or environmental effects on minority and low-income populations.

3.0 Alternatives

The CEQ has provided guidance on the development and analysis of alternatives under NEPA.

A full range of alternatives, framed by the purpose and need, must be developed for analysis for any federal action. They should meet the project/proposal purpose and need, at least to a large degree. They should also be developed to minimize impacts to environmental resources. Alternatives should also be "reasonable," which CEQ has defined as those that are economically and technically feasible, and show evidence of common sense. Alternatives that could not be implemented if they were chosen (for economic or technical reasons), or do not resolve the need for action and fulfill the stated purpose in taking action to a large degree, are therefore not considered reasonable.

3.1 Alternative 1 - No Action

The CEQ has specified that one of the alternatives must be the "no action" alternative for two reasons. One is that it is almost always a viable choice in the range of alternatives, and the other is that it sets a baseline of existing impact that may be projected into the future against which to compare impacts of action alternatives.

Under the No Action Alternative, CVNP would continue with the status quo. There would be no assistance given to the Church in the Valley from CVNP and land ownership would remain the same. Any changes that the church would make to the existing building and site, and the expansion or decrease of services would not involve CVNP land. Because of the land ownership circumstances surrounding the church property, under this alternative, the church would have limited options that would not involve CVNP.

It is expected that, without additional land, the church could not proceed with the proposed addition. In the short-term, the church could remain at the current location and accept the limits to service that the existing building creates. If so, this Alternative would likely result in the NPS land behind the church continuing to be used by the church under an NPS Special Use Permit for a parking lot and passive recreation purposes. In the long-term, however, it is expected that the congregation could relocate away from the current building/location, presumably out of the valley and park and into a nearby community.

As the church does not have immediate plans for relocation of the congregation, for the purposes of this assessment, the No Action Alternative will be considered for both its current and probable long-term impacts.

3.1.1 Wastewater Treatment

The existing wastewater treatment system at the church consists of a single holding tank with an aeration pump that was installed in 1967 (compliant with Ohio EPA regulations at the time of installation). The land owned by the church remains insufficient to provide needed space for a septic leaching or evaporation field.

Today, the 'treatment' system includes a holding tank with an overflow outlet that enters a dry well. The aeration pump on the tank has never worked sufficiently. In practice, the church has simply pumped the tank annually, or as needed, in order to remove wastes. A dry well also serves as a storm water collection receptacle for the church building (gutters). Should the amount of water exceed the capacity of the dry well, a pipe directs the overflow into the front yard of the church and the roadside ditch running along the north edge of Everett Road.

Because of the limited use of the facility (duration and number of users), the volume of wastes is not considerable. While it is not possible to quantify waste generation for the Church, water consumption is a very strong indicator of the volume created. The Church reports that in the three (3) most recent years water consumption records indicate an average water consumption rate of only 400 gallons/week consumption. There are few solids; with water from the toilets, small laundry facilities and kitchen making up the majority of the waste volume.

Historically, annual pumping of the holding tank has been sufficient to manage the wastes. Officials from the church who monitor the system report limited discharge into the dry well. Separately, small amounts of soapsuds have been observed at the end of an underground pipe coming from the property into the ditch along Everett Road indicating small some amount of discharge off the property. While offsite discharge may be small, the system lacks adequate protection of the environment and remains a possible source of pollution to nearby fields and watercourses.

The church is not currently under any orders by Ohio EPA or the Summit County Health Department to make improvements to, or replace, the existing system.

In the long-term, if the church relocates away from this site, the building would likely become vacant in which case no offsite discharges would be expected.

Figure 4. Aerial Photograph of Existing Parking Lot

3.1.2 Parking Facilities

In the short-term, the existing, 60-car parking area would remain in its current location proximate to the neighboring residential property (NPS-owned). In the long-term, it would be expected that the church would relocate and the existing parking area could be removed and revegetated.

3.1.3 Historic Preservation

Under the No Action Alternative, no land exchange would take place, and, therefore, the NPS would not acquire a historic preservation easement for the historic church. Therefore, the church building – listed on the National Register of Historic Places under the Everett NH District – would remain without any protection beyond the interest of current and future owners to preserve the structure.

Should the congregation relocate, as suggested, and, if the Church's assessment of the existing facilities is correct, then the park could expect that no other congregation would likely acquire the property either. In turn, we expect that the property would cease to be used as a church. Furthermore, because churches are typically single-use structures – that is they don't lend themselves to multiple uses – any future owners would likely have to substantially alter the existing building in order to make it useful for other purposes. These circumstances suggest that, if the current congregation was to relocate, the historic church would likely become vacant or would undergo substantial change to provide for another use.

If either of these possibilities were to occur, long-term protection of the historic church would be undermined.

3.3 Alternative 2 – Land Transfer (Exchange) with Conditions (Preferred Alternative)

Under Alternative 2, the park would transfer 4.28 acres of NPS-owned land to the church for use as part of an expanded facility. The actual transfer of land would be accomplished through a land exchange whereby, in return for the 4.28 acres exchanged away, the NPS would receive a historic preservation easement over the church (along with any funds necessary to equalize the value of the outgoing and incoming parcels). In order to fulfill the NPS mission and meet policy, the NPS land would be transferred with conditions that would insure continued protection of the property's natural and cultural resources and other park values. These require that:

- No sensitive natural resources are affected.
- Improvements would be located so as to screen them from nearby roadways, trails and other public areas in order to minimize any impacts to the area's scenic values.
- Historic/cultural resources would be minimally impacted.
- The majority of the existing parking would be relocated away from NPS residential properties.
- All riparian and wetland areas are appropriately protected through established setback requirements in accordance with NPS policies and local regulations.
- Off-site storm water discharge is minimized through the use of Best Management Practices.

The mechanism, by which these protections would be established, is the use of a Restrictive Covenant, a recorded instrument similar to an easement, which would enact permanent terms and conditions governing the use of the land. The Restrictive Covenant for the NPS land that spells out the terms and conditions is included in Appendix F.

In addition, the Church in the Valley will have the sole obligation to obtain all necessary federal, state, and local permits for the project elements associated with this environmental assessment. This will include, but not be limited to, Ohio EPA permits for the sanitary facilities, and local and/or county building permits for construction of the parking lot and associated church addition.

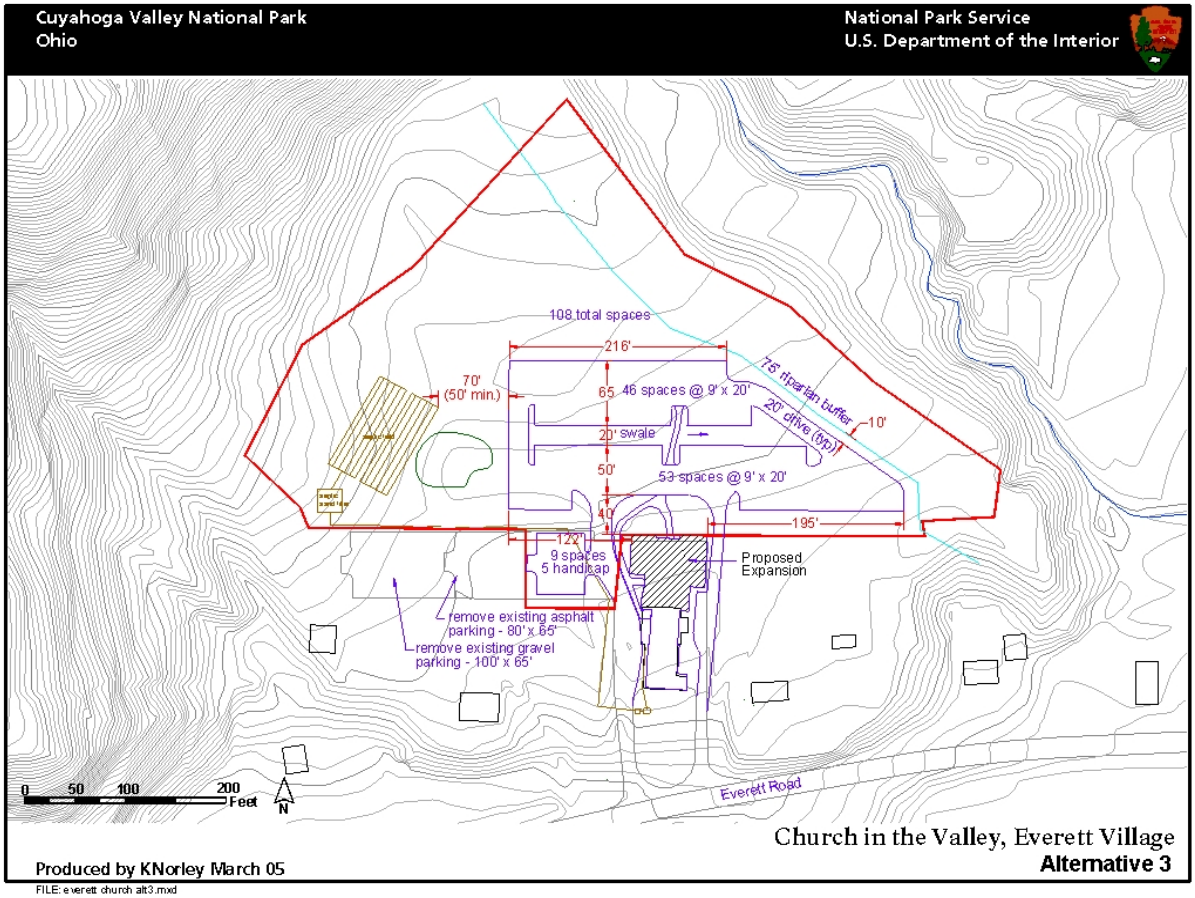

Figure 5. Schematic Drawing of Alternative 2 showing general location and layout of parking lot and septic system. See Appendix D for full version.

In order to evaluate this alternative, the church provided preliminary project plans that meet the church's requirements for the addition and appurtenances (parking lot, sanitary system, etc.). That plan forms the basis of Alternative 2 and the NPS assessment of this alternative. It represents the full build-out potential for the property in the event the project proceeds. Scaled-back implementation would also be possible under the selection of this alternative.

3.2.1 Wastewater Treatment:

Under this alternative, the wastewater treatment needed for the expanded church would be provided using conventional on-lot septic tank followed by leaching tile system. The system would be comprised of a septic tank, a dosing tank, a mounded sand filter and a 600 lineal foot evapo-transpiration field (see Appendix H, Ohio EPA Sewage: Collection, Treatment & Disposal where Public Sewers are not Available). As required by Ohio EPA regulations, a second evapo-transpiration field has been identified for future use as a back up in case of failure of the initial field. The location of the evapotranspiration field under Alternative 2 is governed by two criteria. Ohio EPA regulations prohibit the installation of evapotranspiration fields in disturbed soils therefore eliminating use of areas such as the existing parking lot. At the same time, the archaeological resources in the southeast portion of the field limit the depth of acceptable ground disturbance in that portion of the field. Therefore, the placement of the evapotranspiration field would be in the western portion of the field.

3.2.2 Parking Facilities

Alternative 2 permits the construction of an expanded parking lot to serve the larger church. This alternative would also provide for the desired relocation of existing parking away from the adjoining residential property located at 2257 Everett Road (NPS-owned Tract 114-42). However, a small portion of the existing parking lot would be retained to provide 9 spaces for mobility-impaired individuals. In order to shield views of the parking lot to the greatest extent possible, the added parking lot – providing 99 spaces – would be located in the eastern portion of the property. The spruce trees along the southeast portion of the property would provide the greatest shielding of the parking lot from visibility along Everett Road.

The parking lot surface would be asphalt, and would incorporate a planted swale between the parking 'bays' in order to minimize surface runoff from the lot. The swale would require a culvert under the drive to conduct water away from the lot. On the opposite side of the drive, storm water would be dispersed through use of a spreader mat. Location of the parking lot would be set back from the ravine along the property's eastern edge by at least 75' in compliance with NPS and Summit County Riparian Setback requirements. The 75' vegetated setback will further minimize any offsite storm water runoff. The parking lot would also include needed access drives, and associated site improvements including limited lighting and pedestrian walkways leading to the church. Because the topography of the eastern portion of the field is essentially flat, no topographical changes would be necessary for construction of the lot. Furthermore, protection of the identified, underlying archaeological resources in the southeast can be assured through the use of geotechnical fabric installed at the existing grade along parking lot to be construction above. Lastly, provisions of the real estate exchange would ensure future NPS access to the archaeological resources (See *Appendix F, Section 7)*.

3.2.3 Historic Preservation

As noted above, protection of the church building and associated grounds would be provided through a historic preservation easement (perpetual) whose terms and conditions would directly protect the historic attributes of the church building and general characteristics of the associated land (See Appendix G – Historic Preservation Easement Terms and Conditions). It is expected that the continued ownership and use of the building by the church made possible by this project would sustain the preservation of the building/site indefinitely.

3.3 Alternatives Considered But Rejected

As mentioned above, alternatives should be "reasonable." Unreasonable alternatives should be eliminated before impact analysis begins. Unreasonable alternatives may be those that are unreasonably expensive; that cannot be implemented for technical or logistic reasons; that do not meet park mandates; that are inconsistent with carefully considered, up-to-date park statements of purpose and significance or management objectives; or that have severe environmental impacts (DO-12 Handbook).

3.3.1 Transfer of NPS land without conditions

Transfer of NPS land without protection of the site's natural and cultural resources was considered but deemed impractical. First, it would violate NPS policy and would be administratively difficult, if not impossible to transact. For example, the exchange action would require the review of the State Historic Preservation Office. SHPO concurrence on the project would be impossible if the NPS failed to adequately protect the documented historic, archeological and cultural resources of this property. To proceed with the project without SHPO concurrence would violate the Programmatic Agreement between the NPS and The National Conference of State Historic Preservation Officers. And, because the action might be considered an adverse effect, approval to proceed would require a Memorandum of Agreement between the NPS, SHPO and Advisory Council on Historic Preservation

(ACHP). The SHPO and ACHP would not enter into an agreement in such a circumstance where the NPS – without being able to demonstrate a compelling case – failed to protect recognized cultural resources.

3.4 Environmentally Preferred Alternative

As stated in Section 2.7.D of Director's Order #12 Handbook, the environmentally preferred alternative is the alternative that would promote environmental policy as expressed in the National Environmental Policy Act (NEPA) Section 101 (b). The following is an evaluation of the two alternatives weighed against the six criteria listed in Section 101 of NEPA:

Criterion 1: Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.

> The difference between the two alternatives is not considered significant, largely because of the nature of the site, and the limited physical extent and scope of the project. Arguably, the No Action Alternative has the least direct, negative impact since the larger parking lot, sanitary system and the church addition would not be constructed.

Criterion 2: Ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings.

> In providing for the long-term viability of the church at the historic building location, Alternative 2 is believed to provide greater advantage than the No Action Alternative as it provides the greatest opportunity for the continued use of the church and thereby its maintenance. In the long-term, probable abandonment of the church under the No Action Alternative could impact both the aesthetic values of the property/area and potentially compromise public safety through disrepair.

Criterion 3: Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, for other undesirable and unintended consequences.

> In the short-term, under the No Action Alternative, no construction would occur and therefore would have the least degradation. However, in the long-term, the probable abandonment of the historic church under Alternative 1 would likely lead to the building's degradation, and, with it, increase the risks to health and safety. In addition, relocation of the congregation could result in new construction in an area previously undisturbed. For these reasons, Alternative 2 is regarded as providing the greatest benefit under this criterion.

Criterion 4: Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.

> Unlike the No Action Alternative, Alternative 2 would require the cutting of 7 spruce trees and result in the construction of the proposed parking lot and associated amenities thereby negatively impacting the cultural landscape. However, despite these impacts, its ability to provide direct protection over the church and address the long-term viability concerns of the congregation, suggests that the long-term impacts of Alternative 2 are expected to be less than if the church is forced to relocate and the historic building/site remain vacant.

Criterion 5: Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.

In providing for the long-term viability of the church at the historic building location, Alternative 2 is believed to provide greater advantage than the No Action Alternative.

Criterion 6: Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

As articulated above, Alternative 2 better meets 4 of the 6 criteria objectives and, therefore, has been determined to be both the environmentally preferred alternative and the preferred alternative.

4.0 Affected Environment and Consequences

To determine impacts, methodologies were identified to measure the change in park resources that would occur with the implementation of each alternative. Thresholds were established for each impact topic to help understand the severity and magnitude of changes in resource conditions, both adverse and beneficial, of the various alternatives.

Potential impacts are described in terms of type (are the effects beneficial or adverse?), context (are the effects site-specific, local, or even regional?), duration (are the effects short-term, lasting less than one year, or long-term, lasting more than one year?), and intensity (are the effects negligible, minor, moderate, or major?). Because definitions of intensity (negligible, minor, moderate, or major) vary by impact topic, intensity definitions are provided separately for each impact topic analyzed in this document.

Each alternative is compared to a baseline to determine the context, duration, and intensity of resource impacts. For purposes of impact analysis, the baseline is the continuation of current management (Alternative 1, the No Action Alternative) projected over the next 10 years. In the absence of quantitative data, best professional judgment was used to determine impacts. In general, the thresholds used come from existing literature, federal and state standards, and consultation with subject matter experts and appropriate agencies.

For the purposes of analysis, the following assumptions are used for all impact topics:

Short-term impacts:	Those impacts occurring in the immediate future (usually 1 to 6 months).
Long-term impacts:	Those impacts occurring through the next 10 years.
Direct impacts:	Those impacts occurring from the direct use or influence of the alternative
Indirect impacts:	Those impacts occurring from (activity) that indirectly alter a resource or condition.
Study Area:	Each resource impact is assessed in direct relationship to those resources affected both inside and outside the park, to the extent that the impacts can be substantially traced, linked, or connected to the alternatives. Each impact topic, therefore, has a study area relative to the resource being assessed, and it is further defined in the impact methodology.

Cumulative Impact
The CEQ regulations (40 CFR 1508.7) require the assessment of "cumulative impacts" which are defined as:

The impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.

In January 1997, the CEQ published a handbook entitled Considering Cumulative Effects Under the National Environmental Policy Act (see http://ceq.eh.doe.gov/nepa/ccenepa/ccenepa.htm). The introduction to the handbook opens with, "Evidence is increasing that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time."

Cumulative impacts are considered for all alternatives, including the no-action alternative. They were determined by combining the impacts of the alternative being considered with other past, present, and reasonably foreseeable future actions. Therefore, it was necessary to identify other ongoing or reasonably foreseeable future projects at CVNP and, if applicable, the surrounding region.

Impairment Analysis

The NPS *Management Policies* (NPS 2001a) require an analysis of potential effects to determine whether or not actions would impair park resources. The fundamental purpose of the national park system, as established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values. However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the NPS the management discretion to allow certain impacts within a park system unit, that discretion is limited by the statutory requirement that the agency must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values.

An impact to any park resource or value may constitute impairment, but an impact would be more likely to constitute impairment to the extent that it has a major or severe adverse effect upon a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- Key to the natural or cultural integrity of the park; or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park.

The following process was used to determine whether the alternatives had the potential to impair park resources and values:

1. CVNP's enabling legislation, the *General Management Plan,* the *Strategic Plan,* and other relevant background were reviewed with regard to CVNP's purpose and significance, resource values, and resource management goals or desired future conditions.

2. Management objectives specific to resource protection goals at CVNP were identified.
3. Thresholds were established for each resource of concern to determine the context, intensity and duration of impacts, as defined above.
4. An analysis was conducted to determine if the magnitude of impact reached the level of "impairment," as defined by NPS *Management Policies* (NPS 2001a).

The impact analysis includes any findings of impairment to park resources and values for each of the alternatives.

4.1 Impacts on Visual Resources

4.1.1 Impacts on Scenic Values

4.1.1.1 Regulations and Policies

CVNP was created by Congress in 1974 as Cuyahoga Valley National Recreation Area for the purpose of "preserving and protecting for public use and enjoyment, the historic, ***scenic***, natural, and recreational values" of the Cuyahoga Valley (Public Law 93-555, 1974). Preservation of the natural and scenic values of the Cuyahoga River valley and adjacent lands is central to CVNP's legislative mandate.

Figure 6. Osborne House, Everett

4.1.1.2 Affected Environment

CVNP is composed of a largely forested landscape bisected by the Cuyahoga River, interspersed with old fields, agriculture, and historic buildings and features. The abundant scenic resources of the park, within an hour's drive of three cities (Cleveland, Akron and Canton) containing about 4 million people, make it an attractive destination, as well as a respite from the bustle of city life. Visitors perceive the park to be more remote than it is, probably due to the strong contrast with adjacent developed areas (Schleicher et al. 1994). Evidence of the long history of use by humans is contrasted by the large swaths of what appear to be more natural areas. Scenic views and vistas from either side of the valley reveal patterns of nature and of humans. Visitors also enjoy parts of the park because of what they do *not* see there - industry, signs, light pollution.

Visitors and passers-by can enjoy this landscape from the many roads and highways and more than 100 miles of trails that cross the park. Sight-seeing and pleasure driving are among the most popular activities in CVNP (Anderson et al. 1992). The scenic Cuyahoga River flows through the center of the entire 22-mile length of the park and is fed by many smaller, attractive tributaries. Riverview Road, which is designated on the state and national level as a Scenic Byway, also runs through the entire length of the park.

Over 250 historic structures, including the historic Ohio & Erie Canal and the adjacent Towpath Trail, Everett Village, the Everett Covered Bridge, and Boston Store are just some of the cultural resources that contribute to the scenic values of the park.

Historic Everett, with its rehabilitated historic homes and buildings, provides the visiting public with a rare glimpse of a crossroads hamlet – a settlement pattern common to the 19th century farming landscape. Scenic values and resources of the hamlet include historic homes, agricultural fields,

and land uses which perpetuate the rural character of the hamlet and vicinity. The National Park has no public facilities located in Everett, but the hamlet is an important scene setter for motorists, bicyclists, and pedestrians as they pass through the southern end of the park.

4.1.1.3 Methodology

In this environmental assessment, impacts to scenic values are described in terms of type, context, duration, and intensity, which is consistent with the CEQ regulations. These impact analyses are intended to comply with the requirements of the National Environmental Policy Act.

Impacts to scenic values were identified and evaluated by (1) determining the area of potential effects; (2) identifying existing scenic values present in the area of potential effects; (3) applying how the action affects the visual resource; and (4) considering ways to avoid, minimize, or mitigate impacts to scenic values. CEQ regulations and DO #12 also call for a discussion of the appropriateness of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact (e.g. reducing the intensity of an impact from major to moderate or minor).

Figure 7. Hawkins Barn, Everett

Under Alternative 2, the Church would construct a parking lot and waste water treatment facilities, making construction of the planned addition to the existing church structure possible. The parking and sanitary system should be sited so as to minimize impacts to passing motorists. The goal is to perpetuate the rural appearance of the hamlet. The assessment of potential impacts to neighboring properties – while overlapping with this section – is directly addressed in Section 5.5 Impacts on the Human Environment: Land Use.

For purposes of analyzing potential impacts to scenic values, the thresholds of change for the intensity of an impact are defined as follows:

Negligible: Impact(s) is at the lowest levels of detection - barely perceptible and not measurable.

Minor: **Adverse impact(s)** would nominally affect a small number of the scenic features/resources of the site.

Beneficial impacts would include restoration of some of the existing scenic resources of the site through the removal of incompatible elements or improvement of site features.

Moderate: **Adverse impact(s)** would negatively impact numerous scenic features/resources of the site through the removal or change of contributing features or the introduction of incompatible elements. The nature and extent of impacts diminish the scenic values of the site, but do not impact the overall values of the larger, village of Everett.

Beneficial impacts would include the restoration of some scenic features and the protection of all scenic resources of the site.

Major: **Adverse impact** - impact(s) would alter major scenic features/resources of the site through the removal or change of contributing features or the introduction of

incompatible elements. The nature and extent of impacts are sufficient to diminish the scenic values of the larger hamlet of Everett.

Beneficial impacts would include the restoration and protection of the scenic features/resources of the site thereby improving the overall scenic resources of Everett.

4.1.1.4 Alternative 1 - No Action

Direct Impacts – Under Alternative 1, the park would maintain the status quo of the study area and no impacts would occur. As a consequence to not transferring land to the church, no parking lot or sanitary system would be constructed on NPS, and the historic preservation easement for the church would not be granted to the NPS. No addition would be constructed on the church. No direct impacts are expected with Alternative 1.

Indirect Impacts – The short term-impact under Alternative 1 would be negligible. It is, however, probable that Alternative 1 could lead to long-term, negative impacts on the associated church property if the church is relocated as has been predicted. If the congregation relocated, the church property would likely be vacant for an undetermined period of time, and maintenance of the building and grounds would likely be curtailed or eliminated. This condition could result in minor, negative impacts to the scenic values of the church property and the village as a whole.

Cumulative Impacts – An assessment of the cumulative impacts must assume the probable relocation of the church and, therefore, could reach minor to moderate thresholds should the building become vacant as a result of the church relocation. These adverse impacts would likely result due to inadequate building and grounds maintenance.

Conclusion – Under this alternative, negligible adverse impacts on scenic values of the property would occur in the short-term, although the potential exists for greater impacts on scenic values on the associated church property and village if the congregation relocates offsite. No impairment of park scenic values is expected as a result of this alternative.

4.1.1.5 Alternative 2 – Land Transfer with Conditions

Direct Impacts – As a build alternative, there would be a number of impacts to the scenic values of the field although limited visibility of the field from area roadways is an important mitigating factor. Impacts would likely include:

- A 99-car parking lot would be constructed in the field. The parking lot would be located in the eastern portion of the field and, as a result, would be hidden from view from area roadways and largely from adjacent properties as well. Therefore, the extent of adverse impacts on the scenic values of the field would be minor.
- Lighting for the parking lot and associated walkways could adversely impact the night sky in Everett, although such impacts would be minor as they would be limited to nights with planned church activities. Otherwise, existing security lighting levels would be expected to continue. The location of the parking lot in the eastern portions of the field – bordered on the roadside edge with mature spruce trees – would largely mitigate the impacts from nearby roadways and adjacent properties.
- Construction of the parking lot and septic system, along with the church addition, would have short-term, negative impacts on the scenic values of the field. These could last up to 1 year during construction.
- No impacts to scenic resources are expected from the associated sanitary system as the majority of the system would be underground and therefore hidden from view from area roadways and neighboring properties.
- As a 'build' alternative, Alternative 2 would permit the construction of the planned church addition. While designed to complement the historic church and, therefore maintain or

improve the scenic values of the church, as a result of replacing the earlier non-historic addition, the size of the addition could be viewed by some as negatively impacting the scenic values of the church property.

- The construction of the addition would result in the removal of 7 of 23 spruce trees listed as contributing in the park's Cultural Landscape Report that are located on the property line between the field and adjoining church property.

Indirect Impacts – no indirect impacts have been identified.

Cumulative Impacts – The property will be protected with strict restrictive covenants limiting further development of the property (see Appendix F). In addition, the associated property is surrounded by park land. As such, cumulative impacts on the site and within the historic district are unlikely.

Conclusion – Alternative 2 does have the potential for minor adverse impacts to scenic values of the field and church property both in the short-term and long-term. However, the no impairment of park scenic values is expected as a result of this alternative.

4.2 Impacts on Cultural Resources

As stated in the *NPS Cultural Resource Management Guideline* (NPS 1997), cultural resources are ". . . the material evidence of past human activities. Finite and nonrenewable, these tangible resources begin to deteriorate almost from the moment of their creation. Once gone, they cannot be recovered." Thus, it is imperative that "park management activities reflect awareness of the irreplaceable nature of these material resources." If these resources "are degraded or lost, so is the parks' reason for being." The main cultural resources of CVNP can be categorized as archeological resources, historic structures and cultural landscape.

Cultural resources at CVNP have been categorized into six primary cultural themes: prehistoric and indigenous cultures, agriculture, transportation, settlement, recreation, and industry (NPS 1987). These cultural themes identify a resource by its primary historical significance. However, resources often exhibit overlapping cultural themes as their uses and associations have changed through time. Thus, the cultural resources of CVNP exhibit layers of cultural history that are interwoven.

4.2.1 Archeological Resources

4.2.1.1 Regulations and Policies

Archeological resources will be managed in situ, unless the removal of artifacts or physical disturbance is justified by research, consultation, preservation, protection, or interpretive requirements. Preservation treatments will include proactive measures that protect resources from vandalism and looting, and maintain or improve their condition by limiting damage due to natural and human agents. Data recovery actions will be taken only in the context of planning, consultation, and appropriate decision- making. Preservation treatments and data recovery activities will be conducted within the scope of an approved research design. Archeological research will use non-destructive methods of testing and analysis wherever possible. The Park Service will incorporate information about archeological resources into interpretive and educational, and preservation, programs. Artifacts and specimens recovered from archeological resources, along with associated records and reports, will be maintained together in the park museum collection.

(Also see 36 CFR Part 79; Secretary of the Interior's Standards and Guidelines for Archeological Documentation [48 FR 44734- 737]; Museum Handbook)

4.2.1.2 Affected Environment

Archeological resources are distributed throughout CVNP. More than half (51%) of the park has been archeologically surveyed. A total of 289 archeological sites have been recorded including prehistoric and historic sites. Five archeological sites are listed on the National Register of Historic Places. In general, most archeological survey work at CVNP occurs in conjunction with projects that require ground disturbance. The planning process in relation to these projects typically provides for archeological inventory work to be completed prior to the actual ground disturbing activity. This inventory work is the initial step taken to provide data about the location of resources and the level of significance. In turn, potential impacts on archeological resources are reduced through measures such as site avoidance, project redesign, or other site protection measures. Currently, the only long-term archeological monitoring occurs in relation to actively cultivated farm fields where the fields are inventoried annually to compare and record findings over time.

The project area is part of an archeological site first discovered by Dr. David Brose of the Cleveland Museum of Natural History in 1980. The site, 33Su121 was recorded as a prehistoric lithic scatter located in a fallow field just north of the Everett Church on a second terrace above the river in Summit County, Ohio (*Calumet, Canal and Cuyahoga: An Archeological Overview and Assessment of the Cuyahoga Valley National Park* by Fred Finney, 2002).

National Park Service Midwest Archeological Center (MWAC) archaeologists returned to site 33Su121 in 2000 and 2001 to expand investigations of the site in advance of proposed developments for the Church in the Valley and potential future developments associated with adjacent historic properties owned by the NPS.

During the 2000/2001 inventorying project, archaeologists utilized a range of field methods in the course of their work including shovel tests (30 x 30-cm, # 264), test pits (1x1-m, #31) and trenches (1x20 m, #5), and completed a geomagnetic survey of the entire field (see Figure 12 below). The locations for the test pits and trenches were determined by the results of the shovel tests and geomagnetic surveying. This inventorying work discovered several prehistoric features including 1 linear trench and several circular hearths/roasting features comprised of fire cracked rock. Also discovered were 1,165 artifacts including:

Figure 8. Archeological Field Investigations.

Table 3. Summary of Artifacts Discovered within project area

Fire cracked rock	741
Debitage	389
Pottery	18
Diagnostic Stone Tools	17

Distribution of the features and artifacts was not consistent across the project area. In her report of investigations, Bauermeister reports that, in general, "the density of artifacts decreased to the west while increasing to the north. In fact very few artifacts were recovered from the western portion of the field as compared to the eastern half." Very few artifacts were discovered in the western portion of the field. Vertical distribution of artifacts was largely confined to the disturbed plow zone or 'A horizon' soils (upper 20-30 cm). Charcoal and soil samples removed from several of the hearth features permitted radiocarbon dating. The resulting radiocarbon dates for selected features ranged from, BP 4250 to 4060, AD100 to 370, and AD 1290 to 1410.

MWAC's project archaeologist Ann Bauermeister concluded as a result of analysis that "the site is a multi-component site dating from Middle Archaic through late Woodland… Preliminary interpretation

of the site is that it represents the cumulative effect of widely spread, short-term occupations and use episodes that occurred over a long period of time" (Report of Investigations: 2000-2001 Midwest Archeological Center: Archeological Inventory and Evaluative Testing for Proposed Developments at 33Su121, Cuyahoga Valley National Park, Summit County, Ohio, written by Ann Bauermeister). Based on the findings from the 2000 and 2001 archeological investigations, Bauermeister further concluded that, despite disturbance by plowing activities in historic times, site 33Su121 should be considered eligible for listing onto the National Register of Historic Places under Category D.

Each of the presented alternatives call for protection of the site along with continued NPS access should further inventory becomes necessary.

4.2.1.3 Methodology

The analysis of impacts on the archeological resources is a qualitative assessment based on a review of existing NPS and park policies on the protection of archeological sites, existing park data on archeological resources, and consultation with resources specialists (regional archaeologists and the park's Section 106 coordinator).

Potential impacts on archeological resources may occur from any undertaking that includes any project, activity, or program that can result in changes in ground disturbance. Protecting and preserving the archeological sites of the park is one of the principal goals for cultural resource protection. Thus, the primary goal in this EA is to protect these resources.

In this environmental assessment, impacts to archeological resources are described in terms of type, context, duration, and intensity, which is consistent with the CEQ regulations. These impact analyses are intended to comply with the requirements of the National Environmental Policy Act.

Impacts to archeological resources were identified and evaluated by (1) determining the area of potential effects; (2) identifying resources present in the area of potential effects (3) applying how the action affects the resource; and (4) considering ways to avoid, minimize, or mitigate adverse effects. CEQ regulations and DO #12 also call for a discussion of the appropriateness of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact (e.g. reducing the intensity of an impact from major to moderate or minor).

Under Alternative 2, the land transferred to the Church as a result of the land exchange would be utilized to provide parking and waste water management needs for the church along with maintaining the remainder of the field as open space.

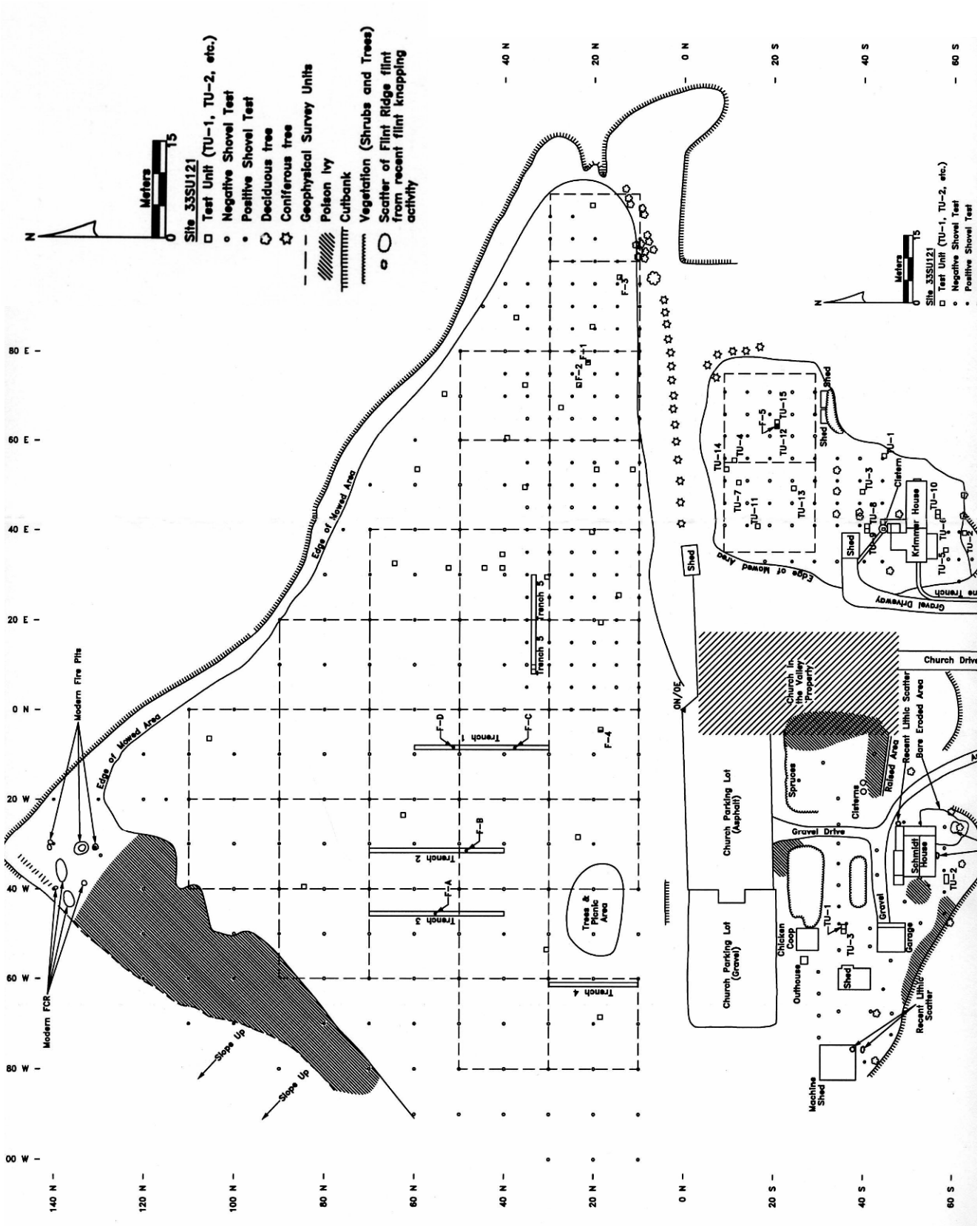

Figure 9. Map Showing Extent of archeological Investigations by the NPS Midwest archeological Center during the summers of 2000 and 2001.

For purposes of analyzing potential impacts to archeological resources, the thresholds of change for the intensity of an impact are defined as follows:

Negligible: Impact(s) is at the lowest levels of detection - barely perceptible and not measurable.

For purposes of Section 106, the determination of effect would be no adverse effect.

Minor: **Adverse impact** - impact(s) to site 33Su121 would be shallow and small in their extent and would not affect the integrity this National Register of Historic Places eligible site.

For purposes of Section 106, the determination of effect would be no adverse effect.

Beneficial impact – preservation of some archeological features in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties.*

For purposes of Section 106, the determination of effect would be no adverse effect.

Moderate: **Adverse impact** – impact(s) to site 33Su121 could be deeper but small in extent or be shallow over a wider extent. Extent of disturbance could jeopardize the site's eligibility for listing onto the National Register of Historic Places.

For purposes of Section 106, the determination of effect would be no adverse effect.

Beneficial impact – preservation of most archeological features in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

For purposes of Section 106, the determination of effect would be no adverse effect.

Major: **Adverse impact** – impact(s) to site 33Su121 would be extensive both in extent and depth. The level of impact would be significant enough to render the site ineligible for listing onto the National Register of Historic Places.

For purposes of Section 106, the determination of effect would be an adverse effect.

Beneficial impact – preservation of all archeological features in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties.*

For purposes of Section 106, the determination of effect would be no adverse effect.

4.2.1.4 State Historic Preservation Office Review

In order to be able to finalize this environmental assessment Section 106 of the NHPA compliance was completed for the preferred alternative (Alternative 2). The State of Ohio Historic Preservation Office approved the alternative on July 23, 2002 (Site Improvements on CUVA Tract 114-72, Boston Township, Summit County, Ohio {CUVA-02-09}).

4.2.1.5 Alternative 1 - No Action

Direct Impacts – Under Alternative 1, the park would maintain the status quo of the study area and no impacts would occur.

Indirect Impacts – Under the No Action alternative, no indirect impacts are expected.

Cumulative Impacts – Under Alternative 1, no cumulative impacts are expected.

Conclusion – Under the No Action alternative, no impacts to archeological resources is expected. Therefore, no impairment of park resources is expected to result under selection of this alternative.

4.2.1.6 Alternative 2 – Land Transfer with Conditions

Direct Impacts – Under Alternative 2, an evapotranspiration field would be constructed in the western portion of the field and its installation would entail trenching for placement of approximately 300 LF of pipe. However, as the Ohio EPA requires the identification of a replacement evapotranspiration field in the event of failure, the impacts of the potential 600' total installation were assessed. Because of the very low concentration of artifacts in this area of the field, the negative impacts would be considered minor. The parking lot would be constructed over the existing grade. This alternative would require the installation of geotechnical fabric on current surface; all improvements including the building up of soil for parking/road surfaces, and landscaping would be above the existing grade. For this reason, no direct impacts are expected as a result of the parking lot.

However, the installation of post lighting for the parking lot (12 – 15' posts and 6-bollard style lights) would result in some ground disturbance below existing grade. In order to insure a proper footing, the pole lighting will require a base that extends below frostline – 48" is the accepted depth for such installation in northeast Ohio. However, the impacts would be very limited in lateral extent and, for that reason, considered negligible or minor.

Selection of Alternative 2 would also result in the construction of the planned addition on Church property. While no archeological investigations have been completed in the affected area (currently under asphalt), and the integrity of any subsurface soils is unknown, archeological evidence on adjacent lands suggests that the site does or did extend underneath the existing church property. This would include the area over which part of the church addition will be constructed. Therefore, while it is highly likely that the subsurface materials are already be disturbed, there is the potential for minor impacts to the site.

Indirect Impacts – no indirect impacts have been identified.

Cumulative Impacts – Under Alternative 2, the land exchange that would transfer ownership of the field from the NPS to the Church will include restrictive covenants that will limit further development of the site (see Appendix F). Impacts on Site 33Su121 on adjacent properties is not expected as the land is expected to remain in NPS ownership and development is not planned.

Conclusion – As a result of the location and limited ground disturbance requirements for the installation of the septic evapotranspiration field and the parking lot, minor, negative impacts to archeological resources could be expected under Alternative 2. For the purposes of 106 Compliance, Alternative 2 is not expected to result in the impairment of park resources.

4.2.2 Impacts on Historic Structures

4.2.2.1 Regulations and Policies

Laws, regulations, and policies have general application for cultural resource management throughout the NPS. These include the Antiquities Act, the Historic Sites Act, the National Historic Preservation Act, the National Environmental Policy Act, and the Archeological and Historic Preservation Act (see Appendix A and Sections 1.4 and 4.3.2 of this EA). Protection of cultural resources is also in accordance with Executive Order 11593, *Protection and Enhancement of the Cultural Environment*, 1971 (see Appendix A).

Cultural resource management procedures are detailed in the NPS *Management Policies* (NPS 2001a) and the *NPS Cultural Resource Management Guideline* (NPS 1997). Specific standards and guidelines for the treatment of cultural resources are provided in

- The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation;
- The Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; and
- The Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.

Figure 10. View of Church from the southeast. The 1967 addition is visible in the rear.

4.2.2.2 Affected Environment

In the *NPS Cultural Resource Management Guidelines* (NPS 1997), a historic structure is defined as "a constructed work…consciously created to serve some human activity." It also notes that "regardless of type, level of significance, or current function, every structure is to receive full consideration for its historical values whenever a decision is made that might affect its integrity. The preservation of historic structures involves two basic concerns: slowing the rate at which historic material is lost, and maintaining historic character." Buildings, monuments, dams, canals, bridges, roads, fences, mounds, structural ruins, and outdoor sculpture are all examples of historic structures.

CVNP treats all structures as cultural resources and therefore universally applies National Register standards for historic preservation. The rural landscape includes 30 properties that are currently listed in the National Register of Historic Places, including 19 properties that are available for management. Overall, the rural landscape in CVNP includes 58 properties with 175 structures including historic structures listed in the National Register, potentially eligible historic structures, and non-historic structures. Listed and potentially eligible structures are managed under a stricter interpretation of the guidelines than other structures.

This environmental assessment considers the resources and impacts associated with the proposed land transfer along with the installation and construction of waste water facilities and a parking lot on land currently owned by the NPS. These improvements would be constructed on land exchanged to the Church in the Valley and would facilitate the construction of an addition to the

privately-owned, historic church. Because of potential indirect impacts on the historic church, the scoping process identified historic structures as a topic for consideration.

The Church in the Valley, formerly referred to as the Everett Church of Christ, stands on the site of a previous church occupied by the United Brethren, which burned down in 1908. The present church was built by the residents of Everett and the surrounding community in 1909 as the Disciple Church. In 1967, the building was enlarged in the rear by one-third of its original size to add rooms for the Pastor's office. Because of its design, materials selection and conflict with the historic building, this addition is considered to have a negative impact on the historic building.

In 1994, the church was included in the National Register of Historic Places nomination for the Everett Historic District as a contributing resource. Subsequent to the nomination, the church made several changes to the building that could affect the contributing resource determination. The post-nomination changes include window replacement, substituting asphalt shingles for slate during roof repairs, and installing vinyl siding. However, despite these changes, the church nonetheless remains an important historic structure in the Everett Historic District.

At a Glance: National Register Listing

The **Everett Historic District** (reference number 93001467), was listed on January 14, 1993. More information about the National Register can be found at http://www.cr.nps.gov/nr/research or by contacting the National Register of Historic Places. National Park Service, 1839 C St., NW (MS 2280) Washington, DC 20240.

Copies of the nomination are available from the National Register, from the Ohio Historic Preservation Office, and at Cuyahoga Valley National Park Headquarters at 15610 Vaughn Road, Brecksville, Ohio 44141.

In addition to the historic significance of the Church, its presence in the hamlet of Everett is an important feature in the district. The church remains one of the few remaining, functioning elements around which the social cohesion of Everett was based.

According to cultural geographer Glenn T. Trewartha, whose 1943 study defined unincorporated hamlets, churches along with schools and commercial institutions such as a general store, tavern, post office, etc. were the most common congregational service institutions in unincorporated hamlets.

Protection of the church is important for both its own historic significance as well as its role as part of the Everett Historic District. In fact, it is the church's inclusion in the district that yielded its greatest significance. Because of changes made to the building, the church would not qualify on its own for inclusion on the National Register. Despite this, it is a critical feature in the listing of Everett as a National Register District.

According to the 1994 Everett National Historic District nomination most unincorporated hamlets that once existed in this context area are no longer identifiable, distinct settlements, due to suburban sprawl or loss of important community functions. Everett retains the defining features of the settlement type and is bordered by open fields or wooded hillsides. The landscape around the community set Everett apart from its surroundings and gives the community a sense of cohesion.

The general features of Everett that characterize it as an unincorporated hamlet, and qualified it for National Register status include:

- Building massing, design and height;
- Consistency of road set backs;
- Distance between properties and primary buildings; and
- Spatial relationship between the buildings and significant landscape features.

Failure to adequately protect these attributes at the church and other properties could disqualify the district from inclusion on the National Register.

4.2.2.3 Methodology

The analysis of impacts on historic resources is a qualitative assessment based on a review of existing NPS and park policies on the protection of historic structures, existing park data on historic structures, and consultation with resources specialists (park historical architects and landscape architects, archaeologists, representatives of the Cleveland Restoration Society, and the park's Section 106 coordinator).

Impacts may occur from any undertaking that includes any project, activity, or program that can directly or indirectly result in changes to historic buildings. Protecting and preserving the historic structures of the park is one of the principal goals for cultural resource protection and is a consideration in the identification, analysis and selection of project alternatives.

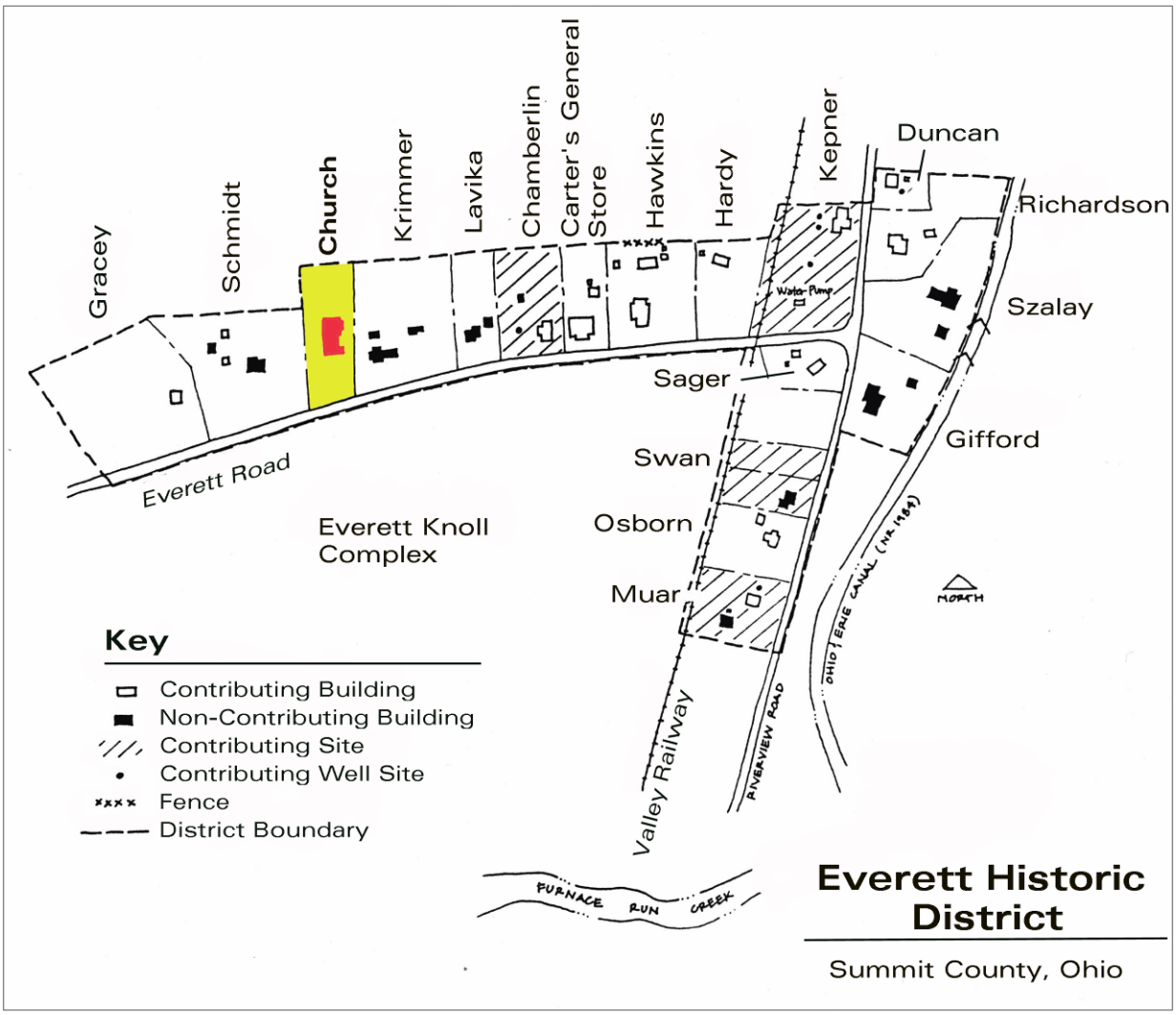

Figure 11. Map of Everett Historic District

Impacts will be analyzed by comparing each alternative's ability to provide long-term protection for the historic church, especially character defining features, to correct previous historically-incompatible alterations, and to ensure Everett's continued listing as a National Historic District.

In this environmental assessment, impacts to the historic church are described in terms of type, context, duration, and intensity, which is consistent with the CEQ regulations. These impact analyses are intended to comply with the requirements of the National Environmental Policy Act. Impacts to the church were identified and evaluated by (1) determining the extent of potential effects; (2) identifying resources present in the area of potential effects (3) applying how the action affects the resource; and (4) considering ways to avoid, minimize, or mitigate adverse effects. CEQ regulations and DO #12 also call for a discussion of the appropriateness of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact (e.g. reducing the intensity of an impact from major to moderate or minor).

Under the two action alternatives in this EA, the construction of a parking lot and a sanitary system will permit the construction of an addition onto the existing, privately-owned historic church. Plans for the addition were developed by the church following consultation with National Park Service staff (historical architect, planner, landscape architect and historian), and representatives of the Cleveland Restoration Society (a local, non-profit organization that provides technical assistance on historic preservation treatment options and also has as area of focus dedicated to sacred resources in particular).

For purposes of analyzing potential impacts to historic structures, the thresholds of change for the intensity of an impact are defined as follows:

Negligible: Impact(s) is at the lowest levels of detection - barely perceptible and not measurable.

For purposes of Section 106, the determination of effect would be no adverse effect.

Minor: **Adverse impact** – The number and/or extent of impacts is nominal and would not result in the building being reclassified as a non-contributing feature in the National Historic District listing for Everett.

For purposes of Section 106, the determination of effect would be no adverse effect.

Beneficial impact – Preservation of all character defining features in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

For purposes of Section 106, the determination of effect would be no adverse effect.

Moderate: **Adverse impact** – The number and/or extent of impacts could potentially result in the building being reclassified as a non-contributing feature in the National Historic District listing for Everett.

For purposes of Section 106, the determination of effect could be no adverse effect or adverse effect depending on the nature and magnitude of the specific changes.

Beneficial impact – Preservation of all character defining features in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties along with the removal of elements from the 1967 addition that adversely impacted the historic church.

For purposes of Section 106, the determination of effect would be no adverse effect.

Major: **Adverse impact** – The number and/or extent of impacts is significant and could jeopardize the National Historic District listing for Everett.

For purposes of Section 106, the determination of effect would be an adverse effect.

Beneficial impact – Preservation of all character defining features in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, removal of elements from the 1967 addition that adversely impacted the historic church, and providing for the long-term use of the structure/property as a church.

For purposes of Section 106, the determination of effect would be no adverse effect.

4.2.2.4 Alternative 1 - No Action

Direct Impacts – The project elements that are the subject of this environmental assessment (parking lot and sanitary system construction in currently vacant field) do not directly impact any historic structures. However, under the no action alternative, there would be no land transfer and, therefore, the parking lot and waste water treatment facilities would not be constructed thereby eliminating the church's option to construct the planned addition. Several negative impacts would result. First, under the no action alternative, the proposed land exchange would not occur thus eliminating the opportunity for the NPS to acquire a historic preservation easement over the church. This would leave the historic, privately-owned church at risk for incompatible modifications, sale, etc.

Second, under the No Action Alternative, the 1967 addition to the church would remain. Because the 1967 addition has been determined to have had a negative impact on the 1909 structure, the no action alternative prolong the minor negative impacts on the historic church.

Indirect Impacts – No indirect impacts have been identified.

Cumulative Impacts – Failure to bring the facility within operational standards for a viable congregation will likely result in an abandonment of the structure in the future. Assuming that the same space issues would face any congregation considering use of the building, failure to expand the structure will likely result in the structure becoming vacant or result in the sale and utilization of the structure for a non-church function. Because of their unique layout and architecture, churches are often single-use buildings. This means that that rehabilitation of the building for some other use is likely to result in minor to moderate negative impacts to the remaining, character defining features of the church. Even sale to the NPS would likely have the same outcome as use of the building for any other purpose would require modification to be useable. The only exception would be use of the building as static exhibit; however, the cost of rehabilitation and maintenance of the building for such a limited purpose would be prohibitive.

Conclusion – In the long-term, the No Action alternative is expected to have minor to moderate negative impacts on the historic building. This is largely due to the probability that, without the addition, the congregation will likely relocate and the building would either become vacant or be re-adapted for some other use – both of which will likely have moderate impacts on the historic building. For purposes of Section 106, the determination of effect would be no adverse effect.

4.2.2.5 Alternative 2 – Land Transfer with Conditions

Direct Impacts – Under Alternative 2, the land exchange would take place and the planned addition could proceed as a result of having sufficient land for construction of the associated parking lot and

sanitary system. Under this alternative, the proposed addition would be constructed onto the church. Plans for the addition were developed by the church following consultation with National Park Service staff (historical architect, planner, landscape architect and historian), the church and its architect, and representatives of the Cleveland Restoration Society (a local, non-profit organization that provides technical assistance on historic preservation treatment options and also has an area of focus dedicated to preserving sacred resources – read "churches"). Using the Secretary's Standards for Historic Preservation, the team developed a design that provided the needed new spaces while protecting the building's historic attributes and significance. The design was also developed in a manner consistent with the stated, overall attributes of the Everett Historic District. For example, the front façade was preserved, and the addition was designed so as to not overwhelm the historic portions of the building nor change the appearance of massing of the building when viewed from Everett Road. The building will retain its country church appearance.

Figure 12. Architectural Renderings of Planned Church Addition (front and rear oblique views).

The schematic design – receiving unanimous support from involved parties – was subsequently submitted to the Ohio State Historic Preservation Office for their concurrence, which was received July 23, 2002 (included in the submission: Site Improvements on CUVA Tract 114-72, Boston Township, Summit County, Ohio {CUVA-02-09})

In addition, construction of the proposed addition, in accordance with the agreed upon design mentioned, would result in the removal of some of the features added during the 1967 addition that did not meet the Secretary's Standards for Historic Preservation. For these collective reasons, Alternative 2 is considered to have minor to moderate direct benefits for the historic building.

Indirect Impacts – No indirect impacts have been identified.

Cumulative Impacts – Any future modifications to the church must adhere to the terms and conditions of the Historic Preservation Easement (see Appendix G). Modifications that require the approval of the NPS will be further subject to approval by the State Historic Preservation Office unless otherwise directly provided for under the terms of Programmatic Agreement between the SHPO and NPS (some work on historic structures is programmatically 'approved,' and excluded from further SHPO review). No cumulative effects to the historic church are expected.

Conclusion – As compared to the No Action Alternative (including its likely prospects for future abandonment of the church), Alternative 2 is considered to have moderate beneficial impacts on the historic church. For the purposes Section 106, this alternative would have no adverse effect on the historic church.

4.2.3 Cultural Landscapes

4.2.3.1 Regulations and Policies

As stated in the *NPS Cultural Resource Management Guideline* (NPS 1997), cultural resources are ". . . the material evidence of past human activities. Finite and nonrenewable, these tangible resources begin to deteriorate almost from the moment of their creation. Once gone, they cannot be recovered." Thus, it is imperative that "park management activities reflect awareness of the irreplaceable nature of these material resources." If these resources "are degraded or lost, so is the parks' reason for being."

Specific standards and guidelines for the treatment of cultural resources are provided in The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, and Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.

Additionally, *NPS Management Policies* (NPS 2001a) and *Cultural Resource Management Guidelines* (NPS 1997), state that all cultural landscapes are to be managed as cultural resources regardless of the type or level of significance. Management actions are to focus on preserving the physical attributes, biotic systems, and uses of a landscape as they contribute to historic significance.

Other laws, regulations, and policies have general application for cultural resource management throughout the NPS. These include the Antiquities Act, the Historic Sites Act, the National Historic Preservation Act, the National Environmental Policy Act, the Archeological and Historic Preservation Act, the Archeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act (see Appendix A and Section 1.4 of this EA). Protection of cultural resources is also in accordance with Executive Order 11593, *Protection and Enhancement of the Cultural Environment*, 1971 (see Appendix A).

4.2.3.2 Affected Environment

Cultural landscapes are the least tangible of the cultural resources. According to NPS Management Policies (NPS 2001a) and Cultural Resource Management Guidelines (NPS 1997), all cultural landscapes are to be managed as cultural resources regardless of the type or level of significance. Management actions are to focus on preserving the physical attributes, biotic systems, and uses of a landscape as they contribute to historic significance. Landscapes differ from other cultural resources as changes from both natural processes and human activities are inherent. Because of this innate dynamic quality, preservation treatments seek to protect and preserve the historic character of a landscape over time through the continuity of distinctive characteristics. Thus, the emphasis is on maintaining the character and feeling rather than on preserving a specific appearance or time period.

The field associated with the proposed land transfer is not included as part of the Everett Historic District Nomination for the National Register. Nor is the field listed as a contributing resource in the Everett Historic District Cultural Landscape Report. This is due, in part, to the fact that the field – as reported in county tax records and U.S. Census records – was not owned by an Everett resident. The 1994 National Register Nomination for the Everett Historic District writes:

> *"…These farmsteads are not included within the boundary of this district. Other farm fields that border the community to the north and east contribute to the integrity of setting and association of this agriculturally oriented community, but county tax records and U. S. Census records show that these lands were not owned by Everett residents…."*

Figure 13. Aerial Photograph showing noted property tracts numbers and area fields in association with the Everett Historic District.

However, this tract sits immediately adjacent to the Everett Historic District to the north. Per the Everett Historic District National Register nomination, "the farm fields that border the [district] to the north and east are also considered to contribute to the integrity of setting and association of this agriculturally-oriented community." Thus, the open field on tract 114-72 that is now denoted as tract 114-81 contributes to the Everett Historic District's sense of place and needs to be preserved and maintained for such purposes. In addition, the parent tract of tract 114-81, 114-72, is listed in the 1987 Cuyahoga Valley National Recreation Area Cultural Landscape Report as contributing to the cultural landscape of Cuyahoga Valley National Park under the theme of agriculture for its field components.

The field (4.28 acres) proposed for transfer to the Church is currently a mowed lawn with a small grove of trees and sporadic trees in the north-east portion. The portion of the field under consideration for this project is currently assigned to the Church for use as a small parking lot and for passive recreational purposes. The permits (2, 1 for the parking lot and 1 for the field use) were originally issued in 1992 and 1998, respectively, and have been maintained / renewed since. Prior to use by the Church, the field, part of NPS Tract 114-72 acquired in 1978, was undergoing succession from field to brush. Woody growth had begun to take over the field prior to the Church's maintenance of the field for open space associated with Church activities.

Until 1984, the field had been assigned under a Special Use Permit to Robert Krimmer, resident of the neighboring property to the south, for use as a garden for his father-in-law Leonard Schmidt. The permit had been in force since shortly after NPS acquisition of the property in 1978. However, changes to NPS policies on agricultural use of NPS lands in 1983 prohibited renewal of the permit upon expiration in the spring of 1984.

It is reported in NPS property files, that Mr. Schmidt had maintained a garden in the field for some time prior to NPS acquisition, although the duration of that period is unknown. It could extend as far back as 1948 when Mr. Schmidt purchased the land for his home from Lewis Bowling – owner of the larger parcel associated with Tract 114-72.

4.2.3.3 Methodology

The analysis of impacts on the cultural landscape is a qualitative assessment based on a review of existing park policies on the treatment of cultural landscapes, existing park data on cultural landscapes, and consultation with park cultural resources specialists (supervisory landscape architect/park section 106 coordinator, historical landscape architect and historian).

Potential impacts on the cultural landscape may occur from any undertaking that includes any project, activity, or program that can result in changes in the character or use. Protecting and preserving the historic character of the landscape is the principal goal for cultural landscape management. Thus, one of the goals of this EA is to preserve the cultural landscape by protecting the historic rural character of the landscape.

Impacts will be analyzed by comparing each alternative's ability to portray the historic rural character of the landscape. In general, the historic character of a landscape is defined by its function, visual quality, spatial organization, land use patterns, and character-defining features. In turn, it is assumed that the historic character of a landscape is more accurately portrayed when the greatest numbers of the above criteria are met.

In this environmental assessment, impacts to cultural landscapes are described in terms of type, context, duration, and intensity, which is consistent with the CEQ regulations. These impact analyses are intended to comply with the requirements of the National Environmental Policy Act.

Impacts to cultural landscapes were identified and evaluated by (1) determining the area of potential effects; (2) identifying cultural resources present in the area of potential effects (3) applying how the action affects the cultural resource; and (4) considering ways to avoid, minimize, or mitigate adverse effects. CEQ regulations and DO #12 also call for a discussion of the appropriateness of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact (e.g. reducing the intensity of an impact from major to moderate or minor).

Under the two action alternatives in this EA, the land transferred to the Church as a result of the land exchange would be utilized to provide parking and waste water management needs for the church along with maintaining the remainder of the field as open space.

For purposes of analyzing potential impacts to cultural landscapes, the thresholds of change for the intensity of an impact are defined as follows:

Negligible: Impact(s) is at the lowest levels of detection - barely perceptible and not measurable.

For purposes of Section 106, the determination of effect would be no adverse effect.

Minor: **Adverse impact** - impact(s) would not affect the character defining patterns and features of a landscape contributing to the National Register Listed Everett Historic District.

For purposes of Section 106, the determination of effect would be no adverse effect.

Beneficial impact – preservation of character defining patterns and features in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties With Guidelines for the Treatment of Cultural Landscapes.*

For purposes of Section 106, the determination of effect would be no adverse effect.

Moderate: **Adverse impact** - impact(s) would alter a character defining pattern(s) or feature(s) of the cultural landscape but would not diminish the integrity of this landscape contributing to the National Register listed Everett Historic District.

For purposes of Section 106, the determination of effect would be no adverse effect.

Beneficial impact – rehabilitation of a landscape or its patterns and features in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties With Guidelines for the Treatment of Cultural Landscapes*.

For purposes of Section 106, the determination of effect would be no adverse effect.

Major: **Adverse impact** - impact(s) would alter a character defining pattern(s) or feature(s) of the cultural landscape, diminishing the integrity of the landscape to the extent that it is no longer contributing feature to the National Register listed Everett Historic District.

For purposes of Section 106, the determination of effect would be an adverse effect.

Beneficial impact – restoration of a landscape or its patterns and features in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties With Guidelines for the Treatment of Cultural Landscapes*.

For purposes of Section 106, the determination of effect would be no adverse effect.

4.2.3.4 State Historic Preservation Office Review

In order to be able to finalize this environmental assessment Section 106 of the NHPA compliance was completed for the preferred alternative (Alternative 2). The State of Ohio Historic Preservation Office approved the alternative on July 23, 2002 (Site Improvements on CUVA Tract 114-72, Boston Township, Summit County, Ohio {CUVA-02-09}).

Figure 14. Existing Parking Lot on NPS land

4.2.3.5 Alternative 1 - No Action

Direct Impacts - Under Alternative 1, the park would continue with the *status quo* in its management of the cultural landscape of the field located behind the Church in the Valley.

In the short-term, the park currently expects that the field would continue to be used by the Church under a Special Use Permit for limited parking and passive recreation purposes. While the continued maintenance and use of the lawn for recreational purposes constitutes a minor beneficial impact since the field is maintained as field/open space, this benefit would be balanced by a minor to moderate adverse impact as a result of the current 60-car parking lot remaining.

In the long-term, should the property be vacated, a combination of beneficial and adverse impacts could be expected. Removal of the existing 60-car parking lot would be possible thereby creating a minor to moderate benefit from this action. At the same time, however, abandonment of the church property would likely result in limited maintenance of the church property and, as a result, negatively impact the cultural landscape values of the church property to a minor extent. The ongoing maintenance of the NPS-owned field would also cease by the church, although the NPS could undertake the regular field mowing to maintain its open space character, and prohibit the deterioration of the field through succession.

Indirect Impacts – Under the No Action alternative, the land transfer would not take place and the church addition construction would not proceed. As a result, 7 spruce trees located behind the church and along the church-NPS property line and recognized in the Everett Historic District Cultural Landscape Report, would not be cut. This would be a minor beneficial impact on the project site. At the same time, no land exchange would occur and, as a result, the historic church property would remain unprotected. Therefore, the grounds associated with the church property would remain at risk for changes that could negatively impact the site's historic significance.

Cumulative Impacts – Under the No Action Alternative, no cumulative impacts are expected.

Conclusion – Under both the short and long-term views of the No Action Alternative, a balancing combination of minor to moderate benefits and adverse impacts would result from selection of the No Action Alternative. For the purposes of Section 106, no adverse impacts on park resources are expected to result from the No Action Alternative.

4.2.3.6 Alternative 2 – Land Transfer with Conditions

Direct Impacts – As a 'build alternative', Alternative 2 would allow the construction of a parking lot and septic evapotranspiration field system on land currently owned by the NPS (for a site map, see Appendix D). By extension, the church addition could also be constructed under Alternative 2.

Construction of the parking lot would be generally in the eastern portion of the field and be visually protected on two of three sides by trees. The parking lot would also consolidate the majority of existing spaces provided in the current parking lot. The added 99-space lot would be sized to account for usual parking needs for the church and not a maximum, special-needs capacity. The existing topography favors the construction of the parking lot at the existing grade. The vehicular and pedestrian surfaces would be asphalt to enable winter snow removal – ensuring safe driving and walking conditions.

Grassy swales would be located between the two parking bays to break up the views of the asphalt and would be planted with non-woody vegetation, such as grasses, that would provide additional interruption of the parking lot.

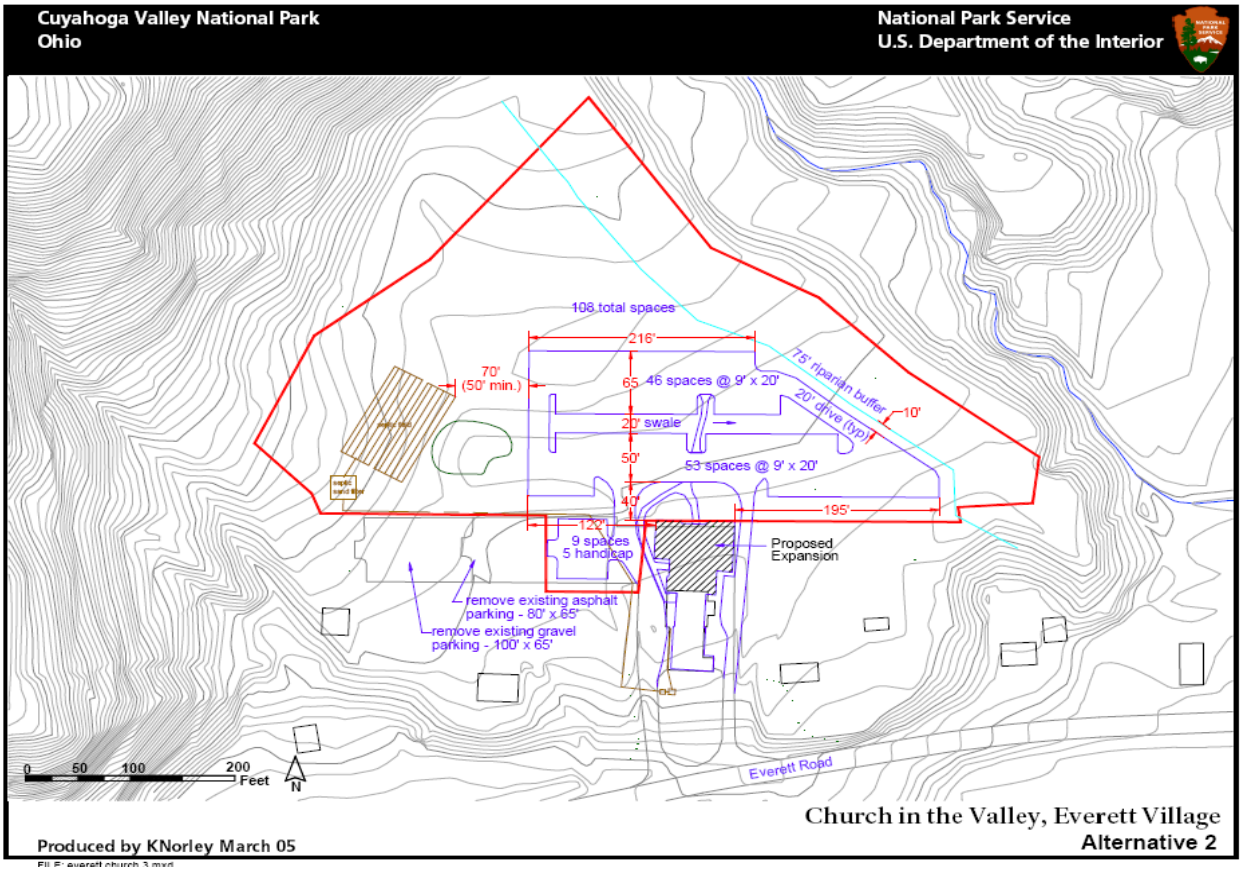

Figure 15. Schematic Drawing of Alternative 2 showing general location and layout of parking lot and septic system. See Appendix D for full version.

Parking lot lighting would be installed to provide safe nighttime use of the lot and would be placed on 14 poles roughly 15' high (existing lighting includes 6 fixtures on two 30' poles and attached to the church). Pedestrian bollard-style lighting would be installed along walkways between the parking lot and church entrance to ensure safe pedestrian access.

Any changes that alter the field's agricultural use appearance constitute an impact to the cultural resource. Therefore, construction of the parking lot and associated driveways and walkways is expected to have moderate, long-term adverse impacts on the cultural landscape of the field.

One mitigating factor, however, is that these impacts are largely limited to heights below 6 feet. As compared to the degree of impacts possible from building construction, for example, the parking lot would have considerably less. This is particularly true the majority of time when church functions are not taking place and there would be few or no cars in the lot.

Any impacts from the installation of the septic evapotranspiration field and associated treatment elements are not expected to have more than negligible impacts on the cultural landscape. On existing NPS land, only the mounded sand filter is expected to be visible above ground and when seeded would largely blend into the surrounding landscape.

In addition, Alternative 2, as a build alternative, would allow for the construction of the church addition on private land. This would result in the cutting of seven spruce (out of 23 trees that are recognized in the Everett Historic District Cultural Landscape Report as 'significant cultural features that retain sufficient integrity….'). Despite this minor adverse impact, as a result of the adoption of

Alternative 2, the NPS would acquire a historic preservation easement over the church property. This would help ensure the long-term protection of all other landscape features located on the historic church property.

Indirect Impacts – No indirect impacts have been identified.

Cumulative Impacts – No other development would be permitted under the terms and conditions of the Restrictive Covenant (see Appendix F). Furthermore, all immediate surrounding lands are in NPS ownership. Therefore, no cumulative effects to the cultural landscape of the field or immediate vicinity are expected.

Figure 16. Example of a Mounded Sand Filter

Conclusion – Under Alternative 2, while overall, minor to moderate negative impacts on the cultural landscape are possible, these are mitigated by the low height of most improvements and also by the frequency and duration of the parking lot use. The overall open character of the field would remain. In addition, the location of the parking lot in the eastern portion of the field does not break up the field and therefore protects the largest possible expanse of field as a continuous feature. Therefore, no impairment of park resources is expected to result under selection of this alternative.

4.3 Impacts on the Human Environment

4.3.1 Land Use

4.3.1.1 Regulations and Policies

The National Park Service has not developed specific policies or regulations that govern decisions of land use such as the location of facilities relative to others, residences, etc.

4.3.1.2 Affected Environment

The natural and cultural components of CVNP are predominant features of the park, but the human component cannot be overlooked. The number of people who live in, work in, and visit the park is significant.

The park spans portions of two Ohio counties (Cuyahoga and Summit). One community in Summit County is surrounded entirely by the park boundary (Peninsula) and there are 14 other communities partially located in or around the park boundary.

The hamlet of Everett comprises 12 historic properties along with another 7 others included in the Everett Historic District National Register nomination as non-contributing properties.

With the exception of the Church in the Valley, all of the developed properties in the Everett and Riverview Road intersection cluster are owned by the National Park Service and are used for either residential or office purposes. The field across Everett Road from the Church is owned by MetroParks, Serving Summit County, and is leased to an area farmer for several years.

Of the 17 properties owned by the NPS, 6 are used for offices or related activities, 2 are awaiting rehabilitation and are currently vacant, and the remaining 9 are residential properties. Included in the 9 residential properties are: 7 assigned to the park's non-profit operator of the Cuyahoga Valley Environmental Education Center for use as housing for interns, and the remaining 2 are NPS housing units are assigned to NPS employees, volunteers, interns, etc.

There are two residential properties located adjacent to both the church and the field associated with this EA (see Appendix D & E for site maps and property photographs). Both properties are owned by the National Park Service. The Schmidt house, located to the west of the church, has recently been rehabilitated by the NPS for residential use. The property includes the house and 4 outbuildings. It is visually separated from the church by a small stand of mature spruce trees. It is also buffered from the field by tree growth along much of the property's northern boundary. Currently, interns working in the park are occupying the residence. The long-term assignment of the property has not been determined, but is expected to be used for similar purposes.

There is some potential for the property (residence and outbuildings) being utilized in the park's Countryside Initiative. The primary goal of the Cuyahoga Countryside Initiative is to revitalize rural landscape resources in order to recreate a working, living landscape reflective of the park's past agrarian heritage. For more information, please refer to the Final Rural Landscape Management Program Environmental Impact Statement, available on line at

http://www.nps.gov/cuva/management/rmprojects/ruraleis/index.htm).

However, the Environmental Impact Statement prepared for the Initiative indicates a low potential for use of this structure in the program.

The Krimmer property, located to the east of the Church includes a vacant historic house and several outbuildings. The Krimmer house is located immediately to the east and is separated from the church by only a small side yard and the two driveways serving the church and the house. The backyard of the house is bordered on its western and northern boundaries by mature spruce trees which serve to help isolate the yard from the church

Figure 17. Hawkins House, Everett

Figure 18. Carter's General Store , Everett

Figure 19. Sager Gas Station, Everett

and subject field. The house remains vacant pending rehabilitation. Possible uses of the building have not been determined, and rehabilitation is not expected before 2006. It is likely to be used for office or residential purposes.

No other immediate properties are likely to be affected by the proposed changes as the adjacent land across Everett Road from the church is owned by MetroParks, Serving Summit County and is leased for farming purposes.

Protecting the ability of neighboring residents to enjoy these two properties without substantial intrusion by activities or development on the church property is an important consideration in the final selection of the preferred alternative.

In assessing the potential impacts to these properties, consideration was given to potential impacts from noise, trespass, nighttime lighting, nuisance smells, proximity to residences, visual intrusion,

Figure 20. Aerial Photograph Showing Proximity of the Project Area to the Schmidt and Krimmer Residences.

traffic, etc. While some these issues are addressed in other areas of this document, they are considered here only from the perspective of the adjacent residential properties.

4.3.1.3 Methodology

The absence of NPS policy on land use conflict avoidance or mitigation translates into broad statements in this environmental assessment about issues of land use conflicts. The analysis of impacts on the Human Environment: Land Use is, therefore, a qualitative assessment based on stated objectives and consultation with park management.

In this environmental assessment, impacts to the Human Environment: Land Use are described in terms of type, context, duration, and intensity, which is consistent with the CEQ regulations. These impact analyses are intended to comply with the requirements of the National Environmental Policy Act.

Impacts to Human Environment: Land Use were identified and evaluated by (1) determining the area of potential effects; (2) identifying resources present in the area of potential effects (3) applying how the action affects the resource; and (4) considering ways to avoid, minimize, or mitigate adverse effects. CEQ regulations and DO #12 also call for a discussion of the appropriateness of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact (e.g. reducing the intensity of an impact from major to moderate or minor).

Figure 21. Krimmer House viewed from Church front driveway and lawn.

Under the two action alternatives in this EA, the land transferred to the Church as a result of the land exchange, would be utilized to provide parking and sanitary needs for the church and be used as open space. As a result, the church addition could proceed as proposed.

For purposes of analyzing potential impacts to Human Environment: Land Use, the thresholds of change for the intensity of an impact are defined as follows:

Negligible: Impact(s) are at the lowest levels of detection - barely perceptible and not measurable.

Minor: **Adverse impact** – land use conflicts (including property appearance conflicts) arise but would not affect use/enjoyment of the adjoining properties. No change of use for the Krimmer and/or Schmidt properties is required.

Beneficial impact – any existing conflicts of use and/or appearance are reduced thereby increasing enjoyment of the Schmidt and/or Krimmer properties.

Moderate: **Adverse impact** – land use conflicts (including property appearance conflicts) begin to affect enjoyment of the adjoining properties and could result in changes of planned use for the Krimmer and/or Schmidt properties.

Beneficial impact – any existing conflicts of use and/or appearance are eliminated thereby increasing enjoyment of the Schmidt and/or Krimmer properties.

Major: **Adverse impact** – land use conflicts (including property appearance conflicts) affect enjoyment of the adjoining properties and would require a change of use for the Krimmer and/or Schmidt properties.

Beneficial impact – all existing conflicts of use and appearance are eliminated and additional buffering is created thereby increasing enjoyment of the Schmidt and/or Krimmer properties.

4.3.1.4 Alternative 1 - No Action

Figure 22. Schmidt House viewed from existing parking lot.

Direct Impacts – Under the No Action alternative, there would be no land transfer, and, therefore, the church addition, the parking lot and sanitary system would not be constructed. In the short-term, so long as the church remained at this location, the existing, minor negative impacts to the Schmidt property would remain indefinitely. These impacts include vehicular / parishioner activities close to the residence (90 feet). However, the short duration of use, primarily Sunday mornings, is a mitigating factor. The Krimmer property, currently vacant, is not directly impacted by the current parking and waste water treatment facilities. This is not expected to change when the structure is occupied for residential or office purposes. In the long-term, abandonment of the property would eliminate all conflicts of use between the Schmidt and Krimmer properties.

Indirect Impacts – No immediate indirect impacts were identified under the No Action alternative. However, in the future, relocation of the congregation off-site could result in the abandonment of the existing church which could have a lead to disrepair of the church and associated property and have a minor adverse impact on the adjoining residential properties.

Cumulative Impacts – Under Alternative 1, no cumulative impacts are expected.

Conclusion – Under the No Action alternative, minor negative impacts to the adjacent Schmidt property continue in the short term. In the event the church was to relocate, conflicts arising out of use would disappear, although the potential for deteriorating appearance of the church and grounds could negatively impact the adjoining properties. For the purposes of EA, there would be no impairment of park resources or land use values for the area.

4.3.1.5 Alternative 2 - Land Transfer with Conditions

Direct Impacts – Alternative 2 would have several direct impacts on the Human Environment: Land Use. The construction of the parking lot and septic system would result in short-term, minor negative impacts on the Schmidt property through construction activity, potential dust, etc. The Krimmer property, being vacant, would be unaffected by any short-term impacts.

In the long-term, the current parking lot would be greatly reduced and replaced with a larger lot located in the eastern portion of the field. This would reduce the minor, negative visual, noise and other impacts on residents of the Schmidt property that results from the existing lot location and size. While a few of the existing parking spaces would be retained for mobility impaired parishioners and business use, the parking closest to the Schmidt house would be removed and reseeded to grass. The land associated with the removed parking would be fenced in order to be included as part of the Schmidt property.

The installation of a septic evapotranspiration field is not expected to have any long-term impacts on the occupants of either of the two adjacent properties.

As a build alternative, Alternative 2 would also allow the church addition to be constructed. As such, there would be minor to moderate, short-term negative impacts on the Schmidt property and the potential for minor, long-term, negative impacts to both properties. The short-term negative impacts to the Schmidt property would occur as a result of the construction activity associated with building the addition and the use of the existing parking lot as the primary construction staging area. Likely impacts would include noise, dust and visual impacts. As these would be limited in time to the project's construction and are not anticipated to be of significant duration or extent, these impacts are generally not expected to exceed a minor characterization although there may be brief periods, during construction, that they reach moderate levels.

Indirect Impacts – There is also the potential for increased negative impacts on the neighboring properties in the future as a result of new opportunities for the church to accommodate weddings and other church related social events. The church does not have specific plans that would make further analysis possible, but it is reasonable to conclude some minor, negative impacts are possible as a result of increased facility and site use made possible as a result of building the church addition.

Cumulative Impacts – Under Alternative 2, no cumulative impacts are expected. The Historic Preservation Easement and Restrictive Covenant terms and conditions associated for the church and field limit further development of the properties (see Appendices F & G). These legal controls over further development of the properties drastically reduce the risk of further cumulative impacts. Furthermore, development activity on adjacent NPS or MetroParks, Serving Summit County lands is very unlikely.

Conclusion – Alternative 2 would result in several impacts, both negative and positive, to the adjoining Schmidt, and, to a lesser extent, Krimmer properties. Minor to moderate negative impacts could be expected at times for residents of the Schmidt property during the construction period. However, minor long-term benefits are expected under this alternative for the Schmidt property as the existing parking lot would be substantially reduced and the associated land incorporated into the Schmidt property. Impacts to the Krimmer property are expected to be negligible in both the short and long-term. Therefore, no impairment of land use values or park resources is expected to result under selection of this alternative.

5.0 Consultation and Coordination

5.1 Public Involvement

In June 2003, the NPS mailed scoping notices to other agencies, partners, tribes, and local communities soliciting comments on preliminary alternatives, issues and concerns, associated with plans to construct a parking lot and sanitary system on lands currently owned by the NPS. The NPS received 8 written replies. A copy of the scoping letter and all incoming correspondence is found in Appendix C.

A Notice of Availability for this Environmental Assessment will be published in the Federal Register, and posted on the park's website. The 30-day public review period would begin on the date the Notice is published in the Federal Register. Reference copies will be made available at Park Headquarters and local public libraries.

Following the 30-day public review period, the NPS would consider all substantive written comments that are received. Additional mitigation measures resulting from the public involvement process would be identified in the decision document. The Environmental Assessment and decision document would be available to all interested parties.

5.2 Individuals and Agencies Consulted

The following list of organizations and individuals received the initial public scoping letter (see Appendix C) and a copy of the Environmental Assessment.

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Table 5 List of Preparers and Contributors

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Darlene Kelbach	Landscape Architect	
Janet Popielski	Civil Engineer	
Eddie Dengg	Botanist (now with the Trust for Public Land)	
Thomas Toledo	Facility Management Specialist	
Jennie Vasarhelyi	Chief, Division of Interpretation and Visitor Services	
Other Environmental Assessment Contributors		
Name	**Agency / Title**	**Involvement**
Jeff Winstel	CVNP Park Planner, Historian	Author of the Everett Historic District National Register nomination.
Ann Bauermeister	Archaeologist, NPS Midwest Archeological Center	Field investigations Project manager and report author.
Kevin Skerl	CVNP Park Ecologist	Providing technical guidance on NEPA process, wildlife, vegetation, and water resource impacts and analysis.
Lisa Petit	CVNP Park Wildlife Biologist	
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Keith Haag	Architect	Architect responsible for church addition and other improvement design.
Jim Titmas, PE	Titmas and Associates, Incorporated	Waste Water Treatment specialist providing technical guidance & design services to the Church Architect.
Paulette Cossel	CVNP Historical Architect	Participated in working sessions with the Cleveland Restoration Society and church to refine design.
Mark Slater	CVNP Historical Architect	
Sam Tamburro	CVNP Historian	
Jennifer S. Bennage	Environmental Engineer, Division of Surface Water, Ohio EPA, Northeast District Office	Provided concept review on waste water treatment options.
David Snyder	archeology Reviews Manager, Ohio Historical Society (SHPO)	Review of findings and determinations of archeological field investigations for project site.
Peter Schueler	Project Manager, Church in the Valley	
John Fisk	Pastor, Church in the Valley	
Fred Holycross	Sacred Landmark Program, Cleveland Restoration Society	Collaboration with church architect and NPS historical architect to refine church addition design.

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