



# Blow-Me-Down Farm Site Management Plan

## *Environmental Assessment*





U.S. Department of the Interior  
National Park Service

Saint-Gaudens National Historic Site  
New Hampshire

Draft Blow-Me-Down Farm Site Management Plan  
Environmental Assessment

June 5, 2013

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Saint-Gaudens National Historic Site acquired the Blow-Me-Down Farm in March of 2010 via donation from the Saint-Gaudens Memorial, the park's non-profit partner. Acquisition of the Blow-Me-Down Farm was addressed in the park's 1996 General Management Plan as an opportunity to fully interpret the national historic site and expand interpretive themes. This Site Management Plan / Environmental Assessment is the much needed first step in the process of rehabilitating the Blow-Me-Down Farm, creating a long-term strategy to preserve and maintain the Blow-Me-Down Farm's resources, and providing for appropriate visitor experiences.

This Environmental Assessment (EA) evaluates two alternatives for the use and management of the Blow-Me-Down Farm: the no-action alternative (Alternative A) and one action alternative (Alternative B). The EA describes the environment and resources that would be affected by the alternatives and the environmental consequences of implementing these alternatives. The National Park Service (NPS) identified Alternative B: The Cornish Colony History and Art Center as the NPS preferred alternative because it best meets the project's purpose and need to define appropriate NPS and visitor uses for the Blow-Me-Down Farm. Implementation of the NPS preferred alternative would result in impacts to historic structures; cultural landscapes; museum collections; state-listed endangered, threatened, and special concern species; visitor use and experience; park operations; and gateway communities; however no impacts were found to be significant.

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**Note to Reviewers and Respondents:**

If you wish to comment on this EA, you may post your comments electronically at <http://park-planning.nps.gov/saga> or you may mail comments within 30 days to the address below. Whether you comment on the website or through the mail, if you include your address, phone number, e-mail address, or other personal identifying information, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold personal identifying information from public review, we cannot guarantee that we will be able to do so.

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# Chapter 1

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## Purpose & Need

Saint-Gaudens National Historic Site (NHS) acquired the Blow-Me-Down Farm in March of 2010 via donation from the Saint-Gaudens Memorial, the park's non-profit partner. Acquisition of the Blow-Me-Down Farm (the Farm) was addressed in the park's *General Management Plan, Development Concept Plan, Environmental Impact Statement: Saint-Gaudens National Historic Site* (NPS 1996). This *Blow-Me-Down Farm Site Management Plan / Environmental Assessment* (plan/EA) is the much needed first step in the process of rehabilitating the Farm's structures and creating a long-term strategy to protect and maintain the Farm's cultural and natural resources. In addition to resource management strategies, the plan/EA will include conceptual plans for visitor use and interpretation, and identify the operational needs of the site.

This (plan/EA) was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended; the regulations of the Council on Environmental Quality (40 CFR 1500-1508); and the NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision Making* (DO-12, 2011) and accompanying DO-12 Handbook (NPS 2001).

### PURPOSE OF AND NEED FOR ACTION

The purpose of the plan/EA is to guide management actions by the National Park Service (NPS) for the long-term protection of the Farm's cultural and natural resources and provide direction for appropriate visitor experiences. The plan is needed to further define appropriate NPS and visitor uses for the newly acquired Farm beyond those listed in the current General Management Plan (GMP) for Saint-Gaudens NHS. In addition, action is needed to preserve the deteriorating structures located at the Farm.

The objectives of this plan/EA, which support the purpose and need, are to:

- Evaluate the feasibility and cost effectiveness of future use alternatives and determine appropriate visitor, park, and partner uses for the Farm.
- Expand the park's interpretive program to include the story of the Cornish Colony and fulfill the park's purpose.
- Relieve the stress on historic structures and curatorial and maintenance facilities within the historic core of the park.



## OVERVIEW OF THE STUDY AREA

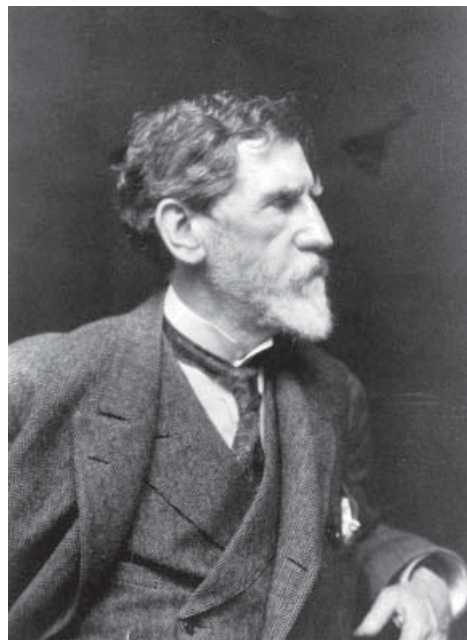
Saint-Gaudens NHS is located within the Connecticut River Valley in the town of Cornish, New Hampshire, approximately 70 miles northwest of Concord, NH and 70 miles southeast of Montpelier, VT. Originally established to include 64 acres, Saint-Gaudens NHS has since grown to encompass over 190 acres. The park encompasses four distinct areas including: the park's historic core which includes Augustus Saint-Gaudens's home (Aspet), gardens, and studios; the Blow-Me-Down Farm and Mill, Charles Beaman's seasonal estate; the Saint-Gaudens Farm, historically used as living quarters by Saint-Gaudens's grounds keeper or tenant farmer; and a small area just outside of the park's historic core which is used for park operations such as museum collections storage and maintenance shops (see Figure 1). Presently, the majority of visitor services, interpretation and educational opportunities, and administrative and operational needs are located within the park's historic core.

The Blow-Me-Down Farm and Mill properties span between the Connecticut River and the historic core of the park. Both properties are associated with Charles C. Beaman Jr. who helped establish the Cornish Art Colony by buying surrounding properties and renting or selling them to artists attracted to the area from New York City. The Blow-Me-Down Mill property includes 40 acres on the east side of NH Route 12A that was acquired by the NPS in 1984, and contains the mill building, the pond, a dam, and a stone bridge. The Blow-Me-Down Farm sits on the west side of NH Route 12A and consists of 42.6 acres of historic landscapes, forests, and agricultural fields; more than ¼-mile frontage along the Connecticut River; and nine structures (Figure 2). The 2010 acquisition of the Farm increased the park's size by nearly one-quarter. Actions proposed in this document are primarily limited to the Blow-Me-Down Farm and Mill properties.

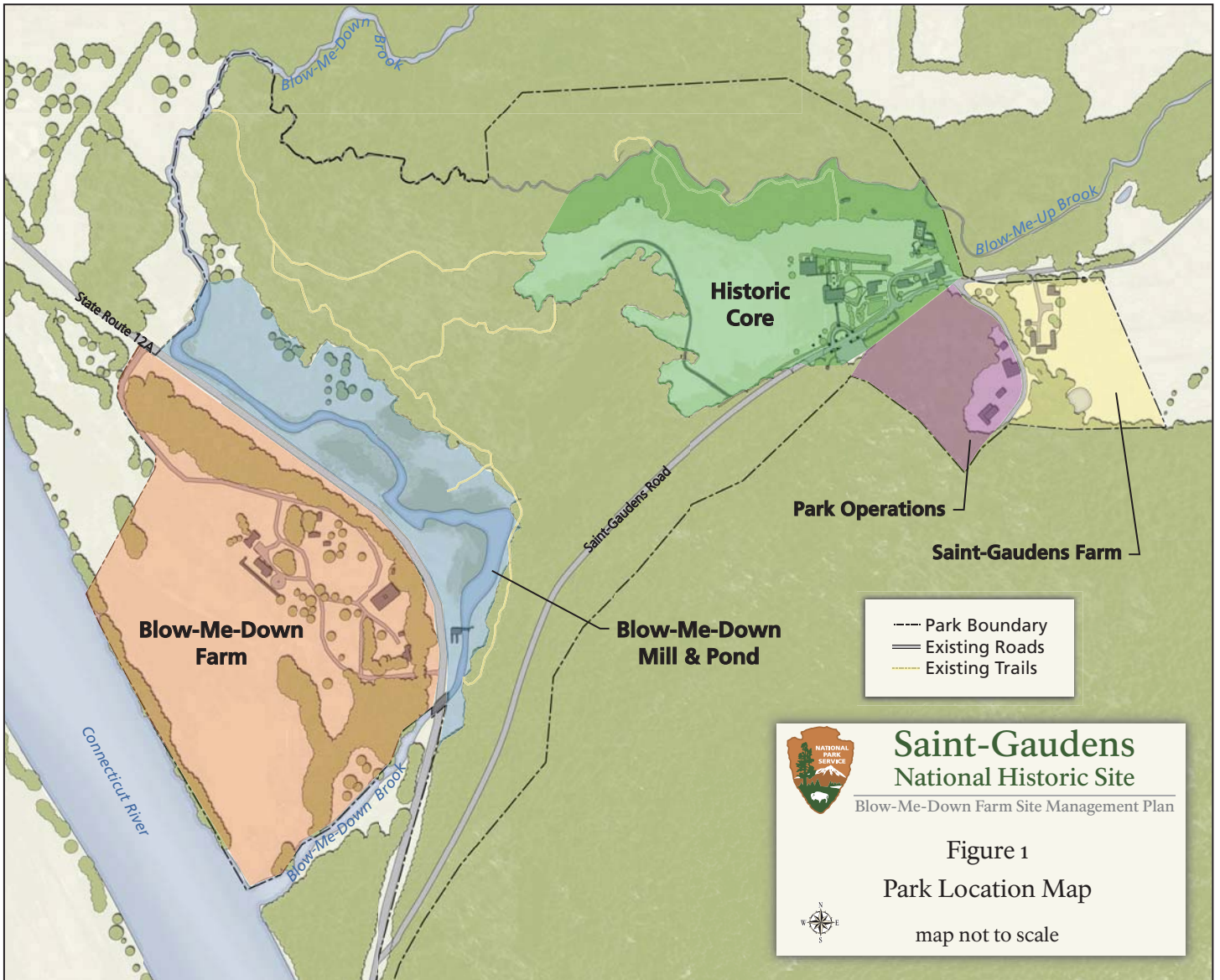
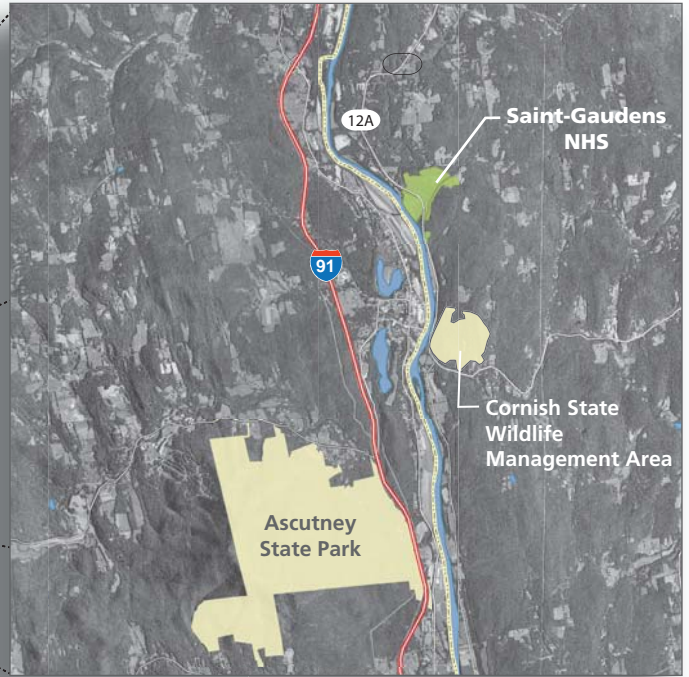
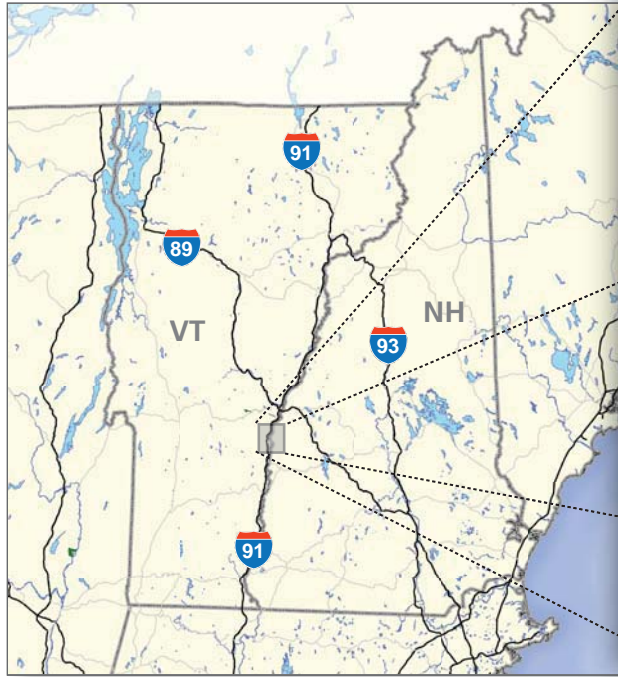
## HISTORY AND SIGNIFICANCE OF SAINT-GAUDENS NATIONAL HISTORIC SITE

Saint-Gaudens NHS was authorized by Congress in 1964 (Public Law 88-543) to preserve, protect, and interpret “historically significant properties associated with the life and cultural achievements of Augustus Saint-Gaudens” (1848-1907) and to promote the arts through events in the spirit of those conducted by Saint-Gaudens. The park was officially established in 1965. In 1976, Public Law 94-578 amended the enabling legislation to increase the authorized boundary of the park by including the Blow-Me-Down Mill property which included the woodlands surrounding the Blow-Me-Down Brook, Blow-Me-Down Pond (the Pond), and the Blow-Me-Down Mill building (the Mill). In 2000, following recommendations of the 1996 GMP, Public Law 106-491 further expanded the authorized boundary to include the Saint-Gaudens Farm and the Blow-Me-Down Farm.

A park's legislated purpose, significance, and mission help shape a national park and guide management practices for each individual park. The legislative purpose outlines the reasons for which a park was set aside as part of the national park system and provides fundamental criteria against which the appropriateness of all planning recommendations, operational decisions,



*Augustus Saint-Gaudens, 1905*



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**Saint-Gaudens  
National Historic Site**

Blow-Me-Down Farm Site Management Plan

Figure 2

Blow-Me-Down Farm & Mill



maps not to scale

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*Saint-Gaudens's First Summer in Cornish, 1885*

and actions are tested. The purposes of Saint-Gaudens NHS are to preserve and interpret the home, artwork, properties, life, and times of renowned sculptor Augustus Saint-Gaudens and to commemorate Saint-Gaudens's and the Cornish Art Colony's contribution to the cultural development of the United States. In partnership with the Saint-Gaudens Memorial, the site promotes the arts through exhibitions, special events, and programs as a living tribute to the sculptor.

A park's National Register of Historic Places (National Register) documentation explains why the park is nationally significant and describes those resources that contribute to its significance. Saint-Gaudens NHS was designated a National Historic Landmark, under the name

of the Saint-Gaudens Memorial, in 1962 and listed on the National Register of Historic Places in 1966. National Register documentation is currently in draft form to update the original nomination taking into account the recent acquisition of Blow-Me-Down Farm as well as the addition of other properties like the Blow-Me-Down Mill and Saint-Gaudens Farm that were added to the park after 1966. The park derives its primary national significance in the area of art, as the summer and later year-round home of sculptor Augustus Saint-Gaudens during the peak of his productive career from 1885 to 1907. The property itself is a physical expression of Saint-Gaudens's classically inspired aesthetic ideals and includes a temple monument containing his ashes, as well as the ashes of several other family members. The park is also significant for its associations with the Cornish Art Colony, initially formed by a group of artists, designers, and other influential urbanites who perpetuated the American Renaissance movement throughout the nation. The relationships among colony members, such as Saint-Gaudens, painter Thomas Dewing, and architect Charles Adams Platt, elevated their careers through frequent collaboration and influenced American appreciation for the arts.

## **HISTORY AND SIGNIFICANCE OF THE BLOW-ME-DOWN FARM**

In 1882, Charles C. Beaman, a successful New York City lawyer, purchased land in Cornish, NH for the purpose of creating a summer home for himself and his family. Beaman centered his Cornish farm, which he named Blow-Me-Down Farm, on a rolling terrace between the Connecticut River and Blow-Me-Down Brook, providing expansive views of the river and west hills, made all the more prominent due to the deforested landscape. By the end of 1884, Beaman expanded the Farm to include the Mill and Pond property and the property which Augustus Saint-Gaudens would eventually purchase for his summer home (Aspet). Beaman would continue to purchase properties in Cornish, eventually accumulating some 2,000 acres.

Beaman, an avid supporter of the arts, enjoyed surrounding himself with creative people and was largely responsible for luring artists, including Augustus Saint-Gaudens, to the area. Cornish appealed to artists because its isolated location ensured a quiet environment necessary for contemplative work and its natural scenery provided creative inspiration. Saint-Gaudens began renting

property from Beaman in 1885 and, along with Beaman, began inviting acquaintances to summer in Cornish. Friends of Beaman and Saint-Gaudens, most of whom were painters, sculptors, and designers, began arriving in the late 1880s, settled on properties leased or purchased from Beaman, and formed the Cornish Art Colony. These artists socialized at multiple estates throughout the colony but often congregated in large groups at Blow-Me-Down Farm or Aspet for dinners, dances, theatrical events, or any number of recreational activities from bowling to ice-skating on the Blow-Me-Down Pond.

Beaman's development of the Blow-Me-Down Farm into a gentleman's farm not only boosted the local agricultural economy, but served as a place of recreation for members of the Cornish Colony. He constructed the Bank Barn, Chauncey Cottage, Blow-Me-Down Mill, Casino, and Dance Hall, commissioning architects and local tradesmen to complete the structures. Beaman established a tradition of constructing and relocating outbuildings to achieve a rustic affect for the property. Until his death in 1900, Beaman would continue to develop the Farm, adding recreational opportunities and improving the infrastructure of the property, to eventually include a working gristmill, an extensive livestock collection, orchards, gardens, a tennis court, golf course, and a "gymnasium" for the children.

The dissolution of the Cornish Art Colony occurred gradually beginning in the 1920s. In 1927, the Beaman family donated some of their landholdings around Aspet to the Saint-Gaudens Memorial. The remainder of the Blow-Me-Down Farm property continued under Beaman family ownership until 1950. The Mill property was eventually acquired by the NPS in 1984 while the developed core of the Farm was donated to the NPS in 2010 by the Saint-Gaudens Memorial.

## PROJECT BACKGROUND

The 1996 GMP recommended that the NPS acquire the Blow-Me-Down Farm for several reasons, including its close historical association with Augustus Saint-Gaudens and the Cornish Colony, and to further protect the historic core of the park from adjacent development.

### Previous and Related Planning Studies

Several plans and studies have informed and contributed to the development of alternatives for the Farm's site management, including the *General Management Plan, Development Concept Plan, Environmental Impact Statement: Saint-Gaudens National Historic Site* (NPS 1996), *Historic Structures Report: Blow-Me-Down Mill* (Bargmann Hendrie + Archetype, Inc. 2010), the draft *Cultural Landscape Report for Blow-Me-Down Mill* (NPS 2009c), *Assessment of Blow-Me-Down Farm Structures* (NPS 2011b), and the draft *National Register of Historic Places Registration Form* and supporting documentation (NPS 2013).

The *General Management Plan, Development Concept Plan, Environmental Impact Statement: Saint-Gaudens National Historic Site* (NPS 1996) sets goals and guidance for the park for resource management and visitor use and experience while analyzing the impacts of various proposed actions. The GMP envisioned the Farm as a location for the construction of a visitor center/museum, for administrative headquarters, satellite maintenance facilities, potential parking/staging area for visitors, a location for concerts, and a location to expand existing park interpretive themes. The GMP did not provide details on accomplishing these goals other than to state that "several existing structures would be rehabilitated" and that sustainable design would be a guiding principal of facility planning and development.

The *Historic Structures Report: Blow-Me-Down Mill* (Bargmann Hendrie + Archetype, Inc. 2010) records and describes specific details of the Mill that contributes to the historic significance of the structure. The historic structure report (HSR) also provides descriptive information and guidelines for use and treatment recommendations. Use and treatment recommendations included rehabilitating the Mill for park education, interpretation, and/or exhibit space in addition to providing additional park storage.

The 2009 draft *Cultural Landscape Report for Blow-Me-Down Mill* (NPS 2009c) documents the history, significance, and integrity of the Mill's surrounding cultural landscape and recommends preservation treatments for the landscape features. Treatment options recommended for the Mill's landscape included the removal non-native invasive species, restoring a healthy wetland, and improving access and circulation to and from the Mill and Pond.

The *Assessment of Blow-Me-Down Farm Structures* (NPS 2011b) is a condition assessment report for the Farm's nine structures. The report provides an accurate overview of the current condition of each structure and identifies repairs necessary to stabilize each structure for both short- and long-term preservation.

The draft *National Register Documentation, Saint-Gaudens National Historic Site* provides information on the significant features of the park, including the Farm and Mill, which make it eligible for listing on the National Register.

## ISSUES AND IMPACT TOPICS

### Planning Issues

During the scoping process, specific considerations and concerns were identified as relevant to the development of the site management plan. The most important of these issues to be considered during the planning process are: access and circulation, interpretation and visitor experience, resource management and protection, park operations, and partnerships and cooperative actions. Along with the purpose and need for the proposed action, these issues, which are described below, guided the development of alternatives.

***Access and Circulation*** – The Farm is separated from the historic core of the park by NH Route 12A. The existing park trail system terminates at Blow-Me-Down Mill and poor sight lines along NH Route 12A create potentially hazardous circumstances for visitors wishing to access the Farm by foot. In addition, not all locations within the park are universally accessible. The alternatives should evaluate universal accessibility as well as improvements for the safety and circulation of visitors.

***Interpretation and Visitor Experience*** – The primary interpretive focus for Saint-Gaudens NHS is Augustus Saint-Gaudens and his contribution to the artistic community. A secondary interpretive theme as stated in the park's purpose is to tell the story of the Cornish Art Colony which Augustus Saint-Gaudens had a large role in establishing. Proposed alternatives should provide the park with the opportunity to more adequately incorporate this theme into its interpretive program.

***Resource Management and Protection*** – The Farm's structures and its cultural landscape are deteriorating due to lack of maintenance and occupancy. In addition, limited space within the

historic core forces the park to store non-museum collections in the collections storage facility, occupying valuable collections storage space and collections conservation workspace. Existing exhibit space within the park is limited and not all exhibit space meets NPS museum standards. Alternatives should include measures to protect the newly acquired resources of the Farm and, at the same time, alleviate the stress on cultural resources within the historic core of the park.

**Park Operations** – The addition of 42.6 acres of land and nine structures have significantly increased the workload of the park’s existing staff. The park continues to operate under the same staffing levels as prior to the Farm’s acquisition in 2010. Additional staffing is needed to keep up with the increase in grounds and structural maintenance. In addition, maintenance and curatorial space is limited in the historic core of the park. The alternatives should address the need for additional office and/or workspace for those operations.

**Partnerships and Cooperative Actions** – Acquisition of the Farm has significantly increased the financial responsibility of the park. Current economic trends do not suggest that additional federal funding for the park would be readily available to assist in preserving and protecting the park’s resources. The alternatives should address the potential for assistance from partners, existing and potential, and other cooperators that may relieve some of the financial burden.

## Regulatory Issues and Management Concerns

Alternatives developed and actions analyzed in this document are subject to an array of legal, policy, and administrative considerations. These constraints help to shape the basis for alternatives and provide a framework for analysis of the impacts within this document. Listed below are some of the laws, policies, and plans that serve to shape the alternatives and analysis.

The **NPS Organic Act of 1916** established the NPS as an agency under the direction of the Secretary of the Interior with the stated purpose of promoting use of national park lands while protecting them from impairment. Specifically, the Act declares that the NPS has a mission, both to conserve park resources and provide for their use and enjoyment “in such a manner and by such means as will leave them unimpaired” for future generations (16 U.S.C. §1).

**NPS Management Policies 2006** (NPS 2006) is the basic NPS-wide policy document, adherence to which is mandatory unless specifically waived or modified by the NPS director or certain departmental officials, including the U.S. Secretary of the Interior. Actions under this EA are in part guided by these management policies.

**Leasing of Properties in Park Areas** (36 CFR 18) and **Director's Order #38: Real Property Leasing** give parks the ability to lease properties for fair market value as long as the lease is compatible with park purposes and values and the lease would not be destructive to park resources. The Farm was acquired with an existing agricultural lease which is not set to expire until 2029. These regulations will inform the park in making decisions about future leases that would be allowed under the alternatives in this plan/EA.

**Director's Order #20: Agreements** establishes NPS policies and procedures for administering agreements; (2) identifies and describes the types of agreements that the NPS enters into with Federal and non-Federal entities; (3) identifies and describes the responsibilities and functions of NPS officials in administering agreements; and (4) affirms the NPS's commitment to comply with the regulations, policies and procedures imposed by the Office of Management and Budget Circulars, the Code of Federal Regulations, the Federal Acquisition Regulation, Executive Orders, the Department of the Interior regulations and other applicable governmental laws and regula-



tions.

**Director's Order #53: *Special Park Uses*** establishes NPS procedures for activities that take place on park land or waters and provides a benefit to an individual, group, or organization, rather than the public at large and requires written authorization and some degree of NPS management to protect park resources and the public interest. A special park use does not include any activity managed under the Concessions Management Improvement Act of 1998 (16 U.S.C. 5951), or any leasing activity managed under the National Historic Preservation Act (16 U.S.C. 470h-3) or Section 802 of the National Parks Omnibus Management Act of 1998 (16 U.S.C. 1a-2(k)). The Superintendent of each park unit is responsible for decisions to approve or deny requests to engage in special park uses at that particular park. The alternatives considered in this document may require compliance with this NPS standard.

The *Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1992) are used to guide management decisions in preserving historic properties. The standards are used to plan for the protection and treatment of historic structures and cultural landscapes to maintain their integrity.

## Impact Topics

Impact topics are resources of concern that could be affected, either beneficially or adversely, by the range of alternatives presented in this plan/EA. Impact topics evaluated in this planning process were identified based on the issues raised during scoping, federal laws, regulations, Executive Orders, NPS *Management Policies 2006* (NPS 2006), Director's Orders, and NPS knowledge of Saint-Gaudens NHS's resources.

### *Impact Topics Retained for Further Analysis*

Impact topics identified and analyzed in this document are listed below along with a brief rationale for their selection. Existing conditions associated with each impact topic analyzed are described in detail in Chapter 3: Affected Environment. An analysis of the impacts of the alternatives by impact topic is provided in Chapter 4: Environmental Consequences.

**Historic Structures** – The NPS defines a historic structure as “a constructed work, usually immovable by nature or design consciously created to serve some human activity” (NPS 2002). For a structure or building to be listed in or eligible for listing in the National Register of Historic Places, it must possess historic integrity of those features necessary to convey its significance, particularly with respect to location, design, setting, feeling, association, workmanship, and materials. National Register Bulletin #15: *How to Apply the National Register Criteria for Evaluation* provides a comprehensive discussion of these characteristics. An updated National Register nomination for Saint-Gaudens NHS, including the Farm, is nearly complete and expected to be submitted to the Keeper of the National Register in 2013. Several structures at the Farm, along with the surrounding landscape, are listed as contributing elements in the draft nomination. The alternatives would specify use and management strategies for those elements; therefore, the impact topic of historic structures is retained for further analysis.

**Cultural Landscapes** – As described in Director's Order 28: *Cultural Resource Management* (DO-#28), a cultural landscape is “a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values” (NPS 2002). Cultural landscapes are often



expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built. The Farm is a cultural landscape and is relatively intact. Because the proposed alternatives include actions that have the potential to alter the cultural landscape, the impact topic of cultural landscapes is retained for further analysis.

**Museum Collections** – The NPS *Management Policies 2006* (NPS 2006) and DO-#28 require the consideration of impacts on museum collections. Actions proposed as part of the alternatives in this Site Management Plan / EA will determine uses for the Farm which will include museum collections. Therefore, the topic of museum collections was retained for analysis.

**State-Listed Endangered, Threatened, and Special Concern Species** – NPS *Management Policies 2006* (NPS 2006) provides for the protection of threatened and endangered species including state and locally-listed species. State-listed vertebrate species which may exist in the general location of the Farm and may be impacted by the alternatives include the Jefferson Salamander (*Ambystoma jeffersonianum*), Northern Long-eared Bat (*Myotis septentrionalis*), and Wood Turtle (*Glyptemys insculpta*). Plant species which were identified by the by the NH Natural Heritage Bureau as species known to exist within one mile of the study area include Beaked Sanicle (*Sanicula trifoliata*), Northern Waterleaf (*Hydrophyllum virginianum*), Bladdernut (*Staphylea trifolia*), Large-flowered Bellwort (*Uvularia grandiflora*), Sago Pondweed (*Stuckenia pectinata*), Vasey's Pondweed (*Potamogeton vaseyi*), and slender Cliffbrake (*Cryptogramma stelleri*). Potential impacts of the alternatives on these species are analyzed in this plan/EA.

Two additional state-listed species were identified in the vicinity of the Farm: the Dwarf Wedgemussel (*Alasmidonta heterdon*) and Northern Redbelly Dace (*Phoxinus eos*). Furthermore, two exemplary natural communities exist on or near the Farm: the silver maple - wood nettle - ostrich fern floodplain forest was documented to exist along the Blow-Me-Down Brook and the rich mesic forest has been documented within one mile of the study area. The alternatives presented in this EA do not include any fill, dredging, dam construction, or other channel altering activities in either the Connecticut River or the Blow-Me-Down Brook, nor would any structures, such as docks or boat landings, be constructed which would disturb potential dwarf wedgemussel habitat or promote motorized watercraft use. Finally, no construction activities are proposed in the area of the silver maple – wood nettle – ostrich fern floodplain forest which would alter the community's composition. Proposed trails would be designed to avoid areas which contain exemplary natural communities and sensitive vegetation. No adverse impacts to dwarf wedgemussel, northern redbelly dace, or the two exemplary natural communities are expected as a result of the alternatives; therefore, these state-listed species and communities were dismissed from further analysis. A copy of this EA will be submitted to the NH Natural Heritage Bureau for review.

**Visitor Use and Experience** – Enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks (NPS 2006). The NPS strives to provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the natural and cultural resources found in parks. The alternatives evaluate appropriate use and management strategies for visitors; therefore, the impact topic of visitor use and experience was retained for further analysis.

**Operations** – As noted above, the addition of the Farm has increased demands on the park's staff and budget. Further, the alternatives include improvements to the landscape, parking lots, and interpretation that would require changes in park operations, particularly to maintenance activities and interpretive staffing. Therefore, the impact topic of operations is retained for further analysis.

**Gateway Communities**– NPS *Management Policies 2006* (NPS 2006) state that the NPS will “encourage the private sector to meet facility needs in gateway communities and thus contribute to

local economic development, encourage competition, increase choices for visitors, and minimize the need for in-park construction.” Cornish and the surrounding townships are considered park gateway communities. The alternatives include actions that could have a direct or indirect impact on these gateway communities. Therefore, the impact topic of gateway communities was retained for further analysis.

### ***Impact Topics Dismissed from Further Analysis***

The following impact topics were initially considered but were dismissed from further analysis because the resource is not present in the study area or because any potential impacts would be negligible to minor. A brief rationale for the dismissal of these impact topics is given below.

***Archeological Resources*** – The NPS defines an archeological resource as any material remains or physical evidence of past human life or activities that are of archeological interest, including the record of the effects of human activities on the environment. Archeological resources are capable of revealing scientific or humanistic information through archeological research (DO-#28). No archeological resources are known to be present at the Farm. In addition, locations of proposed ground-disturbing activities on the Mill property are highly disturbed and are unlikely to contain archeological resources. Implementation of the alternatives proposed in this plan/EA is not expected to impact archeological resources; however, appropriate steps would be taken to protect any archeological resources that are inadvertently discovered during construction. Inadvertent discoveries would be documented, significance assessed, and appropriate mitigation strategies developed in consultation with the New Hampshire State Historic Preservation Officer (SHPO). For these reasons, the topic of archeology is dismissed from further analysis.

***Federally-Listed Endangered and Threatened Species*** – Section 7 of the Endangered Species Act of 1973, as amended, directs all federal agencies to use their existing authorities to conserve federally-listed threatened and endangered species and to ensure that their actions do not jeopardize listed species or destroy or adversely modify critical habitat. One federally listed endangered species that may occur in the Connecticut River in the area of the Farm is the dwarf wedgemussel (*Alasmidonta heterodon*), which is also listed by the state as endangered. The closest documented wedgemussel population is 1.4 miles downstream of the Farm.

The alternatives presented in this EA do not include any fill, dredging, dam construction, or other channel altering activities in either the Connecticut River or the Blow-Me-Down Brook. In addition, the alternatives do not include the addition of built structures along either waterway, such as docks or boat landings, which would disturb potential dwarf wedgemussel habitat or promote motorized watercraft use. Alternatives proposed in this EA do not change the current vegetative management strategies for the shoreline of either waterway or propose shoreline construction activities which may increase sedimentation loads. All proposed ground-disturbing construction activities occur within inland areas of the Farm and would adhere to state and local sediment control measures. In addition, ground disturbing activities proposed for the Farm and Mill would expose a negligible amount of earth, relative to the size of the Connecticut River, which may have the potential to modify dwarf wedgemussel habitat. No adverse impacts to dwarf wedgemussel are expected as a result of the alternatives; therefore, this impact topic was dismissed from further analysis. As part of the Section 7 consultation process, a letter will be submitted to the U.S. Fish and Wildlife Service for review and concurrence with the NPS determination of “may affect, not likely to adversely affect.”

***Wildlife*** – NEPA requires federal agencies to assess the impacts of their actions on components of affected ecosystems. NPS Management Policies 2006 state that it is NPS policy to protect the abundance and diversity of natural resources. Fauna in the area around the Blow-Me-Down

Farm has not been as closely studied as the park's historic core because of its recent acquisition however; recent observational bat inventorying found evidence of a large maternal colony of big brown bats (*Eptesicus fuscus*) in the Blow-Me-Down Farm bank barn (NPS 2012). Typically, bats use caves, mines, and tunnels for hibernacula during the winter months and roost in tree canopies, buildings, caves, and other suitable locations during the summer months. The barn's colony of bats probably returns to the same location each summer to raise their offspring.

Management actions proposed as part of this site management plan include rehabilitation of the barn which would require excluding bats from returning to the structure. The park will oversee all rehabilitation efforts of the barn and exclusion efforts would only be permitted once the colony has dispersed for the winter (typically by the end of September), but before roosting begins the following summer (typically in April). While the mosaic of forests, fields, and water sources in the area provide a variety of habitats for displaced bats to roost, the park would mitigate the lost barn roost by placing bat houses nearby. While some loss of bat habitat would occur, when compared to the overall potential roosting habitat in other areas of and immediately surrounding the park, the impact would not noticeably change the existing bat habitat. Therefore, the impact topic of wildlife was dismissed from further analysis.

**Floodplains** – Executive Order 11988, "Floodplain Management," requires examination of impacts to floodplains and potential risks involved in placing facilities within floodplains. NPS Director's Order #77-2: *Floodplain Management* and accompanying *Procedural Manual #77-2* establish procedures for implementing floodplain protection and management actions in units of the National Park System. Flood Insurance Rate Maps created by the Federal Emergency Management Agency show only the lower terrace of the Farm lying within the floodplain. The developed area of the Farm lies outside of both the Connecticut River and Blow-Me-Down Brook floodplains. The alternatives presented in this plan do not change the management strategy or current use of the lower terraces of the Farm. In addition, these alternatives would not introduce large structures or impervious areas to the Farm that would impede the flow of floodwaters or alter the existing floodplain; therefore, the impact topic of floodplains was dismissed from further analysis.

**Wetlands** – Executive Order 11990 (*Protection of Wetlands*), NPS Management Policies 2006 and *Procedural Manual #77-1: Wetland Protection* directs wetlands be protected and that wetlands and wetland functions and values be preserved. They further direct that impacts to wetlands be avoided whenever there are practicable alternatives. Two different types of wetlands are present within and along the boundary of the Farm: riverine and palustrine. Riverine systems are wetlands or deepwater habitats contained within a channel – the Connecticut River and Blow-Me-Down Brook. Palustrine systems are non-tidal wetlands dominated by trees, shrubs, and emergents. Forested, seasonally flooded palustrine wetlands are located along one section of Blow-Me-Down Brook.

Actions proposed as part of the preferred alternative presented in this plan are not expected to impact the existing wetlands. New trails would be designed to avoid wetland areas and no additional construction is planned or anticipated in the vicinity of wetland areas. Therefore, the impact topic of wetlands is dismissed.

**Water Quality** – NPS Management Policies 2006 (NPS 2006), NPS DO #77: *Natural Resources Management*, along with the Clean Water Act, and other federal, state, and local regulations provide general direction for the protection of surface water and groundwater. Degradation of water quality in small streams due to nonpoint pollution sources such as residential septic systems, storm runoff, and agricultural land use is a growing concern in the Connecticut River Basin (Zimmerman, *et al.*, 1996). The Farm's two existing septic systems, serving the Casino and

Chauncey Cottage, are not adequate for uses proposed under the preferred alternative and would be replaced before new uses would be permitted. Replacing the septic systems would ensure that the systems are adequately sized and functioning properly, therefore, reducing the likelihood of groundwater contamination. During any ground-disturbing construction activity, including installation of new septic systems and construction of new trails, the park would use mitigation measures and best management practices to protect water quality in surrounding streams and rivers. In addition, the park would obtain all required permits and implement the required control measures for installation of new septic and well systems in accordance with applicable laws and regulations. The park does not anticipate impacts to water quality that would exceed a negligible threshold; therefore, the topic of water quality was dismissed from further analysis.

***Prime and Unique Farmland Soils*** – The CEQ NEPA regulations (40 CFR 1508.27) require federal agencies to assess the impacts of their actions on soils classified by the Natural Resources Conservation Service (NRCS) as prime or unique farmland soils. According to the NRCS, there are no unique farmland soils located on the Mill property; however, the Farm contains two prime farmland soil types: Winooski silt loam and Hadley silt loam. The Winooski soils predominately occur along the banks of the Blow-Me-Down Brook which is predominately forested. Hadley soils are found along the lower terraces of the Farm and are currently being used for agricultural purposes. No actions are proposed in this plan/EA that would change the existing agricultural use of Hadley soils. Some ground-disturbing actions are proposed in the forested areas of Winooski soils, but these are minimal and would not irreversibly convert prime farmland soils to other uses. Therefore, the impact topic of prime and unique farmland soils is dismissed from further analysis.

***Ethnographic Resources*** – Ethnographic resources are defined as any “site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it” (DO-28). There are no known ethnographic sites associated with the Farm. As a result of the lack of formally recognized ethnographic resources, the impact topic of ethnographic resources was dismissed from further analysis.

***Environmental Justice*** – Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations,” requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental impacts of their programs and policies on minorities and low-income populations and communities. According to the CEQ, environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (CEQ 1997). Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Although minority and low-income populations as defined in Executive Order 12898 reside in both Sullivan and Windsor counties, the proposed uses and management activities would not have disproportionately high or adverse environmental effects, including human health, economic, social, or environmental impacts on minority or low-income populations residing in these counties. Therefore, the impact topic of environmental justice was dismissed from further analysis.

***Energy Conservation/Sustainability*** – CEQ guidelines for implementing NEPA require examination of energy requirements and conservation potential as a possible impact topic in environmental documents. The objectives of sustainability are to design structures to minimize

adverse impacts on natural and cultural values; to reflect their environmental setting; to maintain and encourage biodiversity; to construct and retrofit facilities using energy efficient materials and building techniques; to operate and maintain facilities to promote their sustainability; and to illustrate and promote conservation principles and practices through sustainable design and ecologically sensitive use. Essentially, sustainability is living in a manner so as to have the least impact on the environment. Many of the proposed alternative actions would move uses from the historic core of the park to the Farm, thereby keeping energy consumption at current levels. New actions perpetuate low-consumption activities and would not contribute to the depletion of energy resources. In addition, current NPS policy requires parks to consider energy conservation and sustainability when designing and rehabilitating structures. Saint-Gaudens NHS would rehabilitate structures to be as conservative and sustainable as possible. The alternatives would have a negligible effect on energy requirements, energy resources, and energy conservation potential; therefore, the impact topic of energy conservation/sustainability is dismissed.

***Indian Trust Resources and Sacred Sites*** – Secretarial Order 3175 requires that any anticipated impacts to Indian Trust resources from a proposed project or action by Department of the Interior agencies be explicitly addressed in environmental documents. The federal Indian Trust responsibility is a legally enforceable obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal laws with respect to Native American tribes. There are no federally-recognized tribes associated with Saint-Gaudens NHS. In addition, there are no known Indian Trust resources within Saint-Gaudens NHS, and the lands comprising the national historic site are not held in trust by the Secretary of the Interior for the benefit of Native Americans due to their status as Native Americans. Additionally, there are no known sacred sites located at the Farm. Therefore, the impact topic of Indian Trust resources and sacred sites was dismissed from further analysis.



# Chapter 2

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## Alternatives

During the summer of 2011, an interdisciplinary team of Saint-Gaudens NHS staff and NPS Northeast Regional Office resource and planning specialists met for the purpose of discussing opportunities and constraints for the use and management of Blow-Me-Down Farm. Shortly following, the park held an open house during which the public and partner organizations could express their ideas and concerns for the future uses of the Farm. These two meetings resulted in the definition of project objectives as described in Chapter 1: Purpose and Need and a list of alternative actions that could potentially meet those objectives.

As part of the alternatives development process, preliminary alternatives, including three action alternatives and a no-action alternative, were developed and released to the public for review and comment. Comments received from the park's legislated partner, the Saint-Gaudens Memorial, and from members of the public, led to the decision to utilize feasible elements from the three preliminary action alternatives to create one phased, comprehensive action alternative. Elements of the preliminary alternatives that received strong support were not mutually exclusive of one another and could easily be combined to create a single, more viable alternative. In addition, the combination of alternative elements would allow Saint-Gaudens NHS to implement the action alternative in phases. Elements requiring less funding could begin earlier in the process while the park waited for funding to implement more costly actions. Elements of the action alternatives found to be infeasible or cost prohibitive were ultimately dismissed from further consideration.

Following are the descriptions of the alternatives carried forward for detailed evaluation in this EA: the no-action alternative (Alternative A – Continuation of Current Management) and the action alternative (Alternative B – The Cornish Colony History and Art Center). A summary table comparing alternative elements is presented at the end of this chapter.

### ELEMENTS COMMON TO ALL ALTERNATIVES

The following section describes common alternative elements that take place under both Alternative A and Alternative B. Common alternative elements are summarized in this section and are not repeated in the descriptions of the alternatives below; however, these common elements are included in the analysis of the impacts of each alternative in Chapter 4: Environmental Consequences.

***Rehabilitation of the Dance Hall*** – The Dance Hall would receive priority funding for rehabilitation to accommodate park administrative needs and/or special events approved by park management. Rehabilitation efforts would include repairs to the interior and exterior of the structure as well as upgrades to all utilities. While the level of rehabilitation efforts could vary depending on use, the following actions were identified in the Blow-Me-Down-Farm Condition Assessment Report (NPS 2011b) as improvements needed to fully stabilize and preserve the structure’s exterior:

- repair and repoint masonry walls, foundations, and chimneys;
- repair porch canopy support columns and decking;
- provide for building accessibility;
- replace or reinforce roof framing;
- selective repair or replacement of window trim and wood siding;
- paint exterior woodwork;
- repair or replace shingle roof; and
- rehabilitate wood cupola.

In addition, the following interior repairs were identified for the Dance Hall:

- refinish wood floors;
- paint interior walls and ceilings;
- repoint masonry around chimney;
- install or repair electrical, plumbing, and heating and cooling systems as needed; and
- repair or install new fire suppression and security systems as needed.

***Replacement of Farm’s Well and Septic Systems*** – The existing well supplying water to the Casino would need to be inspected, but it is thought to be in safe, working order. A new well would be installed for the Chauncey Cottage to replace the existing spring-fed water system which is failing. The two existing septic systems are failing and must be replaced.

***Rehabilitation of the Blow-Me-Down Mill*** – The Blow-Me-Down Mill HSR (Bargmann Hendrie + Archetype, Inc. 2010) would be used to guide interior and exterior rehabilitation efforts for the Mill which could be used for park education and interpretation space in addition to providing additional park storage. Because of the remote location of the structure in relation to the remainder of the park, the interior of the Mill would only be open to the public during set hours, established by the park as part of their interpretive programming. Rehabilitation efforts would include the following actions:

- install or repair electrical, plumbing, and heating and cooling systems as needed;
- upgrade fire suppression and security systems; and
- incorporate accessible means of ingress / egress.

***Rehabilitation of the Blow-Me-Down Mill Cultural Landscape*** – The 2009 draft Blow-Me-Down Mill CLR (NPS 2009c) identified treatment options for the Blow-Me-Down Mill and surrounding landscape, including the removal non-native invasive species, restoring a healthy wetland, and improving access and circulation to and from the Mill and Pond. Treatments for the landscape would include the following elements which are described in detail below:

- redesign Mill parking area;

- install additional interpretive waysides and directional signage;
- provide accessible pathways to the Mill and to a viewing area for the dam; and
- install trails to improve circulation around the Pond and connect to the existing park trail system.

*Redesign Mill parking area* – The existing Mill parking area would be shifted further north, away from the Pond edge. The proposed parking area would be clearly defined, treated with macadam and a gravel chipseal, and consist of four delineated spaces, plus an overflow area. In addition, the parking access drive would be redesigned to provide better sightlines to NH Route 12A.

*Provide accessible pathways to the Mill and to a viewing area for the dam* – An accessible pedestrian circulation route would be constructed from the parking area to the Mill. The walkway would be constructed along the existing pipe rail fence, constructed of a hardened surface, and should blend with the existing historic features. The walkway grade should meet Americans with Disability Act (ADA) codes and be approximately four feet wide.

A stable, universally accessible walkway would be constructed from the front of the mill building to its south side, extending approximately fifty feet from the building to the end of the extant retaining wall, to provide safe and comfortable viewing of the mill dam. The walkway should meet ADA codes and be four to six feet wide to allow ample viewing and turning space. A one to two-foot high and two foot wide retaining wall is needed to retain the slope from the road shoulder.

*Install trails to improve circulation around the Pond and connect to the existing park trail system* – A stable, universally accessible walkway is needed to connect the mill building with the stone arch bridge, extending approximately another 150 feet from dam viewing area described above. The walkway should have a hard, compacted surface and may require retaining walls due to the steep slope of the road shoulder. A mowed grass path could continue to be mowed from the stone arch bridge to connect to the existing Blow-Me-Down Trail. A second mowed grass path could extend to the north end of the meadow along the pond bank.

## **ALTERNATIVE A – CONTINUATION OF CURRENT MANAGEMENT (NO-ACTION ALTERNATIVE)**

Under Alternative A, current management, operations, and conditions would continue at Blow-Me-Down Farm. This is essentially the management structure that has been in place since the Farm was added to Saint-Gaudens NHS in 2010. Federal regulations require the NPS to analyze the continuation of current management, or no-action, alternative and compare the associated environmental consequences to other alternatives considered in environmental documents. If the NPS selects the continuation of current management alternative, they would respond to future needs and conditions associated with the management and use of the Farm without major changes to the present course of action.

### **Access and Circulation**

Day-to-day access to the Farm would continue to be limited to NPS staff, agricultural lessees, and emergency vehicles. The Farm would only be open to visitors for special events and meetings, as needed. During those occasions, access to the interior of the buildings would be limited to those structures which do not pose a threat to the safety of visitors.

The historical entrance to the Farm, directly opposite Blow-Me-Down Mill, would remain closed due to poor entrance and egress sightlines. Visitors would continue to use the farm access drive-way north of the historic entrance to enter the property during special events and empty lawn areas would be designated by park administration for parking. No new approach signage, internal circulation patterns, parking areas, or trails would be created. The park would continue snow removal at the Farm for emergency purposes as needed. Park trails would continue to terminate at Blow-Me-Down Pond and would not link the historic core of Saint-Gaudens NHS to the Farm.

## **Interpretation and Visitor Experience**

Under Alternative A, visitors would experience the park much the same as they do today. Primary visitor services, including contact stations and restrooms, would continue to be located within the historic core of the park. The primary interpretive experience for Saint-Gaudens NHS would continue to focus on Augustus Saint-Gaudens, his work, his life, and his home (Aspet). No interpretive programs would take place at the Farm with the exception of special events or special tours approved by the park on a case-by-case basis. A brief history of the Cornish Colony would continue to be included during tours of Aspet, but no permanent Cornish Colony exhibits would be established due to space constraints. No additional wayside exhibits would be installed at the Farm under Alternative A.

Educational opportunities, such as classes, workshops, and artist-in-residence programs, would continue to take place in the historic core of the park, focusing on sculpture. The park's existing trail network would provide active recreational opportunities while passive recreational opportunities, such as the summer concert series, would continue to occur within the historic core of the park.

## **Resource Management and Protection**

In addition to the actions listed under "Element Common to All Alternatives" above, the park would continue to focus on emergency stabilization and repair of the Casino, Blow-Me-Down Bank Barn, Chauncey Cottage and Garage, Chicken Coop, and Open and Closed Sheds as funding allows. While these structures could be used for some park administrative uses (meeting and storage space), significant capital improvements and rehabilitation of these structures would not occur under this alternative and the structures would remain closed to the public.

Improvements would be made to some of the structures' utilities in order to provide service for some special events and meetings, to bring utility services up to applicable codes, and to improve fire safety, but significant utility upgrades necessary for adaptive reuse of the structures would not occur under Alternative A. During some special events at the Farm, the park may continue to secure portable restrooms for visitor and special event use.

Under Alternative A, no significant improvements to the landscape would be made. The Farm currently requires approximately 10 acres of mowing which would be administered on an as-needed basis for special events and to control overgrowth and invasive species. Tree debris would be cleared as needed, but the removal of dead trees would not occur under this alternative unless they become a threat to historic structures or public safety. Vegetation would continue to be removed along certain areas of the Connecticut River to maintain existing views to Mount Ascutney and the Connecticut River. The lower farm field and a portion of the upper field would continue to be leased for agricultural purposes.

The existing curatorial facility adjacent to the historic core of the park would continue to hold the park's museum collections and some non-collections objects. Overflow non-collections material would continue to be stored in secure locations at the Farm, but no new collections storage units would be created. The park would continue to seek funding to create more environmentally appropriate exhibit space within the historic core of the park, but no additional exhibit space would be created at the Farm. The Little Studio, located within the historic core of the park, would continue to serve as exhibit space and home to the park's summer concert series. The park would not actively seek to expand its collection of Cornish Colony artwork and artifacts under Alternative A.

## Park Operations

Park administrative offices would remain in the historic core of the park. If funding becomes available for rehabilitation of one of the Farm's structures for park administrative use, then the park could move some administrative uses to the Farm. Curatorial and maintenance divisions would be housed in the existing facilities adjacent to the historic core. Smaller spaces at the Farm would continue to be used for some non-collections storage and maintenance purposes, as needed.

## Partnerships and Cooperative Actions

The park would continue to work closely with its partners to protect and enhance park resources and visitor experiences. In addition, the park would look to establish additional partnerships with other organizations to assist in fund-raising or other opportunities which would contribute to the stabilization and protection of the Farm's resources.

## **ALTERNATIVE B – THE CORNISH COLONY HISTORY AND ART CENTER (NPS PREFERRED ALTERNATIVE)**

The intent of Alternative B, the NPS Preferred Alternative, is to provide for the long-term preservation of Blow-Me-Down Farm while expanding the visitor experience which is currently constrained by facility and historic preservation limitations within the historic core of the park. In addition to the life and works of Augustus Saint-Gaudens, this alternative would also focus on preserving resources associated with the Cornish Colony and interpreting the life, work, and significance of the members of the colony. Visitors would receive a larger glimpse into Saint-Gaudens's social life and learn more about the artists he influenced and those who influenced him.

Implementation of this alternative is strongly dependent upon raising the necessary funds from outside sources and the cultivation of strong partnerships to augment what minimal federal funding is available. For these reasons, Saint-Gaudens NHS would look to collaborate with partners and others to protect the Farm's historic resources and offer effective arts and/or history programming to the visiting public, scholars, and other interested parties. The park would use a two-part phasing approach to prioritize goals for key elements and develop an implementation sequence that allows for the greatest flexibility of use, preservation of resources, and enhancement of the visitor experience. More specific phasing information is provided under each planning topic description.

*Phase 1* – Occurs within the first seven years following implementation of Alternative B, if se-



lected. During Phase 1, the park would proactively seek grants and cost-share opportunities, strengthening existing partnerships and developing new partnerships for undertaking needed preservation and rehabilitation or restoration of the Farm's historic structures. The park may also pursue leasing or cooperative agreement opportunities that would bring uses to the Farm that directly relate to the park's purpose and significance including: art, history, and natural resource education programs; artist-in-residence programs; museums; or other programs which provide educational opportunities in the fields of art, art history, historic preservation, public lands management, or natural resources. In addition, the park could proactively pursue short-term leasing of different areas or structures of the farm for special events. These short-term leases would not be limited to uses related to the park's purpose and significance, but could include any appropriate party or event, such as weddings or banquets, upon NPS approval.

**Phase 2** – Begins the eighth year following implementation of Alternative B (if selected) and would continue as the management strategy for the Farm. The intent of Phase 2 is to increase the likelihood of Saint-Gaudens NHS finding suitable occupants to assist in stabilizing and/or rehabilitating the Farm's structures. In the event that efforts identified under Phase 1 to raise funds through grants and partnerships have not shown significant headway by the eighth year, Phase 2 would permit the park to expand acceptable uses of the Farm beyond those which directly support the park's purpose and significance. Under Phase 2 of Alternative B, the park would consider any proposal for use (public or private) as long as the proposal meets NPS leasing regulations.

Lease agreements under Alternative B, Phase 1 and Phase 2, could be created for an entire structure, part of a structure, multiple structures, a portion of the Farm's grounds, the entire Farm, or any combination of the above. Leases could also be created for public or private use which could limit NPS programming and public access. If the Farm is leased for private use, some of the actions listed below may not be possible depending on the terms of the lease.

## Access and Circulation

### *Phase 1:*

Under Alternative B - Phase 1, the park would use the rehabilitated Dance Hall to incorporate new programming and allow for some public access to the Farm during park operating hours. If funding became available, or if appropriate lease agreements were created, preservation and rehabilitation efforts could allow for additional structures to be open for public access once they have been secured and made safe for use. The public would not be granted access to the agriculturally-leased fields in order to protect the lessee's interests and the safety of the visitor.

As with Alternative A, the historical entrance directly opposite the Blow-Me-Down Mill would remain closed due to poor sightlines, and the farm access drive would become the main entrance. New entrance signage would be installed and the park would work with the town of Cornish and the New Hampshire Department of Transportation for additional roadway/approach signage along New Hampshire NH Route 12A. The park would continue to plow snow for emergency purposes during the off-season. If the Farm is leased for year-round use, the park would coordinate snow removal with the lessee through agreements and/or the terms of the lease. The existing paved parking area, between the Casino and Dance Hall, would be resurfaced, as needed, to provide accessible parking, but the majority of visitors and staff would continue to park in empty lawn areas designated by the park. Depending on the level of use, new parking areas may be created in locations outside of the Farm's developed cluster.

Alternative B would build upon the recommendations of the Mill's CLR, expanding circula-

tion routes to the Farm. A new trail system could be developed that would cross NH Route 12A through the culvert under the stone arch bridge, or with a striped road crossing located at the Farm's entrance. The park would work with all appropriate local, state, and federal agencies for design and approval of the road crossing. Rustic trails could extend from the Farm's existing driveway/trail system to the Connecticut River. Trails would be created by means of mowed grass through open field areas and hard-packed soil through forested areas. The proposed trail network would be designed to avoid the agricultural fields and sensitive natural and cultural resources.

### ***Phase 2:***

Under Phase 2, the park would continue to improve access and circulation as described under Alternative B – Phase 1 if portions of the Farm are used to accomplish the park's purpose and public access is acceptable under the terms of any current lease. If, however, the Farm is leased for private use under Alternative B – Phase 2, and public access is not permitted as part of a lease agreement, then the park would not continue to pursue any additional access and circulation improvements listed under Phase 1 above. Under the latter scenario, the park would coordinate access and circulation needs with the lessee through agreements and/or the terms of the lease.

## **Interpretation and Visitor Experience**

### ***Phase 1:***

Under Alternative B - Phase 1, primary visitor services would continue to operate in the historic core, but additional staffing may be provided at the Farm to orient the visitor. The interpretive focus for visitors in the historic core of the park would continue to be Augustus Saint-Gaudens, while the visitor experience at the Farm would focus on arts in general and the history of the Cornish Colony: how it was established, who the artists were, how the colony related to external political and social events, etc. Permanent exhibit space could be dedicated to the Cornish Colony and other classically-influenced artworks while revolving exhibits could showcase the artwork by, or objects associated with, individual artists who formed the Cornish Colony. Interpretive waysides would be installed in selected areas to provide visitors with additional information about Blow-Me-Down Farm and the Cornish Colony.

The park would work with existing and new partners and others to expand on its current educational programs by providing classroom and meeting space at the Farm. Workshops, classes, lectures, and instruction would move beyond sculpture to any of the wide range of artistic mediums used by the Cornish Colony artists. Additionally, the Farm could become a site for research and learning about arts in general or the Cornish Colony in particular. An artist-in-residence program could also be extended to the Farm. The chosen artist could work on his/her project at the Farm during the park's open season. Artists may interact with visitors, answer questions about their artwork, and hold workshops teaching visitors or students how to use their medium. Studio space for these artists could be developed in several different buildings at the Farm.

Passive recreational uses and special events could be moved from the historic core of the park to the Farm. An area of the Farm could be developed as a concert venue. Outdoor spaces or portions of existing buildings could be adaptively reused as special event staging areas. Under Alternative B – Phase 1, visiting artists wishing to use the park as their artistic inspiration could have access to the Farm during normal hours of operation to practice their artwork under the same guidelines used for the historic core of the park.

### ***Phase 2:***

Under Phase 2, the park would continue to expand interpretive and visitor uses of the Farm as described under Alternative B – Phase 1 if portions of the Farm are used to accomplish the park’s purpose and public access is acceptable under the terms of any current lease. If, however, the Farm is leased for private use under Alternative B – Phase 2, and public access is not permitted as part of a lease agreement, then the park would not continue to pursue any opportunities to expand the interpretive programming and visitor use at the Farm as listed under Phase 1 above.

## **Resource Management and Protection**

### ***Phase 1:***

Saint-Gaudens NHS would focus on emergency stabilization and repair of the Farm’s structures as federal funding becomes available. Structures would remain closed to the public until these stabilization efforts are completed and the NPS deems them safe for public use. In addition to limited federal funding, the NPS would look to partners and others for donations, cost-sharing arrangements, or leasing opportunities with the intent of rehabilitating structures for uses related to the park’s purpose and significance.

As structural improvements are made, visitor and operational uses will be incorporated into structures. Specific uses were identified during scoping which would be suitable for each structure at the Farm during Phase 1 of Alternative B including: administrative uses, park operations, and interpretive or educational programming related to the park’s purpose and significance. Proposed structural uses are not necessarily mutually exclusive; several different structures could be suited for the same use and compatible uses could be included within the same structure. Over the course of time, uses may shift from one structure to another or be combined differently within the same structure depending upon programmatic needs.

While the level of rehabilitation efforts could vary depending on needs and the type of use specified for each structure, the following actions were identified in the BMDF Condition Assessment Report (See Chapter 1) as improvements needed to fully stabilize and preserve each of the Farm’s structures. Some or all of these improvements could be made during the course of Alternative B either by the NPS or through lease agreements.

***Casino*** – Preservation and stabilization of the Casino would require repairs to the interior and exterior of the structure as well as upgrades to all utilities. Exterior repairs would include, but are not limited to:

- repointing masonry walls;
- repairing cracked foundations, chimneys, stoops and patios;
- replacing or repairing the metal roof and roof supports;
- repairing windows, storms, and screens;
- replacing window sills as needed;
- providing for building accessibility;
- selective replacement of wood siding; and
- painting exterior woodwork.

Interior repairs would include:

- refinishing and painting walls and ceilings;
- reconfiguration of rooms;
- replacement or rehabilitation of utilities;
- repairing or replacing flooring and doors where needed; and
- upgrades to restroom and kitchen facilities to accommodate usage needs.

**Bank Barn** – Exterior repairs on the Barn would include:

- selective replacement of wood siding;
- carpentry repairs to windows, window sills, and shutters;
- painting, and repairs of cupola, weathervane, and flashing where needed
- wood sill and plaster replacement along perimeter walls and at the silo base;
- providing for building accessibility; and
- providing a foundation closure wall on the north side of the barn.

Interior repairs would include repairs to door and window hardware, reconfiguration of interior spaces, replacement of selected floorboards, and potentially the upgrade or installation of utility systems.

**Chauncey Cottage** – Exterior repairs to the Chauncey Cottage include:

- painting the metal roof (or consideration of other appropriate treatment options);
- repairs to windows, doors, and sills;
- replacement of shingle siding;
- masonry repointing;
- providing for building accessibility; and
- rehabilitation to all porches/entryways.

Interior repairs would include:

- repair or replacement of foundations and floor framing, if necessary;
- adjustments to doors, windows, and hardware;
- replacement of flooring as needed;
- refinishing of floors, walls, and ceilings; and
- upgrades to kitchen and bathrooms to meet usage needs.

**Lewis Garage** – Repairs for the Lewis Garage would include:

- a new roof and gutter system;
- repairs to windows, trim, and wood siding;
- replacement of wood flooring; and
- exterior painting.

**Chicken Coop** – Repairs for the Chicken Coop would include:

- selective replacement of wood siding;
- replacement of roof;
- repair or replacement of concrete slab foundation;
- upgrade existing utilities;
- repairs to windows and sills, and
- replacement of chimney, if appropriate.

**Carriage House** – The Carriage House repairs would include:

- plumbing and squaring up the structure;
- selective replacement of wood siding;
- exterior carpentry repair;
- cleaning and repair of all windows and doors, including sill replacement;
- exterior painting;
- replacement of the interior wood plank floor; and
- reconfiguring interior spaces for potential uses, including upgrading or installing utilities.

**Wood Shed** – Repairs to the Wood Shed include:

- selective repair or replacement of wood siding, trim, sill, and other exterior carpentry features; and
- exterior painting.

Under Alternative B – Phase 1, utility improvements would be required before any permanent visitor, administrative, or operational uses are implemented. Electrical systems would need to be inspected and upgraded or replaced as needed. Existing plumbing lines serving the Casino and Chauncey Cottage would need to be inspected and upgraded as needed. All other structures would require plumbing installations if needed for their chosen use. The park would continue to bring in portable restroom facilities as needed for special events until improvements to permanent facilities are completed. In addition, fire detection, fire suppression, and security systems would need to be upgraded throughout the Farm complex. All plumbing and electrical work would be completed to meet current code requirements.

The cultural landscape could be rehabilitated to its period of significance under Alternative B. Until funding becomes available for rehabilitation efforts, the park would continue to mow the Farm's existing lawns and fields on an as-needed basis. As uses are phased onto the Farm, the park or tenants would need to mow on a more regular basis in areas of frequent use. The park may allow areas further away from the core of the Farm's structures to revert to meadow, mowing only as needed to control overgrowth and invasive species. Dead trees and tree debris would be removed and replaced, if needed, to maintain the cultural landscape. As with Alternative A, vegetation would continue to be removed along certain areas of the Connecticut River to maintain existing views to Mount Ascutney and the Connecticut River. Saint-Gaudens NHS would continue to lease the lower terrace and a portion of the upper terrace for agricultural purposes. An existing agricultural lease is in place for these locations until 2029.



Under Alternative B, the majority of the park's collections would be held and maintained within the existing collections storage facility. Research documents or other research materials could be relocated to the farm for use by visiting researchers if buildings are upgraded to museum standards. As indicated above, some space could be created in the Farm's structures to store or display collections and non-collections objects that would be used for interpretation or research purposes at the Farm. If other uses are moved from the historic core of the park to the Farm's structures, the park may also incorporate collections and non-collections storage space into the vacated spaces within the historic core of the park. The park would continue to seek funding to create additional environmentally appropriate exhibit space in both the historic core and the Farm.

### ***Phase 2:***

Under Alternative B - Phase 2, management strategies for the Farm's historic structures would be the same as under Phase 1. Any new lease created under the Phase 2 would require rehabilitation efforts which would be overseen by the park. Structures which remained vacant moving into Phase 2 would continue to receive stabilization and preservation maintenance from the park as funding becomes available. The park would continue to maintain views of the Connecticut River under Phase 2 and the use of agricultural leases would continue for the lower terraces of the Farm.

Under Phase 2, rehabilitation of the Farm's cultural landscape and management strategies for the park's collections would depend on the terms of any lease in place for the Farm. If portions of the Farm are used to accomplish the park's purpose and public access is permitted, some or all of the landscape rehabilitation could occur and new storage and/or exhibit space could be created if those actions do not conflict with existing leases. If, however, the Farm is leased for private use under Alternative B – Phase 2, then the park may not continue to pursue any additional landscape rehabilitation or collections exhibit or storage strategies listed under Phase 1 above. Under the latter scenario, the park would coordinate landscape maintenance needs with the lessee through agreements and/or the terms of the lease and collections management strategies would revert to those actions listed under Alternative A – Continuation of Current Management.

## **Park Operations**

### ***Phase 1:***

Some park administrative and/or park operations offices may be relocated to the Farm if funding permits the rehabilitation of structures for those uses. Primary curatorial and maintenance work and storage spaces would remain in their existing facilities adjacent to the historic core or the park, but satellite work and storage space may be created in structures at the Farm. Under Alternative B, the tenant would be responsible for rehabilitation and maintenance of leased structures. The park would be responsible for maintenance of any structures and areas of the Farm not under a lease agreement as well as overseeing rehabilitation and maintenance efforts by lessees.

### ***Phase 2:***

Under Phase 2, the park would continue park operations management as described under Alter-

native B – Phase 1 if the expansion of administrative offices and storage space do not conflict with any lease agreements. If, however, the Farm is leased for private use under Alternative B – Phase 2, then the park would not create additional administrative offices or create additional work or storage space at the Farm.

## Partnerships and Cooperative Actions

### *Phase 1:*

During Phase 1, the park would look to their existing partners and seek additional partners to work in collaboration with the park to rehabilitate Farm structures, or portions of structures, for uses related to the park's purpose and compatible with the ideas described under Alternative B, Phase 1 above. The NPS would seek leasing agreements with interested parties by which the lessee would rehabilitate and maintain the structure to meet the needs of their proposed use. The cost incurred by the lessee to rehabilitate a structure could be offset by the rental rate as specified in the lease agreement. Saint-Gaudens NHS would oversee rehabilitation efforts to ensure that all work is completed to current NPS standards.

### *Phase 2:*

After seven years (Phase 1), Saint-Gaudens NHS would open the leasing or cooperative agreement program to anyone wishing to rehabilitate a structure, or portion of a structure, area of the Farm, or the entire Farm for public or private use. Proposed uses would need to be approved by the park and would need to meet NPS standards and policies. Lessees would be responsible for rehabilitating and maintaining the structure to meet their needs. As with Phase 1, the NPS would work with the lessee to set the terms by which rehabilitation costs could be offset by reduced or waived rental rates. As with Phase 1, Saint-Gaudens NHS would oversee rehabilitation efforts to ensure that all work is completed to current NPS standards.

## MITIGATION MEASURES

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures would be implemented where feasible. The NPS would implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

- Historic Structure Reports (HSR) and Cultural Landscape Reports (CLR) are used by the NPS to document the physical history, current condition, and proposed treatment for historic structures and landscapes. HSRs would be created for the Casino, Dance Hall, Blow-Me-Down Bank Barn, Chauncey Cottage and Garage, Chicken Coop, and Open and Closed Sheds, and a CLR would be created for the Farm's cultural landscape. These reports would be used to guide rehabilitation efforts and future maintenance of the Farm's structures and landscape. Until such time as HSRs and a CLR could be completed, the park would continue to use existing resource documentation while working closely with NPS resource specialists to make maintenance decisions regarding the Farm's resources.

- Where necessary for resource or visitor protection, work areas would be identified with construction fence, silt fence, or similar material prior to any activity. The fencing would define the work zone and confine activity to the minimum area required. All protection measures would be clearly stated in the construction specifications, and workers would be instructed to avoid conducting activities beyond the work zone. Disturbances would be limited to areas inside the designated construction limits. No machinery or equipment would access areas outside the work limits.
- Construction equipment staging would occur within previously disturbed areas as much as possible. All staging and stockpiling areas would be returned to preconstruction conditions following construction.
- Contractors would be required to properly maintain construction equipment (i.e., mufflers and brakes) to minimize noise.
- All disturbed ground would be reclaimed using appropriate BMPs including planting species-appropriate plants.
- Until the soil is stable and vegetation is established, erosion-control measures would be implemented to minimize erosion and prevent sediment from leaving the site.
- Temporary barriers would be provided to protect existing trees and shrubs that are not identified for removal.
- All activities would comply with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716, revised).
- Prior to any soil disturbing activities, a thorough geophysical baseline survey of the property would be conducted and adequate archeological ground truthing of the geophysical anomalies would be done to determine their nature, integrity, and extent.
- Known archeological resources in the vicinity of project activities would be identified and delineated for avoidance prior to project work.
- The park would continue to coordinate with the SHPO throughout the course of the project to protect and mitigate cultural resources affected by the preferred alternative.
- Should any archeological resources be uncovered during construction, as appropriate, work would be halted in the area and the park archeologist, SHPO, and appropriate Native American tribes (if applicable) would be contacted for further consultation.
- NPS cultural resource staff would be available during construction to advise or take appropriate actions should any archeological resources be uncovered during construction. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) would be followed.
- NPS would ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archeological sites or historic properties. Contractors and subcontractors also would be instructed on procedures to follow in case previously unknown archeological resources are uncovered during construction.
- Visitors would be informed in advance of construction activities via the park website and visitor center.

## ALTERNATIVE ELEMENTS CONSIDERED BUT DISMISSED

The following alternative elements were considered during the planning process but were dis-

missed from further analysis:

### **The Farm as the Primary Visitor Center**

The 1996 GMP for Saint-Gaudens NHS suggested using the Farm as the primary visitor contact station with a shuttle system being incorporated to drive visitors to the historic core of the park. Saint-Gaudens NHS constructed a new visitor center in the historic core of the park in 2002, before the Farm was acquired, eliminating the need for a visitor center on Blow-Me-Down Farm. Additionally, the park does not receive a large enough number of annual visitors to warrant the cost of operating and maintaining a shuttle system. For these reasons, an alternative including the Farm as a primary visitor center was eliminated from further consideration.

### **Residential Arts School**

During public scoping, the park received a suggestion for using the Farm as a residential arts school in which Saint-Gaudens NHS would be responsible for rehabilitating the Farm's structures for classroom and dormitory use. Students would attend a series of art classes, held at various locations throughout the park, while residing in the Farm's Casino. Classes would be administered by a partner group with assistance from the park. The cost of rehabilitating the Casino for dormitory use was estimated to be around \$2.5 million. Due to financial constraints within the NPS and federal government, this alternative was dismissed as infeasible. This option, however, could fit within the constraints of Alternative B, Phases 1 and 2, if funding were available from an outside source or an outside entity wished to lease the Farm for the purpose of creating a residential arts school.

### **The Barn as Art Studio Space**

Throughout the scoping process, Saint-Gaudens NHS received several requests to convert the Farm's Barn into studio space for artists. The Barn, as it exists today, is a shell building with no utilities or other amenities in place. The cost to rehabilitate the Barn, including adding water and electric, is estimated to be more than \$1 million. As with the residential arts school proposal above, financial constraints within the NPS and federal government make this option infeasible for the park to complete using federal funding alone. This option, however, could fit within the constraints of Alternative B, Phases 1 and 2, if funding were available from an outside source or an outside entity wished to lease the Farm for the purpose of creating studio space within the Barn.

### **The Blow-Me-Down *Working* Farm**

Converting the property into a working farm was considered following suggestions made during public scoping. Under this option, the NPS would create working farm to illustrate agricultural practices used during the Cornish Colony's period of significance as well as educate the public on current sustainable farming practices. While the park's purpose and significance does include telling the story of the Cornish Colony, the focus for the park is the Cornish Colony's influence on art and arts scene across the country, not the agricultural influences of the Cornish Colony. In addition, Saint-Gaudens NHS does not currently possess the equipment or staffing levels necessary to properly manage or maintain a working farm. The nearby Billings Farm and Museum, however, provides visitors with the similar experience of a working farm and agricultural lifestyle. Due to the lack of operational capacity and the close proximity of a similar visitor experience as-

sociated with the NPS, this element was dismissed in favor of more feasible options.

## Subdivision of Property for Mixed Use

Several proposals submitted during the 2007 Request for Proposals suggested subdividing and selling portions of the Farm for private residences. This alternative element was dismissed from further analysis as it does not meet the objective of this plan to protect the resources of the Farm and provide opportunity to expand on the current visitor experience.

## SUMMARY OF ALTERNATIVES

Table 1 provides a comparison of alternatives as presented above.

<b>Table 1: Summary of Alternatives</b>		
<b>Planning Issue</b>	<b>Alternative A: Continuation of Current Management (No-Action)</b>	<b>Alternative B: The Cornish Colony History &amp; Arts Center (NPS Preferred)</b>
<b>Concept</b>	The NPS would continue under current management practices. Visitor experience efforts would exist primarily within the historic core of the park with limited public use of the Farm.	The NPS would work with partners/interested groups to expand visitor use to the Farm while preserving its structures and other resources associated with the Cornish Colony of artists.
<b>Access &amp; Circulation</b>	The Farm would be closed to visitors on a day-to-day basis. Public access to the property could be granted during special events, but public access to the structures would not be permitted until the buildings are stabilized and made safe for public use.  No new circulation routes would be created.	The Farm could be open for public use during the park's normal operating hours. Public access of the structures would not be permitted until the buildings are stabilized or rehabilitated and made safe for public use.  New trails could be constructed to connect the park's existing trail system to the Farm and Connecticut River.
<b>Interpretation &amp; Visitor Experience</b>	The park's interpretive focus would center on Augustus Saint-Gaudens and his artwork.  Interpretation and education programs would take place within the historic core of the park. No permanent programming, exhibits, or waysides would occur at the Farm.  The primary focus of educational programming would be sculpture.  The Farm would be used for occasional special programs such as concerts, theatrical productions, occasional tours, or similar events.	The primary interpretive focus for the park would continue to be Augustus Saint-Gaudens, augmented by programs focusing on the story of the Cornish Colony.  In addition to existing programs within the historic core of the park, programming could be added to the Farm, including:  > An exhibit space to educate visitors to the Cornish Colony and to provide orientation > Addition of new wayside exhibits > Development of educational programming in conjunction with partners > Additional artist-in-residence programs  Educational and artist-in-residence programs would be expanded beyond sculpture to include other art mediums used by the Cornish Colony.



<b>Table 1: Summary of Alternatives</b>		
<b>Planning Issue</b>	<b>Alternative A: Continuation of Current Management (No-Action)</b>	<b>Alternative B: The Cornish Colony History &amp; Arts Center (NPS Preferred)</b>
<b>Resource Management &amp; Protection</b>	<p>The Dance Hall and Mill building would be rehabilitated as funding allows to accommodate park interpretive, educational, and administrative needs and/or special events related to the park's purpose and significance. The Farm's remaining structures and resources would receive preservation and stabilization maintenance as funding becomes available.</p> <p>The Mill cultural landscape would be rehabilitated as funding allows. The developed area of the Farm would be mowed on an as needed basis. The lower fields would continue to operate under agricultural leases.</p> <p>Collections would continue to be stored in existing park storage facilities.</p>	<p>The Mill building and cultural landscape would be rehabilitated as funding allows. Rehabilitation efforts for the Farm's structures would be completed in phases, dependent on funding, as follows:</p> <p>Phase 1: The Dance Hall would receive priority rehabilitation funding for occasional park use. The park would work with its existing partner and others to stabilize and rehabilitate the remaining structures for used related to the park's purpose and significance.</p> <p>Phase 2: Structures remaining vacant seven years after the approval of the Farm's management plan would be advertised through the NPS's leasing program for rehabilitation and private use by outside entities. Uses would require park approval, but would not need to relate to park purpose or significance. Rehabilitation by outside entities would be overseen by the NPS and would have to meet the Secretary's standards for rehabilitation.</p> <p>The Farm's cultural landscape would be rehabilitated as funding became available. The lower fields would continue to operate under agricultural leases.</p> <p>Additional space for collections, non-collections, and research would be created within the historic core of the park and at the Farm.</p>
<b>Park Operations</b>	<p>Park operations would continue as they currently exists with office and workspace located within the historic core or the park. Park staff would continue to maintain the Farm's resources on an as needed basis.</p>	<p>Park operations could be expanded to include additional storage, office, and/or workspace at the Farm depending on terms of any lease in place. Park staff would continue to maintain the Farm's resources until the properties have been leased at which point the lessee would assume rehabilitation and maintenance responsibilities.</p>
<b>Partnerships &amp; Cooperative Actions</b>	<p>The park would work with existing park partners, and seek new partners, to assist in protection and stabilization of the Farm's resources and aid in visitor experience and educational programs related to the park's purpose and significance.</p>	<p>The park will actively seek a variety of partnership and leasing options for rehabilitation and use of the Farm's resources in a phased approach as follows:</p> <p>Phase 1: The park would search for non-NPS funding opportunities with partners or other interested parties to rehabilitate the Farm's landscape and structures for uses directly</p>

Table 1: Summary of Alternatives		
Planning Issue	Alternative A: Continuation of Current Management (No-Action)	Alternative B: The Cornish Colony History & Arts Center (NPS Preferred)
Partnerships & Cooperative Actions (cont.)		<p>related to the park's purpose and significance to include:</p> <ul style="list-style-type: none"> <li>&gt; summer arts schools/camps</li> <li>&gt; art education classes/workshops</li> <li>&gt; artist-in-residence programs</li> <li>&gt; Cornish Colony museum/exhibits</li> </ul> <p>Phase 2: The NPS will actively seek leasing opportunities with any outside entity to include the rehabilitation and use (private or public) of the Farm's structures and/or landscape. Uses would require park approval, but would not need to relate to park purpose or significance.</p>

## SUMMARY OF ENVIRONMENTAL CONSEQUENCES

Table 2 provides a summary of the environmental consequences related to each alternative. A more detailed explanation of the impacts is presented in Chapter 4: Environmental Consequences.

Table 2: Summary of Environmental Consequences		
Resource	Alternative A: Continuation of Current Management (No-Action)	Alternative B: The Cornish Colony History & Arts Center (NPS Preferred)
<b>Historic Structures</b>	The majority of the Farm's structures would be maintained at a level of stabilization which could result in continued deterioration and a worn appearance of those structures. Rehabilitation of the Mill building and Dance Hall would improve the condition of their character-defining features and overall appearance. The impacts would not be significant.	Structures would be maintained at a level of stabilization until such time as rehabilitation efforts were funded resulting in continued deterioration and a worn appearance. Rehabilitation of the Farm's structures would improve the condition of their character-defining features and overall appearance. The impacts would not be significant.
<b>Cultural Landscapes</b>	The Farm's landscape would be maintained in its current condition where much of the vegetative elements of the cultural landscape would remain unrealized. The impacts would not be significant.	Rehabilitation efforts, whether full or partial, for the Farm's cultural landscape would restore the character-defining features of the Farm's cultural landscape. The impacts would not be significant.
<b>Museum Collections</b>	Limited work and exhibit space for collections items would result in the continual relocation of collections and non-collections, which could lead to increased risk of damage to some individual items. The impacts would not be significant.	Exhibit and storage space could be expanded to the Farm, creating more efficient work space for the curatorial staff and eliminating the need for frequent relocation of collections items. Alternative B could also lead to impacts similar to Alternative A if the park is unable to expand collections storage and exhibit space to the Farm. The impacts would not be significant.

<b>Table 2: Summary of Environmental Consequences</b>		
<b>Resource</b>	<b>Alternative A: Continuation of Current Management (No-Action)</b>	<b>Alternative B: The Cornish Colony History &amp; Arts Center (NPS Preferred)</b>
<b>State-Listed Endangered, Threatened, and Special Concern Species</b>	Construction activities could impact state-listed species, but these impacts would be temporary and mitigation measures would be employed to significantly reduce the likelihood of these impacts. The control of non-native, invasive species could result in healthier plant habitats for competing plant species. The impacts would not be significant.	Construction of new trails could impact state-listed species, but these impacts would be temporary and mitigation measures would be employed to significantly reduce the likelihood of impacts. The control of non-native, invasive species could result in healthier plant habitats.. The impacts would not be significant.
<b>Visitor Use and Experience</b>	Improvements to the Mill property would provide better access to the site and enhance the visitor's understanding of the site's history through educational media. The Farm would remain closed on a daily basis, leaving the landscape and structures inaccessible to visitors, limiting interpretive and educational programming focusing on the Cornish Colony. The impacts would not be significant.	Improvements to the Mill property would provide better access to the site and enhance the visitor's understanding of the site's history through educational media. Rehabilitation of the Farm could provide visitors with a broader range of experiences and a better understanding of the significance of the Cornish Colony. Impacts, similar to those listed under Alternative A, could occur if the Farm is leased or used for purposes other than those which support the park's purpose and significance. The impacts would not be significant.
<b>Park Operations</b>	Park operations would continue to incur a heavier maintenance workload under the same operational levels as those existing before acquisition of the Farm. The impacts would not be significant.	Some additional maintenance requirements would continue until the Farm's structures have been rehabilitated. The terms of leases could reduce workload for park staff and costs for the park if lessees become responsible for maintenance of the property. The impacts would not be significant.
<b>Gateway Communities</b>	Beneficial impacts on gateway communities could result if visitation increases during special events at the Farm and/or Mill sites creating additional business for surrounding communities. Additional traffic loads on NH Route 12A has the potential to create some adverse impacts. The impacts would not be significant.	Alternative B could result increased tourism as well as offer additional recreational opportunities for the surrounding communities depending on the leased use. Additional tourism, as with Alternative A, would have the potential for creating increased traffic along NH Route 12A with similar adverse impacts. The impacts would not be significant.

## ENVIRONMENTALLY PREFERABLE ALTERNATIVE

In accordance with the DO-12 Handbook, the NPS identifies the environmentally preferable alternative in its NEPA documents for public review and comment [Sect. 4.5 E(9)]. The environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative (43 CFR 46.30).

Alternative B best protects and preserves the cultural and natural resources of the Farm by creating a management strategy to guide the park in rehabilitating and preserving the Farm's resources while greatly improving visitor safety of the existing structures. Alternative B also provides the widest range of opportunities for visitor enjoyment without resource degradation. Based on the analysis of environmental consequences of each alternative in Chapter 4, Alternative B is the environmentally preferred alternative.

## **NPS PREFERRED ALTERNATIVE**

The preferred alternative is the alternative that NPS believes would best accomplish the project's goals, objectives, and purpose and need. In selecting a preferred alternative, NPS must consider the associated impacts to natural and cultural resources. The NPS identified Alternative B: The Cornish Colony History and Art Center as its preferred alternative because it best meets the objectives of this site management plan and the 1996 approved GMP and is consistent with NPS management policies, laws, regulations and plans. Alternative B best meets the park's purpose and mission of protecting and preserving cultural and natural resources associated with the Cornish Colony by rehabilitating the Mill and the Farm's historic structures and landscape to their period of significance. Alternative B would also provide the park with an opportunity to expand current visitor use and experience to include interpretation of the Cornish Colony and the role Saint-Gaudens played in establishing the Colony and bringing its members to Cornish, NH.

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# Chapter 3

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## Affected Environment

This chapter describes the existing environmental conditions for each of the impact topics potentially affected by the alternatives, as identified in Chapter 1. The actions proposed in this EA would predominately occur within the Blow-Me-Down Farm and Blow-Me-Down Mill properties; however, some resources within the historic core of the park could also be impacted. Therefore, those resources are included in the affected environment and general descriptions are provided for this broader area. Potential impacts to these topics are assessed by alternative in “Chapter 4 – Environmental Consequences.”

### HISTORIC STRUCTURES

Blow-Me-Down Farm contains eight historic structures situated along a terrace overlooking Mount Ascutney and the Connecticut River. The structures have historically been adaptively re-used to conform to the needs of the each owner. Structures have been moved from one location to another and alterations have been made including additions and removal of entire sections of some buildings. Of the Farm’s eight historic structures, only two were ever used for residential purposes; the remaining six were used for entertainment, farm use, or shed/garage space. All eight structures are listed in the Saint-Gaudens National Historic Site Historic District 2013 draft National Register documentation as contributing resources (NPS 2004b).

A preliminary condition assessment was completed for the Farm’s structures in 2011. Following is a brief physical description of each of the eight historic structures along with a summary of their current condition:

**Casino** – The 3,400 square foot Casino is the primary structure at the Farm and is the result of a number of additions, removals, and modifications. The structure, as it exists today, includes timber framing from the original 1787 Federal-period house, but was redesigned as a Classical Revival style house in 1888. The structure was altered once again in 1927 with an addition built in the same style. The Casino is a 2 ½ story wood frame, L-shaped structure with full basement, gable roofs, exterior wood shingle siding, and metal roofing. There are five entrances to the Casino, however, none of the entrances are currently handicap accessible.



*Casino*

The first floor of the Casino includes a large kitchen with commercial cooking fixtures; three empty rooms once used for dining, office, and living space; one bathroom; and a laundry room. The second floor contains five bedrooms and four bathrooms with the third floor containing the remaining three bedrooms, one bathroom, and a large walk-in attic.

The Casino appears to be structurally sound, however, significant work is needed to repair or replace deteriorating features including rusting plumbing, sagging roofs, failing mortar joints, cracked plaster walls, and rotting window sashes among others. The existing septic system is failing and would need to be replaced.

Electrical and heating systems require additional inspection, but both appear to need significant upgrades in order to meet current code requirements. No cooling system exists.

***Dance Hall*** – The Dance Hall was originally constructed as an attachment to the Casino in 1888 and used as a bowling alley. It was detached from the Casino and renovated as a freestanding structure in 1927 where it has been used as an entertainment/social gathering space. The narrow, rectangular wood-frame building sits on concrete block and brick piers and is adorned with a columned cupola. The Dance Hall contains four entrances, none of which are handicap accessible.

The interior includes one primary large open floor hall space and two smaller rooms on the west end of the building. The building is structurally sound, with the exception of one roof rafter which is being supported by a jack. Architectural elements in the Dance Hall are deteriorating including rotting wood trim and steps, deteriorating shingles, and failing mortar joints. The primary heat source is a wood burning stove and fireplace. No cooling system exists. A sink was previously installed in the Dance Hall, but the Farm's water and septic lines have not been connected to the Dance Hall. The existing electrical system does not meet current code requirements.



*Dance Hall*

***Bank Barn*** – The Barn was constructed in 1884 and is a characteristic example of a wood-frame, high-drive New England bank barn. It has a rectangular plan with three-and-one-half levels, an asphalt-clad front gable roof, and clapboard-sheathed walls which are painted red. The Barn rests on a fieldstone foundation with an earthen ramp on the western façade and an open carriage way extending through the ground level of the building. The main level contains a wide central aisle with stall layouts and a stairway accessing upper loft storage levels and a small cupola space. The Barn was restored and stabilized by the Saint-Gaudens Memorial in 1998-1999 in accordance with





*Bank Barn*

nineteenth-century building techniques.

An existing bat infestation has led to the accumulation of guano in many areas of the barn, but the Barn is structurally sound and most of the architectural finishes remain in good condition. A limited water supply is present on the ground level. The electrical system is limited and does not meet current code.

***Chauncey Cottage and Lewis Garage*** – The Chauncey Cottage is a rectangular, one-and-one-half story, three-bay by one-bay wood-frame building which was constructed in 1890. The cottage has a metal-clad gambrel roof, wood shingled walls, and a fieldstone foundation that is faced with brick on the exterior. The cottage has four entrances including two historic, shed-roofed porches. None of the entrances are handicap accessible. The cottage retains its original design, plan, and many of the original interior features.

The first floor of the cottage includes a living space, dining room, kitchen, bathroom, sunroom, mudroom, and a space for wood storage. The second floor contains three bedrooms, one bath and an attic space. The Cottage's fieldstone foundation will need additional investigation to determine its stability before any repair or rehabilitation could be initiated. The remainder of the Cottage appears to be structurally sound although many of the architectural features are in poor condition. The plumbing and electrical



*Chauncey Cottage*



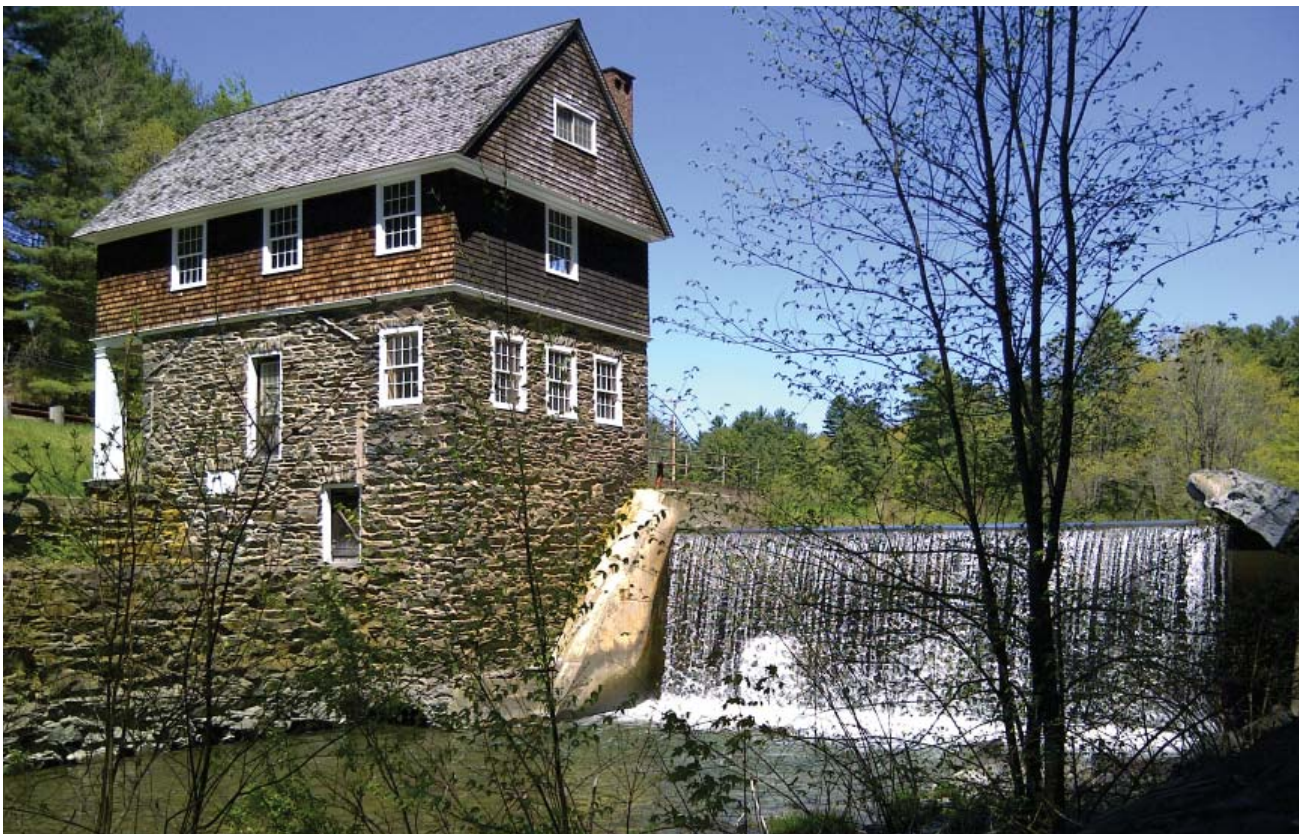
systems appear to be in poor condition, but additional investigations will be needed to determine the exact condition. An oil-fired furnace is used for the heating system (the condition of which requires additional study) and no cooling system exists.

The Lewis Garage is a 1 ½ story post and beam wood frame structure supported by masonry piers with exterior wood clapboard siding and an asphalt shingle roof. The garage consists of a single storage space on the ground floor with a single attic space above served by a wood stair. The garage is structurally sound; however, the roof and exterior siding are both in poor condition. The electrical system is limited and does not meet current codes.

**Chicken Coop** – The Chicken Coop, constructed circa 1888, is a 4-bay by 1-bay shed-roofed building with exterior wood clapboard and metal roofing. Entrances include single plank doors west and a modern metal roll door on the east. The interior of the building includes one open, rectangular room. The condition of the Chicken Coup is fair, but there are early signs of wear, failure, and deterioration throughout the structure. The electrical system is limited and does not meet current code requirements.

**Carriage House** – The Carriage House was constructed on the property in 1884 and relocated in 1899. It has a corrugated metal-clad shed roof and four pairs of wood plank double doors with strap hinges. The overall condition of the structure is considered to be poor and beginning to show signs of structural failure. The electrical system is limited and does not meet current codes.

**Wood Shed** – The Wood Shed was constructed circa 1890 and has a corrugated metal-clad side gable roof and three open bays extending through the building. The overall condition of the Wood Shed is fair. No electrical system exists.



*Blow-Me-Down Mill and Dam*



*Blow-Me-Down Mill* – Once part of Beaman’s Farm, the Blow-Me-Down Mill is situated across NH Route 12A on the bank of the Blow-Me-Down Pond. Constructed in 1891, the mill building is a two and a half-story stone masonry and wood frame structure that was built into the slope of the west bank of the creek and pond. Its first floor and basement level are constructed of mortared fieldstone that also doubles as a retaining wall between the south side of the dam and the stone arch bridge. A wide, first-floor porch is created from the cantilevered second story on the west side of the building. Foundation walls are all that remain of the building’s ell, a rectangular appendage formerly located on the south side. Used by Beaman as a working grist mill, the mill ceased operation in 1928 and briefly functioned as a doctor’s office after World War II. After the doctor’s office closed, the mill building was abandoned and fell into disrepair, resulting in collapse of the Mill’s southern ell in 1967. The main entrance faced NH Route 12A with two additional entrances located on the south elevation, one of which led to the former south wing. None of the entrances are handicap accessible.

## CULTURAL LANDSCAPES

As described in NPS Directors Order #28, a cultural landscape is “a reflection of human adaptation and use of natural resources and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures, buildings, walls, and vegetation, and by use of reflecting cultural values and traditions.” Saint-Gaudens NHS contains historic and designed landscapes that are nationally significant and contribute to the story of Augustus Saint-Gaudens and the Cornish Colony. The Farm and Mill landscapes are listed on the Saint-Gaudens National Historic Site Historic District 2013 draft National Register documentation as contributing resources (NPS 20013). For this discussion, the development of the landscapes is tied to and includes the Farm’s structures, circulation systems, topographic features, and vistas. These features are included in the evaluation of impacts to cultural landscapes.

The Blow-Me-Down Farm landscape has a manicured but natural setting characterized by grass lawns and rolling open fields that extend west to the banks of the Connecticut River. The fields were extant during Beaman’s occupancy of the property and are visible in historic aerial photographs. Blow-Me-Down Brook runs along the south boundary of the Farm within a deep forested ravine and empties into the Connecticut River. The Farm’s historic structures are organized on the upper terrace of the Farm along the east side of the property.

The buildings are accessed through a historic driveway system, which loops through the property and terminates on both ends at SR 12A. A section of the driveway, located in the southeast corner of the property in the ravine along the Blow-Me-Down Brook, terminates at the Farm’s historic entrance along SR 12A. The historic entrance is no longer used due to poor sight lines. Clusters of trees and informal hemlock hedge allées create scenic canopies over the driveway on the main portion of the property. In addition, the driveway system includes a paved parking area alongside the Casino and Dance Hall.

Other contributing features of the landscape include five granite mill wheels, believed to be salvaged from the Mill; the south gate, which was erected at the Farm’s historic entrance in 1898; and a stone wall located on the west side of the Casino.

The Blow-Me-Down Mill landscape encompasses the mill building, dam, mill pond, stone arch bridge, and a portion of the Blow-Me-Down Brook. Construction of the earliest surviving contributing resource, the stone arch bridge, dates to 1887. The bridge, which spans the Blow-Me-Down Brook, is a fieldstone structure with a single barrel vaulted arch and 30-foot-long wing walls. The north face of the bridge, visible from the mill building, retains its original massing and

materials expressing the original design, workmanship, and setting over the brook. The exposed portion of the bridge also demarcates the historic alignment of SR 12A.

Along with the mill building, construction of the dam was completed in 1891, resulting in the creation of a large 30-acre pond known as the Blow-Me-Down Pond. Since its creation, modifications to the Blow-Me-Down Mill landscape have altered its appearance. Most noticeably, the realignment of SR 12A resulted in the modification of the pond edge and the front lawn area at the mill building. The roadbed was elevated approximately ten feet above historic grade and pulled west of the mill building's porch so such that the roadway is approximately fifteen feet away from the building and level with the second story. A steep grass bank was formed at the mill building's front porch, leading up to the new road bed. A gravel parking area is located north of the mill building and an informal, mown trail leads from the stone arch bridge to the Blow-Me-Down Trail on the opposite side of the pond.

## MUSEUM COLLECTIONS

NPS *Management Policies, 2006* and NPS DO-28 require the consideration of impacts on museum collections. Saint-Gaudens NHS contains a collection of 10,000 items including casts of Augustus Saint-Gaudens' sculptures, his working models, cameos, coins, portrait bas-reliefs and monumental sculpture. Also included in the collection are artworks by other members of the Saint-Gaudens' family and the Cornish Colony of artists, as well as park archives.

In 2008 the park received accreditation from the American Association of Museums, as only the fourth such designated museum in New Hampshire. Collection items are exhibited in three of the historic structures within the historic core of the park, not all of which fully meet NPS museum standards. Items are stored in the collections storage building, with a few items of a less sensitive nature stored in other buildings. In some cases, collection items are mixed with non-collection items; and there is limited space for appropriate curatorial workspace or researcher space. The primary location for storage of collection items is the collection storage building which was originally built in 1979 as a temporary building, but has since been upgraded including an addition built in 2002. The collections storage building meets current NPS museum standards, but the structure is not large enough to fully address current park needs.

## STATE-LISTED ENDANGERED, THREATENED, AND SPECIAL CONCERN SPECIES

Informal consultation with the New Hampshire Natural Heritage Bureau indicated the potential presence of ten state-listed endangered, threatened, and special concern species which may be impacted by the actions proposed in this plan/EA. Of the remaining species, three invertebrate species and one plant species have been documented through previous NPS monitoring in areas surrounding the historic core of the park and Blow-Me-Down Pond. No surveys have been completed for the Farm, but suitable habitat for all species exists within the area.

The Jefferson Salamander (*Ambystoma jeffersonianum*) prefers a habitat of mixed or deciduous forests. This salamander typically hides in underground retreats, but is brought out by heavy rains and warm temperatures to migrate in breeding ponds. The Northern Long-eared Bat (*Myotis septentrionalis*) prefers to hibernate in caves and/or mines, but will roost in deciduous tree cover and in buildings. Habitats for the Wood Turtle (*Glyptemys insculpta*) include stream channels and adjacent terrestrial areas. The wood turtle uses aquatic habitats for mating, feeding, and hibernation

while using terrestrial habitats for laying eggs and foraging. Beaked Sanicle (*Sanicula trifoliata*), Northern Waterleaf (*Hydrophyllum virginianum*), Bladdernut (*Staphylea trifolia*), Large-flowered Bellwort (*Uvularia grandiflora*), Sago Pondweed (*Stuckenia pectinata*), Vasey's Pondweed (*Potamogeton vaseyi*), and slender Cliffbrake (*Cryptogramma stelleri*) all prefer wooded and/or bottomland habitats such as those surrounding the Pond and Blow-Me-Down Brook.

## VISITOR USE AND EXPERIENCE

Saint-Gaudens NHS received approximately 33,000 visitors in 2011 during its open season of Memorial Day weekend through October 31. The Farm is currently closed to the public year round; while no regularly scheduled programming currently takes place at the Farm, the park does try to open the Farm up on several weekends during the summer for visitors to experience. The primary visitor experience for Saint-Gaudens NHS occurs within the historic core of the park and focuses primarily on Augustus Saint-Gaudens. Visitors can pay an admission fee to the park and tour the artist's home, studios, and gardens to learn more about Saint-Gaudens, his personal life, and his artwork. In addition to the permanent exhibits showcasing Saint-Gaudens work, the park also exhibits some artwork created by his wife, Augusta, and other artists who formed to the Cornish Colony.

Workshops aimed toward beginning and intermediate sculptors are held throughout the summer and provide visitors an opportunity to interact with and learn from the sculptor-in-residence. Visitors are also permitted to practice their own artistic skills under park guidelines used to protect the resources of the park. During most Sundays in July and August, the park holds summer concerts in conjunction with the Trustees of the Saint-Gaudens Memorial. The park also contains more than 1.5 miles of hiking trails through the woods surrounding Aspet, continuing down to the terminus at Blow-Me-Down Mill.

The park's visitor center, containing the bookstore and accessible restrooms, is located in the historic core of the park. A small contact station/fee booth is located in the park's main parking lot adjacent to the historic core. Also located in this area is a second restroom facility. The parking lot is of sufficient size to hold cars on a daily basis, but during some special events and concerts, visitors are directed to park in the meadow below Aspet. There is no food service available at the park although picnic tables are available for visitors bringing in their own food.

A visitor survey conducted in 2004 indicated that 98% of park visitors were satisfied with the facilities, services, and experiential opportunities available at Saint-Gaudens NHS (NPS 2004). When asked which exhibits/activities they would like to see during future visits, the majority of visitors requested more information on the Cornish Colony of artists, additional displays of Saint-Gaudens's artwork, and additional natural resource education programs.

## OPERATIONS

Current operational staff for Saint-Gaudens NHS consists of fifteen full time equivalents (FTE) per year which was based on the needs of the park before acquisition of the Farm. Operations are further augmented with the help of volunteers and interns. Grounds maintenance at the Farm includes mowing during the growing season and snow plowing for emergency access in the winter. Park staff mows 1.6 acres of the Farm's lawn on a weekly basis with an additional 7 acres mown approximately 6 times per year. Currently, there is only emergency maintenance for trees at the Farm when they pose a safety hazard or when fallen trees block access drives. As indicated

above, structural maintenance for the Farm includes only emergency repair with the exception of the Dance Hall and first floor of the Casino which are occasionally cleaned for NPS programmatic use. Custodial and interpretive staff are only present in the historic core of the park as no programs currently exist at the Farm and those buildings remain vacant.

## GATEWAY COMMUNITIES

Saint-Gaudens NHS is located within the town of Cornish, a rural area along the western border of New Hampshire. Cornish and the surrounding townships are considered gateway communities. NH Route 12A, which runs between the Farm and Mill, is the primary access road leading to the park. Visitors primarily travel from the north, through the town of Lebanon, NH, or from the west, through Windsor, VT, before making their way to the NHS. These towns are home to a variety of merchants who provide accommodations, dining, and gifts and souvenirs to the park's visitors.

While approximately half of the park's visitors are from areas outside of these gateway communities, about half live within these areas. Saint-Gaudens NHS is one of the primary destinations in the area for recreational and leisure use. The park provides several activities which are used regularly by nearby residents including hiking trails, weekly summer concert series, and a number of classes and workshops.

# Chapter 4

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## Environmental Consequences

This chapter describes the environmental consequences, organized by impact topic, associated with the alternatives presented in “Chapter 2: Alternatives.” This chapter also includes methods used to analyze direct, indirect, and cumulative impacts. A summary of the environmental consequences for each alternative is provided in Table 3, which can be found in Chapter 2. The resource topics presented in this chapter and the organization of the topics correspond to the resource discussions contained in “Chapter 3: Affected Environment.”

### METHODOLOGY FOR ANALYZING IMPACTS

In accordance with the CEQ regulations, direct, indirect, and cumulative impacts are described (40 CFR 1502.16) and the impacts are assessed in terms of context and intensity (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are also described and incorporated into the evaluation of impacts. The specific methods used to assess impacts for each resource may vary; therefore, these methodologies are described under each impact topic. The impact analyses and conclusions were based on the review of existing literature and studies, information provided by on-site experts and other government agencies, professional judgments, and park staff insight.

#### Type of Impact

Impacts are discussed by type, as follows (the terms “impact” and “effect” are used interchangeably throughout this document):

**Direct:** Impacts that would occur as a result of the proposed action at the same time and place of implementation (40 CFR 1508.8).

**Indirect:** Impacts that would occur as a result of the proposed action but later in time or farther in distance from the action (40 CFR 1508.8).

**Beneficial:** An impact that would result in a positive change to the resource when compared to the existing conditions.



**Adverse:** An impact that causes an unfavorable result to the resource when compared to the existing conditions.

## Cumulative Impacts

Cumulative impacts are defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.7). As stated in the CEQ handbook, *Considering Cumulative Effects under the National Environmental Policy Act* (CEQ 1997), cumulative impacts need to be analyzed in terms of the specific resource, ecosystem, and human community being affected and should focus on impacts that are truly meaningful. Cumulative impacts are considered for all alternatives, including alternative A, the no-action alternative.

Through the internal and external project scoping processes, the projects described below were identified as contributing to cumulative impacts on the resources addressed by this EA. Because some of these actions are in the early planning stages, the evaluation of the cumulative impact is based on a general description of the projects.

- ***Realignment of NH Route 12A*** – The realignment of NH Route 12A by State of New Hampshire Department of Transportation from the northern portion of the Blow-Me-Down Pond to south of the stone arch bridge, straightened the formerly meandering road into a single, wide-arching curve to allow for higher vehicular speeds. In the process, the western extents of the pond were filled, creating a smooth, regular edge and reducing the amount of open water. Additionally, the roadbed adjacent to the Blow-Me-Down Mill was elevated approximately ten feet above historic grade and pulled west of the Mill’s porch so passing cars were now approximately fifteen feet away from the building and level with the second story. The realignment of NH Route 12A has resulted in impacts to cultural landscapes; state-listed endangered, threatened, and special concern species; soils; and visitor use and experience.
- ***Preservation of the Blow-Me-Down Farm Bank Barn and Removal of Non-historic Structures*** – Under the ownership of the Saint-Gaudens Memorial Association, stabilization and repair work was completed on the Farm’s Bank Barn in 1999. In addition, the Memorial also removed two non-historic structures from the Farm, an in-ground swimming pool, which was located adjacent to the Casino and the Dance Hall; and a large, 18,750 square foot, metal building that was originally constructed as a horse riding arena. These actions have resulted in impacts on historic structures, cultural landscapes, visitor use and experience, and park operations.
- ***Ascutney Management Unit Long-Range Management Plan*** – The *Ascutney Management Unit Long-Range Management Plan* is currently being revised by the Vermont Agency of Natural Resources. The Ascutney Management Unit includes Mt. Ascutney State Park which is located in Vermont directly across the Connecticut River from Blow-Me-Down Farm. The plan will inform management decisions for the future of Mt. Ascutney State Park over the next 15-20 years and will determine potential future uses for the state park. Projects proposed in the management plan have the potential to impact cultural landscapes and visitor use and experience.

Cumulative impacts are analyzed for each resource topic and each alternative. Cumulative impacts are assessed by combining the impacts of each alternative with the impacts of these other projects and identifying the relative contribution of the alternative to the overall cumulative impact. In defining the contribution of each alternative to cumulative impacts, the following terminology is used:

**Imperceptible:** The incremental effect contributed by the alternative to the overall cumulative impact is such a small increment that it is impossible or extremely difficult to discern.

**Noticeable:** The incremental effect contributed by the alternative, while evident and observable, is relatively small in proportion to the overall cumulative impact.

**Appreciable:** The incremental effect contributed by the alternative constitutes a large portion of the overall cumulative impact.

### Assessing Impacts Using CEQ Criteria

The impacts of the alternatives are assessed using the CEQ definition of “significantly” (1508.27), which requires consideration of both context and intensity:

**Context** – This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short and long-term effects are relevant.

**Intensity** – This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:

- 1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect would be beneficial.
- 2) The degree to which the proposed action affects public health or safety.
- 3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.
- 4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.
- 5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.
- 6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
- 7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively

significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

- 8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.
- 9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
- 10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

For each impact topic analyzed, an assessment of the potential significance of the impacts according to context and intensity is provided in the “Conclusion” section that follows the discussion of the impacts under each alternative. Resource-specific context is presented in the Methodologies section under each resource topic and applies across all alternatives. Intensity of the impacts is presented using the relevant factors from the list in (b) above. Intensity factors that do not apply to a given resource topic and/or alternative are not discussed.

## **HISTORIC STRUCTURES**

### **Methodology**

Potential impacts to historic structures are evaluated based on changes to character-defining features of the resources. This approach is derived from both the *Secretary of the Interior’s Standards for Rehabilitation of Historic Buildings* as well as the regulations of the Advisory Council on Historic Preservation (ACHP) implementing the provisions of Section 106 of the National Historic Preservation Act.

The resource-specific context for the evaluation of impacts on historic structures includes:

- preservation and protection of historically significant properties associated with the life and cultural achievements of Augustus Saint-Gaudens, including his association with the Cornish Colony; and
- the Blow-Me-Down Mill and structures on Blow-Me-Down Farm, with the exception of the Victorian Playhouse, are listed as contributing resources in the draft National Register of Historic Places Registration Form.

### **Impacts of Alternative A – Continuation of Current Management (No-Action Alternative)**

Under Alternative A, emergency stabilization and repair of the Blow-Me-Down Farm structures would continue as funding allows. If additional funding permits, the Mill and Dance Hall could receive additional interior and exterior rehabilitation for occasional park and visitor use. Rehabilitation of the Mill and Dance Hall would enhance and protect the resource value of those struc-

tures by restoring their historic fabric, correcting structural deficiencies, and creating structures which are safe for public use. Upgrades to existing or installation of new fire detection/suppression and security systems in the Mill and Dance Hall would forestall loss or damage to the structures from fire or vandalism. All work would conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. All work performed on the structures would be done in such a way as to minimize impacts on, and allow preservation of, the remaining historic fabric.

No rehabilitation would occur for the Farm's remaining structures under Alternative A, leaving them closed to the public and underutilized. As a result, there would be potential for further deterioration and the Farm's structures continue to have a worn appearance, detracting from the surrounding cultural landscape.

Structures within the historic core of the park, such as the Little Studio, would continue to house multiple incompatible uses, requiring frequent relocation of furniture and exhibits in order to accommodate the variety of uses. This frequent relocation of items increases wear and tear on the historic structures and increases the likelihood of damaging their character-defining features.

### *Cumulative Impacts*

Other past, present, and reasonably foreseeable actions that have had impacts on historic structures include the preservation of the Farm's Bank Barn and removal of the Farm's non-historic structures. Efforts to stabilize the Bank Barn have enhanced the appearance of the structure and helped to preserve its contributing features. This action has contributed a beneficial impact on historic structures. The impact of Alternative A, in conjunction with the impact of this action, would result in a beneficial cumulative impact on historic structures. Alternative A would contribute noticeable adverse and beneficial increments to the overall cumulative impact.

### *Conclusion*

Overall, Alternative A would result in both beneficial and adverse impacts on historic structures. Adverse impacts would result from maintaining the majority of the Farm's structures at a level of stabilization which could result in continued deterioration and a worn appearance of those structures. Adverse impacts to these structures, which are listed as contributing resources in the draft National Register nomination, would not likely result in a loss of integrity or their removal as contributing resources on the National Register. Likewise, continued adverse impacts to structures within the historic core of the park due to incompatible uses, would not result in a loss of their integrity or their removal from the National Register. Rehabilitation of the Mill and Dance Hall would result in beneficial impacts of Alternative A as the condition of their character-defining features and overall appearance would be improved and preserved. Alternative A would contribute noticeable adverse and beneficial impacts to the overall beneficial cumulative impact on historic structures. The adverse impacts of Alternative A on historic structures would not likely be significant because the impacts on the character-defining features of the historic structures would be minimal and their status as contributing features on the National Register would be retained.

## Impacts of Alternative B – The Cornish Colony History and Art Center (NPS Preferred Alternative)

Under Alternative B, preservation, stabilization, and rehabilitation of the Farm's structures would occur as funding becomes available or through terms of lease agreements as specified in Chapter 2. The level of rehabilitation efforts for each structure could vary greatly depending on each structure's intended use and terms of lease agreements; however, overall, more structures would potentially be stabilized and rehabilitated than under Alternative A. For the purposes of this EA, the historic structures impact analysis will focus primarily on a stabilization and preservation level of construction efforts which would be necessary for structural use or occupancy.

Under Alternative B – Phase 1, the Mill and Dance Hall would be rehabilitated as funding becomes available. The impacts to these structures would be the same as those stated under Alternative A above. In addition, until rehabilitation efforts are initiated for the remaining structures at the Farm, the park would continue the current management practices of emergency stabilization and repair for those structures. The adverse impacts of maintaining structures at the level of stabilization would be the same as those listed under Alternative A above.

The park would look to its partners and others to assist in fund-raising to rehabilitate the Farm's remaining structures. Additionally, those structures would be advertised through the NPS lease program for public and/or private use that relates to the park's legislated purpose in order to facilitate rehabilitation efforts. Once funding or a lease agreement is in place, rehabilitation of the structures would be completed to accommodate a structure's intended use. Structural improvements could involve full or partial rehabilitation of the each building depending upon the terms of a lease. The NPS would approve of and oversee all rehabilitation efforts to ensure that the character-defining features and historic integrity of the structures are not lost. All work would conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. All work performed on the structures would be done in such a way as to minimize impacts on, and allow preservation of, the remaining historic fabric.

Basic preservation and stabilization of the structures, as listed in Chapter 2, would require repairs to cracked foundations, replacement of rotting woodwork (siding, window frames, sills, and doorways), and repainting of some structures. These preservation efforts would be beneficial to historic structures as they would serve to prevent further deterioration or total loss of the buildings. In addition to the beneficial impacts of rehabilitation, some unavoidable adverse impacts would accompany actions, such as upgrades to utilities, where some loss of historic fabric would be expected through the routing of conduit and piping through walls, ceilings, and floors.

Under Alternative B – Phase 2, the park would expand the allowable uses for which each structure could be leased, which could increase the likelihood of finding a suitable lessee and initiating rehabilitation efforts. As under Phase 1, all rehabilitation efforts would require NPS approval and would conform to the treatment recommendations of the HSRs and the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Structures which have not been rehabilitated or otherwise preserved, would continue to be repaired and stabilized by the park as funding permits.

Rehabilitation of the Farm's structures could allow for some uses, such as the summer concert series, exhibit space, and/or park storage, to move from the historic core of the park to the Farm if those uses are compatible with the terms of the Farm's lease agreements. This relocation of uses could reduce wear and tear on the structures in the historic core by eliminating overcrowded workspaces and separating incompatible uses.



## *Cumulative Impacts*

Other past, present, and reasonably foreseeable actions that have had impacts on historic structures include the preservation of the Farm's Bank Barn and removal of the Farm's non-historic structures. Efforts to stabilize the Bank Barn have enhanced the appearance of the structure and helped to preserve its contributing features. This action has contributed a beneficial impact on historic structures. The impact of Alternative B, in conjunction with the impact of this action, would result in a beneficial cumulative impact on historic structures. Alternative B would contribute a noticeable beneficial increment to the overall cumulative impact.

## *Conclusion*

Alternative B would result in primarily beneficial impacts on historic structures but also has potential for some adverse impacts. Adverse impacts would result from maintaining structures at a level of stabilization until such time as rehabilitation efforts were funded. This would result in continued deterioration and a worn appearance of those structures but would not likely result in a loss of structural integrity or a structure's removal as a contributing resource on the National Register. Rehabilitation of the Mill and Farm's structures would result in beneficial impacts of Alternative B as the condition of their character-defining features and overall appearance would be improved and preserved. Additional beneficial impacts could result in reducing overcrowded workspaces and separating incompatible uses within the park's historic core. Alternative B would contribute noticeable adverse and beneficial impacts to the overall beneficial cumulative impact on historic structures. Overall, Alternative B would have a beneficial impact on historic structures because more structures would be preserved and rehabilitated, and leasing the structures for use would help ensure that the structures were maintained in good condition over time. In the context of the purpose of the park to preserve and protect properties associated with Saint-Gaudens and preservation of structures that contribute to the property's eligibility for the National Register, the beneficial impacts would be considered significant. Any adverse impacts to structures as a result of stabilization efforts while awaiting funding for rehabilitation, or adverse impacts that may result from structural work needed to accommodate lessee uses, would not be significant because the impacts on the character-defining features of the historic structures would be minimal and their status as contributing features on the National Register would be retained.

## CULTURAL LANDSCAPES

### **Methodology**

According to the NPS Director's Order 28: Cultural Resource Management (DO-28), a cultural landscape is "a reflection of human adaptation and use of natural resources and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built. The character of a cultural landscape is defined both by physical materials, such as roads, buildings, walls, and vegetation, and by use reflecting cultural values and traditions" (NPS 2002). Individual features are not examined alone, but in relationship to the overall landscape. The arrangement and interrelationships of the cultural landscapes' organizational elements and character-defining features provided the key to the determination of the potential impacts and effects of the proposed action presented in the project alternatives.

The resource-specific context for assessing impacts to cultural landscapes includes the following:

- the Blow-Me-Down Farm and Blow-Me-Down Mill landscapes are nationally significant for their association with the Cornish Colony as listed in the draft National Register of Historic Places Registration Form.

### **Impacts of Alternative A – Continuation of Current Management (No-Action Alternative)**

Under Alternative A, the Mill parking lot would be shifted further away from the edge of the Blow-Me-Down Pond and be better defined as a parking area. New, compacted trails would be created to provide accessible routes from a new parking area to the Mill, a dam viewing area, and the stone arch bridge as specified in the draft CLR. These actions would introduce new elements into the cultural landscape, but they would be designed to have a minimal visual and physical impact on its character-defining features, thereby reducing any adverse impacts. Because this area of the Mill cultural landscape was significantly altered during the relocation of NH Route 12A, the adverse impacts of introducing new elements would be negligible to the overall existing integrity of the landscape.

The Farm's landscape would remain in its current condition with only emergency actions, such as fallen or hazardous tree removal, occurring. Views to the Connecticut River would continue to be maintained and the rolling farm terraces, historic driveway system, and location of the Farm's historic structures would continue to reflect the spatial layout of the historic landscape. No rehabilitation efforts would be made to return the vegetative landscape elements deteriorated condition of the Farm's structures would differ from their historic appearance, with corresponding impacts to the cultural landscape. The existing condition of these elements of the cultural landscape would not reflect the Farm's appearance during its period of significance and would hamper the park's ability to interpret the landscape.

Repairs to underground utilities and installation of new septic and well systems would require temporary visual disruptions to the landscape because of open trenches, piles of side-cast materials, and the presence of construction equipment. These adverse impacts would last for the duration of construction, however, once utilities are installed, all areas would be returned to pre-construction grades and planted with species-appropriate vegetation.

### ***Cumulative Impacts***

Other past, present, and reasonably foreseeable actions that have had impacts on cultural landscapes include the realignment of NH Route 12A, the preservation of the Blow-Me-Down Farm Bank Barn and removal of non-historic structures, and the *Ascutney Management Unit Long-Range Management Plan*. Realignment of NH Route 12A has contributed an adverse impact on the Blow-Me-Down Mill cultural landscape through alteration of the Pond and historical topography as well as relocation of historic landscape features. Improvements to the Farm's Bank Barn and removal of non-historic structures at the Farm have had a beneficial impact on the Blow-Me-Down Farm cultural landscape. Management decisions included in the *Ascutney Management Unit Long-Range Management Plan* could adversely impact historical views of Mount Ascutney if additional development and/or construction of telecommunications towers are permitted within the state park, resulting in the introduction of permanent, noticeable visual intrusions. Collectively, these cumulative actions have contributed or would contribute to an adverse and beneficial impact on cultural landscapes. Alternative A would contribute an adverse increment that, in

conjunction with these actions, would result in an overall adverse cumulative impact on cultural landscapes. Alternative A would also contribute a small beneficial increment to the overall cumulative impact which would somewhat offset the adverse impacts to the Farm's cultural landscape.

### ***Conclusion***

Alternative A would result in beneficial and adverse impacts on cultural landscapes. Adverse impacts would result from maintaining the Farm's landscape in its current condition as the structural and vegetative elements present during the Farm's period of significance would remain missing or in a deteriorated condition, impeding an accurate representation of those landscape features. The beneficial impacts of maintaining views, agricultural fields, and the spatial organization of the Farm would offset adverse impacts by maintaining use patterns and topographic features key to understanding the National Register listed cultural landscape. Alternative A would contribute an adverse increment to the overall adverse cumulative impact. Although full rehabilitation of the landscape would not occur, the adverse impacts would not be significant as many of the original character-defining features of the cultural landscapes, including spatial organization, circulation patterns, and some small-scale features, remain visible within the Mill and Farm landscapes.

### **Impacts of Alternative B – The Cornish Colony History and Art Center (NPS Preferred Alternative)**

Under Alternative B – Phase 1, negligible impacts to the Mill's cultural landscape would be similar to those described under Alternative A above as improvements would be made to parking and circulation. Depending on the use and terms of lease agreements, some or all of the Farm's landscape would be rehabilitated to its period of significance and existing vegetation would receive horticultural care to improve its health and appearance. Vegetative removal and/or replacement would be used as needed to rehabilitate the landscape. Repairs would be made to existing landscape structures, such as retaining walls and circulation patterns. Improvements to the exteriors of the Farm's structures, which dominate much of the cultural landscape, would help to restore the landscape's historic appearance. These activities would result in beneficial impacts to vegetation and viewsheds through restoration of the cultural landscape.

New interpretive elements and trails would be designed to have minimal visual and physical impact on the character-defining features of the cultural landscape, but any adverse visual impact of the introduction of non-historic elements into the landscape would be offset by the interpretive value of providing visitors with a better understanding of its historic character.

Repairs to underground utilities and installation of new septic and well systems would require temporary visual disruptions to the landscape because of open trenches, piles of side-cast materials, and the presence of construction equipment. These adverse impacts would last for the duration of construction, however, once utilities are installed, all areas would be returned to pre-construction grades and planted with species-appropriate vegetation.

Under Alternative B – Phase 2, the degree of cultural landscape rehabilitation at the Farm would dependent on the Farm's use and terms of lease agreements. Some landscape improvements, such as the installation of new vegetation, may not occur if the Farm is leased for private use. The adverse impacts of not restoring the vegetative features of the landscape would be similar to those listed under Alternative A. Lease agreements and NPS policy would, however, provide for the protection of the existing character-defining features of the landscape. Private leases, there-

fore, would not result in the removal of surviving cultural landscape features dating from the Farm's period of significance.

### ***Cumulative Impacts***

As described under Alternative A above, other past, present, and reasonably foreseeable actions would result in adverse cumulative impacts on cultural landscapes. Alternative B would contribute a noticeable beneficial increment; however, it is unlikely that this would offset the adverse impacts of these other actions and the overall cumulative impacts would remain adverse.

### ***Conclusion***

Overall, Alternative B would result in beneficial impacts from rehabilitation efforts, whether full or partial, for the Farm's cultural landscape. Beneficial impacts would result from restoring vegetative plantings and regular maintenance of the Farm's cultural landscape. Any adverse impacts resulting from construction would only be temporary and would not be significant because the character-defining features of the National Register listed cultural landscape would not be lost. Alternative B would contribute noticeable beneficial increment to the overall adverse cumulative impact. Beneficial impacts to the landscape under Alternative B would result in restoration of a nationally significant landscape key to the park's mission, purpose, and significance.

## **MUSEUM COLLECTIONS**

### **Methodology**

Museum collections (historic artifacts, natural specimens, and archival and manuscript material) may be threatened by fire, theft, vandalism, natural disasters, and humidity. The preservation of museum collections is an ongoing process of preventative conservation, supplemented by conservation treatment when necessary. The primary goal is preservation of artifacts in as stable a condition as possible to prevent damage and minimize deterioration. The park's archives and collection are characterized in a 1991 Scope of Collections Statement and a draft 2009 update. The findings of these documents form the basis for the analysis of impacts in this section.

Resource-specific context for the evaluation of impacts on museum collections include:

- preservation and protection of museum collections associated with Augustus Saint-Gaudens and the Cornish Colony are key to the park's mission and enabling legislation; and
- many of the park's museum and archival collections are listed as contributing resources in the draft National Register of Historic Places Registration Form.

### **Impacts of Alternative A – Continuation of Current Management (No-Action Alternative)**

Under Alternative A, most museum collections would continue to be housed in the park's museum collections storage building. Overcrowding in the storage building would continue to constrain curatorial workspace, making it difficult to effectively maintain portions of the collec-

tion. In addition, some collection pieces are very large and must be stored in crates, reducing the accessibility of those pieces. Due to the large size of the crates, many of them must be stored in aisles, blocking access to other collection items. These actions result in adverse impacts as staff are unable to easily perform regular curatorial housekeeping on those items and items are not easily accessible for exhibit or research. The lack of current storage space also restricts the park's ability to acquire new items related to the Cornish Colony of artists, limiting the park's ability to expand its visitor experience.

Alternative A would not increase the amount of appropriate exhibit space within the park. While the park rotates some exhibits to provide greater access to more of the collection, visitors would only have access to view a small portion of the park's collection at any given time. During special events, like the summer concert series, some of these exhibit spaces would be closed to the public, further reducing the public's opportunities for viewing the park's collection. Although lack of exhibit space limits the park from displaying a large number of collections items, the park selects exhibit items that would provide visitors with a broad range of Saint-Gaudens's works to experience.

### *Cumulative Impacts*

No past, present, or reasonably foreseeable projects were identified that would impact museum collections, therefore, there would be no cumulative impacts to museum collections under Alternative A.

### *Conclusion*

Alternative A has the potential to result in adverse impacts on museum collections. Limited work and exhibit space for collections items would result in the continual relocation of items and less than optimal storage locations. These actions have the potential to increase the risk of damage to some individual items. The adverse impacts of Alternative A on museum collections would not be significant because impacts to the pieces would not change their status as contributing features on the National Register and visitors would have the opportunity to view a breadth of Saint-Gaudens works, thereby fulfilling the park's mission.

### **Impacts of Alternative B – The Cornish Colony History and Art Center (NPS Preferred Alternative)**

Under Alternative B – Phases 1 and 2, the existing museum collections storage building would continue to be the primary storage facility for collections items, but additional storage space for some non-collections material and collections less sensitive in nature could be created at the Farm. As these non-critical items are removed from the collections storage building, park staff would have better access to the remaining collections items for cleaning and preservation purposes. As some uses, such as the summer concert series, are moved to the Farm, additional exhibit space could be created within the historic core of the park, resulting in additional opportunities for visitors to experience more of the park's collection. Depending on uses established at the Farm, the park could also expand its exhibit space and collection to include additional objects related to the Cornish Colony. These actions would be beneficial to museum collections as more items are moved out of the storage building, creating more space for the curatorial staff to perform preservation maintenance and cleaning. Additional exhibit space would also provide greater opportunity for the park to display more of the collection to the visiting public.



Either phase of Alternative B could result in a private use lease of the Farm in which the park may not be able to expand their collections storage or exhibit space. Under this scenario, the park would continue to manage museum collections under current policies with adverse results similar to those listed under Alternative A.

### *Cumulative Impacts*

No past, present, or reasonably foreseeable projects were identified that would impact museum collections, therefore, there would be no cumulative impacts to museum collections under Alternative B.

### *Conclusion*

Alternative B has the potential to result in both beneficial and adverse impacts on museum collections. Alternative B could benefit museum collections if exhibit and storage space is expanded to the Farm, creating more efficient work space for the curatorial staff and eliminating the need for frequent relocation of collections items. Adverse impacts, similar to Alternative A, could potentially result if the park is unable to expand collections storage and exhibit space to the Farm. There would be no cumulative impacts to museum collections under Alternative B. The adverse impacts of Alternative B on museum collections would not be significant because impacts would likely be minimal as the park would continue to exhibit a range of Saint-Gaudens's work, providing visitors with an experience that would fulfill the park's purpose and mission.

## **STATE-LISTED ENDANGERED, THREATENED, AND SPECIAL CONCERN SPECIES**

### **Methodology**

Impacts are analyzed for state-listed endangered, threatened, and special concern species described as present or with the potential to be found in the study area in Chapter 3. Impacts on state-listed species were based on the following: (1) the known or likely occurrence of a species or its preferred habitat in the vicinity of the project area; (2) the direct physical loss or modification of habitat; (3) the effective loss of habitat due to construction activity or noise, or the species' sensitivity to human disturbance.

Resource-specific context for assessing impacts to state-listed endangered, threatened, and special concern species includes the following:

- These species are protected by state laws, meaning that protection of these species is significant on a statewide and/or regional scale.
- NPS Management Policies 2006 and Director's Order 77 (Natural Resource Protection) direct the NPS to treat state-listed species in the same way that federally-listed species are treated to the extent practicable.
- The presence of state-listed species in the parks is an important component of the visitor experience.
- Maintaining the integrity of local populations (occurrences) of state-listed species, and their habitat, is important because these species are rare and have specialized habitat requirements.

## Impacts of Alternative A – Continuation of Current Management (No-Action Alternative)

Alternative A could potentially have beneficial and adverse impacts on state-listed endangered, threatened, and special concern species. Rehabilitation of the Mill and proposed improvements to the Mill's cultural landscape would result in ground disturbance, which could result in vegetative disturbance, trampling, and uprooting, but these impacts could likely be avoided or minimized with monitoring and careful work in areas with sensitive vegetation. The use of heavy machinery and other construction equipment and/or ground-disturbing activities may destroy turtle and or salamander nests; however, this would be kept to a minimum through the implementation of preconstruction surveys. Other protection measures that could be implemented to minimize adverse impacts include the use of handheld equipment instead of machinery and the implementation of seasonal construction restrictions during nesting and birthing seasons for turtles and salamanders (typically between March and September).

Existing management strategies would continue for the agricultural fields which would not alter existing habitat conditions and no measureable change in state-listed species habitat would occur outside of natural variability. Impacts to state-listed species and communities due to structural stabilization or rehabilitation at the Farm are not likely due to habitat preferences and a lack of documented occurrences of these species in and surrounding the structures. Pre-construction surveys for the northern long-eared bat, which may nest in structures, would mitigate the likelihood of impacting that species during these construction activities. Should construction staging areas be needed, the park would survey the area for state-listed species and select the most appropriate location based on those findings.

Construction of the septic system and well would require ground disturbance, but areas designated for construction of those systems are currently maintained as lawn and would not be a suitable habitat for the state-listed plant species. Jefferson salamanders and wood turtles are mobile species and would be expected to vacate the area during construction activities. Construction noise may also impact the northern long-eared bat if nesting in nearby tree cover. These impacts could be adverse, but can be mitigated by conducting pre-construction surveys to confirm presence or absence of these species.

Under Alternative A, the Farm and Mill properties would be monitored for the control of invasive species which could compete with native, special-status species and alter state-listed exemplary natural communities. While not all non-native species are harmful, those that are invasive can have serious consequences for native plant habitats. Management of non-native, invasive species would have beneficial impacts on special-status species and communities by removing competing vegetation from the study area. In addition, any ground-disturbing activities conducted as part of Alternative A would be restored using native plants to reduce the likelihood of introducing invasive species into the study area.

### *Cumulative Impacts*

No past, present, or reasonably foreseeable projects were identified that would impact state-listed threatened and endangered species; therefore, there would be no cumulative impacts to species under Alternative A.

## ***Conclusion***

Under Alternative A, construction activities could result in some adverse impacts on state-listed species such as loss of individuals, loss of breeding habitat and disruption of breeding cycles and foraging, but these impacts would be temporary and would be avoided and minimized to the extent possible by mitigation measures such as seasonal restrictions and monitoring. The adverse impacts of Alternative A would not be considered significant because the impacts would not persist beyond construction and any loss of individuals or habitat would be minimal and would not affect the viability of the populations, which is consistent with policies and best practices for protection and conservation of state-listed threatened and endangered species.

Alternative A could have some beneficial impacts on state-listed threatened and endangered species from the control of non-native, invasive species in the study area, resulting in healthier plant habitats and state-listed exemplary natural communities. The beneficial impacts of Alternative A on state-listed endangered, threatened, and special concern species would also not be considered significant because the extent of the benefit would be limited to the local populations in the park and would not likely contribute to any meaningful extent to the viability of the populations as a whole.

## **Impacts of Alternative B – The Cornish Colony History and Art Center (NPS Preferred Alternative)**

Under Alternative B – Phase 1, impact associated with rehabilitation of the Mill, improvements to the Mill’s landscape, and construction of the well and septic systems would be similar to those listed under Alternative A.

Construction related to stabilizing and rehabilitating the Farm’s historic structures is unlikely to impact state-listed species due to habitat preferences and a lack of documented occurrences of these species in and surrounding the structures. Pre-construction surveys for the northern long-eared bat, which may nest in structures, would mitigate the likelihood of impacting that species during these construction activities. Should construction staging areas be needed, the park would survey the area for state-listed species and select the most appropriate location based on those findings.

Planting and rehabilitation activities related to the Farm’s cultural landscape would mainly occur in currently mown areas which are not known to contain any state-listed plant species. NPS resource specialists would monitor construction to avoid unexpected encounters with state-listed species. Management of the agricultural fields and invasive plant monitoring and control practices would continue, as listed under Alternative A with similar impacts.

Construction of new trails would result in ground disturbance and could have incidental impacts to vegetation, including disturbance, trampling, and uprooting. These impacts can likely be avoided or minimized with monitoring and careful work in areas with sensitive vegetation. Trail work would be routed to avoid exemplary natural communities to the greatest extent possible. Implementation of protection measures, including temporary flagging or fencing of sensitive habitats, training of construction crews to avoid certain species, and inspection by NPS resource specialists would minimize impacts. Trail construction could also adversely impact the Jefferson salamander and wood turtle by temporarily displacing those species. In addition, construction noise could impact the northern long-eared bat if nesting in nearby tree canopies. These impacts, however, would be temporary in nature and would not continue to impact those species once

trail construction was completed. These impacts could be mitigated by conducting pre-construction surveys for the three species to confirm presence or absence. In addition, conducting these activities during the summer, outside of the typical breeding season for these species would reduce the potential for encountering this species.

### *Cumulative Impacts*

No past, present, or reasonably foreseeable projects were identified that would impact state-listed threatened and endangered species; therefore, there would be no cumulative impacts to species under Alternative B.

### *Conclusion*

Overall, Alternative B would result in both adverse and beneficial impacts on state-listed species. Construction of new trails could adversely impact state-listed species, but these impacts would be temporary and mitigation measures would be employed to significantly reduce the likelihood of adverse impacts. Beneficial impacts would result from the control of non-native, invasive species in the study area, resulting in healthier plant habitats and state-listed exemplary natural communities. The adverse impacts of Alternative B on state-listed endangered, threatened, and special concern species would not be significant, as they would be temporary, would not result in changes to exemplary natural communities, and would be in keeping with all regulatory laws and policies.

## VISITOR USE AND EXPERIENCE

### *Methodology*

Potential impacts on visitor use and experience are assessed based on the current description of visitor use and experience presented in this document. Enjoyment of park resources and values by visitors is part of the fundamental purpose of all parks. This analysis considers how the proposed alternatives would affect how people use the park, as well as how the alternatives would alter visitors' experiences.

Resource-specific context for assessing impacts of the alternatives to visitor use and experience includes:

- visitor understanding of the relationship between Augustus Saint-Gaudens and the Cornish Colony;
- visitor understanding of the contribution the Cornish Colony had on the American arts scene; and
- the ability for visitors to immerse themselves in activities related to Augustus Saint-Gaudens and the Cornish Colony.



## **Impacts of Alternative A – Continuation of Current Management (No-Action Alternative)**

Under Alternative A, the Mill would be rehabilitated to provide occasional visitor access and circulation around the Mill would be improved. Beneficial impacts would be the result of these improvements as visitors would have better access to view the Mill, the dam, and the Pond. The additional wayside exhibits would further enhance the visitor's ability to understand the history and significance of the Mill property.

The Farm, under Alternative A, would remain closed to visitation on a daily basis. Opportunities would thus be lost for interpreting the Farm and its role in the development of the Cornish Colony of artists. Interpretive and educational programs would be conducted within the limits of the existing facilities within the historic core for classroom and exhibit space. Interpretation and educational programs would continue to focus on (the aspects of Saint-Gaudens works that revolve around the historic core) and would not be expanded to include the significance of the Cornish Colony and the role Augustus Saint-Gaudens played in establishing the Cornish Colony to any great degree. Events, such as the summer concert series, would continue to take place within the historic core of the park, limiting available exhibit space and park tours during those events.

Visitor experience of the Farm would be limited to park approved special events, during which many of the structures could only be experienced from the outside. Until funding becomes available for repair, the deteriorated exterior of the structures and cultural landscapes would limit the opportunity for visitors to experience the Farm's historic character. Some structural stabilization and repair work, such as the ongoing Victorian Playhouse project, would provide educational opportunities for partners and others interested in historic preservation.

### ***Cumulative Impacts***

Other past, present, and reasonably foreseeable actions that would or have had impacts on visitor use and experience includes the realignment of NH Route 12A, the preservation of the Blow-Me-Down Farm Bank Barn and removal of non-historic structures, and the *Ascutney Management Unit Long-Range Management Plan*. The realignment of NH Route 12A changed the appearance of the Mill landscape and Pond impeding the visitor's ability to realize its historic character and the *Ascutney Management Unit Long-Range Management Plan* could impact historic views from the Farm. Preservation of the Farm's Bank Barn and removal of non-historic structures have enhanced interpretation of the Farm. Collectively, these actions contribute beneficial and adverse cumulative impacts on visitor use and experience. The impact of Alternative A, in conjunction with these actions, would result in adverse cumulative impacts on visitor use and experience. Alternative A would contribute noticeable adverse increments to the overall cumulative impact.

### ***Conclusion***

Alternative A would result in both beneficial and adverse impacts on visitor use and experience. Beneficial impacts would result from improvements to the Mill property, providing better access to the site and enhancing the visitor understanding of the site's history through educational media. Adverse impacts would occur because visitor experience and understanding of the Farm would be limited to exhibits provided in the facilities at the historic core and occasional access to the Farm grounds during structured events. In combination with other actions that adversely impact visitor experience, Alternative A would contribute a noticeable adverse increment. How-

ever, while Alternative A would likely have overall adverse impacts on visitor use and experience, the impacts would not be considered significant because although the Farm would not be fully incorporated into the park's interpretive and educational programming, it would still be included to a degree sufficient for visitors to understand its significance and the role played by Augustus Saint-Gaudens, in accordance with the park's mission.

### **Impacts of Alternative B – The Cornish Colony History and Art Center (NPS Preferred Alternative)**

Alternative B – Phase 1, would result in beneficial impacts as the Farm and Mill could become a larger part of the park's interpretive programming, expanding visitor experience to include the story of the Cornish Colony and the role it played in America's art scene. The NPS would share responsibility with its partners in offering effective programming to the visiting public to include additional educational and interpretive programs and special events directly related to the park's significance and themes.

With additional staffing, the park could devote staff time for coordinating some visitor and orientation services at the Farm and Mill. The NPS would work closely with its partners to raise funds and/or secure lease agreements for rehabilitating the Farm's structures to their historical appearance, furthering the visitor's understanding of the Farm's history and significance. New interpretive exhibits and waysides would greatly enhance this visitor experience and provide a better understanding of the Mill's and Farm's historical uses.

The addition of new trails would connect the currently bisected parcels of the park and provide visitors with additional opportunities for active recreational use. Moving events, such as the summer concert series, to the Farm would eliminate the need to close certain areas of the historic core during those events.

Alternative B – Phase 1 could also result in adverse impacts depending on terms of lease agreements or partnership programs. Should the property, or portions thereof, be leased for private use, some, or all, of the improvements to the Farm may not occur. Adverse impacts, similar to those listed under Alternative A, could result if public access to the Farm is not granted or the park is unable to expand programming due to private lease agreements.

Impacts to visitor use and experience under Phase 2 of Alternative B could result in beneficial and adverse impacts depending on the terms of lease agreements. Under Phase 2, the Farm could be leased for purposes other than those relating to the park's purpose and significance. If the Farm is privately leased and/or leased for these other uses, then adverse impacts, similar to those listed under Alternative A, could result from lack of public access to the Farm.

### ***Cumulative Impacts***

Other past, present, and reasonably foreseeable actions that would have or has had impacts on visitor use and experience were described under Alternative A above. Collectively, these actions would result in beneficial and adverse cumulative impacts on visitor use and experience. The impact of Alternative B, in conjunction with these actions, could result in beneficial and adverse cumulative impacts on visitor use and experience. Alternative B could contribute noticeable beneficial and adverse increments to the overall cumulative impact.

## **Conclusion**

Overall, Alternative B could result in both beneficial and adverse impacts on visitor use and experience. Beneficial impacts would result from improvements to the Mill property, providing better access to the site and enhancing the visitor understanding of the site's history through educational media. Beneficial impacts could also occur as the Farm is rehabilitated, providing visitors with a broader range of experiences and a better understanding of the significance and contribution of the Cornish Colony, and their relationship to Saint-Gaudens. Adverse impacts, similar to those listed under Alternative A, could occur if the Farm is leased or used for purposes other than those which support the park's purpose and significance. Alternative B could contribute noticeable beneficial and adverse increments to the overall cumulative impact. The adverse impacts of Alternative B on visitor use and experience would be minimal as the park would continue to interpret the Cornish Colony and provide some Cornish Colony experiences, such as the summer concert series, within the historic core of the park. Although interpretive programming and activities would likely be smaller in scale, in the context of the park's purpose and significance, these potential adverse impacts would not be significant.

## **PARK OPERATIONS**

### **Methodology**

Impact analyses are based on the current description of park operations presented in Chapter 3. Park operations includes quality of effectiveness and the ability to maintain the infrastructure used in the operation of the park in order to adequately protect and preserve vital resources and provide for an effective and safe employee and visitor experience.

Resource-specific context for assessing impacts of the alternatives to park operations includes:

- parks must operate within the constraints of the unit-specific budget and number of staff positions that have been allocated by Congress and the NPS Director's office; and
- park staff is not only responsible for activities within the study area but must also provide for an effective and safe visitor experience and protect resources within the entire park.

### **Impacts of Alternative A – Continuation of Current Management (No-Action Alternative)**

Under Alternative A, no additional staffing would be allotted to reflect the increase in maintenance responsibilities caused by acquisition of the Farm. Park staff would continue to maintain the Farm's landscape and structures on an as needed basis. Continued deterioration of the structures could increase maintenance workload as additional emergency repairs need to be completed. In addition, the maintenance of the structures could increase facility costs and park expenditures if deterioration continues. The Mill and Dance Hall, along with the Mill's cultural landscape, would be rehabilitated, requiring additional custodial duties during times of use. The adverse impact of additional workloads for maintenance and custodial staff, however, could be slightly offset by rehabilitation of the Mill and Dance Hall as those structures should require fewer hours of maintenance. The additional maintenance requirements would have an adverse impact on park operations by increasing workload, facility costs, and expenditures for the park.

### *Cumulative Impacts*

Other past, present, and reasonably foreseeable actions that would or have had impacts on park operations includes the preservation of the Blow-Me-Down Farm Bank Barn and removal of non-historic structures. Preservation of the Farm's Bank Barn and removal of non-historic structures decreased the number of facilities and improved the stability of one of the Farm's historic structures, thereby freeing up operational funding for use in other areas of the park. Collectively, these actions contributed beneficial cumulative impacts on park operations. The impact of Alternative A, in conjunction with these actions, would result in beneficial and adverse cumulative impacts on park operations. Alternative A would contribute imperceptible adverse increments to the overall cumulative impact.

### *Conclusion*

Overall, Alternative A would result in adverse impacts to park operations primarily due to an increase in maintenance workload under the same staffing and operational funding levels as those existing before acquisition of the Farm. Alternative A would contribute imperceptible adverse increments to the overall cumulative impact. The adverse impacts of Alternative A on park operations would not be significant because the limited additional maintenance required for the Farm would not prevent park staff from responding to other resource maintenance needs within the park and providing urgent maintenance of Farm structures in combination with limited visitor access would help ensure visitor safety.

### **Impacts of Alternative B – The Cornish Colony History and Art Center (NPS Preferred Alternative)**

Under Alternative B – Phase 1, the Mill and Dance Hall would be rehabilitated, along with the Farm's remaining structures, which would be rehabilitated under lease agreements. As structures are improved, maintenance expenditures would be expected to decrease as the buildings are stabilized. Depending on the terms of a lease, the lessee may be responsible for some maintenance responsibilities, further reducing workload for park staff. Funding earned as part of the lease program could then be used by the park for other maintenance or preservation efforts throughout the park.

Rehabilitation of the landscapes, along with an increase of public use of the Mill and Farm, could lead to additional maintenance workloads for park staff as lawns and vegetation would require more frequent care. These adverse impacts, however, would be offset by the reduction in building maintenance requirements.

### *Cumulative Impacts*

Other past, present, and reasonably foreseeable actions that would or have had impacts on park operations were described under Alternative A. Collectively, these actions contributed beneficial cumulative impacts on park operations. The impact of Alternative B, in conjunction with these actions, would result in beneficial and adverse cumulative impacts on park operations. Alternative B would contribute noticeable beneficial and adverse increments to the overall cumulative impact.

## ***Conclusion***

Under alternative B, beneficial impacts to park operations could be expected because the park would decrease maintenance expenditures and responsibility for maintaining and stabilizing the Mill and Farm structures. The overall ability of park staff and funding to meet the demands of Alternative B would be minimal and would improve the ability of park staff to respond to resource and visitor needs within other areas of the park. Alternative B would contribute noticeable beneficial and adverse increments to the overall cumulative impact. The adverse impacts of Alternative B on park operations would not be significant because the additional expenditures for the park would go towards protecting and preserving resources which contribute to the park's National Register listing.

## **GATEWAY COMMUNITIES**

### **Methodology**

Impacts of proposed alternatives on the regional economy are created by visitor expenditures, both within the park and outside park boundaries, through the NPS management and operation of the park, and through regional non-labor expenditures. For the analysis, potential impacts on gateway communities are assessed based on the current description presented in Chapter 3.

Resource-specific context for the evaluation of impacts on gateway communities include:

- the contribution of gateway communities to the experience of visiting the park; and
- the contribution of park uses and management options for the Farm on gateway communities.

### **Impacts of Alternative A – Continuation of Current Management (No-Action Alternative)**

Under the Alternative A, rehabilitation of the Dance Hall and Blow-Me-Down Mill could provide additional recreational experiences for park visitors, but the infrequency of these events would not provide a noticeable benefit to the surrounding communities. The summer concert series would continue to be held within the historic core of the park, providing both beneficial and adverse impacts to the surrounding community. The concerts would continue to provide an opportunity for outdoor recreation for some local residents as well as provide additional business to the surrounding merchants. Additional traffic on NH Route 12A, however, could adversely impact communities who live on or frequently use the highway.

### ***Cumulative Impacts***

There would be no cumulative impacts to gateway communities under Alternative A.

## ***Conclusion***

Alternative A has the potential to result in beneficial impacts on gateway communities as visita-



tion could increase during special events at the Farm and/or Mill sites, but the limited number of special events would not lead to a significant increase in the recreational use of the park. There would be no cumulative impacts to gateway communities under Alternative A. Beneficial impacts would not be considered significant because any increase in visitor spending would be minor, as special events are held infrequently, are of short duration, and would not be expected to create more than a negligible increase to the local business revenue.

### **Impacts of Alternative B – The Cornish Colony History and Art Center (NPS Preferred Alternative)**

Under Alternative B – Phases 1 and 2, structures on the Farm would be rehabilitated and new programming and opportunities for the visitor experience could occur, attracting a larger number of visitors to the area. An increase in park visitation could result in more customers frequenting local businesses, resulting in a beneficial impact to gateway communities. Additional beneficial impacts of Alternative B would result by increasing recreational opportunities for gateway community members. If the rehabilitated Farm does not attract more visitors to the area, or the Farm is leased for private use, then the alternative would not change the current economic conditions or level of recreational experiences of the gateway communities. Adverse impacts, similar to Alternative A, could also occur under Alternative B if the level of visitation increases dramatically. NH Route 12A could see an increase in traffic during, adversely impacting the local community.

### ***Cumulative Impacts***

There would be no cumulative impacts to gateway communities under Alternative B.

### ***Conclusion***

Alternative B has the potential to result in beneficial impacts on gateway communities. Alternative B could result in an increase in increase in tourism levels benefiting local businesses and an increase in recreational opportunities. The full impact to gateway communities is unknown because of the high variability in possible uses for the Farm. There would be no cumulative impacts to gateway communities under Alternative B. These potential impacts, however, would not be significant, as the presence of the gateway communities would continue to contribute to the experience of visiting the park and the park would continue to provide the same level, or more, visitor opportunities to gateways communities.

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# Chapter 5

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## Consultation & Coordination

Director's Order #12 requires the NPS to make "diligent" efforts to involve the interested and affected public in the NEPA process. This process, known as scoping, helps to determine the important issues and eliminate those that are not; allocate assignments among the interdisciplinary team members and/or other participating agencies; identify related projects and associated documents; identify other permits, surveys, consultations, etc. required by other agencies; and create a schedule that allows adequate time to prepare and distribute the environmental document for public review and comment before a final decision is made. This chapter documents the scoping process for the proposed action, identifies future compliance needs and permits, and includes the list of preparers and contributors for the document.

### **BRIEF HISTORY OF PLANNING AND PUBLIC INVOLVEMENT**

The scoping process is initiated at the beginning of a NEPA project to identify the range of issues, resources, and alternatives to be addressed in the document. Typically, both internal and public scoping are conducted to address these elements. During the preparation of this EA, state and federal agencies also were contacted to uncover any additional planning issues and to fulfill statutory requirements. The planning process for the proposed action was initiated during the internal, agency, and public scoping in the summer of 2011. This process introduced the purpose and need of the project and potential actions that could be included as part of the future management of the Farm and Mill properties. Discussions with interested agencies and individuals were initiated at this time.

#### **Internal Scoping**

The park held a collaborative, multi-disciplinary brainstorming workshop at Blow-Me-Down Farm in June, 2011. This first meeting, which included staff and resource specialists from Saint-Gaudens NHS and the NPS Northeast Regional Office, identified potential uses, issues, and concerns for the Farm.

## **Public Scoping**

In July, 2011, the park released a public scoping newsletter for a 30-day public review and comment period during which the public was invited to submit comments on the scope of the planning process, issues, concerns and potential alternatives for the site management plan/EA. During the scoping period, a public scoping open house was held at the Blow-Me-Down Farm to present the history of the park and Farm, detail the EA process, and record public input. Seventeen pieces of correspondence were entered into the NPS PEPC system either from direct entry by the commenter or by uploading hard copy letters received by the NPS.

Suggestions and concerns received from these meeting were reviewed and used to inform the creation of alternatives. The public was then engaged a second time in January 2012 when the park released a second newsletter which presented draft alternatives. The park received 38 pieces of correspondence in response to this second public involvement effort. Comments received during the public review of the draft alternatives were used to further refine the alternatives, creating those which were presented in this EA.

## **AGENCY CONSULTATION**

The NPS initiated scoping with multiple agencies early in the planning process. Copies of the scoping letters and responses from the agencies, if applicable, can be found in Appendix A.

### **Federal Agencies**

A letter was sent to the U.S. Fish and Wildlife Service for comments on January 25, 2012, and the U.S. Fish and Wildlife Service replied on March 8, 2012, stating that one federally-listed species under their jurisdiction was known to occur in the study area. Consultation with the U.S. Fish and Wildlife Service is ongoing. See Appendix A for copies of written correspondence.

### **State and Local Agencies**

State and local agencies engaged in scoping efforts included the New Hampshire State Historic Preservation Officer (SHPO), the New Hampshire Natural Heritage Bureau, and the New Hampshire Department of Transportation (DOT). The New Hampshire SHPO requested continued consultation as the plan progresses and the park begins to plan for rehabilitation of the Farm's structures. The New Hampshire Natural Heritage Bureau commented, providing a list of species known, or having the potential, to occur within the proposed action area. The New Hampshire DOT requested that any development within a road right-of-way follow state and local guidelines and procedures for review and approval. See Appendix A for copies of written correspondence with these agencies.

## **FUTURE COMPLIANCE NEEDS AND PERMITS**

Implementation of the NPS preferred alternative would require that the NPS abide by applicable laws and regulations. The NPS would continue to coordinate with the New Hampshire SHPO, the Keeper of the National Register, the New Hampshire DOT, and the town of Cornish, NH throughout the life of the project. Prior to any ground disturbance, the proper authorities would

consult with the appropriate authority having jurisdiction in the study area to ensure the proper permits are in place.

## **LIST OF PREPARERS, CONTRIBUTORS, AND REVIEWERS**

This document was prepared by staff at Saint-Gaudens National Historic Site and the NPS Northeast Regional Office.

Amanda Jones, Community Planner, NPS Northeast Regional Office  
Rick Kendall, Superintendent, Saint-Gaudens National Historic Site  
Henry Duffy, Curator, Saint-Gaudens National Historic Site  
Greg Schwarz, Chief of Interpretation, Saint-Gaudens National Historic Site  
Steve Walasewicz, Chief of Resource Management & Maintenance, Saint-Gaudens National Historic Site  
April May Preston, Administrative Officer, Saint-Gaudens National Historic Site  
Jacki Katzmire, Regional Environmental Coordinator, NPS Northeast Regional Office  
Cheryl Sams O'Neill, Resource Planning Specialist, NPS Northeast Regional Office



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# References

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Archetype Architecture Inc.

- 1992 Adaptability Study of the Blow-Me-Down Mill at Saint-Gaudens National Historic Site. Prepared for the National Park Service.

Bargmann, Hendrie + Archetype, Inc.

- 2010 Historic Structure Report: Blow-Me-Down Mill, Saint-Gaudens National Historic Site, Cornish, New Hampshire. Prepared for the National Park Service.

Barnett, James J.

- 1988 *Resources Management Plan [Saint-Gaudens National Historic Site]*. Prepared for the National Park Service.

Beaman, Charles C.

- 1884-1900 Blow-Me-Down Farm Record. Typed manuscript on file at SAGA Library, Cornish, NH.

Child, William H.

- 1975 *History of the Town of Cornish, New Hampshire*. The Reprint Company, Publishers, Spartanburg, S.C.

Colby, Virginia Reed

- 1979 "Stephen and Maxfield Parrish in New Hampshire." *Antiques*, June, p. 1293.

Colby, Virginia Reed, and James B. Atkinson

- 1996 *Footprints of the Past: Images of Cornish, New Hampshire & The Cornish Colony*. Concord Historical Society, Concord, N.H..

The Cornish Colony Gallery and Museum

- 2001 *Cornish Art of the Past Century*. The Cornish Colony Gallery and Museum, Cornish, NH.
- 2003 *The Women of the Cornish Colony, Part II*. The Cornish Colony Gallery and Museum, Cornish, NH.

Dryfhout, John H.

- 2000 This Land of Pure Delight: Charles C. Beaman and Blowmedown Farm. Augustus Saint-Gaudens Memorial: Cornish, NH.

Farley, James L.

- 1973 "The Cornish Colony." Vol. XIV, No. 1, *Dartmouth College Library Bulletin*.

Hepler, Margaret, Timothy Binzen, Jennifer Wendt, and Mitchell T. Mulholland

- 2006 *Archeological Overview and Assessment of the Saint-Gaudens National Historic Site, Cornish, New Hampshire*. Archaeological Services at the University of Massachusetts. On file, Saint-Gaudens National Historic Site, Cornish, NH.

Knapp, Martha

- 2001 Historic Structure Report, Blow Me Down Mill, Saint-Gaudens National Historic Site, Cornish, New Hampshire. Prepared for the National Park Service.

Kraft, Susan

- 1993 Saint-Gaudens National Historic Site: Scope of Collection Statement. Prepared for the National Park Service.

Manning, Robert E.

- 1993 Saint-Gaudens National Historic Site Visitor Study, Study Completion Report. Prepared for National the Park Service.

Mckay, James A.

- 1991 *Resource Management Plan, Saint-Gaudens National Historic Site*. Prepared for the National Park Service.

National Park Service, U.S. Department of the Interior

- 1993a Cultural Landscape Report for Saint-Gaudens National Historic Site, Volume 1: Site History and Existing Conditions. National Park Service, Denver Service Center.
- 1993b Cultural Landscape Report for Saint-Gaudens National Historic Site, Volume 2: Site Analysis. Draft prepared for National Park Service, Denver Service Center.

- 1993c Cultural Landscape Report for Saint-Gaudens National Historic Site, Volume 3: Management Options. Draft prepared for National Park Service, Denver Service Center.
- 1996 General Management Plan, Development Concept Plan, Environmental Impact Statement, Saint-Gaudens National Historic Site.
- 2000 Trail Design Plans for the Saint-Gaudens National Historic Site, Entrance Trail. Prepared for National Park Service, Denver Service Center.
- 2006 *NPS Management Policies 2006*.
- 2009a *Collection Management Plan Saint-Gaudens National Historic Site*.
- 2009b Cultural Landscape Report for Aspet, Saint-Gaudens National Historic Site, Volume II: Recent History, Existing Conditions, and Analysis. Olmsted Center for Landscape Preservation, Boston, MA.
- 2009c Cultural Landscape Report for Blow-Me-Down Mill, Saint-Gaudens National Historic Site, Cornish, New Hampshire. Revised Draft, April 23, 2009. Olmsted Center for Landscape Preservation, Boston, MA.
- 2011a *Cultural Landscape Report for Aspet, Volume III: Treatment*. Olmsted Center for Landscape Preservation, Boston, MA.
- 2011b *Assessment of Blow-Me-Down Farm Structures*.
- 2013 *National Register Documentation, Saint-Gaudens National Historic Site*.

Sullivan, Brigid

- 1992 *Saint-Gaudens National Historic Site: Conservation Survey*. Prepared for the National Park Service.

University of New Hampshire (UNH), Susan Faxon Olney, Barbara Ball Buff, John H. Dryfhout, Frances Grimes, Lisa Quirk and Deborah Can Buren, contributors.

- 1985 *A Circle of Friends: Art Colonies of Cornish and Dublin*. Exhibit Catalog, University Art Galleries, Durham, NH; Thorne-Sagendorph Art Gallery, Keene, NH; Saint-Gaudens National Historic Site, Cornish, NH; and Hood Museum of Art, Hanover, NH. University of New Hampshire, Durham, NH.

University of Idaho, Park Studies Unit; Manni, Marc F. and James Gramann and Steven J. Hollenhorst

- 2005 *Saint-Gaudens National Historic Site Visitor Study, Summer 2005*. Prepared for the National Park Service.

Zimmerman, M. J., S. J. Grady, E. C. T. Trench, S. M. Flanagan, M. G. Nielsen

- 1996 Water-Quality Assessment of the Connecticut, Housatonic, and Thames River Basins Study Unit: Analysis of Available Data on Nutrients, Suspended Sediments, and Pesticides, 1972-92. U.S. Geological Survey Water-Resources Investigations Report 95-4203, 162 pp.



# Appendix A

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## Relevant Correspondence

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# United States Department of the Interior

NATIONAL PARK SERVICE  
Northeast Region  
U.S. Custom House  
200 Chestnut Street  
Philadelphia, PA 19106-2878

IN REPLY REFER TO:

January 25, 2012

Mr. Tom Chapman  
U.S. Fish and Wildlife Service  
70 Commercial St., Suite 300  
Concord, NH 03301

Dear Mr. Chapman:

The National Park Service (NPS) is currently developing a Site Management Plan and Environmental Assessment (EA) for the Blow-Me-Down Farm located within the boundary of Saint-Gaudens National Historic Site, Cornish, NH. Blow-Me-Down Farm, acquired by the NPS in 2010, is a 42.6-acre property that includes nine structures, several agricultural fields, and more than ¼-mile frontage along the Connecticut River.

A Site Management Plan is the much needed first step in the process of rehabilitating the buildings at the farm and creating a long-term strategy to protect and maintain the farm's cultural and natural resources. In addition, the Plan will include conceptual plans for visitor use and interpretation, and identify the operational needs of the site. Once all planning issues are identified, a range of alternatives will be developed and analyzed. Alternatives will be presented for public and regulatory review in a draft environmental assessment during the spring of 2012. Additional information about the plan is available online at the park's planning website, <http://parkplanning.nps.gov/saga>.

This letter is to inform you that we have begun the National Environmental Policy Act (NEPA) process and serve as a record that the NPS is initiating consultation with your agency pursuant to the requirements of the 1973 Endangered Species Act, as amended. In order to comply, we are requesting information concerning federal and state rare, threatened, and endangered species; special status species; or designated critical habitats documented or reasonably suspected within 0.5 miles of the project site, which is depicted on the enclosed map. We are also coordinating with the New Hampshire Fish and Game's Nongame and Endangered Wildlife Program and the New Hampshire Natural Heritage Bureau to obtain and review their file information.

According to information available on your website, one endangered species potentially occurs within the general vicinity of Blow-Me-Down Farm: the dwarf wedgemussel (*Alasmidonta heterodon*). We anticipate no significant environmental impacts associated with the project and look forward to receiving any guidance or comments you may have regarding the process or the project itself.

We look forward to working with you on the Blow-Me-Down Farm Site Management Plan/EA. If you have any questions or would like additional information, please contact me at 215-597-1841.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amanda Jones", with a stylized flourish at the end.

Amanda Jones,  
Project Manager, Park Planning & Special Studies, National Park Service – Northeast Region

enclosures



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

New England Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301-5087  
<http://www.fws.gov/newengland>

March 8, 2012

Ms. Amanda Jones  
Park Planning and Special Studies  
National Park Service  
U.S. Custom House  
200 Chestnut Street  
Philadelphia, PA 19106-2878

Dear Ms. Jones:

This responds to your January 25, 2012 letter, requesting that we provide information on the presence of federally endangered dwarf wedgemussels that occur within the vicinity of the Blow-Me-Down Farm (Farm) in Cornish, New Hampshire. Our comments are provided in accordance with the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531, *et seq.*).

Dwarf wedgemussels occur in the Connecticut River immediately up- and downriver of the Cornish-Windsor covered bridge (approximately two miles south of the Farm). We do not have records of dwarf wedgemussels occurring in the river by the Farm, however, we do not believe that area has been surveyed. Should suitable habitat occur in the river adjacent to the Farm shoreline, we anticipate that dwarf wedgemussels should be present. In this stretch of the Connecticut River, dwarf wedgemussels are known to occur in inches of water immediately below mean low water to depths of 10 to 20 feet.

Your letter states that no significant environmental impacts associated with rehabilitating buildings at the project site are anticipated. However, should construction activities occur near the shoreline, we recommend that appropriate erosion control measures be in place to prevent adverse effects from sedimentation of the near shore waters.

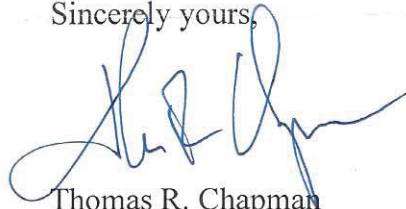


Ms. Amanda Jones  
March 8, 2012

2

Thank you for your cooperation. Please contact Susi von Oettingen of this office at 603-223-2541, extension 22, if you have any questions or need additional assistance.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'T. Chapman', with a long horizontal flourish extending to the right.

Thomas R. Chapman  
Supervisor  
New England Field Office



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
Saint-Gaudens National Historic Site  
139 Saint-Gaudens Road  
Cornish, NH 03745

February 6, 2012

Sara Cairns  
New Hampshire Natural Heritage Bureau  
PO Box 1856  
Concord, NH 03302-1856  
scairns@dred.state.nh.us

Dear Ms. Cairns:

The National Park Service (NPS) is currently developing a Site Management Plan and Environmental Assessment (EA) for the Blow-Me-Down Farm located within the boundary of Saint-Gaudens National Historic Site, Cornish, NH. Blow-Me-Down Farm, acquired by the NPS in 2010, is a 42.6-acre property that includes nine structures, several agricultural fields, and more than ¼-mile frontage along the Connecticut River.

A Site Management Plan is the much needed first step in the process of rehabilitating the buildings at the farm and creating a long-term strategy to protect and maintain the farm's cultural and natural resources. In addition, the Plan will include conceptual plans for visitor use and interpretation, and identify the operational needs of the site. Once all planning issues are identified, a range of alternatives will be developed and analyzed. Alternatives will be presented for public and regulatory review in a draft environmental assessment during the spring of 2012. Additional information about the plan is available online at the park's planning website, <http://parkplanning.nps.gov/saga>.

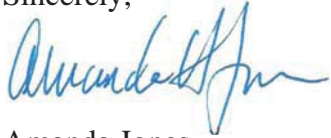
This letter is to inform you that we have begun the National Environmental Policy Act (NEPA) process and serve as a record that the NPS is initiating informal consultation with your agency pursuant to the requirements of the 1973 Endangered Species Act, as amended. In order to comply, we are requesting information concerning federal and state rare, threatened, and endangered species; special status species; or designated critical habitats documented or reasonably suspected within 0.5 miles of the project site, which is depicted on the enclosed map. We are also coordinating with the U.S. Fish and Wildlife Service (USFWS) to obtain and review their file information.

According to information available on the USFWS website, one federally listed endangered species potentially occurs within the general vicinity of Blow-Me-Down Farm: the dwarf wedgemussel (*Alasmodonta heterodon*). In addition, maps obtained from the NH Fish and Game Department website indicate that our project area falls within at least two critical wildlife habitat areas: forest floodplain and grassland. We anticipate no significant environmental impacts

associated with the project and look forward to receiving any guidance or comments you may have regarding the process or the project itself.

We look forward to working with you on the Blow-Me-Down Farm Site Management Plan/EA. If you have any questions or would like additional information, please contact me at 215-597-1841.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amanda Jones". The signature is fluid and cursive, with a long horizontal stroke at the end.

Amanda Jones,  
Project Manager, Park Planning & Special Studies, National Park Service – Northeast Region

enclosures



# NEW HAMPSHIRE NATURAL HERITAGE BUREAU

DRED - DIVISION OF FORESTS & LANDS

PO Box 1856 -- 172 PEMBROKE ROAD, CONCORD, NH 03302-1856

PHONE: (603) 271-2214 FAX: (603) 271-6488

**To:** Amanda Jones, National Park Service  
200 Chestnut Street 3rd Floor  
Philadelphia PA 19106

**From:** Sara Cairns, NH Natural Heritage Bureau

**Date:** 2012-02-09

**Re:** Review by NH Natural Heritage Bureau of request dated 2012-02-06

**NHB File ID:** 1120

**Town:** Cornish

**Project type:** Landowner Request

**Location:** West of Blow-Me-Down Pond

I have searched our database for records of rare species and exemplary natural communities on the property(s) identified in your request. Our database includes known records for species officially listed as Threatened or Endangered by either the state of New Hampshire or the federal government, as well as species and natural communities judged by experts to be at risk in New Hampshire but not yet formally listed.

**This site is within an area flagged by NH Fish & Game for possible impacts on rare mussels. Contact Kim Tuttle (271-6544) for more details. The closest documented mussel population is ca. 1.4 miles downstream.**

NHB records on the property(s):

Invertebrate Species	Mapping Precision	% within tract	Last Reported	Listing Status		Conservation Rank	
				Federal	NH	Global	State
Dwarf Wedge Mussel ( <i>Alasmidonta heterodon</i> )	--	<1	1986	E	E	G1	S1
Natural Community				Federal	NH	Global	State
Silver maple - wood nettle - ostrich fern floodplain forest	Good	21	1997	--	--	-	S2

NHB records within one mile of the property(s):

Vertebrate species (For more information on animal species, contact Kim Tuttle, NH F&G at 271-6544)	Last Reported	Listing Status		Conservation Rank	
		Federal	NH	Global	State
Jefferson Salamander ( <i>Ambystoma jeffersonianum</i> )	1986	--	SC	G4	S2
Northern Redbelly Dace ( <i>Phoxinus eos</i> )	1986	--	SC	G5	S3
Northern Long-eared Bat ( <i>Myotis septentrionalis</i> )	2002	--	SC	G4	S3
Wood Turtle ( <i>Glyptemys insculpta</i> )	2005	--	SC	G4	S3

**NOTE: This review cannot be used to satisfy a permit or other regulatory requirement to check for rare species or habitats that could be affected by a proposed project, since it provides detailed information only for records actually on the property.**





## NEW HAMPSHIRE NATURAL HERITAGE BUREAU

DRED - DIVISION OF FORESTS & LANDS

PO BOX 1856 -- 172 PEMBROKE ROAD, CONCORD, NH 03302-1856

PHONE: (603) 271-2214 FAX: (603) 271-6488

Natural Community		Federal	NH	Global	State
Rich mesic forest	1983	--	--	--	S3
<b>Plant species</b>		<b>Federal</b>	<b>NH</b>	<b>Global</b>	<b>State</b>
Beaked Sanicle ( <i>Sanicula trifoliata</i> )	1906	--	T	G4	S2
Northern Waterleaf ( <i>Hydrophyllum virginianum</i> )	2002	--	T	G5	S2
Bladdernut ( <i>Staphylea trifolia</i> )	11	--	T	G5	S2
Large-flowered Bellwort ( <i>Uvularia grandiflora</i> )	2009	--	E	G5	S1
Sago Pondweed ( <i>Stuckenia pectinata</i> )	1972	--	E	G5	S1
Vasey's Pondweed ( <i>Potamogeton vaseyi</i> )	1972	--	E	G4	S1
Slender Cliffbrake ( <i>Cryptogramma stelleri</i> )	2001	--	E	G5	S1

Listing codes: T = Threatened, E = Endangered, SC = Special Concern

Rank prefix: G = Global, S = State, T = Global or state rank for a sub-species or variety (taxon)

Rank suffix: 1-5 = Most (1) to least (5) imperiled. "--", U, NR = Not ranked.

B = Breeding population, N = Non-breeding, H = Historical, X = Extirpated.

A negative result (no record in our database) does not mean that no rare species are present. Our data can only tell you of known occurrences, based on information gathered by qualified biologists and reported to our office. However, many areas have never been surveyed, or have only been surveyed for certain species. An on-site survey would provide better information on what species and communities are indeed present.

**NOTE: This review cannot be used to satisfy a permit or other regulatory requirement to check for rare species or habitats that could be affected by a proposed project, since it provides detailed information only for records actually on the property.**



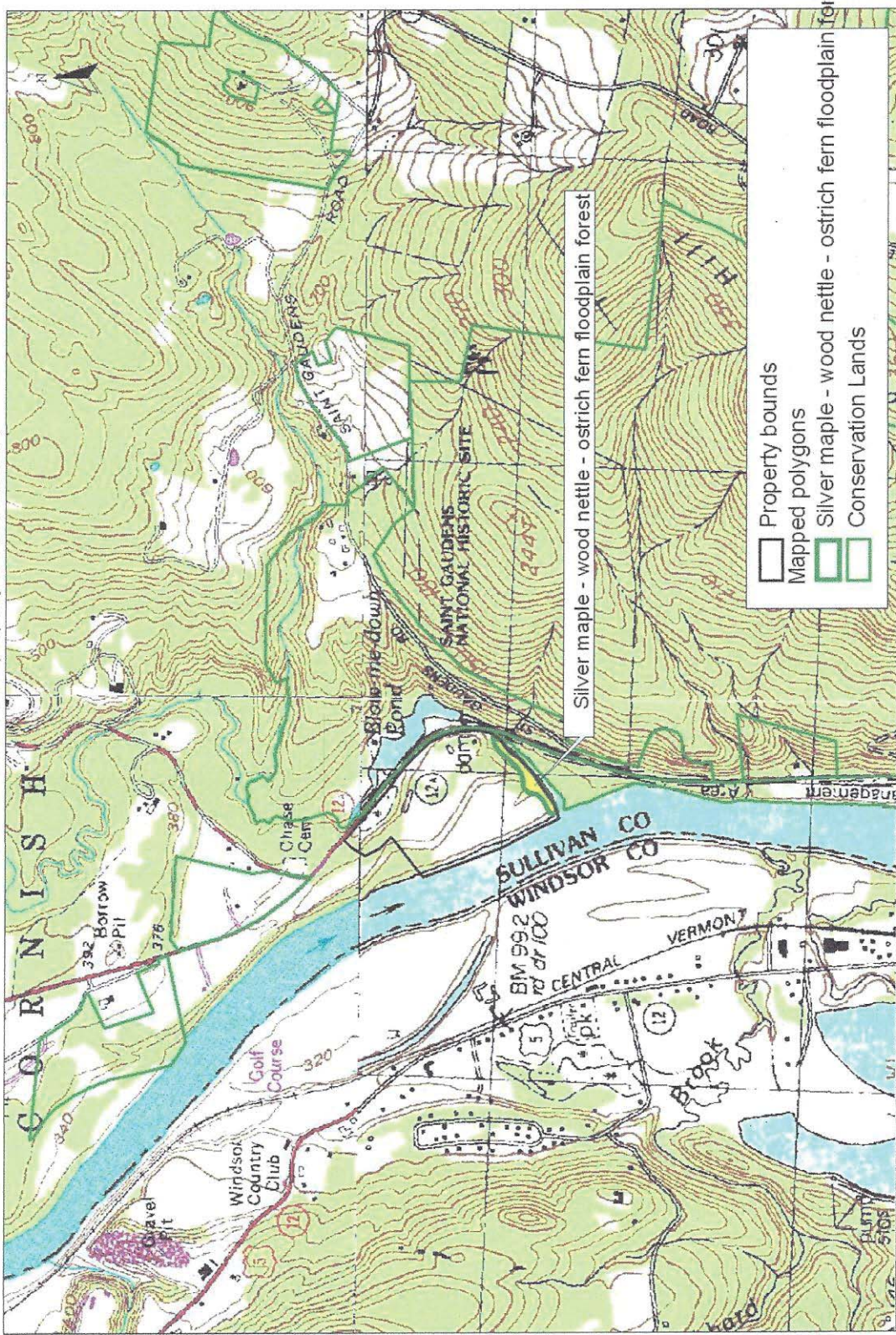
NHB: L1120



NH NATURAL HERITAGE BUREAU

### Known locations of rare species and exemplary natural communities

Sensitive species are labelled but not mapped. All other records are clipped to the property boundaries. Occurrences not on the property are not shown.



Property: Saint-Gaudens National Historic Site



## New Hampshire Natural Heritage Bureau - Community Record

### Silver maple - wood nettle - ostrich fern floodplain forest

Legal Status	Conservation Status
Federal: Not listed	Global: Not ranked (need more information)
State: Not listed	State: Imperiled due to rarity or vulnerability

#### Description at this Location

Conservation Rank: Fair quality, condition and/or landscape context ('C' on a scale of A-D).  
 Comments on Rank: Not a high quality or large patch. It is, however, perhaps typical of small brook confluences with the Connecticut River, which characteristically create a small terrace system from deposition and eddy back waters during flood stage.

Detailed Description: 1997: This small floodplain patch was dominated by *Acer saccharinum* (silver maple) and *Ulmus americanus* (American elm) in the overstory, with *Lonicera canadensis* (Canadian honeysuckle), *Vitis riparia* (river grape), *Toxicodendron radicans* (climbing poison ivy) and *Parthenocissus quinquefolia* (Virginia creeper) in the tree and vine sub-canopy. Dominant herbs included *Matteuccia struthiopteris* var. *pennsylvanica* (ostrich fern) and *Boehmeria cylindrica* (false nettle). The lowest terrace along the brook upstream of the confluence supported a mat of *Onoclea sensibilis* (sensitive fern); the sand levee at the river's edge was dominated by graminoids.

General Area: 1997: A back channel framed parts of the floodplain, with a steep bank rising to the highway. Soils were silty and very fine sandy loams. This small floodplain patch lies upstream of a narrow strip of wildlife management area, presumably for angler and bird hunting access. Clearings upstream and downstream, and the immediate slope up to the road define the edges of this community, and several pathways for anglers cut through the narrow forest. Human travel and garbage are evident, and there is considerable edge effect.

General Comments:  
 Management  
 Comments:

#### Location

Survey Site Name: Blow-Me-Down Brook  
 Managed By: Cornish WMA - Connecticut River Access

County: Sullivan	USGS quad(s): Windsor (4307244)
Town(s): Cornish	Lat, Long: 432939N, 0722239W
Size: 11.1 acres	Elevation: 300 feet

Precision: Within (but not necessarily restricted to) the area indicated on the map.

Directions: Route 12A to St. Gaudens National Park entrance. Park at the St. Gaudens entrance and hike across road and down to the brook confluence with the Connecticut River.

#### Dates documented

First reported: 1997-07-31	Last reported: 1997-07-31
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Bechtel, Doug. 1997. Field survey to Blow-Me-Down Brook on July 31.



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
Saint-Gaudens National Historic Site  
139 Saint-Gaudens Road  
Cornish, NH 03745

July 19, 2011

Ms. Elizabeth Muzzey  
NH Division of Historical Resources  
State Historic Preservation Office  
19 Pillsbury Street  
Concord, NH 03301-3570

Dear Ms. Muzzey:

The National Park Service (NPS) is currently developing a Site Management Plan and Environmental Assessment (EA) for the Blow-Me-Down Farm location within Saint-Gaudens National Historic Site. Blow-Me-Down Farm is a 42.6-acre property that includes nine structures, several agricultural fields, and more than ¼-mile frontage along the Connecticut River.

Blow-Me-Down Farm was the home of the Charles C. Beaman family. Beaman, a New York City lawyer and friend of Augustus Saint-Gaudens, attracted Saint-Gaudens to Cornish with the promise that the area held many "Lincoln-shaped men" for the sculptor to model. Saint-Gaudens and his wife, Augusta, moved to Cornish and rented the property that we today know as Aspet from Beaman before deciding to stay permanently. The presence of Saint-Gaudens attracted other artists, writers and musicians to Cornish to create what is now known as the Cornish Colony. The Blow-Me-Down Farm was a hub of the Cornish Colony's social activities.

Blow-Me-Down Farm was acquired by the Saint-Gaudens Memorial in 1998 through the generous donation of acquisition funds by Eric Lagercrantz on behalf of his late wife Mary Beaman Lagercrantz, Charles Beaman's granddaughter. The Saint-Gaudens Memorial donated the farm to the National Park Service in 2010.

A Site Management Plan is the much needed first step in the process of rehabilitating the buildings at the farm and creating a long-term strategy to protect and maintain the farm's cultural and natural resources. In addition, the plan will include conceptual plans for visitor use and interpretation, and identify the operational needs of the site.

Saint-Gaudens National Historic Site is also in the process of completing a National Register Nomination for Blow-Me-Down Farm. The nomination will be used to inform the planning team of the farm's significant resources as decisions about use, preservation, and maintenance are being made.

We would like to begin the consultation process set forth in 36 CFR Part 800 and the 2008 Programmatic Agreement for compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. We are initiating early consultation and advice to ensure that cultural resources are adequately considered in the planning process. We welcome your input at this early stage and will continue to seek your comments as the planning process advances.

The planning team held the first round of public meetings on July 7, 2011 at the Blow-Me-Down Farm and will continue to engage the public throughout the planning process. We anticipate developing

preliminary alternatives during the summer of 2011, moving to a Draft Site Management Plan/EA by winter 2011/2012, and a Final Plan/Decision Document in the spring of 2012. For additional information about the plan and upcoming meetings please visit <http://parkplanning.nps.gov/saga>.

We look forward to working with you on the Blow-Me-Down Farm/EA. If you have any questions or would like additional information, please contact me at 603-675-2175.

Sincerely,

A handwritten signature in cursive script that reads "Rick Kendall".

Rick Kendall,  
Superintendent







As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

United States Department of the Interior – National Park Service