



Roosevelt-Vanderbilt

National Historic Sites

Home of Franklin D. Roosevelt National Historic Site
Eleanor Roosevelt National Historic Site
Vanderbilt Mansion National Historic Site

National Park Service
U.S. Department of the Interior



Abbreviated Final General Management Plan / Environmental Impact Statement 2010



**Abbreviated Final General Management Plan
and Environmental Impact Statement
Roosevelt–Vanderbilt National Historic Sites
Hyde Park, New York**

Hyde Park, New York, is home to three national historic sites established by separate legislation: Home of Franklin D. Roosevelt National Historic Site; Eleanor Roosevelt National Historic Site (also known as Val–Kill); and Vanderbilt Mansion National Historic Site. The sites are combined into a single administrative unit, which is operated by one superintendent with one staff. Together the parks include over 1,100 acres of federally owned land along the east bank of the Hudson River.

The *Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS)* for Roosevelt–Vanderbilt National Historic Sites provides guidance for the three sites in Hyde Park. The draft plan was available for public and agency review from December 24, 2009 through February 28, 2010. The document presents and evaluates three alternatives. The No–Action Alternative would continue the current management direction. Action Alternative One would focus on restoring the historic appearance of the properties and encouraging visitors to explore more of the estate buildings and landscape. Action Alternative Two would seek to make the parks relevant to more audiences by encouraging greater civic participation in park activities, while significantly enhancing the historic character of park resources. Action Alternative Two is the National Park Service Preferred Alternative. The *Draft GMP/EIS* also assesses the potential impacts of the alternatives on cultural and natural resources, the visitor experience, park operations, and the socioeconomic environment.

This document is an *Abbreviated Final General Management Plan/ Environmental Impact Statement* for Roosevelt–Vanderbilt National Historic Sites. It responds to and incorporates the public and agency comments received on the *Draft GMP/EIS*. An abbreviated final GMP/EIS is used because the comments received require only minor responses and editorial changes to the *Draft GMP/EIS*. No changes have been made to the alternatives or to the impact analysis presented in the *Draft GMP/EIS*. Therefore, Action Alternative Two remains the National Park Service Preferred Alternative.

The public release of the *Abbreviated Final GMP/EIS* will be followed by a 30–day no–action period, after which a Record of Decision will be prepared to document the selected alternative and set forth any stipulations for implementation of the GMP. The *Abbreviated Final GMP/EIS* and the *Draft GMP/EIS* constitute the complete and final documentation upon which the Record of Decision will be based.

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Roosevelt-Vanderbilt

National Historic Sites

Home of Franklin D. Roosevelt National Historic Site
Eleanor Roosevelt National Historic Site
Vanderbilt Mansion National Historic Site

Abbreviated Final General Management Plan/ Environmental Impact Statement



TOP COTTAGE



HOME OF FDR



VANDERBILT MANSION



VAL-KILL



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Introduction

This document is an *Abbreviated Final General Management Plan/Environmental Impact Statement* for Roosevelt-Vanderbilt National Historic Sites. It is comprised of the NPS responses to public comments, errata detailing editorial changes to the *Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS)*, and copies of agency and substantive comment letters.

The *Draft GMP/EIS* for Roosevelt-Vanderbilt National Historical Sites was available for public and agency review from December 24, 2009 through February 28, 2010. Copies of the document were sent to individuals, agencies, and organizations (as listed on page 242 in Part Five) and were made available at the parks' visitor centers, the local library, and on the National Park Service (NPS) Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov>). In addition some 3,400 printed copies of a 16-page summary of the draft plan were distributed. Public open houses were held on January 28 and 29, 2010. Press releases, email notifications, and messages on the parks' nps.gov homepages were used to announce the availability of the document, as well as the public open house dates and times. Seventy-six commenters provided 185 comments on the *Draft GMP/EIS*.

This *Abbreviated Final GMP/EIS* responds to and incorporates the public and agency comments received on the *Draft GMP/EIS*. An abbreviated final GMP/EIS is used because the comments received require only minor responses and editorial changes to the *Draft GMP/EIS*. NPS Director's Order 12 Handbook, Section 4.6(D) defines minor as "making factual corrections, or explaining why comments do not warrant further agency response." No changes have been made to the alternatives or to the impact analysis presented in the *Draft GMP/EIS* as a result of public comments.

The public release of this *Abbreviated Final GMP/EIS* will be followed by a 30-day no-action period, after which a Record of Decision will be prepared to document the selected alternative and set forth any stipulations for implementation of the GMP. This *Abbreviated Final GMP/EIS* and the *Draft GMP/EIS* will constitute the complete and final documentation upon which the Record of Decision will be based.

Comments and Responses

The Superintendent received 76 pieces of correspondence in the form of letters (seven), emails (three), comment sheets from the public open houses (six), and electronic comments submitted through the NPS PEPC website (60).

Approximately one-third of the correspondence was “form letters” or correspondence from different people containing nearly identical content. Form letters were treated as unique pieces of correspondence, as some were personalized. One letter was received in duplicate.

The planning team carefully reviewed and considered each piece of correspondence received. From the correspondence, the planning team identified some 185 “comments” or statements about a particular issue. The team then categorized these comments as substantive or non-substantive as required by the Council on Environmental Quality guidelines. NPS Director’s Order 12 Handbook, Section 4.6(A) defines substantive comments “as those that do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS.
- Question, with reasonable basis, the adequacy of environmental analysis.
- Present reasonable alternatives other than those presented in the EIS.
- Cause changes or revisions in the proposal.

In other words, they raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives or comments that only agree or disagree with NPS policy are not considered substantive.”

Responses are required for all substantive comments. Responses may also be provided for non-substantive comments that warrant clarification of NPS policy or the content of the *Draft GMP/EIS*. In this *Abbreviated Final GMP/EIS*, responses are provided for substantive comments as well as for non-substantive comments that warrant clarification. All agency correspondence and correspondence containing substantive public comments are reprinted in full in Appendix B. A full set of the correspondence is available upon request.

All commenters who identified a preference identified Action Alternative Two (the Preferred Alternative) as their preferred option. Many commenters stated support for particular components of the Preferred Alternative. There were no statements of support or preference for Action Alternative One or the

No-Action Alternative. Topics on which multiple comments were received include: recreational use, trail volunteers, regional trails, cultural landscapes, and educational programs.

Substantive Comments Requiring Responses

The following section summarizes the substantive comments received and presents the corresponding NPS response. The correspondence for each of the substantive comments is reprinted in its entirety in Appendix B.

Topic: Coastal Management Program Consistency

Comment: The New York State Department of State (NYSDOS) commented that, because the General Management Plan (GMP) must comport with NYS Coastal Management Program (CMP) policies and purposes, the National Park Service should certify whether or not the GMP is consistent with the NYS CMP policies. The agency stated that GMP/EIS should provide a brief analysis of how the plan is consistent with those policies and should indicate that any Federal actions within the Coastal Zone Management Area are required to be reviewed by the NYSDOS for consistency with the State's coastal policies and if those actions are not consistent then the actions cannot proceed. In addition, because portions of the parks are situated within three subunits of the New York Scenic Areas of Statewide Significance (SASS), the agency stated that the GMP/EIS should provide a description and analysis of the three subunits in consideration of any action to protect the views to and from the national historic sites.

NPS Response: On March 26, 2010, the NPS transmitted to the NYSDOS a CMP consistency determination, including the analysis of three subunits of the SASS related to viewshed protection. The NPS determined and certified that the GMP and its approval and implementation will not hinder achievement of any of the applicable coastal policies in Article 42 of the State Executive Law and 19 NYCRR Part 600.5 and the approval and implementation of the plan will comply with, be undertaken in a manner consistent with, and will advance the relevant enforceable policies of the CMP, including those related to the SASS. The NYSDOS issued a letter of concurrence to the Superintendent on April 7, 2010. The Final GMP/EIS includes, via errata, the CMP consistency determination,

letter of concurrence, and clarifying language regarding CMP consistency, including protection of views related to the applicable subunits of the SASS (see “Errata” below). The NPS will continue to consult with the NYSDOS, as appropriate, as the GMP is implemented.

Topic: Impact Analysis

Comment: One commenter suggested that the *Draft GMP/EIS* should consider impacts to the community, such as increased traffic to each major entrance, and consider impacts of partner actions, such as partner use of the Vanderbilt Coach House.

NPS Response: As stated in the *Draft GMP/EIS* on page 165, the GMP/EIS is programmatic in character and presents an overview of potential impacts relating to each alternative. Impacts of potential actions affecting the Vanderbilt Coach House under each alternative are considered at various points in Part Four: Environmental Consequences, among them pages 179, 182, 200, 203, 207, 209, 211 and 216-217.

Regarding traffic impacts, as noted in the *Draft GMP/EIS*, a key issue confronting the parks is declining visitation (pages 26 and 138–141). The proposed efforts outlined in the plan to address this issue (e.g. offering a wider array of visitor experiences) are expected to slow or perhaps halt the downward trend, rather than result in major increases in visitation. Consequently, no substantial or even measurable increases in visitor-related traffic are expected.

Comment: One commenter stated, “It was mentioned that mountain bikes and ATVs [all-terrain vehicles] were responsible for introducing and spreading seeds of non-native invasive species but hiking boots are equally capable of carrying seeds. Mountain bicycling is more similar to hiking than motorized trail users.” The commenter goes on to say that, “Trail widening, trampling of trail side plants and social trail creation are not just the cause of mountain bikers. All user groups are guilty of this activity, especially if the trails are not meeting their needs or have erosion or water issues. Every use group has their own desires and will create trails to suit their needs.”

NPS Response: On pages 186, 196 and 197, the *Draft GMP/EIS* states that, “promoting recreational use of the trails,” could lead to increased trampling of vegetation, increased spread of invasive plant species, and disturbance and dispersal of wildlife and that, “construction of new trail segments,” would require removal of vegetation and result in increased fragmentation of habitat, dispersal of wildlife, and soil disturbance. The *Draft GMP/EIS* does not differentiate among types of non-motorized recreational use, except in the case of additional unauthorized trails. Pages 186 and 196 state that, “Allowing bicycle use on designated trails could result in new, informal, unauthorized trails to be opened in the forested areas of the parks.” This statement is based on the observation by park staff of the increased number of unauthorized trails on the lands the NPS acquired in 2007 used by bicycles. Please note that, as stated in the *Draft GMP/EIS* on page 165, the GMP/EIS is programmatic in character and presents an

overview of potential impacts relating to each alternative.

As noted on page 87, the *Draft GMP/EIS* proposes that park managers conduct a multi-use trail master plan to guide development and use of the trail system. The goal of the trail master plan is to develop a comprehensive, well-designed, sustainable trail system that provides a variety of visitor experiences which support the parks' missions.

Non-substantive Comments Warranting Clarification

The Superintendent received over 180 non-substantive comments from agencies, organizations, and individuals on the *Draft GMP/EIS*. As previously described, non-substantive comments do not require an agency response; however, the NPS believes that some of the non-substantive comments received warranted further clarification of NPS policy or of the information provided in the draft plan. The following section summarizes the non-substantive comments that warranted a response. The corresponding NPS response follows a summary of the comment.

The Superintendent also received non-substantive comments on the *Draft GMP/EIS* which warranted no clarification or response. Some of these comments were expressions of support for the Preferred Alternative or for a particular aspect of the Preferred Alternative. Others were citations of research or information provided in support of a particular issue, or suggestions for implementation.

Topic: Green Practices

Comment: The United States Environmental Protection Agency rated the draft document as "LO—Lack of Objections." They also commented that, "EPA would like to use this opportunity to encourage the National Park Service and the contractors on this project to implement green practices and techniques during the design and operation of the project. For example, Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product and would be an excellent approach to maintaining the historic look and feel of the park." EPA also suggested that the NPS should: reduce air emissions from diesel vehicles during construction by installing diesel particulate filters (DPF) on construction equipment; pursue energy efficiency, water conservation, and healthy indoor air quality during renovations; and obtain electricity from alternative and/or renewable sources.

NPS Response: The National Park Service supports sustainable design and development and incorporates factors like energy efficiency and waste reduction into agency decision-making. A statement on "Sustainable Design and Development" is found on page 239 in Part Five: Consultation and Coordination. In addition, the draft plan proposes (page 89) to reduce the parks' utility costs and carbon

footprint through conserving energy, increasing efficiency, relying more heavily on green sources of energy, and increasing use of alternative fuels.

Topic: Recreational Use

Comment: Many commenters voiced support for promoting recreational use of the parks. This topic received the most attention of any topic, as it was addressed by nearly 75% of the commenters. Most of the commenters who addressed this issue supported expansion of recreational opportunities on park trails specifically for bicycles. The following quotes represent the types of comments received on this topic:

“I think the areas open to the public should be used as much as possible for recreational activities, i.e. biking, hiking, canoeing, etc.”

“I support the expansion of recreational opportunities being proposed under Alternative 2 of the General Management Plan for Roosevelt-Vanderbilt Historical Sites, particularly where it pertains to mountain biking.”

“The idea of recreation based interpretation is a fantastic one for visitors of all ages.”

“I recommend using and enhancing the trail system so that bicycles could be used as the primary mode of transport about the estate.”

“I believe a well managed trail system should be permitted in these areas.”

“It would be nice to open up the carriage roads west of Rt 9 to bicycling. These are nice, open, fairly long trails that fit well for visitors that want to see the park and as much of it as possible.”

“What a great opportunity it would be to get local youth involved in a healthy recreational mountain bike experience which can also foster volunteerism, education, and responsibility at these magnificent Historic Sites.”

“I recommend studying this [trail] system and planning a proper mix of bicycle and walking trails and paths that show off the best features of the estate.”

“I would like to state that Mt Biking should be allowed again in the park and on all trails that are sustainable.”

NPS Response: The *Draft GMP/EIS* outlines the purposes for which the parks were established and describes the resources from which the parks derive their national significance (pages 14-15). It also identifies the primary themes which express the central meaning of park resources and which visitors should take away from their visit (pages 16-20). It is within this framework that the plan promotes compatible recreational use of trails as a way for people to experience more of the park resources and learn about park themes (pages 72, 87, 88, and 93).

As described on pages 148-149, visitors can experience the parks on foot, bike, cross-country skis, and snowshoe. Park guidelines allow bicycling

(including mountain bikes, as the NPS makes no distinction between types of bicycles), cross-country skiing, and snowshoeing on 1.7 miles of paved shared-use roads/trails and on the 1.8-mile unpaved shared-use Roosevelt Farm Lane. Hiking is allowed on all authorized trails. Equestrian and motorized uses are prohibited.

The draft plan proposes that the park staff manage trail uses to ensure protection of natural and cultural resources. It also proposes that park managers conduct a multi-use trail master plan along with appropriate historic resource studies, to guide development and use of the trail system (pages 87 and 88). The goal of the trail master plan is to develop a comprehensive, well-designed, sustainable trail system that provides a variety of visitor experiences which support the parks' missions. Please note that under current Federal regulation and Department of the Interior policy, any recommendation for bicycle use on pedestrian trails within the national historic sites will require the promulgation of a special regulation, a process which can take over one year.

Topic: Local Bike Group Volunteers

Comment: Many commenters suggested that park managers coordinate with local bike group volunteers to construct and maintain trails at Roosevelt-Vanderbilt. Most of these commenters suggested that the park staff work with a local affiliate of the International Mountain Biking Association, the "Fats in the Cats" bicycle club. The following quotes represent the types of comments received on this topic:

"There are a significant and active number of cyclists available to volunteer and reduce tax-payer expenditures for trails."

"Our local mountain biking community, Fats In The Cats, has been involved in activities in cooperation with the National Park Service and the International Mountain Biking Association on the FDR land in the past. We would welcome the opportunity to further develop a relationship with the National Park Service and other like minded civic groups in an effort to carry on the legacy of these properties while introducing more contemporary ways to do that."

"Mountain bike volunteers are willing to help the agency construct and maintain trails, bringing a new base of volunteer support to Roosevelt-Vanderbilt Historical Sites."

NPS Response: Volunteers are an essential part of the work of the parks and the Preferred Alternative seeks to increase partner and volunteer opportunities at Roosevelt-Vanderbilt (page 93). In 2009, 218 volunteers contributed 12,491 hours to maintenance and operations at the parks. Park managers appreciate the work that local bike group volunteers have already done at the park and welcome additional individual and organizational volunteers. Please contact Margaret Laffin, Volunteer Coordinator, or Dave Hayes, Natural Resource Specialist and Trail Coordinator, or consult the parks' websites to learn about volunteer opportunities.

Topic: Regional Trail Network

Comment: Several commenters voiced support for developing a regional trail network that could connect the parks with area attractions, including the recently completed and very successful “Walkway over the Hudson” and Norrie Point. The following quotes represent the types of comments received on this topic:

“If possible, a bike trail could be connected to the Walkway Over the Hudson on either side of the River. It would go from, say Norrie Point all of the way over the Walkway incorporating the Roosevelt-Vanderbilt area, making a great biking experience.”

“The huge success of the Walkway Over The Hudson could also benefit these national historic sites by creating trails that interconnect them in some fashion and attracting visitors to the national parks by trail access. This would promote positive healthy recreational activities that appeal to all age groups while also providing easy access to multiple attractions in the area.”

NPS Response: The *Draft GMP/EIS* proposes that park managers work with partners to create trail links among key attractions, such as Walkway over the Hudson and Mills-Norrie State Park (page 59). Please note that the NPS hopes to participate as a partner with the responsible agencies and organizations in the development of such trail links, but has no authority over trail development and use outside of park lands.

Comment: One commenter suggested that the NPS paint a bike lane on Route 9 between the national historic sites.

NPS Response: Please note that the NPS holds no real-estate interest or ownership of U.S. Route 9 (Albany Post Road) and would have no authority to develop a bike lane on the road. The authority to develop a bike lane on Route 9 rests entirely with the Town of Hyde Park and the New York State Department of Transportation. Park managers would support such an effort and would cooperate with responsible agencies as appropriate, if such agencies choose to establish a bike lane.

Topic: Part-time Personnel

Comment: One commenter suggested hiring more part-time personnel for every area—from education to support enhanced children’s educational programming to the curatorial building—to help accomplish required tasks that, at present, cannot be done because of time constraints in the course of the working day.

NPS Response: As described in the *Draft GMP/EIS* on pages 92 and 95, implementing the plan would involve filling staff positions as outlined in the existing target organization (about 10 positions have lapsed) and adding 4.5 full-time-equivalent positions. In addition, as described on page 93, plan implementation would involve working with partners to bring new expertise and resources to the parks, including personnel to support educational and other programs. Please note that, as described in the *Draft GMP/EIS* on pages 6 and

45, a GMP is a policy level document that outlines broad objectives and does not provide details regarding implementation or specifics about how positions will be filled or partner involvement structured.

Topic: Tourism Promotion and Partnerships

Comment: One person commented that the *Draft GMP/EIS* should stress local partnerships such as with the Town of Hyde Park, the Northern Dutchess Alliance, and Dutchess County among others, to increase tourism promotion as a part of their plans.

NPS Response: An overarching concept of the plan is to enhance and expand partnerships. Another component is to consider marketing and promotion of the national historic sites an ongoing park operational activity. Please see pages 54, 57, 58, 59, 73, 84, and 92 for references to areas of potential collaboration with local and regional agencies and organizations. As described on pages 58, 59 and 92, park managers are committed to collaborating with the Town of Hyde Park, Scenic Hudson, and the Hudson River Valley National Heritage Area and other entities to enhance regional tourism through the proposed Hudson Valley Welcome Center, as well as through other mechanisms, such as marketing and promotion, car-free access, trail networks, and thematic linkages. Also, please note that, as described in the *Draft GMP/EIS* (pages 6 and 45), a GMP is a policy-level document that outlines broad objectives. It does not provide specifics regarding implementation or partner roles.

Comment: One commenter noted, “What I didn’t see was a plan to advertise the parks. With the Walkway Over the Hudson now a proven tourist attraction and only a short distance away, it would seem that the ROVA sites could become part of a daytrip for local tourists or a destination vacation for visitors from more distant locales.”

NPS Response: As noted above, this comment supports a proposal of the plan: to consider marketing and promotion of the national historic sites an ongoing park operational activity (pages 58 and 92). The plan proposes to continue working with partners on a collaborative marketing effort, “Historic Hyde Park,” as well as to pursue new sources of funds and partners to enhance marketing through additional venues.

Topic: Property Acquisition Priorities

Comment: One commenter suggested that the *Draft GMP/EIS* mention the desirability of making priority property acquisitions when the opportunity presents itself (e.g. the Red House).

NPS Response: Please note that the full-text version of the *Draft GMP/EIS* provides more information on land protection than the summary of the draft plan (to which this comment refers). See the following pages in the *Draft GMP/EIS* regarding priorities for land protection and acquisition: Historic Setting (pages 54 and 78), the Red House (page 83), and maintenance facility (pages 57, 88, and 90). Pages 54 and 78 state that the NPS will continue to work with partners to protect

the remaining undeveloped Roosevelt Family Estate lands between Route 9 and Route 9G. Page 83 states that the NPS would seek full-fee or less-than-fee interest in the Red House. Pages 88 and 90 state that the NPS would seek an appropriate site for a new maintenance facility based on identified site selection criteria. Also, please see pages 98 and 99 under “Ideas Considered but Not Advanced for Further Analysis” regarding the infeasibility of NPS acquisition of the Hyde Park Mall and the remaining resources related to the Vanderbilt Farm.

Topic: Constructing a New Learning Center

Comment: One commenter questioned the advisability of constructing a new learning center at a time when visitation is in decline.

NPS Response: The *Draft GMP/EIS* proposes no new construction for the Learning Center. Instead, it states that historic outbuildings would be rehabilitated to support this function (pages 72, 87 and 90). Please note that while the overall visitation to the sites is trending downward, members of the public have expressed a great interest in more educational offerings. The plan proposes enhanced educational programming as one way to strengthen visitation.

Topic: Maintenance Backlog

Comment: One commenter expressed frustration at the apparent lack of progress in addressing maintenance needs and stated that they welcome any means that would provide additional resources for the NPS to address the maintenance backlog.

NPS Response: As described on in the *Draft GMP/EIS* on pages 25 and 28, one of the issues facing the park is the backlog of maintenance and preservation projects. While modest increases have been made to the park budget in the past few years, they are insufficient to overcome deepening shortfalls accruing over several decades from rising fixed costs (such as employee cost-of-living adjustments, retirement and health insurance benefits, and utility costs) and the greater costs of overcoming the effects of deferred maintenance and preservation. Operations increases, such as additional seasonal positions afforded as part of the “National Park Centennial Initiative” (a broad effort by the Department of the Interior to commemorate the 100th anniversary of the establishment of the NPS in 2016) and project funds, such as those provided through the American Recovery and Reinvestment Act have helped, but are not sufficient to remedy the outstanding backlog.

This is primarily why the draft plan seeks to explore and implement new and augmented sources of revenue to help support operations, maintenance, collections care, and provision of visitor services. The draft plan proposes to enhance existing partnerships and welcome new partners to bring new resources and expertise to the parks. The draft plan also encourages increased coordination among partners to enhance the capacity of the individual partner organizations so that they are better positioned to more fully serve the missions of the national historic sites.

Suggestions for Implementation

The Superintendent received suggestions from agencies, organizations, and individuals regarding implementation of resource management, administrative, maintenance, and interpretive operations. Detailed suggestions for implementation are not considered to be substantive under the definition provided by NPS Director's Order 12 Handbook, Section 4.6 (A). Detailed operational suggestions for implementation are more appropriately addressed on a day-to-day basis or in implementation plans rather than a GMP. Therefore, individual responses to these suggestions are not provided. The suggestions offered, however, were valuable and will be considered by park staff and partners as the plan is implemented.

Here are some examples of the suggestions received:

- Post the parks' interpretive tours on the parks' websites and on "YouTube," and announce park activities on the local cable access channel.
- Approach Cornell Cooperative Extension and the Poughkeepsie Farm Project (a non-profit group associated with Vassar College) to gauge their interest in partnering with the park to implement the agriculture related components of the *Draft GMP/EIS*.
- Seek agricultural partners that are driven by missions to support sustainable, low-impact farming methods, and that are committed to increasing awareness of issues.
- Provide bicycles to borrow, such as in Copenhagen where single speed bicycles are accessed via coin.
- Develop environmentally themed tours or podcasts with area educational and research institutions.
- Form partnerships with school districts, foundations, and the New York State Department of Environmental Conservation to conduct a national park laboratory, such as "Bridging the Watershed."
- Establish a summer day camp for elementary and middle school children implemented in small groups, with potential camp themes of ecology, farming, conservation, or forestry.

Errata

This section contains revisions and corrections to the *Draft GMP/EIS*. Some of these changes provide further clarification as a result of public comment. Others correct errors discovered after the publication of the draft. The combination of the *Draft GMP/EIS* and the *Abbreviated Final GMP/EIS*, including these errata, constitutes the complete and final record on which the Record of Decision will be based.

The revisions and corrections are listed below. Corrections to the text are presented first, followed by additions to the appendices and then corrections to the maps. The corrections are noted by page, paragraph, and sentence number. Changes are indicated by presenting the revised sentence with deleted text shown in ~~strikeout~~ and added text shown in underline.

Text Corrections

Page xv, first paragraph, first sentence:

This alternative calls for a significant expansion of partnership activities in the ~~management and~~ operation of the sites and opens up greater potential for new approaches to generating revenue to help sustain and improve operations.
[Correction to error discovered after the publication of the draft plan]

Page 32, fifth paragraph:

Add, after the first sentence: This portion of the national historic site also sits within ED-26 Franklin D. Roosevelt Home Entrance Subunit and ED-27 Franklin D. Roosevelt Home Subunit of the Estates District New York Scenic Area of Statewide Significance (SASS). *[Clarification resulting from public comment]*

Page 39, first paragraph:

Add, after the first sentence: It also sits within ED-24 Vanderbilt Mansion Subunit of the Estates District New York Scenic Area of Statewide Significance (SASS). *[Clarification]*

Page 70, third paragraph, first sentence:

This alternative foresees a significant expansion of partnership activities in the ~~management and~~ operation of the sites and opens up greater potential for new approaches to generating revenue to help sustain and improve operations.
[Correction]

Page 86, third column, second bullet, first sentence:

With partners, establish a program of changing exhibits in dedicated spaces (such as the HOFR Stables, Top Cottage bedroom wing, a portion of the ELRO Stable-Garage, and VAMA Coach House and Pavilion) to explore park themes from varying perspectives. *[Correction]*

Page 237, after second paragraph:

Add, after the existing paragraph under “Coastal Zone”: New York State has designated Scenic Areas of Statewide Significance (SASS). The SASS Estates District consists of the Hudson River and its shore lands and is divided into 29 subunits. Vanderbilt Mansion NHS is situated within the ED-24, Vanderbilt Mansion Subunit, and the Home of FDR NHS is situated within ED-26, Franklin D. Roosevelt Home Entrance Subunit and ED-27, Franklin D. Roosevelt Home Subunit. Whether within or outside of a designated SASS, proposed actions subject to review under federal or state coastal acts or a Local Waterfront Revitalization Program must be assessed to determine whether the action could affect and would be likely to impair a scenic resource.

[Clarification]

Additions to Appendices

The coastal management program consistency determination and letter of concurrence are appended in the Final GMP/EIS (see Appendix A of this document). *[Clarification]*

Map Corrections

Map, Page 7:

Delete the “Future Proposed Development” labels from the map: “Rivers Edge (Single Family Residential);” “Club at Hyde Park;” “Baker-Gagne Property (Commercial/Residential);” and “Stoneledge (Senior Housing).” *[Correction]*

Map, Page 74:

Revise text in the legend, under “Proposals,” last bullet: Rehabilitate for flexible-programming space/changing exhibits and retain a portion for maintenance. *[Correction]*

Maps, Pages 7, 47, 63, 69, 75, 106-107, 127, 129:

Revise text in the legends: Historic Roosevelt Family Estate: (NPS acquisition-authorized boundary) *[Correction]*

Appendices

Appendix A: Coastal Consistency Determination and Letter of Concurrence

**Department of the Interior Coastal Consistency Determination
Pursuant to 15 CFR Part 930, Subpart C
of the Roosevelt-Vanderbilt National Historic Sites
General Management Plan**

Summary

The National Park Service has prepared a draft General Management Plan/ Environmental Impact Statement for the three national historic sites in Hyde Park, New York: Home of Franklin D. Roosevelt National Historic Site, Eleanor Roosevelt National Historic Site, and Vanderbilt Mansion National Historic Site. The three sites embrace over 1,000 acres of land on the east bank of the Hudson River in Dutchess County. The National Park Service manages the three sites as a single administrative entity: Roosevelt-Vanderbilt National Historic Sites.

The primary function of a general management plan is to define clearly the purposes of the parks and their management direction. The general management plan provides a foundation to guide and coordinate all subsequent planning and management and takes the long view, 20 years into the future.

Portions of Roosevelt-Vanderbilt lie within New York State's designated Coastal Zone Management Area: Vanderbilt Mansion National Historic Site and the portion of the Home of FDR National Historic Site located to the west of US Route 9 (Albany Post Road). In addition, Vanderbilt Mansion NHS and the western portion of the Home of FDR NHS are within the New York Scenic Area of Statewide Significance (SASS) Estates District.

Any Federal actions within the Coastal Zone Management Area are required to be reviewed by the New York State Department of State for consistency with the State's coastal policies. If those actions are not consistent, then such actions cannot proceed. Whether within or outside a designated SASS, all proposed actions subject to review under Federal and State coastal acts or a Local Waterfront Revitalization Program must be assessed to determine whether the action could affect a scenic resource and whether the action would be likely to impair the scenic beauty of the scenic resource.

The general management plan for Roosevelt-Vanderbilt was developed by a team of NPS planning professionals, subject matter experts, and park staff. The planning team also consulted with technical staff from within the NPS and from other agencies. Public scoping for the plan began in December

2005. Consultation with the New York State Historic Preservation Office and tribal interests was initiated in December 2005 and January 2006. Input from natural resource specialists was sought at the outset of the planning effort and consultation with the U.S. Fish and Wildlife Service was initiated in December 2008. The draft plan was made available for public comment for over sixty days, beginning in December 2009 and concluding in February 2010. The Final General Management Plan is expected to be released for the 30-day No-Action period in the fall of 2010.

Summary Coastal Policy Analysis

The general management plan provides the conceptual framework and guidance for more specific planning, design, and implementation activities that will advance the purposes of the parks. The plan is consistent with the applicable enforceable policies of the New York State Coastal Management Program. The applicable enforceable policies include: Fish and Wildlife Policy 7; Flooding and Erosion Policies 11, 14 and 17; Public Access Policies 19 and 20; Recreation Policy 21; Historic Resource and Visual Qualities Policies 23, 24, and 25; Agricultural Lands Policy 26; Air and Water Quality Policy 37 and 41; Wetlands Policy 44. The plan is also consistent with applicable coastal policies in Section 912 of Article 42 of the State Executive law and implementing regulations in 19 NYCRR Part 600.5 relating to development and appropriate uses and protection of the coastal area and its resources.

Summary Scenic Areas of Statewide Significance Analysis

New York State has designated areas with statewide significance for their scenic value: Scenic Area of Statewide Significance (SASS). The SASS Estates District consists of the Hudson River and its shore lands. The Estates District is divided into 29 subunits, which together constitute a landscape of national and international significance. Vanderbilt Mansion NHS is situated within the ED-24, Vanderbilt Mansion Subunit, and the Home of FDR NHS is situated within ED-26, Franklin D. Roosevelt Home Entrance Subunit and ED-27, Franklin D. Roosevelt Home Subunit.

The Historic Resources and Visual Quality policies 24 and 25 provide guidance for proposed actions that may affect the scenic quality of these coastal areas. Policy 24 requires that agencies determine if a proposed action would be likely to impair the scenic beauty of an identified SASS resource and sets forth certain siting and facility-related guidelines to be used to achieve the policy. Policy 25 involves areas outside of a designated SASS, but which contribute to the overall scenic quality of the coastal area. It requires that agencies

ensure that proposed actions will be undertaken so as to protect, restore or enhance the overall scenic quality of the coastal area.

The general management plan provides the conceptual framework and guidance for more specific planning, design, and implementation activities that will advance the purposes of the parks. The plan is consistent with the applicable enforceable policies of the New York Scenic Area of Statewide Significance policies 24 and 25.

Determination and Certification

The National Park Service has reviewed and assessed the General Management Plan and Environmental Impact Statement for Roosevelt-Vanderbilt National Historic Sites pursuant to the consistency provisions of the federal Coastal Zone Management Act and its implementing regulations in 15 CFR Part 930. Based on that review and assessment and the preceding information, and given the purposes of the Act, and the applicable Coastal Management Program policies, the National Park Service has determined and certifies that:

The General Management Plan and its approval and implementation will not hinder achievement of any of the applicable coastal policies in Article 42 of the State Executive Law and 19 NYCRR Part 600.5 and the approval and implementation of the plan will comply with, be undertaken in a manner consistent with, and will advance the relevant enforceable policies of the Coastal Management Policy, including those related to the Scenic Areas of Statewide Significance.



STATE OF NEW YORK
DEPARTMENT OF STATE
ONE COMMERCE PLAZA
99 WASHINGTON AVENUE
ALBANY, NY 12231-0001

DAVID A. PATERSON
GOVERNOR

LORRAINE A. CORTÉS-VÁZQUEZ
SECRETARY OF STATE

April 7, 2010

Ms. Sarah Olson, Superintendent
United States Dept of the Interior
National Park Service
Roosevelt-Vanderbilt National Historic Sites
4097 Albany Post Road
Hyde Park, New York 12538

Re: F-2010-0288(DA)
National Park Service
General Management Plan for the Roosevelt-
Vanderbilt National Historic Sites
Town Hyde Park, Dutchess County
Negative Determination

Dear Ms. Olson:

On April 2, 2010, the Department of State received the National Park Service's negative determination and supporting information for the above referenced activity. Based on the information provided, the Department concurs with your determination that the General Management Plan for the Roosevelt-Vanderbilt National Historic Sites will not result in any reasonably foreseeable effects to land and water uses or natural resources of the coastal area. Further review of this activity by the Department of State is not necessary.

Thank you for providing this information to the Department of State. If you have any questions regarding this matter, please contact us at (518) 474-6000 and refer to our file # F-2010-0288(DA).

Sincerely,

Jeffrey Zappieri
Supervisor, Consistency Review Unit
Office of Coastal, Local Government
and Community Sustainability

JZ/jr/dc

Appendix B: Agency and Substantive Correspondence

This appendix presents copies of correspondence received from government agencies and correspondence which contains substantive comments. Additional correspondence is available upon request. As noted above, all substantive comments have been addressed in this *Abbreviated Final GMP/EIS*.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1868

FEB 22 2010

Superintendent Sarah Olson
National Park Service
Roosevelt Vanderbilt National Historic Sites
4097 Albany Post Road
Hyde Park, NY 12538

Rating: LO-1

Dear Superintendent Olson:

The Environmental Protection Agency (EPA) has reviewed the draft General Management Plan and Environmental Impact Statement (draft GMP/EIS) issued by the National Park Service, Department of Interior (NPS/DOI) for the Roosevelt-Vanderbilt National Historic Sites, New York (CEQ # 20090438). This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C 7609, PL 91-604 12 (a), 84 Stat. 1709), the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's regulations for implementing NEPA (40 CFR Parts 1500-1508).

The draft GMP/EIS analyzed the potential environmental impacts over the next 20 years of the proposed general management plan for the National Historic Sites. The analysis assesses three alternatives, including the no action alternative. The proposed alternative is intended to make the sites relevant to more audiences by encouraging greater civic participation in park activities while significantly enhancing the historic character of park resources. The proposed alternative covers the three units of the National Park System that comprise Roosevelt-Vanderbilt National Historic Site: the Franklin D. Roosevelt National Historic Site; the Eleanor Roosevelt National Historic Site, and the Vanderbilt Mansion National Historic Site. The primary issues include preservation and treatment of cultural resources, provision of visitor services, and partnership opportunities.

EPA's comments are below:

- Based on the information in the draft GMP/EIS, EPA would like to use this opportunity to encourage the National Park Service and the contractors on this project to implement green practices and techniques during the design and operation of the project. For example, Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product and would be an excellent approach to maintaining the historic look and feel of the park.
<http://www.epa.gov/nps/lid/>

Internet Address (URL) • <http://www.epa.gov>

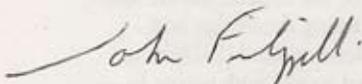
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 50% Postconsumer content)

- Air emissions from diesel vehicles and equipment during operation and construction will include particulate matter (PM_{2.5} and PM₁₀). To reduce the potential health and environmental impacts of these pollutants in the park area and to improve the conditions for workers, the installation of diesel particulate filters (DPF) on construction equipment should be considered. DPFs can reduce diesel particulate emissions by 90 percent for stationary and non-stationary diesel equipment. To learn more about this technology and its application, you may reference DPFs at <http://www.epa.gov/oms/retrofit/nonroad-list.htm> or contact us directly.
- Several building and operations features offering multiple benefits, including energy efficiency, water conservation, and healthy indoor air quality, should be considered during renovations. Applying building rating systems and tools, such as Energy Star, Energy Star Indoor Air Package, and Water Sense can significantly reduce the environmental footprint of the park. The following link identifies and explains these opportunities. <http://www.energystar.gov/>.
- To meet electrical needs during construction and operation, EPA recommends obtaining electricity from alternative and/or renewable sources. The U.S. Department of Energy offers the newly developed Renewable Energy Incentive Program. The program provides incentives and support services needed for participants to build renewable energy projects using solar, wind and biopower technologies. In addition, the Department of Energy's "Green Power Network" (GPN) provides information, markets and technical assistance that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy in New York:
http://apps3.eere.energy.gov/greenpower/buying/buying_power.shtml?state=NY.

Based on our review, we have rated this draft GMP/EIS as LO-1 indicating Lack of Objection - Adequate Information. Enclosed are a rating system sheet and some additional greening recommendations that may be applicable to this project.

Thank you for the opportunity to comment on the DEIS. If you have any questions, please call Charles Harewood of my staff at (212) 637-3753.

Sincerely yours,



John Filippelli, Chief
Strategic Planning and Multi-Media Programs Branch

Enclosures

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION
Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analysis, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

U.S. EPA Region 2 Green Recommendations¹

Recommendations:

To the maximum extent possible, projects are encouraged to use local and/or recycled materials; to recycle materials generated onsite; and to utilize low emissions technology and fuels. Further, they should use, to the extent feasible, renewable energy (including, but not limited to solar, wind, geothermal, biogas, and biomass) and energy efficient technology in the design, construction, and operation of transportation, building, and infrastructure projects.

- **ENERGY STAR/Multi-media green building and land design practices**
Require green building practices which have multi-media benefits, including energy efficiency, water conservation, and healthy indoor air quality. Apply building rating systems and tools, such as Energy Star, Energy Star Indoor Air Package, and Water Sense for stimulus funded building construction. Third party high-bar, multimedia standards should be required for building construction and land design (LEED and Sustainable Sites Initiative, Collaborative for High Performance Schools (CHPS), or local equivalent).
<http://www.usgbc.org/DisplayPage.aspx?CMSPageID=64>
http://www.energystar.gov/index.cfm?c=business.bus_bldgs
http://www.energystar.gov/index.cfm?c=bldrs_lenders_raters.nh_iap
- **Encourage water conservation in building construction**
Promote the use of water-efficient products to be used in new building construction through the use of WaterSense-labeled products and the use of contractors certified through a WaterSense-labeled program. <http://www.epa.gov/watersense/water/fed-agency.htm>
- **Encourage Low Impact Development to help manage storm water**
Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product. <http://www.epa.gov/nps/lid/>
- **Alternative and Renewable Energy**
The Department of Energy's "Green Power Network" (GPN) provides information and markets that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy. http://apps3.eere.energy.gov/greenpower/buying/buying_power.shtml?state=NJ

¹ "Green" here means environmentally sound practices in general and is not equivalent to the specific "green infrastructure" requirements in the American Recovery and Reinvestment Act (ARRA). Please note that this list is not meant to be all inclusive.

- Ensure clean diesel practices**
 Implement diesel controls, cleaner fuel, and cleaner construction practices for all on- and off-road equipment used for transportation, soil movement, or other construction activities, including:
 1) Strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and strict enforcement of idling limits;
 2) Use of ultra low sulfur diesel fuel in nonroad applications ahead of the mandate; and
 3) Use of the cleanest engines either through add-on control technologies like diesel oxidation catalysts and particulate filters, repowers, or newer, cleaner equipment
 Encourage entities to consider adopting contract specifications requiring advanced pollution controls and clean fuels. A model spec is online at (applies to both on and non-road engines):
<http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf>
 Additional Information: <http://www.epa.gov/diesel/construction/contract-lang.htm>
 How to guide: <http://www.mass.gov/dep/air/diesel/conetro.pdf>
- Promote the use of recycled materials in highway and construction projects**
 Many industrial and construction byproducts are available for use in road or infrastructure construction. Use of these materials can save money and reduce environmental impact. The Recycled Materials Resource Center has developed user guidelines for many recycled materials and compiled existing national specifications. <http://www.recycledmaterials.org/tools/uguidelines/index.asp>
<http://www.recycledmaterials.org/tools/uguidelines/standards.asp>
<http://www.epa.gov/osw/conserves/rrr/imr/index.htm>
- Encourage safe reuse and recycling of construction wastes**
 Promote reuse and recycling at the 50% (by weight) level for building, road, and bridge project construction and demolition debris wastes. The *Federal Green Construction Guide for Specifiers* includes a construction waste management specification.
http://www.wbdg.org/design/greenspec_msl.php?s=017419
- Encourage sustainable storm water management at building sites**
 Implement site planning, design, construction, and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the building site with regard to the temperature, rate, volume, and duration of flow.
http://efpub.epa.gov/npdes/home.cfm?program_id=298
 Consider designs for storm water management on compacted, contaminated soils in dense urban areas:
<http://www.epa.gov/brownfields/publications/swdp0408.pdf>.
- Encourage cost-efficient, environmentally friendly landscaping**
 EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. Designed to help preserve natural resources and prevent waste and pollution, GreenScapes encourages companies, government agencies, other entities, and homeowners to make more holistic decisions regarding waste generation and disposal and the associated impacts on land, water, air, and energy use. <http://www.epa.gov/osw/conserves/rrr/greenscapes/index.htm>
- Incorporate onsite energy generation and energy efficient equipment upgrades into projects at drinking water and wastewater treatment facilities**
 Promote the use of captured biogas in combined heat and power systems and/or renewable energy (wind, solar, etc.) to generate energy for use onsite as well as upgrades to more energy efficient equipment (pumps, motors, etc.)
http://www.epa.gov/waterinfrastructure/bettermanagement_energy.html

- **Encourage land development in brownfield and infill sites**
 Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. These sites are often "infrastructure-ready," eliminating the need to build new roads and utility lines which are necessary in undeveloped land. <http://www.epa.gov/brownfields/>
- **Use the Integrated Design process on building developments**
 Current procurement practices tend to separate out development into distinct stages that discourage communication across the project lifecycle. The Integrated Design process calls for the active and continuing engagement of all stakeholders throughout the building design, development, and construction phases including the owners, architects, engineers, building department officials, and other professionals. This process can help create a higher performing building at lower costs, allows for various building systems to work together, eliminates redundancy from overdesign and unnecessary capacity, and minimizes change orders during the construction phase. We encourage revising procurement practices so that it can use the Integrated Design process. http://www.wbdg.org/design/engage_process.php
- **Encourage use of Smart Growth and transit oriented development principles**
 Smart Growth and transit oriented development (TOD) principles help preserve natural lands and critical environmental areas, and protect water and air quality by encouraging developments that are walkable and located near public transit. <http://www.epa.gov/smartgrowth>
- **Ensure environmentally preferable purchasing**
 Promote markets for environmentally preferable products by referencing EPA's multi-attribute Environmentally Preferable Purchasing guidance. <http://www.epa.gov/epp>
- **Purchase 'green' electronics, and measure their benefits**
 Require the purchase of desktop computers, monitors, and laptops that are registered as Silver or Gold products with EPEAT, the Electronics Product Environmental Assessment Tool (www.epeat.net). Products registered with EPEAT use less energy, are easier to recycle, and can be more easily upgraded than non-registered products. Energy savings, CO₂ emission reductions, and other environmental benefits achieved by the purchase, use and recycling of EPEAT-registered products can be quantified using the Electronics Environmental Benefits Calculator (<http://eerc.ra.utk.edu/ccpct/eebc/eebc.html>).
- **Incorporate greener practices into remediation of contaminated sites**
 Encourage or incentivize the use of greener remediation practices, including designing treatment systems with optimum energy efficiency; use of passive energy technologies such as bioremediation and phytoremediation; use of renewable energy to meet power demands of energy-intensive treatment systems or auxiliary equipment; use of cleaner fuels, machinery, and vehicles; use of native plant species; and minimizing waste and water use. <http://cluoin.org/greenremediation/index.cfm>



Franklin D. Roosevelt Library

4079 Albany Post Road, Hyde Park, NY 12538-1917

February 22, 2010

Sarah Olson, Superintendent
Roosevelt-Vanderbilt National Historic Sites
4097 Albany Post Rd.
Hyde Park, NY 12538

Dear Sarah,

On behalf of the Franklin D. Roosevelt Presidential Library and Museum, I congratulate you on the 2009 General Management Plan that has been prepared to guide the development of the NPS site here in Hyde Park. It is an impressive and thorough document and presents a clear picture of the opportunities and challenges ahead.

I agree that Action Alternative Two is a forward-looking plan and one that has great appeal for its diversity of programming centered around the landscape. The Hudson Valley today is prized for its environmental awareness and broad swaths of open space. The National Park Service can greatly enhance public understanding of this land, how it was used historically, and how recreational use today complements contemporary educational and environmental best practices.

I look forward to working with you and your staff in partnership on programs and development projects that are mutually supportive in the years to come.

Sincerely,

CYNTHIA M. KOCH, Ph.D.
Director



**New York State Office of Parks,
Recreation and Historic Preservation**

Historic Preservation Field Services Bureau • Peebles Island, PO Box 189, Waterford, New York 12188-0189
518-237-8643
www.nysparks.com

David A. Paterson
Governor

Carol Ash
Commissioner

February 26, 2010

Sarah Olson, Superintendent
Roosevelt-Vanderbilt National Historic Sites
4097 Albany Post Road
Hyde Park, NY 12538

Re: **NPS**
Roosevelt-Vanderbilt Draft
General Management Plan
Hyde Park, Dutchess County
10PR00219

Dear Ms. Olson:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the submitted Draft Management Plan (Draft Environmental Impact Statement) in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

Based upon our review of the submitted General Management Plan, it is the SHPO's opinion that our office can support the goals, findings and direction of the submitted report: we believe it is an important management tool that can help determine and promote the public use, future treatment and ultimate preservation of these numerous and pre-eminent resources under Park Service stewardship. Obviously, our office desires all work undertaken on these historic properties have a positive impact whether the specific project involves rehabilitation/restoration of an existing feature (e.g., clearing secondary plant material to reclaim lost historic views), expanding interpretive options (e.g., opening Vanderbilt Coach House to public) or a new structure (e.g., proposed maintenance facility). We find that the preferred alternatives to various project initiatives presented in the report to be both reasonable and appropriate. Although we can not offer our formal opinion under Section 106 for projects until we have reviewed the specific details, these reviews have not been an issue between our offices.

Thank you again for the opportunity to offer comment on the General Management Plan. The report will allow us an opportunity to anticipate upcoming review issues and to hopefully avoid potential problems. We acknowledge and appreciate the effort that went into developing and preparing the report and we believe it will soon begin to pay dividends once the projects under consideration are initiated. If you have any questions, please feel free to contact me. Ext. 3273.

Sincerely,

Kenneth Markunas
Historic Sites Restoration Coordinator

Name:

Jaime A. Ethier

Organization:

NYS Department of State

Organization Type:

I – Unaffiliated Individual

Address:

99 Washington Avenue
Albany, NY 12231
USA

Date Sent:

02/26/2010

Date Received:

02/26/2010

Number of Signatures:

1

Contains Request(s):

No

Form Letter:

No

Type:

Web Formw

Notes:

The New York State Department of State (NYSDOS) appreciates this opportunity to review and comment on the Draft General Management Plan/Environmental Impact Statement (GMP/EIS) for the Roosevelt-Vanderbilt National Historic Sites. As the NYSDOS administers the New York State Coastal Management Program (CMP) as part of the implementation of the federal Coastal Zone Management Act of 1972 we reviewed this General Management Plan/Environmental Impact System with consideration to the New York State coastal management program and policies and other related programs.

The General Management Plan participants are to be commended for creating a plan framework that addresses sustainable stewardship and interpretation of the sites' historical and natural landscape assets and supporting ancillary structures. This General Management Plan sets a precedent—it will lead the historical estate house museums in the Hudson River Valley to take the first steps for the long-overdue interpretation of agricultural and viewshed management practices that were carried out at the estates. The proposed plan seeks to treat historical landscapes as central to interpretation of life at the estates by re-introducing the productive, cost-neutral, or revenue-generating agricultural and horticultural estate functions and incorporating them as features of the visitor experience.

While there is no specific requirement under NEPA to provide a review and analysis of State Coastal Policy regarding the effects of the General Management Plan for the Roosevelt-Vanderbilt National Historic Site, this project is a federal action within the New York State Coastal Management Area. Therefore the General Management Plan and all its component projects are subject to the provisions of the Coastal Zone Management Act of 1972. Because the General Management Plan must comport with NYS Coastal Management Program policies and purposes, the National Park Service should certify whether or not the General Management Plan is consistent with the NYS CMP policies.

Although the Coastal Zone Management Act is referenced on page 237 of Part 5– Coordination and Consultation, and Part 1– Foundation for Planning indicates that “the portion of the national historic site located to the west of Route 9 is situated within the New York State’s designated coastal zone management area” and that “all proposed activities for this portion of the park must be consistent with the state’s coastal zone management program policies” the GMP/EIS should also provide a brief analysis of how the GMP is consistent with those policies. The GMP/EIS should also indicate that any Federal actions within the Coastal Zone Management Area are required to be reviewed by the NYSDOS for consistency with the State’s coastal policies and if those actions are not consistent then the actions cannot proceed.

Furthermore, as the Vanderbilt Mansion NHS sits within the ED-24 Vanderbilt Mansion Subunit of the Estates District New York Scenic Area of Statewide Significance (SASS) and the Home of Franklin D. Roosevelt NHS sits within ED-26 Franklin D. Roosevelt Home Entrance Subunit and ED-27 Franklin D. Roosevelt Home Subunit, also of the Estates District Scenic Area of Statewide Significance, the GMP/EIS should provide a description and analysis of these three important subunits of the SASS related to viewshed analysis and in consideration of any action to protect the views to, and from, the Historic Sites. More information on the SASS subunits can be found at the NYSDOS’s Coastal Resources website at http://nyswaterfronts.com/SASS/PDF/Estates_District.pdf.

Again, thank you for this opportunity to comment on the *Draft GMP/EIS*.

Roosevelt - Vanderbilt

National Historic Sites

Name of Franklin D. Roosevelt National Historic Site
Theodore Roosevelt National Historic Site
Vanderbilt Mansion National Historic Site

National Park Service
U.S. Department of the Interior



General Management Plan Open House January 28th and 29th 2010

Any comments you'd like to share with the planning team?

NEED TO CONSIDER IMPACTS TO COMMUNITY SUCH AS
INCREASED TRAFFIC TO EACH MAJOR ENTRANCE OVER
THE "GENERATION" TO THE END OF THE PLAN.

(INCLUDE PARTIAL IMPACTS - e.g., at COACH HOUSE)

Your reaction or suggestions on Action Alternative Two—the preferred alternative?

- Enhances historic character of the properties and continues historic land uses
- Provides a wider range of activities and programs to reach more varied audiences
- Brings new expertise and resources to the parks through significant expansion of partnership participation

I PREFER THIS ALTERNATIVE

The public comment period will conclude on February 28, 2010. To view the draft plan or submit additional comments, please visit: <http://parkplanning.nps.gov/rova>

Thank you for your input!

Name:

Michael Vitti

Organization:

Concerned Long Island Mountain Bicyclists

Organization Type:

I - Unaffiliated Individual

Date Sent:

02/28/2010

Date Received:

02/28/2010

Number of Signatures:

1

Form Letter:

No

Contains Request(s):

No

Type:

Web Form

Thank you for allowing comments for Hyde Park.

I am the president of Concerned Long Island Mountain Bicyclists, we are a non profit established in 1990. We have built and currently maintain over 150 miles of trails across the NYC Metro area. We like to travel to various trails for day trips. We would like to know the time frame when you anticipate the mountain bicycle trails will be opened again.

I read the draft report and have a few things for you to consider:

-It was mentioned that mountain bikes and ATVs were responsible for introducing and spreading seeds of non-native invasive species but hiking boots are equally capable of carrying seeds. Mountain bicycling is more similar to hiking than motorized trail users.

-Trail widening, trampling of trail side plants and social trail creation are not just the cause of mountain bikers. All user groups are guilty of this activity especially if the trails are not meeting their needs or have erosion or water issues. Every user group has their own desires and will create trails to suit their needs.

-Accepting input from the local mountain bikers (and other user groups) in trail design will help create an exciting trail that will more likely keep users on their specified trails. This will also give them a sense of ownership and will create a passion for maintaining that trail.

-Fragmentation is a relative term and single track trails that maintain the existing tree canopy create the least effect on fragmentation of habitat.

-Promoting the trails will create a beneficial effect on the economy as mountain bikers come to ride the trails and eat at the restaurant that is located right at the trailhead. I rode the trails once when they were opened then became dismayed when they closed without notice and I haven't returned since.

-Fats in the Cats and other bike clubs throughout the area would love to chip in on the maintenance of the trails. This would be a win-win for the local residents and the managers of the park, especially in these tough economic times.

-We support alternative 2, we have a lot of experience with negative use in parks and it is best to increase the people using the park for a positive recreational activity such as mountain bicycling. This brings in more eyes and ears into the park and creates stewardship opportunities.

Thank you for your time and consideration.

Happy trails,

Michael Vitti

CLIMB President

IMBA NY Rep

NY State Trails Council Delegate

The National Park Service cares for special places saved by the American people so that all may experience our heritage.

EXPERIENCE YOUR AMERICA!

