

## 1. PURPOSE AND NEED

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### 1.1 Introduction

The National Park Service (NPS) is proposing to take action to preserve the Wesleyan Chapel at Women's Rights National Historical Park and to enhance the visitor's experience while at the chapel. This Environmental Assessment and Assessment of Effect (EA/AoE) identifies five different alternatives that focus on the preservation and enhancement of the chapel. Each alternative is assessed for its overall effectiveness in achieving NPS goals and objectives – *to preserve the Wesleyan Chapel and to enhance the visitor experience*. Alternatives are also analyzed for potential adverse and/or beneficial impacts on the chapel, its setting in the surrounding community, and its historical context.

The EA/AoE has been prepared in compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and implementing regulations of the Council on Environmental Quality (40 CFR 1500-1508.9) (CEQ) and NPS Director's Order #12: *Conservation Planning, Environmental Impact Analysis and Decision-Making* and accompanying Handbook (2001) (DO-12). This EA/AoE has been prepared to also fulfill the requirements of Section 106 of the National Historic Preservation Act (NHPA), and implementing regulations of the Advisory Council on Historic Preservation (36 CFR Part 800) (ACHP), and NPS Director's Order #28: *Cultural Resources Management* (DO-28). This EA/AoE provides the decision-making framework in which a reasonable range of alternatives and their effects are presented and analyzed, and a strategy for the long-term preservation and enhancement of the Wesleyan Chapel is considered.

### 1.2 Background

Women's Rights National Historical Park (Park) was established in 1980 by Public Law 96-607. The park was established to preserve and interpret for the education, inspiration, and benefit of present and future generations the nationally significant historical and cultural sites and structures associated with the struggle for equal rights for women and to cooperate with state and local entities to preserve the character and historic setting of such sites and structures. A primary resource for the Park's mission is the Wesleyan Chapel located in Seneca Falls, NY.

The Wesleyan Chapel was one of the first churches built in the United States by the newly-formed Wesleyan Methodists. The Wesleyan Methodists welcomed anti-slavery and other reform speakers. The chapel was built to house religious observances and instruction and as a meeting place for discussions about social reforms. In the latter function, the chapel hosted the First Women's Rights Convention, which was held on July 19, and 20, 1848. Some 300 women and men participated in the convention and adopted the Declaration of Sentiments advocating social, political, economic and educational rights for women. The First Women's Rights Convention serves as the defining moment in the chapel's history that is celebrated at Women's Rights National Historical Park.

In 1985, the (NPS) purchased the building for inclusion in Women’s Rights National Historical Park and began architectural and structural studies. These studies included historical investigations and archival research reviews that involved the dismantling of the building’s newer additions in order to document and reveal the remaining sections of the Wesleyan Chapel dating from 1848, the year the First Women’s Rights Convention was held.

The studies indicated that the Wesleyan Chapel has hosted a variety of uses and has undergone many renovations since it was first established in 1843. Its initial use, the First Wesleyan Methodist Church, lasted for 29 years before the Wesleyans moved to a new facility. It was during this period that the First Women’s Rights Convention was held at the chapel. After the Wesleyan Methodists moved to a new facility in 1872 and the chapel passed into private hands, the structure underwent multiple renovations during the following years. The subsequent renovations greatly altered the building’s appearance and resulted in the removal of much of the building’s original structure.

The first remodeling of the chapel occurred in 1872 to accommodate two stores on the first floor and a public hall on the second floor. The original roof was raised approximately eight feet for the new second story and a two-story addition was built on the back side at this time. A second addition on the north end of the building was added in 1890 for a new stage and dressing rooms for the Johnson Opera House. In 1917, the building was remodeled for The Regent Theater, a movie house. Between 1919 and 1985, additional alterations were undertaken to serve the following uses: automobile garage/dealership, hall, offices, laundromat, garage, and apartments.

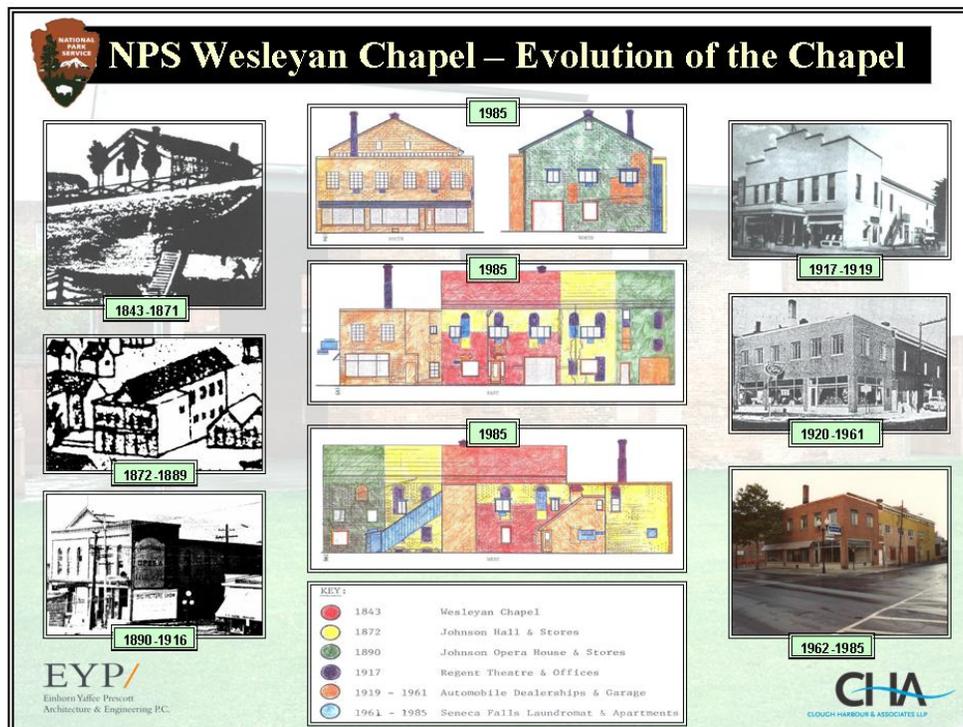


Figure 1: Architectural Evolution of Chapel

The sections of the original Wesleyan Chapel that were identified in the architectural and structural studies included portions of the eastern and western brick walls and four of the six original wooden roof trusses and roof sheathing boards. In 1987, the NPS held a national design competition to collect proposals on how to preserve and celebrate the remaining sections of the chapel. The winning design for the site exists today at Women’s Rights National Historical Park.

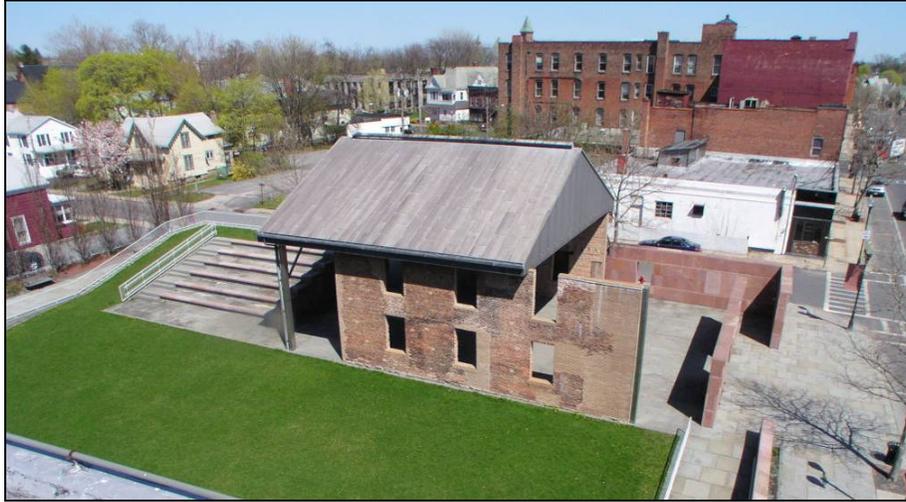


Figure 2: Current design of the Wesleyan Chapel

The winning design for the site, as executed in 1992-1993, the model for which is shown below, removed all components of the building post-dating 1848. The remaining roof and portions of the original east and west walls were carefully preserved and supported by a new structural system that included steel members and a sandstone anchor wall. The design also incorporated a natural grass amphitheater area that is skirted by a commemorative “water-wall” west of the chapel. A line of beech trees was aligned north of the chapel and a perennial garden was planted to the south. Collectively, these features form a commemorative site that celebrates the Women’s Rights Movement.

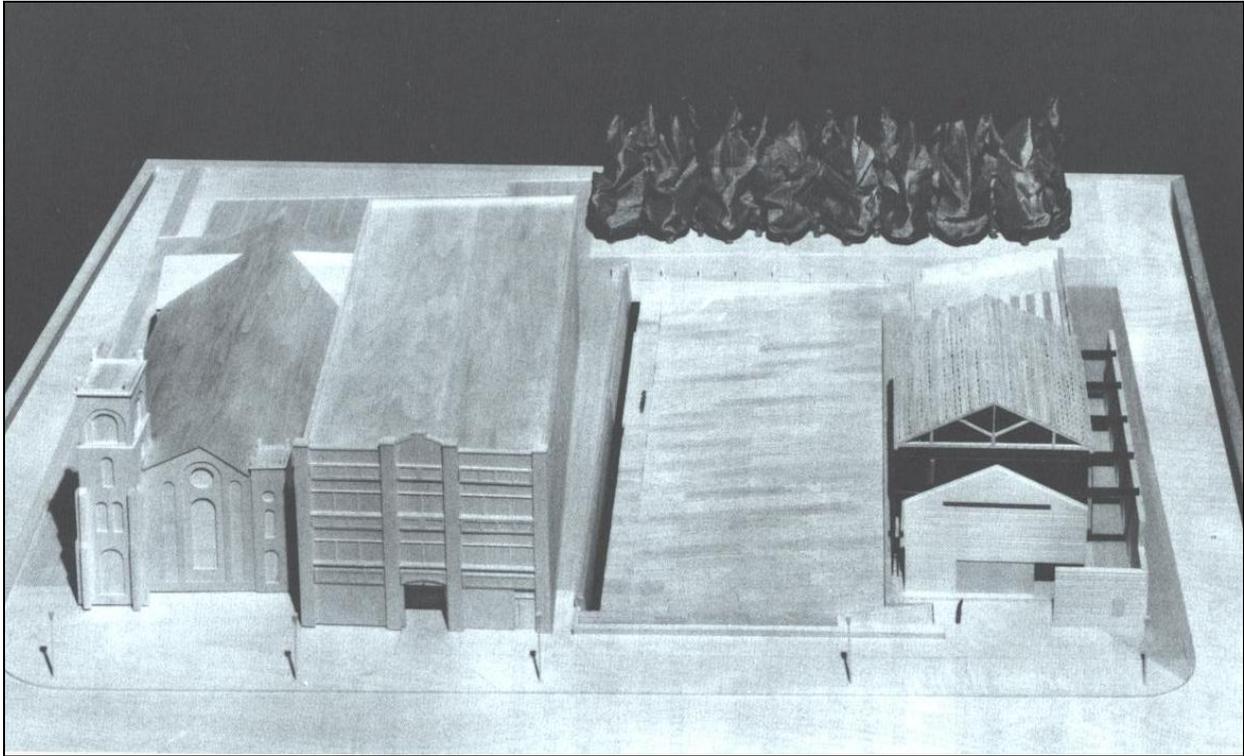


Figure 3: Winning Model of 1987 National Design Competition

Since the uncovering of the original walls and wooden roof in 1992-93, the remaining structure has entered into various stages of deterioration as a result of being exposed to the severe weather of Upstate New York. In addition to structural deterioration caused by environmental conditions, vandalism, nesting birds, and inappropriate use of the structure also threaten the long-term preservation of the chapel.

### **1.3 Project Location**

Located at 136 Falls Street in the Village of Seneca Falls, Seneca County, New York, the Wesleyan Chapel is approximately 50 miles east of the City of Rochester and 47 miles west of the City of Syracuse. The chapel is located within the central business district of the Village of Seneca Falls. The following map shows the location of the chapel within the heart of the Finger Lakes region.

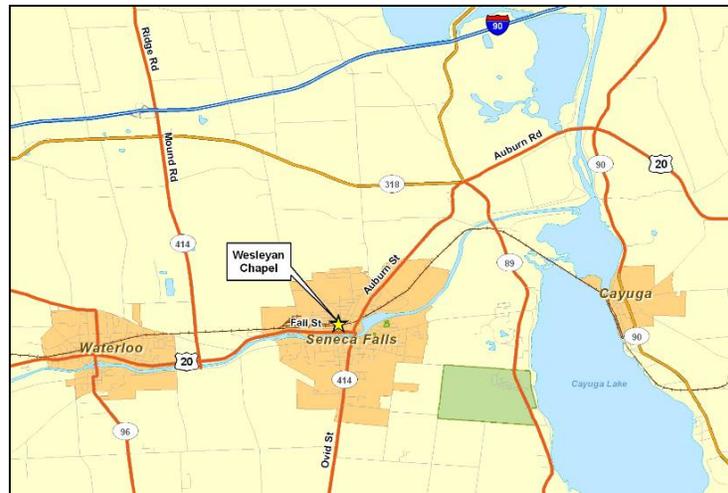


Figure 4: Map of Seneca Falls

The map below shows the location of the Wesleyan Chapel within the Seneca Falls Historic District.

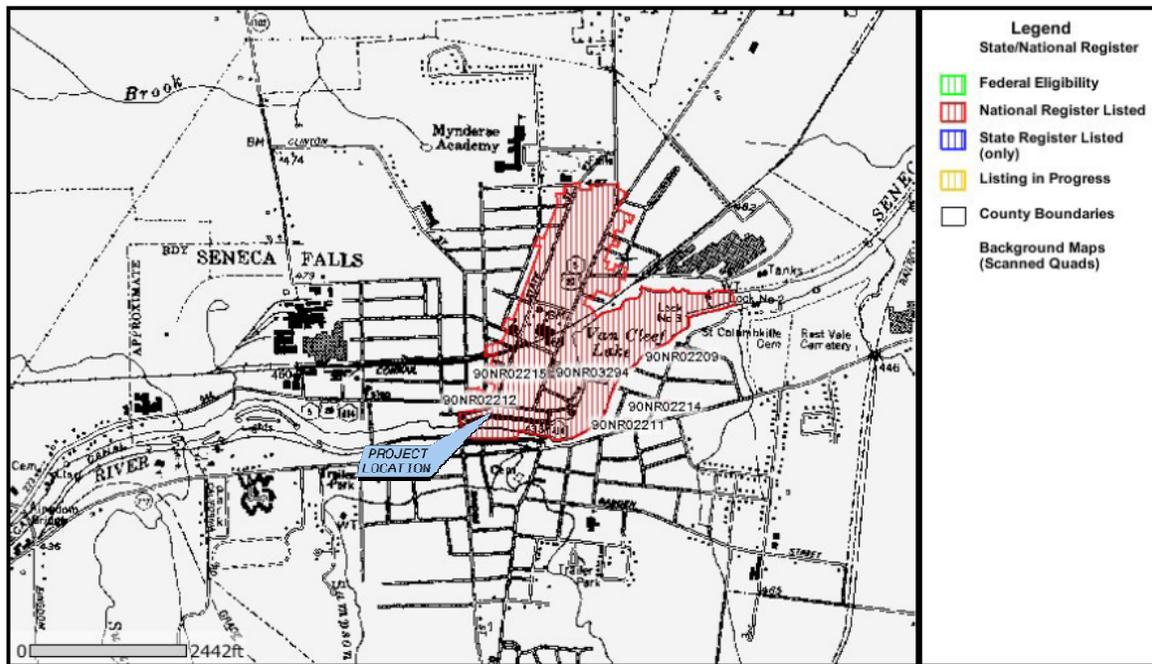


Figure 5: Location Map of Wesleyan Chapel in Seneca Falls Historical District

The Seneca Falls Village Historic District (historic district) was listed on the National Register of Historic Places in 1991. The district boundaries were drawn to include a cohesive concentration of remaining buildings, structures, and objects associated with the industrial, commercial, and residential growth of Seneca Falls between 1800 and 1930. The historic district retains a substantial degree of integrity in its collection of brick and frame commercial and residential buildings.

## 1.4 Purpose of the Action

The purpose of the proposed action is to decide the best way to protect the chapel from further deterioration and ensure the long-term preservation of the chapel so that it may remain as a celebrated symbol of the Women's Rights Movement that occurred during the mid-nineteenth century. Long-term preservation of the chapel would meet the goal of enhancing the visitor experience by mitigating traffic noise, discouraging vandalism and inappropriate use, and addressing problems associated with roosting and nesting birds inside the structure.

## 1.5 Need for the Proposed Action

The need for the action is to halt deterioration of historic fabric and reduce or eliminate inappropriate uses in order to improve visitor use and experience, as described in more detail below.

### *Historic Architectural Resources*

#### Deterioration of Historic Fabric

The Wesleyan Chapel, the primary historic resource of Women's Rights National Historical Park, is experiencing deterioration of its interior brickwork due to its environmental exposure. The rate of deterioration of the original bricks is of particular concern to the NPS. A number of preservation professionals have investigated the brick masonry conditions and concluded that the deteriorating bricks are "underfired" brick that were used on the interior of the chapel where historically they would be plastered and protected from the exterior environment. In August, 2002, 1:1:6 Technologies Incorporated completed a *Brick Investigation for the Wesleyan Chapel* for the NPS. Some of their findings were:

- The original bricks are deteriorating on an individual basis; those bricks that are deteriorating are those that were visibly deteriorating in 1994 photographs.
- Additional concerns are incompatible construction techniques bonding new brick to original brick.
- Six remnants of surviving plaster are becoming detached from the interior brick walls, as evidenced by gaps along the perimeter of the plaster. The entire bottom portion of the southern-most fragment on the west wall has fallen off (this could, in part, be due to vandalism).

Bird roosting and nesting has also been cited as an issue that affects the chapel's physical structure and has been cited as an issue that poses health and safety concerns for NPS staff and visitors. Birdproofing has been installed, but small gaps and nooks exist where smaller birds build nests which retain moisture against the historic fabric and allow staining and corrosion from bird droppings, which can negatively affect the chapel as an historic resource.

## Inappropriate Use

Vandalism and inappropriate use of the chapel have also been identified by NPS staff as issues that negatively affect the chapel as an historic resource. The chapel has experienced various forms of vandalism such as graffiti, physical damage to the structure, and littering. Inappropriate uses and activities have compromised the chapel's historic fabric.

## *Visitor Use and Experience*

## Noise

The Wesleyan Chapel is located within the Village of Seneca Falls on NY State Route 5 & 20. This route serves as the traditional main street business district for the Village. As a result, vehicular traffic, especially heavy truck traffic, produces loud noise that makes it difficult for visitors to hear interpretive tours of the site.

The Wesleyan Chapel is not an enclosed structure; its north and south walls are missing and its window openings are not glazed. As a result, noise from the surrounding environment is easily audible from "inside" the chapel.

Traffic noise levels within the chapel have been studied to quantify the impact on this resource. NPS worked with Jaffe Holden Acoustics (JHA) to evaluate the environmental noise at the chapel. On October 20<sup>th</sup> and 21<sup>st</sup>, 2005, JHA conducted a series of acoustic measurements in order to quantify noise levels due to street traffic. Several locations were measured within and around the chapel site.

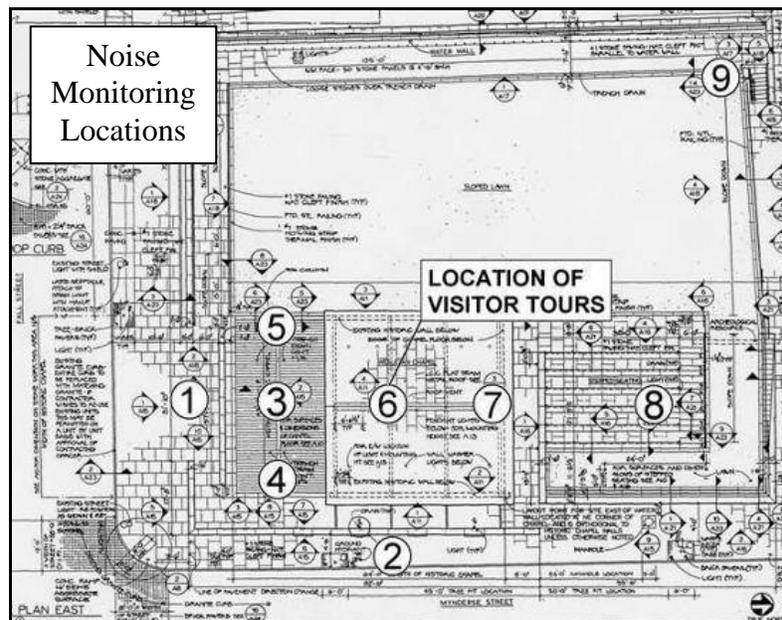


Figure 6: Noise Monitoring Locations

These measurements provided the baseline data from which the NPS can assess the effectiveness of each alternative at addressing noise impacts. The following list reflects a summary of the findings of the study:

- The majority of the problematic traffic noise was generated by heavy trucks (3 axles or more) on Fall Street. Traffic noise from Mynderse Street was virtually negligible.
- Traffic noise levels decrease only slightly as one moves farther away (north) from Fall Street. Once within the confines of the perimeter walls, between the chapel and Fall and Mynderse Streets, the traffic noise levels are somewhat uniform, even in areas that are better shielded from the street by stone walls.
- An interpreter begins the tour with a voice level 3db above the background noise. For half of the tour the interpreter's voice volume must be doubled and for 5% of the tour volume must be quadrupled or stopped.
- An unpenetrated physical barrier, 14 - 16 feet in height, extending along the full face of the chapel to the Visitor Center would be required to provide sufficient traffic noise attenuation for visitor tours to proceed uninterrupted.

### Visitor Understanding

There is a need to improve the interpretation of the chapel. Many visitors have indicated that they are unable to understand and interpret the current design of the site. Visitors have also stated that they feel that by leaving the historic fabric as a relic or unfinished structure, that the park is not celebrating the site appropriately.

### Inappropriate Use

Occurrences of inappropriate use and behavior have occurred within the chapel site and surrounding grounds since the chapel was developed by NPS as a commemorative site. Uses of the chapel and the surrounding grounds have included activities that range from biking, rollerblading, skateboarding, and people cutting through the site during interpretive tours, to activities that are illegal and are taking place mostly during the evening hours.

These inappropriate uses and activities of the chapel site and surrounding grounds have resulted in disruptions to interpretive tours, safety and security issues to visitors and park staff, and vandalism of the chapel and the surrounding site. According to NPS, there are seven (7) recorded instances of vandalism to the chapel since 1993.

In a March 9, 2006 letter to the NPS, Seneca Falls Police Chief Capozzi wrote:

*“Because of the layout of the open grass area being below street level and very difficult to see where the bleachers are erected, we have had individuals being able to conceal themselves from our Officers who are on patrol. Because the vision is obscured from street level inside the Wesleyan Chapel building, individuals are able to congregate and also vandalize the building while being concealed.”*

As a result of these inappropriate uses and vandalism, tours are disrupted and the long-term preservation of the chapel's historic fabric is compromised.

## **1.6 Scoping**

Scoping is an early and open process to determine the breadth of environmental issues and alternatives to be addressed in a NEPA document. Scoping is used to identify which issues need to be analyzed in detail and which can be eliminated from in-depth analysis. It also allocates assignments among the participating members and/or other participating agencies; identifies related projects and associated documents; identifies permits, surveys, consultations, and other requirements, and creates a schedule that allows adequate time to prepare and distribute the EA/AoE for public review and comment before a final decision is made. Scoping efforts include any staff, interested agency, or any agency with jurisdiction by law or expertise; for example including the State Historic Preservation Office, Tribal Historic Preservation Office, or U.S. Fish and Wildlife. Scoping may also include interested or affected organizations and individuals.

As issues have emerged that threaten the preservation of the chapel the NPS has taken steps to mitigate or further study them. The NPS conducted both internal scoping with appropriate NPS staff and external scoping with the public and interested and affected groups and public agencies concerned about the Wesleyan Chapel. Internal scoping was conducted by staff of the Women's Rights National Historical Park and resource professionals of the NPS's Northeast Regional office. In addition, the NPS solicited assistance from Einhorn Yaffee Prescott (EYP) Architecture & Engineering P.C. and Clough Harbour & Associates LLP (CHA) to help prepare this EA/AoE report and supporting information on alternatives. This interdisciplinary process defined the project's purpose and need, identified potential actions to address the need, determined what the likely issues and impact topics would be, and identified the relationship, if any, of the proposed action to other planning efforts that may directly/indirectly involve the chapel.

To begin the public scoping process, the NPS met with the New York State Historic Preservation Office (SHPO) on January 25, 2006, and mailed a scoping brochure describing the proposed action and soliciting comments to more than 450 people and agencies (stakeholders) in February, 2006. Copies of agency correspondence can be found in Appendix A. The brochure (also referred to as informational newsletter) provided background information about the significance of the chapel and its various uses over time. It also identified various issues currently confronting the Wesleyan Chapel and noted ways to provide the NPS with comments and concerns. The brochure is included as Appendix B in the EA/AoE.

A public scoping meeting was held March 8, 2006 and comments solicited through April 12, 2006. The meeting was held at the Women's Rights National Historical Park visitor center in Seneca Falls, New York. A separate scoping meeting for various local and regional public agencies was also held that day. Public agencies and potentially involved Native American tribes were also sent letters soliciting project comments.

An additional meeting was held on March 15, 2006 between the NPS and the original design team that was awarded the winning design for the commemorative park site developed in 1993. The purpose of this meeting was to inform the designers about current issues confronting the chapel, including those related to brick deterioration and visitor experience. Comments were solicited from the design team regarding additional concerns and are incorporated into the Issues and Concerns list found below.

NPS staff encouraged all agency representatives and the public to provide comments on the project using various forms of media. This included solicitation of public comments via the National Park Service Planning, Environment, and Public Comment (PEPC) website <http://parkplanning.nps.gov>. In addition, local newspapers and a Syracuse television station informed the public about the meetings and the need for the NPS to undertake some form of action relative to the Wesleyan Chapel. The public scoping process was designed to reach as many individuals across the country as possible.

During the public comment period, approximately two dozen people provided written comments through various media including mailings, e-mail and via the NPS website. Additional oral comments were solicited from the public during the public scoping meeting on March 8, 2006.

## 1.7 Issues

Issues and concerns expressed during scoping are categorized by several different areas of concern which include:

- 1.) *Cultural resource protection and structural issues relating specifically to the deterioration of historic materials.*
- 2.) *Interpretive issues relating to the visitor experience.*
- 3.) *Design issues relating to the appearance and functional use of the chapel.*

The following list outlines issues and opportunities identified during the public scoping process. The circular bullets represent issues and opportunities identified and discussed during the public scoping meeting. The triangular bullets outline additional issues and opportunities not already identified, but which were addressed in written comments received during the comment period.

- 1.) *Cultural resource protection and structural issues relating specifically to the deterioration of historic materials.*

- Long-term solutions to accelerating rate of brick deterioration
- Short-term treatment of brick deterioration
- Replacement of historic era bricks
- Placement of protective covering on interior brick
- Drainage improvements
- Construction-related issues
- Possible “encapsulation” of the chapel in another structure (protection from noise & weather)

- Encapsulation of the chapel or the chapel and the grounds in combination within a glass or transparent atrium
- Rebuilding the chapel as it was
- Placing window sashes in openings
- Creating new stainless steel truss and columns and extend roof to cover all walls with air curtains
- Covering soft bricks on the interior walls with plaster similar to the original covering (or a clear plaster)
  
- ▶ Utilizing security technology such as cameras (wired into police department's dispatch center), motion lights, locking doors, etc.
- ▶ Utilizing visitor center for discussion of the evolution of the chapel – alternative tour opportunities
- ▶ Repairing mortar and materials to match the low strength of the original materials, otherwise deterioration can occur
- ▶ Testing original mortar and match properties to new mortar; raking out and re-pointing joints using lime putty

## 2.) *Interpretive Issues*

- Complexity of the historic interpretation of the chapel
- Traffic noise, particularly increasing truck traffic and adverse disruptions on visitor experience, especially for those with hearing impairments
- Effective treatments for nesting birds
- Educational displays, audio tapes, self-guided tours
- Tourism opportunities
- Capturing the feeling of the convention
- Displaying models of the chapel
- Recording emotional testimonials, audio tapes and exhibits
  
- ▶ Providing law enforcement – a Park Ranger
- ▶ Rebuilding the structure and allowing its use as a chapel open to public assemblies
- ▶ Resolving the unfinished appearance of building
- ▶ Resolving perception that because chapel is not protected it is not important
- ▶ Resolving perception that this site is not being “celebrated”
- ▶ Moving statues, benches and seating out into the chapel
- ▶ Using the visitor center for discussion and the chapel for private reflection

## 3.) *Design-related Issues*

- Necessity of having to explain the existing design of the chapel
- Vandalism and inappropriate uses on site (biking, skateboarding, etc.)
- Improving perception of safety and security as very important for tourism

- Obstructed views and policing of the site
  - Policing difficult as activities cease and desist prior to arrival of law enforcement
  - Use of design materials, ex.) red sandstone, that do not relate to the site
  - Need for place of quiet meditation
  - Pedestrian circulation improvements to restrict “cut through”
  - ADA use and compliance, including considering the hearing impaired
  - Concern with snow and ice removal from the structure and parking areas
  - Enhancing the appearance of the chapel and site
  - Buying property across the street and dropping the street elevation
  - Using a video/introductory movie at the visitor center to introduce the convention and the chapel
  - Enclosing the seating area
- ▶ Building something new (monument) from what remains of the original structure
  - ▶ Reincorporating old bricks into a new building; design stained glass windows depicting women from convention; using original bricks around windows
  - ▶ Using original bricks for building of new monument to convention
  - ▶ Rebuilding the structure as closely as possible to what is known

## 1.8 Impact Topics Retained for Further Analysis

To focus the environmental analysis, the issues identified during scoping were used to derive a number of impact topics to focus the environmental analysis presented in this EA/AoE. Impact topics are resources of concern that could be affected, either beneficially or adversely, by implementing any of the proposed alternatives and which distill the issues and concerns into distinct subjects for discussion and analysis. Impact topics were identified on the basis of federal laws, regulations, Executive Orders, NPS *Management Policies, 2006* (NPS, 2006), the Environmental Screening Form (ESF), and NPS knowledge of resources. In completing the ESF the Park reviewed the proposed alternatives, considered the data needed to describe the affected environment, and predicted impacts of the alternatives.

Concerns identified during the scoping process involved deteriorating bricks, weather conditions, loud traffic noise that disrupts interpretive tours, nesting of birds, vandalism, and the cost of maintenance over time. Existing conditions at the chapel are represented in the photographs below.



Based on the issues and concerns identified, the impact topics retained for detailed analysis in this EA/AoE consist of historic architectural resources (the historic Wesleyan Chapel, and

Seneca Falls Historic District) archeological resources (out parcel building and resources in the ground within and outside of the chapel excluding the chapel's foundation) and visitor use and experience. The existing conditions for each of these impact topics is described in Chapter 3, Affected Environment. Potential impacts to these resources as a result of implementing any of the alternatives considered in this EA/AoE are presented in Chapter 4, Environmental Consequences. A brief rationale for the selection of each impact topic is provided below.

### Historic Architectural Resources

NHPA, NEPA, the 1916 NPS Organic Act, NPS Management Policies, and DO-28 require Federal agencies to consider the effects of their proposed actions on cultural resources. Protection and preservation of cultural resources at the Park are of critical importance and are discussed as part of the analysis.

The Wesleyan Chapel meets the criteria for eligibility and is listed on the National Register of Historic Places. As an historic resource, the chapel is entering into various stages of deterioration resulting from being exposed to the environment. The NPS, as steward of this resource, is concerned at the rate of deterioration experienced by the original bricks of the chapel dating from 1848 (shown below), the year the first Women's Rights Convention was held.



Figure 7: Deteriorating Chapel Bricks

The preservation of this resource for current and future generations is of paramount concern and is the primary consideration of the current project. Therefore, in accordance with 36 CFR 800, an assessment is required of the effect that the construction would have on the Park and other potential cultural resources in the project area. The proposed project would have an impact on historic resources associated with the chapel. To determine each alternative's ability to preserve cultural resources, the NPS identified "*historic architectural materials*" that they would like to protect to the greatest extent practicable in the short and long term. Historic architectural materials include the following:

- **Wall Elements:** bricks, mortar, bedding joints, original material around window openings, and plaster
- **Roof Elements:** rafter plates, trusses, nails, and sheathing
- **Foundation Elements:** east and west wall exposed foundation materials (limestone and mortar)

The non-historic architectural resources, the elements added to the chapel during the 1993 construction, do not contribute to the eligibility of the chapel. Changes to the historic architectural resources of the chapel may affect the historic district as a whole. Potential impacts to the historic district must be considered as part of the planning process in this EA/AoE. Therefore, the impact topic of historic architectural resources consisting of the Wesleyan Chapel and the historic district were retained for detailed analysis in this EA/AoE.

### Archeological Resources

Preservation of the Wesleyan Chapel may impact archeological resources. Previous archeological investigations have identified and recovered archeological artifacts within the footprint and to some extent around the perimeter of the chapel. Archeological materials refer to subterranean materials that are *not* part of the Wesleyan Chapel. Artifacts collected during archeological investigations in advance of treatment will be cataloged into the park museum collection for future research and exhibit in accordance with NPS policy. Two areas have the potential to contain archeological materials and are identified as follows:

- Archeological materials within the footprint of the Wesleyan Chapel
- Archeological materials outside of the footprint of the Wesleyan Chapel

Therefore, the impact topic of archeological resources was retained for detailed analysis in this EA/AoE.

### Visitor Use and Experience

NPS Management Policies 2006 state that the enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks and that the NPS is committed to providing appropriate, high-quality opportunities for visitors to enjoy the parks. The Alternatives for this proposed action were developed to create an improved visitor experience while visiting the chapel. Therefore, the impact topic of visitor use and experience was retained for detailed analysis in this EA/AoE.

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

During project scoping, several impact topics were identified that were initially considered but then dismissed from further analysis in the EA/AoE. Impact topics dismissed from detailed analysis are described below with the rationale for dismissal.

### CULTURAL RESOURCES

#### Cultural Landscapes

A cultural landscape as defined in DO-28 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.” As a modern designed landscape, the landscape surrounding the Wesleyan Chapel is not a cultural landscape as defined

by DO-28, thus does not need to be evaluated for Section 106. Therefore the impact topic of cultural landscapes was dismissed from further analysis.

### Museum Collections

DO-28 defines a museum object as “a material thing possessing functional aesthetic, cultural, symbolic, and/or scientific value, usually movable by nature or design. Museum objects include prehistoric and historic objects, artifacts, and works of art, archival material, and natural historic specimens that are part of a museum collection.” No museum collections are exhibited at the current treatment with the exception of a 1908 commemorative bronze plaque, which will be removed from the surround wall for treatment. Artifacts related to the chapel may be displayed dependent on interior environmental factors necessary to assure their safety. Archeological resources which may be recovered during compliance investigations are considered above. Because no collections will be affected, this item was removed from further consideration.

### Ethnographic Resources

Ethnographic resources are objects and places, including sites, structures, landscapes, and natural resources, with traditional cultural meaning and value to associated peoples. Research and consultation with associated people identifies and explains the places and things they find culturally meaningful. Ethnographic resources eligible for the National Register of Historic Places are called traditional cultural properties. Scoping included consultation with local tribal authorities as well as the surrounding communities and general public. No known ethnographic resources were identified within the Park; therefore, the impact topic of ethnographic resources was dismissed from further analysis.

## NATURAL RESOURCES

### Vegetation

NPS *Management Policies, 2006* requires the protection of the natural abundance and diversity of all the Park’s naturally occurring communities. The Wesleyan Chapel is located in a developed community and the project area supports vegetation typical of an urbanized environment, such as maintained lawn and ornamental plantings. The only impact to vegetation that may result from any of the alternatives would be a negligible loss of lawn area. Therefore, the impact topic of vegetation was dismissed from further analysis.

### Wildlife and Wildlife Habitat

NPS *Management Policies 2006* requires that native animal life should be protected and perpetuated as part of the Park’s natural ecosystem. As noted for vegetation above, The Wesleyan Chapel is located in a developed community and the project area supports common wildlife species that are typical of an urbanized environment. The only impacts to wildlife that may result from any of the alternatives would be displacement during construction activities and

negligible loss of foraging or bird nesting habitat. Therefore, the impact topic of wildlife was dismissed from further analysis.

### Threatened and Endangered Species

Section 7 of the Endangered Species Act directs all federal agencies to use their authority in furtherance of the purposes of the Act by carrying out programs for the conservation of threatened and endangered species. Federal agencies are required to consult with the U.S. Fish and Wildlife Service (FWS) to ensure that any actions authorized, funded, and/or carried out by the agency do not jeopardize the continued existence of any listed species or critical habitat. The NPS initiated consultation with the FWS through an information request letter dated February 27, 2006 per Section 7 of the Endangered Species Act (ESA). The FWS provided a response dated May 17, 2006, which identified one federally-listed species with the potential to occur in the project area; however, found that the potential for adverse effects to the listed species was not likely. No further consultation or coordination under Section 7 is required.

The NPS also submitted an information request letter to the New York State Department of Environmental Conservation (NYSDEC) on the same date (February 27, 2006) to solicit information on the presence of threatened or endangered species, or species of special concern. In their response dated March 28, 2006, the NYSDEC determined that one state-listed species occurs or may occur on or in the immediate vicinity of the site. Based on the enclosed report of state-listed animals and plants, significant natural communities and other significant habitats, and using the project site as a reference with the NYSDC letter, the project site and land around the site does not contain habitat that would support the protected species identified by NYSDEC.

Based on the results of consultation with the FWS and the NYDEC, along with supporting documentation, the impact topic of threatened and endangered species was dismissed from further analysis. Copies of agency correspondence are included in Appendix A.

### Floodplains

Development within floodplains and floodways is regulated by federal and state laws to reduce the risk of property damage and loss of life due to flooding, as well as to preserve the natural benefits floodplain areas have on the environment. Executive Order 11988: Floodplain Management and NPS Director's Order #77-2 (Floodplain Management and accompanying Procedural Manual) require all federal agencies to avoid construction within 100-year floodplains unless no other practical alternative exists. Through the consultation of Federal Emergency Management Agency maps and site visits to the project, it was determined that there were no floodplains within the project area. Therefore, the impact topic of floodplains was dismissed from further analysis.

### Wetlands

Executive Order 11990 (Protection of Wetlands) and NPS Director's Order #77-1 (Wetland Protection and accompanying Wetland Procedural Manual) require federal agencies to avoid

negative impacts to wetlands. National Wetland Inventory Maps do not identify any wetlands within the Park or in the project area. Absence of wetlands was confirmed through a site visit and discussion with Park environmental staff. Therefore, the impact topic of wetlands was dismissed from further analysis.

### Water Quality

NPS *Management Policies 2006* requires protection of water quality consistent with the Clean Water Act. Implementing any of the alternatives may result in short-term negligible impacts during construction. Potential impacts would be mitigated by implementing all potential Best Management Practices (BMPs), erosion control measures, and activities as necessary to prevent adverse impacts to water quality. Therefore, the impact topic of water quality was dismissed from further analysis.

### Air Quality

The 1963 Clean Air Act, as amended (42 U.S.C. 7401 et seq.) requires federal land managers to protect air quality. Section 118 of the Clean Air Act in particular requires the NPS to meet all federal, state, and local air pollution standards and NPS *Management Policies 2006* addresses the need to analyze potential impacts to air quality during park planning. Construction activities may have a short-term negligible impact on air quality as a result of dust and vehicle emissions. These impacts would be temporary; ending at the completion of the project. There would be no long-term impacts to air quality. Therefore, the impact topic of air quality was dismissed from further analysis.

### Sound Environment/Soundscape

NPS *Management Policies 2006* states that the NPS will strive to protect the natural quiet and natural sounds associated with the physical and biological resources of the park. Soundscape is defined as the natural sound conditions that exist in the absence of any human-produced noises. The chapel is located in a developed community, the Village of Seneca Falls, along NY State Route 5 & 20, which also serves as the traditional main street business district for the Village. The sound environment of the project area is typical of an urbanized setting and is not considered a natural soundscape. Therefore, the impact topic of soundscape and the sound environment was dismissed from further analysis.

### Geology and Soils

The Wesleyan Chapel is located in the Village of Seneca Falls. The chapel and its surrounding area are currently developed or have been previously impacted by development. Thus, issues with soil disturbance do not exist and the impact topic was dismissed from further analysis.

### Prime and Unique Farmlands

Prime and unique farmlands are protected under the Farmland Protection Policy Act (7 U.S.C. 4201 et seq.) which states that Federal agency programs must assess the effects of their actions on farmland soils classified by the U.S. Department of Agriculture's (USDA) Natural Resource Conservation Service (NRCS) as prime or unique. Prime farmland is defined in the Act as "land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion," while unique farmlands are lands "other than prime farmland that is used for the production of specific high-value food and fiber crops." None of the mapped soil types in the project area are classified as prime or unique farmlands; therefore, the impact topic of prime and unique farmlands was dismissed from further analysis.

### Viewsheds/Visual Resources

Part of the NPS mission, as outlined in the NPS *Management Policies 2006*, is that the agency works to understand, maintain, restore, and protect the inherent integrity of the natural resources, processes, systems, and values of the parks. Scenic views and visual resources are considered important characteristics that are individual to each park unit. The associated construction activities would have a short-term, negligible adverse impact on the visual resources of the Park during the construction period because of the addition of construction equipment and personnel. The proposed improvements would result in no long-term adverse changes to visual resources. Therefore, the impact topic of viewsheds and visual resources was dismissed from further analysis.

## OTHER RESOURCES

### Socioeconomic Environment

The socioeconomic environment includes land use, demographics, housing, employment, and economy of an area. The project site is entirely on National Park Service property. Local economic generators adjacent to the chapel consist of retail, office, light industrial, small businesses, and agriculture. The Village and Town of Seneca Falls are located within Seneca County, in the heart of the Finger Lakes region, which is also referred to as "wine country". Tourism plays a large role in the local economy as a result of the area's many attractions, which includes the Wesleyan Chapel. Although tourism is a large industry for the area, preserving the Wesleyan Chapel would not likely result in an increase in tourism, nor would there likely be negative impacts on the tourism industry or any local economic generators adjacent to the chapel. Therefore, impact topics related to the socioeconomic environment were dismissed from further analysis.

### Environmental Justice

Executive Order 12898, "General 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 disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. All related work would be within the boundaries of the Park and would be confined to the footprint area of the Wesleyan Chapel and stepped seating. Any impacts that result from implementing any of the alternatives would be limited to park visitors and would not have disproportionate health or environmental effects on minorities or low-income populations or communities as defined in the Environmental Protection Agency's Environmental Justice Guidance (1998). Therefore, the impact topic of environmental justice was dismissed from further analysis.

### Park Operations

Routine maintenance activities for the chapel include maintenance of the sidewalks and the chapel grounds, including mowing and shoveling of snow as well as ice removal. The only impact on park operations that may result from implementing any of the alternatives would be short-term and negligible due to construction activities. No long-term impacts on park operations are anticipated. Therefore, the impact topic of park operations was dismissed from further analysis.

### Indian Trust Resources

Executive Order 13175 requires that any anticipated impacts to Indian trust resources from a proposed project or action by Department of Interior agencies be explicitly addressed in environmental documents. There are no known Indian Trust resources present at Women's Rights National Historic Park. Therefore, the impact topic of Indian Trust resources was dismissed from further analysis.

## **1.10 Related Plans and Studies**

### *General Management Plan*

The General Management Plan (GMP) for Women's Rights National Historical Park (prepared in 1986 and amended in 1991) serves as a manager's guide for meeting the objectives established for the Park and as a public statement of the National Park Service's management intentions. The GMP establishes long-range strategies for resource management, visitor use, and development of an integrated park system. The Park currently operates under the direction of the approved *Strategic Plan (SP)* and a new Strategic Plan is currently being updated. Management objectives identified within the SP direct the maintenance of the chapel in order to provide for a positive visitor experience and to the long-term preservation of the chapel for current and future generations. The proposed action to perform mitigation actions that stabilize and preserve the

historic fabric of the Wesleyan Chapel is entirely consistent with the Park's management documents.

*Town and Village of Seneca Falls Draft Comprehensive Plan*

The Village and Town of Seneca Falls prepared a draft of a joint comprehensive plan for public review in January, 2006. The plan addresses issues relative to the chapel in terms of tourism opportunities that both communities could capitalize on as well as issues relative to the enhancement of a visitor's experience to encourage return visits.

Draft Goal 17.3 states:

*Fully collaborate with the National Park Service in reaching the full potential of the Women's Rights National Historical Park and Seneca Falls Heritage Area management plans.*

Major intentions of this EA/AoE are to preserve the Wesleyan Chapel and to enhance the visitor experience. Therefore, working with the Village and Town of Seneca Falls to achieve these shared goals through effective collaboration resulting from this process is consistent with the intent of this document. During the scoping period and during the public review and comment period, the NPS solicited ideas and concerns from representatives and private citizens from the Town and Village of Seneca Falls to advance preservation efforts and to improve the visitor experience at the chapel.