
4. Environmental Consequences

This section describes the environmental consequences associated with the alternatives presented in this document. Five (5) alternatives were identified for further evaluation as possible solutions to help preserve the Wesleyan Chapel while enhancing the visitor experience. These alternatives, which are described in detail in Chapter 2, include:

- **Alternative A:** No Action
- **Alternative B:** Expand the Existing Treatment/Provide Visitor Enclosure
- **Alternative C:** Rehabilitate Chapel with Alternative Material
- **Alternative D:** Rehabilitate Chapel with Non-Historic Brick Masonry Units (NPS Preferred Alternative)
- **Alternative E:** Enclose Chapel Remains in a New Structure

The NPS consulted or conducted various studies to assess and quantify impacts on the chapel. A list of these studies can be found below:

- The General Management Plan (GMP) for Women's Rights National Historical Park (prepared in 1986 and amended in 1991)
- Women's Rights National Historical Park Strategic Plan – December 1994
- Special History Study – Women's Rights National Historical Park – September 1985
- Wesleyan Chapel – Historic Structure Report – 1992
- Historic Structure Report – Archeological Data Section – September 1989
- Maintenance Assessment – 2005
- Interpretive Assessment – 2005
- Brick Investigation for the Wesleyan Chapel – September 2002
- Draft Acoustical Measurement Report – Wesleyan Chapel – November 2005
- Comprehensive Interpretive Plan – Women's Rights National Historical Park – 2002
- Women's Rights National Historical Design Competition – A Vision Realized – 1990
- Wesleyan Chapel Brickwork: Photographic Documentation – 1994

This chapter is organized by impact topic, which distills the issues and concerns into distinct subjects for discussion and analysis. NEPA requires consideration of context, intensity, and duration of adverse and beneficial impacts (direct, indirect, and cumulative) and measures to mitigate for adverse impacts. NPS policy also requires that impairment of resources be evaluated in all environmental documents; therefore, this discussion is also included for each impact topic.

This document is also being used to comply with the requirements of Section 106 of the NHPA. The CEQ regulations that implement NEPA require assessment of impacts to cultural as well as natural resources.

4.1 Methodology for Assessing Impacts

As required by NEPA, potential impacts are described in terms of type (beneficial or adverse, direct or indirect), context (site-specific, local, or regional), duration (short-term or long term), and level of intensity (negligible, minor, moderate, or major).

Impact analyses and conclusions were based in part on the review of available existing literature and Wesleyan Chapel studies, which include: Special History Study, Historic Structure Report, Acoustical Measurement Report, the Brick Investigation Report, and the Comprehensive Interpretive Plan (2002). Other information was provided by on-site experts and other agencies, professional judgments, park staff insight, and federal agencies.

Type

- Beneficial: A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.
- Adverse: A change that moves the resource away from a desired condition or detracts from its appearance or condition.
- Direct: An impact that is caused by an action and occurs at the same time and place.
- Indirect: An impact that is caused by an action but is later in time or farther removed in distance, but still reasonably foreseeable.

Context

Context is the setting within which an impact is analyzed.

- Site-specific: The impact would affect the Wesleyan Chapel.
- Local: The impact would affect the park site and historic district.
- Regional: The impact would affect localities, cities, or towns surrounding the park.

Duration

For all resources and values, the duration of impacts in this document is defined as follows:

- Short-term: Impacts that occur only during construction or last within less than one year.
- Long term: Impacts that last longer than one year.

Level of Intensity

Because definitions of intensity vary by impact topic, intensity definitions are provided separately for each impact topic analyzed in this EA. As such, definitions of intensity are provided below for Historic Architectural Resources (the historic Wesleyan Chapel and the 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.

Cumulative Impacts

The CEQ regulations, which implement the National Environmental Policy Act of 1969 (42 USC 4321 et seq.), require assessment of cumulative impacts in the decision-making process for federal projects. Cumulative impacts are defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions” (40 CFR 1508.7). Cumulative impacts are considered for all alternatives, including the no-action alternative.

Cumulative impacts were determined by combining the impacts of the alternatives with other past, present, and reasonably foreseeable future actions. Therefore, it was necessary to identify other ongoing or reasonably foreseeable future projects at the Women's Rights National Historical Park. Based on discussions with park staff and a review of park-funded projects, no reasonably foreseeable future development is anticipated for Women's Rights National Historical Park. There are also no “off site” impacts expected to occur around the chapel in the near future or other projects with the potential to result in cumulative impacts on the resources analyzed in this EA/AoE.

Impairment

In addition to determining the environmental consequences of the alternatives under consideration, NPS *Management Policies* and DO #12 require analysis of potential impacts to determine whether actions would impair park resources.

The fundamental purpose of the national park system, as established by the Organic Act and reaffirmed by the General Authorities Act, as amended, is a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values. However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values.

Although Congress has given the National Park Service the management discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law

directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values. An impact to any park resource or value may constitute impairment, but an impact would be more likely to constitute impairment to the extent that it has a major or severe adverse effect upon a resource or value whose conservation is:

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

Impairment may result from National Park Service activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park.

Impairment determinations are not made for visitor use and experience because, according to the Organic Act, enjoyment cannot be impaired in the same way an action can impair park resources and values. An impairment determination is made in the Conclusion section of the impact analysis for each topic under each alternative.

Impacts to Cultural Resources and Section 106 of the National Historic Preservation Act

In this EA/AoE, impacts to cultural resources are described in terms of type, context, duration, and intensity, which is consistent with the regulations of the CEQ that implement the NEPA. These impact analyses are intended, however, to comply with the requirements of both NEPA and Section 106 of the NHPA. In accordance with the Advisory Council on Historic Preservation's regulations implementing Section 106 of the NHPA (36 CFR Part 800, Protection of Historic Properties), impacts to cultural resources were also identified and evaluated by (1) determining the area of potential effects; (2) identifying cultural resources present in the area of potential effects that are either listed in or eligible to be listed in the National Register of Historic Places; (3) applying the criteria of adverse effect to affected, National Register eligible or listed cultural resources; and (4) considering ways to avoid, minimize or mitigate adverse effects.

Under the Advisory Council's regulations a determination of either adverse effect or no adverse effect must also be made for affected National Register listed or eligible cultural resources. An adverse effect occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the National Register, e.g. diminishing the integrity (or the extent to which a resource retains its historic appearance) of its location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the alternatives that would occur later in time, be farther removed in distance or be cumulative (36 CFR 800.5, Assessment of Adverse Effects). A determination of no adverse effect means there is an effect, but the effect would not diminish the characteristics of the cultural resource that qualify it for inclusion in the National Register.

CEQ regulations and the National Park Service's *Conservation Planning, Environmental Impact Analysis and Decision Making* (Director's Order #12) also call for a discussion of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact, e.g. reducing the intensity of an impact from major to moderate or minor. Any resultant reduction in intensity of impact due to mitigation, however, is an estimate of the effectiveness of mitigation under NEPA only. It does not suggest that the level of effect as defined by Section 106 is similarly reduced. Cultural resources are non-renewable resources and adverse effects generally consume, diminish, or destroy the original historic materials or form, resulting in a loss in the integrity of the resource that can never be recovered. Therefore, although actions determined to have an adverse effect under Section 106 may be mitigated, the effect remains adverse.

An assessment of effect is included in the Section 106 Summary for historic architectural resources and archeological resources. A Section 106 summary for each alternative is included at the end of this chapter. The Section 106 summary is an assessment of the effect of the undertaking (implementation of the alternative) on National Register eligible or listed cultural resources only, based upon the criteria for effect and adverse effect found in the Advisory Council's regulations.

4.2 Historic Architectural Resources

Impact Thresholds

Negligible: Impact is at the lowest levels of detection with neither adverse nor beneficial consequences. The determination of effect for Section 106 would be *no adverse effect*.

Minor: Impact is measurable but would not be noticeable to visitors and would not affect the character-defining features of a National Register of Historic Places eligible or listed structure. The determination of effect for Section 106 would be *no adverse effect*.

Moderate: Impact would affect a character-defining feature(s) of a structure, would be noticeable to visitors, but would not diminish the integrity of the structure to the extent that its National Register of Historic Places eligibility is jeopardized. The determination of effect for Section 106 would be *no adverse effect*.

Major: Impact would alter a character-defining feature(s) of a structure, potentially diminishing the integrity of the structure to the extent that it is no longer eligible for the National Register of Historic Places. The determination of effect for Section 106 would be *adverse effect*. A memorandum of agreement (MOA) is executed among the National Park Service and applicable state or tribal historic preservation officer and, if necessary, the Advisory Council on Historic Preservation in accordance with 36 CFR 800.6(b). Measures identified in the

MOA to minimize or mitigate adverse impacts reduce the intensity of impact under NEPA from major to moderate or minor.

Impacts of Alternative A: No Action

Impact Analysis: Under Alternative A, the Park would continue its current maintenance and preservation practices. In the short term, Alternative A would have no impact on the historic architectural resources of the Wesleyan Chapel. However, in the long term there would be an indirect, adverse impact to the historic bricks of the walls. Because no additional improvements beyond current maintenance to protect the chapel would occur, the chapel's original brick walls would continue to decline. The nature of this impact would be the continued deterioration and loss of historic brick masonry due to the exposure of the walls to the harsh elements of New York State. The NPS cannot slow this deterioration without being able to control the movement of moisture and masonry temperature. There would be a long term, site-specific, indirect moderate to major adverse impact to the historic Wesleyan Chapel under Alternative A.

There would be no actions taken that would change the chapel's trusses or foundation under Alternative A. This would result in no impact for these resources.

Under Alternative A, there would be no visual change to the chapel; therefore there would be no impacts to the historic district. This would result in no impact for the historic district.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts to the historic Wesleyan Chapel. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the long term damage of the historic brick by the elements over time due to the implementation of Alternative A would ultimately result in a determination of *adverse effect* on the historic Wesleyan Chapel. The continued loss of historic materials could also eventually have an *adverse effect* on the historic district.

Conclusion: Alternative A would result in indirect, site-specific, long term moderate adverse impacts to the bricks of the historic Wesleyan Chapel and have no impact on the chapel's trusses or foundation. Actions under this alternative would result in a determination of adverse effect for purposes of Section 106 for both the historic architectural resources and possibly the historic district. There would be no cumulative effects as there are no past, present or reasonably foreseeable future actions.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative A is not likely to result in impairment of park resources or values related to the historic Wesleyan Chapel.

Impacts of Alternative B: Expand the Existing Treatment/Provide Visitor Enclosure

Impact Analysis: Alternative B would have impacts on the historical architectural resources of the Wesleyan Chapel's brick, trusses and foundation. The nature of the impacts to the chapel's bricks include the necessity to "clothe the brick" to protect the masonry from the elements, which would require covering the deteriorated brick with some form of buffering materials. Attaching or adhering material to this brick would be destructive, and/or non-reversible.

Beneficial impacts of Alternative B on the historic masonry would be the improved ability to control the moisture content of the historic bricks, differential thermal gain and micro-climates/impacts associated with wind currents, thus slowing the rate of deterioration. Most of the benefit would be derived through the extension of the roofline and the window infills which would deflect additional amounts of rain from the masonry. There would be a lesser benefit when it snows. Impacts to the chapel's brick under Alternative B are direct, site-specific, long term, moderate and adverse.

Another impact of Alternative B would be a minor disturbance of the trusses and supported sheathing in the extension of the roof. This impact would be mitigated through careful detailing and installation of the roof extension. Impacts under Alternative B would be direct, site-specific, long term, minor and adverse.

The historic foundation would not be impacted as long as the placement of the new structural support columns for the roof extension avoids the foundation. Archeological investigations will be undertaken as part of the design to mitigate any adverse effects through appropriate design solutions. Impacts to the foundation would be no impact.

Alternative B would be beneficial to the historic Wesleyan Chapel because the treatment would reduce the incidence of rain falling directly on the exposed interior historic brick, thus reducing the frequency of brick surface saturation, but would not provide the ability to control ambient brick temperatures or wetting associated with blowing snow.

The implementation of Alternative B would change the appearance of the historic district by enclosing the outdoor seating in a glass structure and would have a direct, local, long term, minor adverse impact to the historic district.

Overall, Alternative B would have direct, site-specific, short and long term moderate, adverse impacts on the historic Wesleyan Chapel due to the construction requirements and the permanency of the brick treatment and a direct, local, long term, minor adverse impact to the historic district

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on historic architectural resources. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative B would result in a determination of *no adverse effect* on the historic Wesleyan Chapel. By adding a modern, glass enclosure to the seating area behind the chapel, Alternative B might have an *adverse effect* on the historic district.

Conclusion: Impacts to the chapel's brick under Alternative B are direct, site-specific, long term, moderate and adverse. Impacts to trusses would be direct, site-specific, long term, minor and adverse. There would be no impact to the foundation. This alternative would have a direct, local, long term, minor adverse impact to the historic district. Overall, Alternative B would result in direct, site-specific, short and long term moderate adverse impacts to the historic Wesleyan Chapel and would result in a determination of no adverse effect for purposes of Section 106. There is the possibility of adverse effect to the historic district. Beneficial effects of Alternative B include the reduction and frequency of brick surface saturation as less rain would fall on the brick. There would be no cumulative effects as there are no past, present or reasonably foreseeable future actions.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative B is not likely to result in impairment of park resources or values related to the historic Wesleyan Chapel.

Impacts of Alternative C: Rehabilitate Chapel with Alternative Material

Impact Analysis: Alternative C would have an impact on the historic Wesleyan Chapel's brick, trusses and foundation. The nature of this impact would be the necessity of attaching new construction to the historic masonry which includes the installation of the new roof supports that would be placed at the south end of the Chapel's original footprint; providing foundation support for the installation of the missing wall with light weight infills at the south west and south east elevations; and connection of the new brick masonry to the historic brick masonry at the north elevation. Impacts to the chapel's historic brick under Alternative C are direct, site specific, long term, minor and adverse.

Alternative C would also impact the trusses due to the need to extend the roof. This action would cause a minor disturbance of the trusses and supported sheathing. The impact would be mitigated through careful detailing and installation of the roof extension. Impacts to the chapel's trusses with mitigation are direct, site specific, long term minor and adverse.

Construction necessary for Alternative C would also impact the historic foundation of the Chapel. There is a necessity to add to the foundation to support the new construction. The impact to the foundation would be mitigated through archeological testing as part of the project planning to insure the area is appropriately cleared and documented. The above ground foundation would be preserved and new foundation supports would be added in manner that does not disturb the historic foundation, and would be distinguished from the historic in a subtle manner. With

mitigation, the impacts to the chapel's foundation are direct, site specific, long term, minor, and adverse.

This alternative would have beneficial results in that the treatment would provide protection against masonry wetting from rain or blowing snow, while the loose enclosure would allow a measure of interior temperature control to slow the brick deterioration associated with freeze thaw cycles.

Mitigation of the impacts would be accomplished with the connection of the new north wall light weight infill material to the historic brick masonry with mechanical anchorage in the appropriate mortar joints and caulking of the joint created by butting the material to the historic brick masonry.

This treatment may also be determined to have an impact on the Seneca Falls Historic District as alternative materials may not be sympathetic in character/design to other materials found throughout the district. Impacts under this alternative are direct, local, long term, minor, and adverse.

Overall, Alternative C would have site-specific, short and long term, minor adverse impacts on part of the historic Wesleyan Chapel due to the requirements for construction and direct, local, long term, minor, and adverse impacts to the historic district.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on the historic Wesleyan Chapel. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative C would result in a determination of *no adverse effect* on the historic Wesleyan Chapel. While there would be some minor adverse impacts to the historic architectural resources, mitigation efforts through design and construction standards would keep the undertaking from reaching an adverse effect. Due to the use of alternative materials that may not be sympathetic in character/design to the other materials found throughout the district, Alternative C could have an adverse effect on the historic district.

Conclusion: Impacts to the chapel's historic brick, trusses, and foundation under Alternative C are direct, site specific, long term, minor and adverse. Overall, with mitigation in place, Alternative C would result in direct, site-specific, short and long term, minor adverse impacts to the historic Wesleyan Chapel and would result in a determination of no adverse effect for purposes of Section 106. Impacts to the historic district under this alternative are direct, local, long term minor and adverse. Beneficial effects of Alternative C are moisture protection to historic masonry and temperature control in the building to slow the brick's deterioration. There would be no cumulative effects as there are no past, present or reasonably foreseeable future actions.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key

to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative D is not likely to result in impairment of park resources or values related to the historic Wesleyan Chapel.

Impacts of Alternative D: Rehabilitate Chapel with Non-Historic Brick Masonry Units (NPS Preferred Alternative)

Impact Analysis: Alternative D would have an impact on the historic Wesleyan Chapel's brick, trusses, and foundation. The nature of this impact would be the necessity of attaching new construction to the historic masonry which entails the installation of a connection for the new brick masonry to the historic brick masonry at the north elevation. Impacts to the chapel's brick are direct, site specific, long term, minor and adverse.

Alternative D would also impact the trusses due to the need to extend the roof. This action would cause a minor disturbance of the trusses and supported sheathing. Impacts to the trusses are direct, site specific, long term, minor and adverse.

The historic foundation of the chapel would be impacted by the implementation of Alternative D as well. The nature of the impact is the disturbance of the existing foundation during construction. New roof supports would be placed at the south end of the Chapel's original footprint and foundation support for the missing brick masonry wall at the southwest and southeast elevations would be necessary. The impact would be mitigated through archeological investigations to occur per an agreement with the SHPO, to investigate, monitor, and/or mitigate any archeological resources that may be impacted as part of the project. The above ground foundation would be preserved and new foundation supports would be added in manner that does not disturb the historic fabric, and would be distinguished from the historic in a subtle manner. Impacts to the foundation under this alternative are direct, site specific, long term, minor and adverse.

This alternative would be beneficial in that the treatment would provide protection against masonry wetting from rain or blowing snow and interior temperature control can be used to halt or substantially slow the brick deterioration associated with moisture uptake and freeze thaw cycles.

Mitigation of the impacts would be accomplished through the mechanical anchorage in the appropriate mortar joints and caulking of the joint created by butting the material to the historic brick masonry.

This treatment is not anticipated to have an impact on the Seneca Falls Historic District as materials are expected to be sympathetic in the character/design to other materials found throughout the district. Impacts under this alternative are direct, local, long term, negligible impacts.

Alternative D would have direct, site-specific, short-term and long term, minor, adverse impacts on the historic Wesleyan Chapel due to the requirements for construction and negligible impacts to the historic district.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on the historic Wesleyan Chapel. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative D would result in a determination of *no adverse effect* on the historic Wesleyan Chapel. While there would be some minor adverse impacts to the historic Wesleyan Chapel, mitigation efforts through design and construction standards would keep the undertaking from reaching an adverse effect. Alternative D would have *no adverse effect* on the historic district.

Conclusion: Impacts to the chapel's brick, trusses and foundation are direct, site specific, long term, minor, and adverse. Overall, with mitigation in place, Alternative D would result in direct, site-specific, short and long term, minor, adverse impact to the historic Wesleyan Chapel and would result in a determination of *no adverse effect* for purposes of Section 106. Impacts to the historic district under this alternative are direct, local, long term, negligible impacts. Beneficial effects of Alternative D are moisture protection to historic masonry and temperature control in the building to slow the brick's deterioration. There would be no cumulative effects as there are no past, present or reasonably foreseeable future actions.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative D is not likely to result in impairment of park resources or values related to the historic Wesleyan Chapel.

Impacts of Alternative E: Enclose Chapel Remains in a New Structure

Impact Analysis: Alternative E would not have short-term impacts on the historic Wesleyan Chapel due to the fact that the alternative recommends covering the resources in their entirety with a glass enclosure. Provided that proper construction practices are followed to prevent damage during construction, this action would have no impact to the chapel. Construction supervision will be provided to ensure project is constructed as specified.

Benefits of this alternative include enclosing the structure to protect the historic features from the elements. Actions resulting from this alternative would have site specific, long-term, negligible impacts on the historic Wesleyan Chapel.

This treatment may be determined to have an adverse impact on the Seneca Falls Historic District as a large glass enclosure may not be sympathetic in character/design to other materials

found throughout the district. Impacts to the historic district are direct, local, long-term, moderate and adverse.

Alternative E would have direct, site specific, long term, negligible impacts on the historic Wesleyan Chapel and direct, local, long-term, moderate and adverse impacts on the historic district.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on the historic Wesleyan Chapel. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative E would result in a determination of *no adverse effect* on the historic Wesleyan Chapel. Alternative E would have an adverse effect on the historic district.

Conclusion: Alternative E would result in direct, site specific, short-term, negligible impacts to the historic Wesleyan Chapel and would result in a determination of *no adverse effect* for purposes of Section 106. Impacts to the historic district are direct, local, long-term, moderate and adverse. Beneficial effects of Alternative C are the protection of the chapel's historic resources from the elements. There would be no cumulative effects as there are no past, present or reasonably foreseeable future actions.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative E is not likely to result in impairment of park resources or values related to the historic Wesleyan Chapel.

4.3 Archeological Resources

Impact Thresholds

Negligible: Impact is negative and at the lowest levels of detection with neither adverse nor beneficial consequences. The determination of effect for Section 106 would be *no adverse effect*.

Minor: Disturbance of a site(s) is confined to a small area and results in little, if any, loss of important information potential and no damage to National Register of Historic Places eligible archeological features. The determination of effect for Section 106 would be *no adverse effect*.

Moderate: Disturbance of a site(s) would not result in substantial loss of important information potential or significant damage to national Register of Historic Places eligible archeological features. While there may be limited disturbance to

archeological features, the resource would remain eligible for listing on the National Register. For purposes of section 106, the determination of effect would be *adverse effect*, and a Section 106 agreement document (PA/MOA) would be executed between the NPS, SHPO, and other appropriate parties.

Major: Disturbance of a site(s) is substantial and results in the loss of most or all of the site and its potential to yield information. The site would no longer be eligible for listing on the National Register of Historic Places. For purposes of Section 106, the determination of effect would be *adverse effect*, and a Section 106 agreement document (PA/MOA) would be executed between the NPS, SHPO, and other appropriate parties.

Impacts of Alternative A: No Action

Impact Analysis: Under Alternative A, there would be no changes to the archeological resources of the Wesleyan Chapel and the existing resources would be preserved as they currently exist. The Park would continue to preserve these resources in place and continue to pursue efforts to fully document the site's archeological resources. There would be no impacts to archeological resources under this alternative.

Cumulative Impacts: There would be no impacts to archeological resources under Alternative A; therefore, there would be no cumulative impacts to archeological resources.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative A would result in a determination of *no effect* on archeological resources.

Conclusion: Alternative A would have no direct or cumulative impacts on archeological resources and would result in a determination of *no effect* for purposes of Section 106.

Because there would be no major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the Park, (2) key to the natural or cultural integrity of the Park or to opportunities for enjoyment of the park, or (3) identified as a goal in the Park's GMP or other relevant NPS planning documents, implementation of Alternative A is not likely to result in impairment of park resources or values related to archeological resources.

Impacts of Alternative B: Expand the Existing Treatment/Provide Visitor Enclosure

Impact Analysis: Alternative B would have an impact on the archeological resources associated with the Wesleyan Chapel. The nature of the impacts comes from the installation of a new foundation system to add supports to be able to extend the roof line that could impact archeological resources left undisturbed by the ca. 1990 construction.

This impact would be mitigated by archeological investigations to be undertaken as part of the project planning to insure the area is appropriately cleared and documented.

Alternative B would have direct, site-specific, long term, minor adverse impacts on the archeological resources.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on archeological resources. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative B would result in a determination of *no adverse effect* on archeological resources. Any ground disturbing activities would be assessed for their potential to impact known or unknown archeological resources. The Park would implement all NPS guidelines to survey and evaluate archeological resources that may be affected and avoid and / or mitigate those impacts as necessary.

Conclusion: With mitigation in place, Alternative B would result in direct, site-specific, long term, minor adverse impacts to archeological resources and would result in a determination of no adverse effect for purposes of Section 106. There would be no cumulative impacts.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative B is not likely to result in impairment of park resources or values related to archeological resources.

Impacts of Alternative C: Rehabilitate Chapel with Alternative Material

Impact Analysis: Alternative C would have an impact on the archeological resources associated with the Wesleyan Chapel. The nature of the impact is the installation of a new foundation system to add supports to be able to extend the roof line and the construction associated with the removal of the outdoor seating could impact archeological resources left undisturbed by the ca. 1990 construction.

This impact would be mitigated by archeological investigation to be undertaken as part of the project planning to insure the area is appropriately cleared and documented.

Alternative C would have direct, site-specific, long term, minor adverse impacts on the archeological resources.

Cumulative: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on archeological resources. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative C would result in a determination of *no adverse effect* on archeological resources. Any ground disturbing activities would be assessed for their potential to impact known or unknown

archeological resources. The Park would implement all NPS guidelines to survey and evaluate archeological resources that may be affected and avoid and / or mitigate those impacts as necessary.

Conclusion: With mitigation in place, Alternative C would result in direct, site-specific, long term, minor adverse impacts to archeological resources and would result in a determination of *no adverse effect* for purposes of Section 106. There would be no cumulative impacts.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative C is not likely to result in impairment of park resources or values related to archeological resources.

Impacts of Alternative D: Rehabilitate Chapel with Non-Historic Brick Masonry Units (NPS Preferred Alternative)

Impact Analysis: Alternative D would have an impact on the archeological resources associated with the Wesleyan Chapel. Impacts result from the installation of a new foundation system that would add supports to extend the roof line and the construction associated with the removal of the outdoor seating that could impact archeological resources left undisturbed by the ca. 1990 construction.

This impact would be mitigated by archeological investigation to be undertaken as part of the project planning to insure the area is appropriately cleared and documented. Removal of outdoor seating area may have a negligible adverse impact due to previous construction of seating area. Archeological monitoring would occur during construction.

Alternative D would have direct, site-specific, long term, minor adverse impacts on the archeological resources.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on archeological resources. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative D would result in a determination of *no adverse effect* on archeological resources. Any ground disturbing activities would be assessed for their potential to impact known or unknown archeological resources. The Park would implement all NPS guidelines to survey and evaluate archeological resources that may be affected and avoid and / or mitigate those impacts as necessary.

Conclusion: With mitigation in place, Alternative D would result in direct, site-specific, long term, minor adverse impacts to archeological resources and would result in a determination of *no adverse effect* for purposes of Section 106. There would be no cumulative impacts.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative D is not likely to result in impairment of park resources or values related to archeological resources.

Impacts of Alternative E: Enclose Chapel Remains in a New Structure

Impact Analysis: Alternative E would have an impact on the archeological resources associated with the Wesleyan Chapel. The nature of the impact is the installation of a new foundation system to support the enclosure and a new systems corridor. This could impact archeological resources left undisturbed by the ca. 1990 construction.

This impact would be mitigated with archeological testing being undertaken as part of the project planning to insure the area is appropriately cleared and documented before construction.

Alternative E, with mitigation, would have site specific, long term, minor adverse impact.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on archeological resources. Therefore, there are no cumulative impacts.

Section 106 Summary: For the purposes of Section 106, the implementation of Alternative E would result in a determination of *no adverse effect* on archeological resources. Any ground disturbing activities would be assessed for their potential to impact known or unknown archeological resources. The Park would implement all NPS guidelines to survey and evaluate archeological resources that may be affected and avoid and / or mitigate those impacts as necessary.

Conclusion: With mitigation in place, Alternative E, would have direct, site specific, long term, minor adverse impacts to archeological resources and would result in a determination of *no adverse effect* for purposes of Section 106. There would be no cumulative impacts.

Because there would be no major, adverse impacts to a resource whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's GMP or other relevant NPS planning documents, implementation of Alternative E is not likely to result in impairment of park resources or values related to archeological resources.

4.4 Visitor Use and Experience

Impact Thresholds

- Negligible:** Impact barely detectable, not in primary resource areas or would occasionally affect a few visitors
- Minor:** Impact slight but detectable, not in primary resource areas or would affect few visitors. Would be perceived as negative by visitors or would inhibit the achievement of visitor experience.
- Moderate:** Impact readily apparent, somewhat negative, in primary resource areas or would affect many visitors. Would be perceived as negative by visitors or would inhibit the achievement of visitor experience.
- Major:** Effect severe in primary resource areas, or would affect most of visitors. Would be perceived as negative by visitors or would inhibit the achievement of visitor experience.

Impacts of Alternative A: No Action

Impact Analysis: Under Alternative A, no changes would be made to the Chapel structure and surrounding grounds. The structure would remain open on three sides and noise from vehicular traffic, especially heavy truck traffic, would continue to make it difficult to hear interpretive programs. Inappropriate uses would continue to occur at the site including vandalism, biking, rollerblading, skateboarding and people cutting through the site. Bird nesting would continue unabated. People who have difficulty understanding and interpreting the current site design would continue to experience similar issues. The overall impact would be long term, site-specific, moderate and adverse.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts on archeological resources. Therefore, there are no cumulative impacts.

Conclusion: Alternative A would result in direct, long term, site-specific, moderate and adverse impacts to visitor use and experience. There would be no cumulative effects from past, present and reasonably foreseeable future actions.

Impacts of Alternative B: Expand the Existing Treatment/Provide Visitor Enclosure

Impact Analysis: Under Alternative B, the visitor experience would improve through enclosing the steps. Since the structure would remain open on two sides, visitor experience would continue to include noise from vehicular traffic and inappropriate uses discussed in Alternative A, but to a lesser extent by making it more difficult for pedestrians to cut through the site. Noise inside the chapel may worsen by enclosing the steps and bird nesting would continue.

Since the structure is open on two sides and the surround wall would not be lowered, vandalism to historic fabric and inappropriate uses would continue to be an issue and may detract from the visitor's experience.

Implementation of this alternative by the NPS may result in an increased difficulty by visitors to understand the site as some visitors who attend tours may remain confused about the condition of the chapel and wonder why the seating area is protected, and about its relationship to the historic chapel.

Implementing this alternative would result in direct, short-term impacts during construction as the chapel would be closed to visitors. This would end when construction was finished. The project would have long term, site specific, moderate and adverse impacts.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts to visitor use and experience. Therefore, there are no cumulative impacts.

Conclusion: Alternative B would result in direct, short and long term, site specific, moderate and adverse impacts to visitor use and experience. After construction, actions associated with this alternative would likely result in an enhanced visitor experience although some difficulty understanding site design would occur. To address this, the visitor center would include exhibits to improve interpretive opportunities. The exhibits at the visitor center would be about the convention and the history of the chapel building, including its evolution throughout time. There would be no cumulative effects from past, present and reasonably foreseeable future actions.

Impacts of Alternative C: Rehabilitate Chapel with Alternative Material

Impact Analysis: Under Alternative C visitors would benefit from the enclosed structure. Noise would be reduced, the building would have limited temperature and climate control, bird nesting would not be an issue and inappropriate uses and vandalism would be reduced inside the structure due to enclosing the structure. This alternative would also enhance the visitor understanding of historic volume and historic form. However, the park would need additional interpretation to eliminate confusion of the use of non-brick materials. The exterior of the chapel would still be susceptible to vandalism, but vandalism levels would be reduced as visibility to the structure would be improved.

Implementing this alternative would result in direct, short-term impacts during construction as the chapel would be closed to visitors. This would end when construction was finished. Alternative C would have site-specific, long term, minor impacts to visitor experience.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts to visitor use and experience. Therefore, there are no cumulative impacts.

Conclusion: Alternative C would result in direct, site-specific, short and long term minor impacts to visitor use and experience. The visitor experience would be enhanced even more so than in Alternative B resulting in increased visitor satisfaction and experience. Some visitors may experience difficulty understanding the use of non-historic materials. This would be alleviated by adding additional interpretation explaining the use of non-brick materials. There would be no cumulative effects from past, present and reasonably foreseeable future actions.

Impacts of Alternative D: Rehabilitate Chapel with Non-Historic Brick Masonry Units (NPS Preferred Alternative)

Impact Analysis: Under Alternative D visitors would benefit from the enclosed structure. Noise would be reduced, the building would have limited temperature and climate control, bird nesting would not be an issue and inappropriate uses and vandalism would be reduced inside the structure due to enclosing the structure. This alternative would also enhance the visitor understanding of historic volume and historic form through the use of brick materials that are visually different than the historic brick. This would result in less time spent during interpretive tours discussing the treatment of the chapel and more time discussing its significance. The exterior of the chapel would still be susceptible to vandalism, but vandalism levels would be reduced as visibility to the structure would be improved.

Implementing this alternative would result in short-term impacts during construction as the chapel would be closed to visitors. This would end when construction was finished. Alternative D would have site-specific, long term minor impacts to visitor use and experience.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts to visitor use and experience. Therefore, there are no cumulative impacts.

Conclusion: Alternative D would result in direct, site-specific, short and long term minor impacts to visitor use and experience. Overall, the visitor experience would be enhanced even more so than in Alternative C as the historic volume is present and has the appearance of a chapel building made of brick with non-historic brick material that is distinguishable from historic bricks. This would result in increased visitor satisfaction and experience. The use of similar materials would improve the visitor experience and remove any difficulty understanding the historic structure. There would be no cumulative effects from past, present and reasonably foreseeable future actions.

Impacts of Alternative E: Enclose Chapel Remains in a New Structure

Impact Analysis: Under Alternative E visitors would benefit from enclosing the site in a structure. Noise would be reduced, the building would have limited temperature and climate control, bird nesting would not be an issue and inappropriate uses and vandalism would be eliminated to both the interior and exterior of the chapel.

Under Alternative E, design of the site may still contribute to confusion, although encapsulation of the chapel intuitively says “there is something here worth preserving”. Additional interpretation would be needed. During tours, the interpreter would spend more time discussing the treatment of the site and less interpreting the history and importance of the chapel. Reduced visibility of the chapel from the exterior of the enclosed structure is also a concern.

There would be short term moderate adverse impacts when the enclosure would be constructed. These impacts would end when construction ended. Alternative E would result in beneficial results to visitor experience by enclosing the chapel site. Alternative E would have direct, short and long term, site-specific, minor impacts to visitor use and experience.

Cumulative Impacts: As noted in the methodology section in this chapter, there are no other projects or activities with the potential to contribute to cumulative impacts to visitor use and experience. Therefore, there are no cumulative impacts.

Conclusion: Overall, visitor use and experience would be improved; however, this alternative may provide some confusion to visitors understanding of the remaining historic fabric. Alternative E would result in direct, short and long term, site-specific, minor impacts to visitor use and experience. There would be no cumulative effects from past, present and reasonably foreseeable future actions.

4.5 106 Summary

In January, 2006, the NPS conducted a site visit at the Wesleyan Chapel with the representatives from the SHPO. The purpose of this visit was to inform the SHPO about the effort by the NPS to develop alternatives to preserve the chapel for future generations. The SHPO agreed with the need to preserve the chapel and indicated that continued maintenance of the chapel (i.e., the No Action Alternative – Alternative A) is not a viable option to achieve long term preservation. Throughout the process, SHPO has been kept informed about meetings and findings. Several months later, after site visits, meetings and continued involvement, SHPO concurred with the National Park Service’s selection of the preferred preliminary alternative “D,” rehabilitation of the Chapel to reestablish the building’s envelope and secure the historic walls and roof structure from the elements. See Appendix C for copies of the correspondence between the SHPO and the Park.

This EA/AoE underwent internal NPS review by the park’s cultural resource advisors (Section 106 advisor team) in January, 2007, and their comments were incorporated within the document. Subsequent to internal review, the EA/AoE was submitted to the SHPO for review on May 8, 2007. Consultation with SHPO will be ongoing throughout the implementation process of the preferred alternative.

The environmental consequences, including an assessment of effect for Section 106 of the NHPA, were documented within individual impact topics in Chapter 4 of this EA/AoE. In the analysis, an Assessment of Effect for purposes of Section 106 was included for the listed or potentially eligible National Register cultural resources including: historic architectural resources

(the historic Wesleyan Chapel and Seneca Falls Historic District) and archeological resources. Effects were assessed for each topic by each of the alternatives. Below is a summary discussing an overall assessment of effect for each alternative.

Alternative A: No Action

Alternative A, which maintains current management practices, would result in an *adverse effect* determination for the historic Wesleyan Chapel and potentially an *adverse effect* on the historic district and a *no effect* determination for archeological resources. While the current maintenance practices would continue, it has been determined that without additional improvements to protect the exposed historic brick fabric, there would be continued deterioration which may result in an adverse effect. The archeological resources associated with the Wesleyan Chapel are adequately protected so continued management practices would have no effect on them.

Alternative B: Expand the Existing Treatment/Provide Visitor Enclosure

Alternative B, which recommends clothing the historic bricks to protect them from the elements, would result in a *no adverse effect* determination for the historic Wesleyan Chapel and possible an *adverse effect* determination for the historic district. It would have *no adverse effect* for archeological resources. Any ground disturbing activities would be assessed for their potential to impact known or unknown archeological resources. The Park would implement all NPS guidelines to survey and evaluate archeological resources that may be affected and avoid and/or mitigate those impacts as necessary.

Alternative C: Rehabilitate Chapel with Alternative Material

The implementation of Alternative C would result in a determination of *no adverse effect* on both historic architectural resources and archeological resources. There is the possibility that this alternative could have an *adverse effect* on the historic district. While there would be some minor adverse impacts to the historic architectural resources, mitigation efforts through design and construction standards will keep the undertaking from reaching an adverse effect. Any ground disturbing activities would be assessed for their potential to impact known or unknown archeological resources. The Park would implement all NPS guidelines to survey and evaluate archeological resources that may be affected and avoid and/or mitigate those impacts as necessary.

Alternative D: Rehabilitate Chapel with Non-Historic Brick Masonry Units (NPS Preferred Alternative)

The implementation of Alternative D would result in a determination of *no adverse effect* on the Wesleyan Chapel, the archeological resources, and the historic district. While there would be some minor adverse impacts to the historic architectural resources, mitigation efforts through design and construction standards will keep the undertaking from reaching an adverse effect. Any ground disturbing activities would be assessed for their potential to impact known or unknown archeological resources. The Park would implement all NPS guidelines to survey and

evaluate archeological resources that may be affected and avoid and / or mitigate those impacts as necessary.

Alternative E: Enclose Chapel Remains in a New Structure

For the purposes of Section 106, the implementation of Alternative E would result in a determination of *no adverse effect* on the Wesleyan Chapel and archeological resources. It would have an *adverse effect* on the historic district. Any ground disturbing activities would be assessed for their potential to impact known or unknown archeological resources. The Park would implement all NPS guidelines to survey and evaluate archeological resources that may be affected and avoid and / or mitigate those impacts as necessary.

4.6 Summary of Impacts by Alternative

Alternative A: No Action

Under Alternative A, current maintenance practices would be followed. Since no preventative measures would be taken to reduce the deterioration of the brick, over time there would be continued deterioration resulting in an adverse impact to the brick and a Section 106 determination of adverse effect. There would be no impacts to the historic district or archeological resources as no changes would take place at the Wesleyan chapel site. This would result in an *adverse effect* determination for Section 106. There would be no cumulative impacts to the historic architectural resources.

There would be no changes to archeological resources resulting in no direct or cumulative impacts on archeological resources and would result in a determination of *no effect* for purposes of Section 106.

Visitor use and experience would continue to experience the problems it currently faces. Noise levels would remain high from vehicular traffic, the site would be acceptable to vandalism and unwanted uses, and visitors would continue to experience difficulty interpreting the current site design. Impacts to visitor use and experience would be would long term, site-specific, moderate and adverse impacts with no cumulative effects.

Alternative B: Expand the Existing Treatment/Provide Visitor Enclosure

Under Alternative B, the interior walls would be clothed and the outdoor seating enclosed, closing one side of the chapel. The brick would be protected from the elements to some extent with minor disturbance to the trusses and no impacts to the foundation. The appearance of the historic district would change with the addition of the glass structure enclosing the outdoor seating. This would result in direct, site-specific, short and long term moderate adverse impacts on the historic Wesleyan Chapel, a no adverse effect determination under Section 106, and a direct, local, long term, minor impact to the historic district with an adverse effect determination for Section 106. No cumulative impacts are anticipated for either historic architectural resource.

The new foundation would have site-specific, long term, minor adverse impacts to the archeological resources and a no adverse effect determination under Section 106 with no cumulative impacts.

Visitor experience would improve through a reduction in unwanted uses by increased difficulty cutting through the site. The chapel would be acceptable to vandalism as it is now and noise levels may increase. Visitors would continue to experience difficulty interpreting the current site design and wonder why the steps are enclosed. Impacts to visitor use and experience would be short and long term, site-specific, moderate and adverse with no cumulative impacts.

Alternative C: Rehabilitate Chapel with Alternative Material

Under Alternative C, the volume of the chapel would be recreated with non-brick materials. The brick would be impacted from the non-brick sheathing to protect the masonry from the elements. The trusses and foundation would also be impacted by the supported sheathing. This treatment would have site-specific, short and long term, minor adverse impacts to the historic Wesleyan Chapel due to the requirements for construction and direct, local, long term minor and adverse impacts to the historic district. With mitigation, action to the Wesleyan chapel would result in a no adverse effect under Section 106. The project would result in an adverse effect determination for Section 106 for the historic district and no cumulative impacts to either historic resource.

The new foundation would have site-specific, long term, minor adverse impacts to the archeological resources and a no adverse effect determination under Section 106 with no cumulative impacts.

Visitor use and experience would benefit from the closed structure. Noise would be reduced, bird nesting eliminated and the building climate controlled. Vandalism would be reduced inside the chapel and reduced to the exterior by improved visibility of the structure. The visitor understanding would be enhanced by the completion of a whole chapel. However, additional interpretation would be needed to reduce confusion of non-brick materials. This alternative would result in site-specific, short and long term minor impacts to visitor use and experience and no cumulative impacts.

Alternative D: Rehabilitate Chapel with Non-Historic Brick Masonry Units (NPS Preferred Alternative)

Under Alternative D, the volume of the chapel would be recreated with brick materials that are visually different to the historic material. Impacts to historic resources and archeology would be identical to Alternative C for NEPA and Section 106. Alternative D would have *no adverse effect* on the historic district.

Visitor use and experience would benefit from the closed structure. Noise would be reduced, bird nesting eliminated and the building climate controlled. Vandalism would be reduced inside the chapel and reduced to the exterior by improved visibility of the structure. The visitor understanding would be enhanced by the completion of a whole chapel even more so than Alternative C through the use of brick and less time during interpretive tours would need to be

spent explaining the treatment of the chapel. Alternative D would result in site-specific, short and long term minor impacts to visitor use and experience and no cumulative impacts.

Alternative E: Enclose Chapel Remains in a New Structure

Under Alternative E, the chapel would be enclosed in a glass structure. Enclosing the chapel would have beneficial results to the chapel. Actions would result in site specific, long term, negligible impacts on the historic Wesleyan Chapel with a determination of no adverse effect for Section 106. Constructing a glass structure may not be sympathetic to the historic district and have direct, local, long-term, moderate and adverse impacts on the resource and an *adverse effect* determination for Section 106 with no cumulative impacts to either historic architectural resource.

The new foundation would have site-specific, long term, minor adverse impacts to the archeological resources and a no adverse effect determination under Section 106 with no cumulative impacts.

Noise would be reduced, the building would have limited temperature and climate control, bird nesting would not be an issue and inappropriate uses and vandalism would be eliminated to both the interior and exterior of the chapel, resulting in improved visitor use and experience. The site design may contribute to confusion, but the enclosure indicates something is worth preserving. The interpreter would need to spend additional time during tours to explain the treatment. This alternative would result in site specific, short and long term moderate adverse impacts during construction with no cumulative impacts.

5. Consultation and Coordination

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

5.1 Brief History of Planning and Public Involvement

Internal scoping was conducted by staff of 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 Architecture & Engineering P.C. and Clough Harbour & Associates LLP to help prepare this EA/AoE report. This interdisciplinary process defined the 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 involvement process, the NPS mailed a scoping brochure describing the proposed action and soliciting comments to more than 450 people and agencies (stakeholders) in February 2006. The brochure (also referred to as an informational newsletter – see Appendix) 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 NPS held a public scoping meeting on March 8, 2006, which was advertised in the brochure. Also held that day was a scoping meeting for various local and regional public agencies. Comments were solicited during the public scoping process originally until March 24, 2006. A follow-up postcard was sent by NPS to the same project stakeholders in March that extended the comment period until April 12, 2006. 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 of the commemorative site about the 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 issues.

NPS staff encouraged all agency representatives and the public to provide comments on the project. This included solicitation of public comments via the National Park Service PEPC website. 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 a well-attended public scoping meeting, which was held on March 8, 2006. Issues and concerns expressed are categorized by several different areas of concern or topics and are summarized in Chapter 1.

Subsequent Alternatives Development meetings were held on April 25 and 26, 2006 to provide a summary of the possible alternatives.

5.2 Interagency Coordination

Several agencies were contacted during the scoping period. Agencies contacted during the planning process included the New York State (NYS) Department of Transportation (DOT), the NYS Department of Environmental Conservation (DEC), the NYS Office of Parks, Recreation and Historic Preservation (SHPO), and the United States Department of Interior – Fish and Wildlife Service (USFWS). These agencies were also invited to participate in the scoping meeting described above. See Appendix A for copies of written correspondence with these agencies.

5.3 List of Recipients

The EA/AoE will be on formal review for 30 days and has been distributed to a variety of interested individuals, agencies, and organizations. It is also available on the Internet at <http://parkplanning.nps.gov>.

Federal Agencies and Officials

United States Department of Interior –USFWS

State Agencies

NYS SHPO
NYS DEC
NYS DOT

Local Agencies and Officials

Village of Seneca Falls, Department of Planning and Historic Preservation
Village of Seneca Falls, Department of Police

Consulting Parties and Individuals

Original Design Team of the Commemorative Site
Former Park Superintendent
American Indian Tribes

5.4 List of Preparers

Preparers

Tina Orcutt, Superintendent, Women's Rights National Historical Park
Jennifer McConaghie, Resource Planning Specialist, National Park Service
Cheryl Sams O'Neill, Resource Planning Specialist, National Park Service
Christopher Tavner, Historic Architect, Einhorn Yaffee Prescott Architecture & Engineering P.C.
Mark Warner, Architect, Clough Harbour & Associates LLP

Contributors and Reviewers

Stephen Spaulding, Chief, Architectural Preservation Division, National Park Service,
Jacki Katzmire, Regional Environmental Coordinator – Philadelphia, National Park Service
David Uschold, Regional Section 106 Coordinator – Boston, National Park Service

5.5 References

The NPS conducted various studies to assess and quantify impacts on the chapel. These studies were referenced throughout the process in preparing this EA/AoE report. A list of these studies can be found below:

- Acoustical Measurement Report (Draft) – Wesleyan Chapel – November 2005
- Brick Investigation for the Wesleyan Chapel – September 2002
- Choosing by Advantages Decisionmaking System© (CBA) – Jim Suhr – 1999
- Comprehensive Interpretive Plan – Women's Rights National Historical Park – 2002
- General Management Plan (GMP) for Women's Rights National Historical Park (prepared in 1986 and amended in 1991)
- Interpretive Assessment – 2005
- Maintenance Assessment – 2005
- Special History Study – Women's Rights National Historical Park – September 1985
- Wesleyan Chapel Brickwork: Photographic Documentation – 1994
- Wesleyan Chapel – Historic Structure Report – Archeological Data Section – September 1989
- Wesleyan Chapel – Historic Structure Report – 1992

- Women’s Rights National Historical Park Design Competition – A Vision Realized – 1990
- Women’s Rights National Historical Park Strategic Plan – December 1994

5.6 Acronyms and Abbreviations

ACHP	Advisory Council on Historic Preservation
BMPs	Best Management Practices
CBA	Choosing by Advantages Decisionmaking System©
CEQ	Council on Environmental Quality
CHA	Clough Harbour & Associates LLP
DEC	New York State Department of Environmental Conservation
DO-12	Order #12: <i>Conservation Planning, Environmental Impact Analysis and Decision Making</i> and accompanying handbook
DO-28	NPS Director’s Order #28: <i>Cultural Resources Management</i>
DOT	Department of Transportation
EA/AoE	Environmental Assessment and Assessment of Effect
ESA	Endangered Species Act
EYP	Einhorn Yaffee Prescott Architecture & Engineering P.C.
FWS	U.S. Fish and Wildlife Service
GMP	General Management Plan
JHA	Jaffe Holden Acoustics
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act of 1969, as amended
NHPA	National Historic Preservation Act
Historic district	Seneca Falls Historic District
NPS	National Park Service
NRCS	Natural Resource Conservation Service
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
PA	Programmatic Agreement
PEPC	National Park Service Planning, Environment, and Public Comment website
SHPO	New York State Historic Preservation Office
SP	Strategic Plan
USDA	U.S. Department of Agriculture