



## INTRODUCTION

In July 2011, the National Park Service (NPS) issued an Environmental Assessment (EA) analyzing impacts associated with a proposed Former Reserved Properties Management Plan (FRPMP) for Cumberland Island National Seashore (“CUIS” or “the Seashore”). The FRPMP/EA evaluated a range of options for managing certain properties at the Seashore that came into full NPS ownership following the expiration of reserved property agreements in 2010 and 2011. The plan analyzed, in particular, how NPS would manage the various structures located on these reserved properties. It also developed a process to be used in determining the use of land and structures on reserved properties that expire at a later date.

The purpose of this document is to record the decision of the NPS and to declare a Finding of No Significant Impact (FONSI) pursuant to the Council on Environmental Quality's (CEQ) regulations for implementing the National Environmental Policy Act Of 1969 (NEPA).

## Background

The CUIS was established by Congress as a unit of the National Park System in the Act of October 23, 1972, (Public Law 92-536, codified at 16 U.S.C. 459i et seq.). The purpose of the Seashore, as stated in Section 1 of the foregoing act, is “to provide for public outdoor recreation use and enjoyment of certain significant shoreline lands and waters of the United States and to preserve related scenic, scientific, and historical values.” On September 8, 1982, much of the northern half of CUIS was designated as wilderness or potential wilderness to be managed as part of the National Wilderness Preservation System (Public Law 97-250, 16 U.S.C. 1131 et seq.). On December 8, 2004, additional legislation modified the wilderness boundary to remove the Main Road and certain other roadways from designated wilderness and mandated visitor tours to the north end of the Seashore (Public Law 108-447).

At present, the federal government owns most of the upland areas within the Seashore boundary. Some areas within the Seashore remain in full private ownership, while additional areas constitute what are often referred to as “reserved estates” (in this document they will be referred to as reserved properties). These reserved properties are in use by third parties but will convert to full government possession after a specified period of time. The enabling legislation for the Seashore includes a provision that permitted the owners of improved property to reserve for themselves and their successors or assigns a limited right of use and occupancy after these properties were acquired by the Federal Government or its agents, as follows:

[A]ny owner or owners of improved property on the date of its acquisition by the Secretary may, as a condition of such acquisition, retain for themselves and their successors or assigns a right of use and occupancy of the property for noncommercial residential purposes, for twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or his spouse, whichever is later.

This provision was exercised by entering into one of two types of Reserved Property Agreements (RPAs): (1) a term for a specified number of years or (2) a life estate that ended at the death of the owner. (Note: Certain landowners concluded RPAs with the National Park Foundation

before establishment of the Seashore. These RPAs had varying terms, including terms of 36 and 40 years.) Upon fulfillment of the terms specified in each RPA, the rights of use and occupancy granted to the former owners, successors, or assigns would terminate and full use of the property would revert to the NPS.

Twenty RPAs were created during the land acquisition process for the Seashore. The terms of use and occupancy were negotiated individually in each RPA and thus each agreement varies within the established framework. The result is that RPAs have expired and will continue to expire at various times. In recent years, one RPA concluded in January 2000 and three others expired in late 2010. A fifth RPA expired in May 2011. Assets associated with these five expired agreements are located throughout the Seashore. In total, the list of assets associated with these five expired agreements includes *seven properties or tracts*, comprising approximately 50 acres of land; seven residential homes; and a number of smaller structures.

The location of the seven former reserved properties is indicated in Figure 1 below.



Descriptions of the individual tracts are provided below:

**The Grange** (expired 12-15-10) – 4.94 acres. The Grange and its surrounding property are contributing features of the Dungeness Historic District, which is listed in the National Register of Historic Places (NRHP). The property is located in the heart of the historic district and, until its RPA expired, had been the only private inholding within the district. The Grange building itself contains 7,000 SF of finished interior space plus additional attic and basement areas. The Grange has been rehabilitated several times over the years and is in good condition. A small dock provides intermittent boat access depending on tide conditions. The Grange and Beach Creek Dock House are listed on the NPS List of Classified Structures. (The List of Classified Structures is an inventory of all historic and prehistoric structures within the parks of the National Park System that have been evaluated and determined to have historical, architectural and/or engineering significance, and in which the National Park Service has, or plans to acquire, any legally enforceable interest.) Non-historic structures on the tract include a 2-bay, wood-framed garage.

**Nancy's Fancy** (expired 12-15-10) – 9.9 acres. Located between Stafford and Little Greyfield. This isolated tract is the only developed site in its general environs. It is just inside the tree-line at the edge of the ocean-side dune field and lies approximately 250 yards from the beach. The wood-frame house is elevated on wood pilings, with the lower level partially enclosed.

**Phillips Tract** (expired 9-29-10) – .38 acres. Located north of Greyfield in the Davisville area on the southern part of the island. The smaller of two tracts under an RPA with the Cumberland Island Holding Company. Assets include a small, modern bungalow house of wood-frame construction. The tract is located near existing NPS housing.

**Goodsell Tract** (expired 9-29-10) – 6.55 acres. Located north of Greyfield in the Davisville area on the southern part of the island. The larger of the two tracts under an RPA with the Cumberland Island Holding Company. Assets include a modest-sized, modern, ranch style house of wood-frame construction. There is an adjacent shed also of wood-frame construction. The tract is located near existing NPS housing.

**Schwartz-Jenkins Tract** (expired 10-8-10) – 7.5 acres. Located between Stafford and Little Greyfield on the west side of the island, the tract is approximately 1/3-mile from the NPS dock on Old House Creek and has frontage on Old House Creek marsh. Assets include a modern, ranch style house of wood-frame construction; a modern efficiency-type residence designed for the mobility impaired; a small modern, guest cabin; and a pole shed.

**Stafford Beach House** (expired 1-02-00) – 1 acre. This tract is located on the western edge of the dune field at the interface with the maritime oak forest, approximately 250 yards from the ocean beach. It is east of the Stafford Historic District, outside of the district boundary, but potentially eligible for nomination to the National Register of Historic Places and List of Classified Structures. Assets include a small, two-wing beach bungalow centered on a large, wooden deck and a detached, small, modern addition.

**Toonahowie** (expired 5-27-11) – 20 acres. Located on the west side of Table Point within an area that is designated wilderness. It is the only developed site in its general environs.

Structures include a modern, ranch-style house of wood-frame construction built on brick piers, with lap siding and an attached carport and shed built on a concrete slab. The property has a dock and deep-water access on Mumford Creek.

### **Purpose and Need for the Plan**

The primary purpose of the plan is to determine the most beneficial and appropriate use of the land and structures associated with the five expired RPAs. A secondary purpose of the plan is to create a decision making process that can be used to analyze assets associated with reserved property agreements that expire in the future.

The plan is needed to determine the management approaches that NPS will take with respect to the land and structures coming into full NPS ownership after the RPAs expire. Each of the seven tracts that have come into NPS ownership have been under private control for decades, with little direct NPS involvement. NPS needs to identify the most beneficial and appropriate use of these tracts and the structures located thereon.

### **Development of Management Options**

The NPS developed five management options potentially applicable to each property. These management options are thought to represent the full range of feasible approaches for managing resource conditions and visitor experiences at each tract. The five potential management options evaluated in the FRPMP/EA were:

- Reuse for Exclusive Private Residential Purposes – Allow the former agreement holder, or some other third party, to occupy the property. Objectives would be to (1) have private parties pay for upkeep; (2) obtain rent revenue; and (3) encourage uses that support park area management objectives.
- Reuse for Park Operational Purposes -- Move certain management operations away from a less than optimal site and relocate them to the former reserved property.
- Reuse for Visitor Service/Education/Recreation Purposes – Use the former reserved property to expand core interpretive programs, heritage and environmental education, recreation, and other visitor activities.
- Removal/Disposal – Remove structures on the property if they are not needed, or are located in wilderness.
- Reuse as Employee, Volunteer, and/or Cooperator Housing – Move housing from an existing, less than optimal location and relocate it to the former reserved property.

### **Preferred Management Option for Each Former Reserved Property**

A preferred management option for each former reserved property was selected using the Choosing by Advantages (CBA) process and subsequent value analysis. The results of the CBA analysis are summarized below:

## **THE GRANGE**

### ***Preferred Management Option: Reuse for Visitor Service/Education/Recreation Purposes***

In considering the visitor service/education/recreation option and the exclusive private residential use option, it was ultimately determined that the advantages of reusing The Grange for visitor activities, enjoyment, and education outweighed the advantages of reusing the structure for exclusive private residential purposes. An essential advantage of the visitor use option is that it would integrate The Grange property into the most fundamental interpretive areas and programs of the Seashore, which comprise the Dungeness Historic District and the “Footsteps Tour.” The Grange is situated in the heart of the district and is a significant feature that has never been accessible to the public. It is part of the story of Cumberland Island and its grounds and interior ought to be accessible to all island visitors.

The features of the property also present an excellent opportunity for adaptation as a center for heritage and environmental education programs. Such a facility would be in keeping with the goals of various NPS, State of Georgia, and park initiatives to foster education and outreach. While the historic character and features of The Grange building would be preserved, some of its facilities could be adapted for exhibits, classrooms, and discovery labs. The ample grounds and dock provide opportunities for outdoor programs. The Grange’s proximity to the Dungeness Historic District, Beach Creek, and other resources on the island provides direct exposure to the island’s natural and cultural features. Its location is also important to support the logistical needs of the heritage and environmental education program. The Seashore’s use of the Grange for visitor services, including a potential education center, would allow for marked improvement in the two critical service-wide goals of enhancing educational opportunities and making the parks relevant to a diverse population.

Maintaining The Grange and using it for education and interpretation programs will result in additional costs for the NPS. However, the park anticipates developing partnerships or other appropriate agreements targeted specifically toward support and involvement in education and outreach programs that would help alleviate the operational and maintenance burdens. One possible mechanism for achieving this objective is a historic lease.

When evaluating the exclusive private residential use option, the ability to minimize the National Park Service’s maintenance and operational burden was a very strong advantage. However, in looking at other factors, exclusive private residential use provided little or no comparative advantage. While income from a residential lease or similar agreement would help finance preservation and maintenance of the historic features, these advantages would be offset by the exclusivity of residential use, particularly because The Grange is located in the middle of the Dungeness Historic District, a primary visitor destination on the island.

Exclusive private residential use at The Grange would increase the potential for impacts to natural and cultural resources island-wide, and could similarly affect the visitor experience. One potential impact of exclusive, private residential use is likely to be additional beach driving under the State of Georgia’s beach driving permitting system (Georgia Rule 391-2-2-.03.) Managing and supporting a lease also places its own set of administrative and operational burdens on the Seashore. In addition, exclusive private residential use would effectively make The Grange available to a very small segment of the American public and render it inaccessible

to the overwhelming majority of visitors, in contravention of NPS policy. For these reasons, the circumstances of exclusive private residential use are not suitable considering the property's location.

The exact method of interpreting the history and architecture of The Grange and implementing a potential visitor service/education/recreation program on the site is beyond the scope of the plan. Among the instruments that could be used are partnership agreements, cooperative agreements, and historic leases (36 CFR Part 18). Any of these could include provisions for part-time residential occupancy if such occupancy were determined to further the reuse for visitor service/education/recreation function and be compatible with historic preservation goals for The Grange.

### **NANCY'S FANCY**

#### ***Preferred Management Option: Removal/Disposal***

The property is located in a natural area near the beach and dunes that has the potential to revert to a natural, more primitive character. The house is threatened by the encroachment of dunes. In addition, professional inspection of the house indicates that its condition is such that bringing it up to NPS standards would be expensive. Such a cost would not be worthwhile given the greater advantages associated with natural restoration of the site and the minimal benefits the location provides for use alternatives. The somewhat remote and isolated location is not ideal for park administrative or housing purposes, nor is it near visitor use areas where it could readily be incorporated into visitor programs and activities. Reusing the property for residential purposes provides no other advantage aside from reducing NPS maintenance and operational burdens, which can be accomplished through removal.

### **GOODSELL/PHILLIPS**

#### ***Preferred Management Option: Reuse as Employee, Volunteer, and/or Cooperator Housing***

Two houses on this tract are located near existing employee housing in the "Davisville" portion of the Seashore. Using this site for housing would allow NPS to move personnel out of non-historic and historic structures in the Dungeness Historic District. The non-historic structures at Dungeness could then be removed from the housing inventory, the historic district could be better interpreted to the public, and the cultural landscape restored. (Historic structures in the district no longer used for housing would be occupied periodically by persons using the proposed environmental/heritage education facility at The Grange.) If further study reveals that the existing Goodsell/Phillips structure(s) cannot be repaired and maintained at reasonable cost, the structure(s) could be removed and the site potentially used for new housing. Maintenance costs associated with using Goodsell/Phillips for housing would be offset by the collection of rent from the resident employee.

### **SCHWARTZ-JENKINS**

#### ***Preferred Management Option: Removal/Disposal***

The original CBA analysis for this structure identified certain advantages justifying reuse of the facilities at the site as employee, volunteer, and/or cooperator housing. However, subsequent professional inspection of the primary residential structure on this tract indicates that its condition has deteriorated to the point that it is structurally unsound and cannot be brought up to NPS standards at a reasonable cost, and most likely would have to be replaced altogether. In

addition, while the new residential addition built on the property was initially thought to provide the most benefit for potential reuse due its design for the mobility-impaired, later inspections and assessments have revealed that there are numerous deficiencies (some of them serious) that would need to be addressed before the structure could be considered up to standards. Moreover, the tract's relatively isolated, detached location makes it logistically problematic for inclusion in operations, visitor services, and/or housing. While the ADA accessibility of the new addition has significant advantages, those too must be weighed against the financial cost and potential resource impacts involved in completing the substandard ADA addition, which may have long-term safety and structural problems. Ultimately, the NPS has determined that efforts to improve accessibility on the island should be directed toward facilities that are more centrally located and serve more visitors with disabilities than what is possible at the Schwartz-Jenkins tract. Therefore, because the NPS cannot identify an appropriate reuse for the property that is financially practical, the management recommendation is for removal/disposal and restoration of the site to a primitive state.

### **STAFFORD BEACH HOUSE**

#### ***Preferred Management Option: Reuse as Employee, Volunteer, and/or Cooperator Housing with the potential removal of non-historic elements***

This historic structure's setting is well suited for housing researchers, university field students, and volunteers working on scientific and other resource projects. It could also be used to house NPS personnel. Maintenance costs associated with using the structure for housing would be offset by the collection of rent from the occupant. While the structure's setting has advantages for visitor interpretation and education programs, its relatively remote location, well away from most visitor destinations, makes this use impractical. Likewise, the distance of the structure from the park's principal administrative areas countered any advantages for park operational use. Residential reuse was strongly considered but its sole distinguishing advantage was to minimize NPS maintenance and operational burdens. That advantage would be offset by the effects of private residential use within the park, as previously discussed. Accordingly, the NPS' preferred management alternative for the Stafford Beach House is reuse for employee, volunteer, and/or cooperator housing.

### **TOONAHOWIE**

#### ***Preferred Management Option: Removal/Disposal***

The house and related structures at Toonahowie are located in the Seashore's designated wilderness area. Under the Wilderness Act of 1964, designated wilderness is to be an area without permanent structures. 16 U.S.C. § 1133(b), (c). Accordingly, these structures need to be removed to allow the area to more fully achieve wilderness character.

### **Alternatives Considered**

The NPS considered two alternatives in the EA process: one action alternatives and a "No-Action" alternative. The no action alternative would continue current management of the reserved properties, which essentially involves monitoring their condition and acting to preserve and protect historic resources. In contrast, the action alternative combines the preferred management option for each former reserved property, as described previously, into a comprehensive action alternative. The action alternative is NPS' preferred alternative.

These two alternatives are more fully summarized as follows:

***Alternative A – No Action (Continue Current Management)***

This alternative would entail leaving in place all non-historic and historic structures on the former reserved properties. All non-historic structures would be maintained in such a way as to prevent their deterioration and to rectify any safety hazards, but they would not be occupied or used for any purpose. All historic structures (i.e., The Grange, Beach Creek Dock House, and Stafford Beach House) would be maintained and preserved in accordance with the Secretary of Interior's Standards for the Treatment of Historic Properties, as well as other applicable laws governing historic preservation. For all structures, the NPS would conduct periodic inspections and general maintenance to ensure roofs are intact, leaks are blocked, drainage problems are corrected, and rodent and insect controls are in place. For historic structures, any damage would be repaired in accordance with the Secretary's standards.

***Alternative B – Implement a Mixture of Removal and Adaptive Re-use of Structures (Preferred Alternative)***

Under this alternative, the NPS would implement a comprehensive FRPMP consisting of the preferred management alternative for each reserved property as developed in the CBA process and subsequent evaluations. These uses are:

- The Grange – Reuse property and structures for visitor interpretation, education, and recreation services. Remove secondary non-historic structures.
- Goodsell tract – Reuse structure for employee, volunteer, and/or cooperator housing. Use site for new housing structure if existing structure cannot be adapted at reasonable cost.
- Phillips tract – Reuse structure for employee, volunteer, and/or cooperator housing. Use site for new housing structure if existing structure cannot be adapted at reasonable cost.
- Schwartz-Jenkins tract – Remove structures.
- Nancy's Fancy – Remove structures.
- Stafford Beach House – Reuse structure for employee, volunteer, and/or cooperator housing. Remove non-historic additions.
- Toonahowie – Remove structures.

Specific design considerations and construction plans for the structures reused or demolished under this alternative are beyond the scope of the FRPMP. In accordance with the National Historic Preservation Act (NHPA), future Section 106 compliance will be completed prior to any action that might have an effect on historic properties subject to this plan, including structures, landscapes, and archeological sites. With respect to The Grange, further consultation will be conducted with the Georgia State Historic Preservation Office (SHPO), the National Trust for

Historic Preservation (NTHP), Partners in Preservation (PIP), and others as appropriate as more specific action/reuse plans are developed.

The environmental consequences of the two alternatives were assessed using the following impact topics:

- Natural Resources (vegetation, wildlife);
- Physical Environment (air, water, soil);
- Cultural, Historic, and Archaeological Resources;
- Public Health and Safety (including accessibility);
- Visitor Use/Experience;
- Wilderness; and
- CUIS operations.

Section 4 of the EA provides a detailed description of the environmental consequences of each alternative. Indirect and cumulative impacts were assessed, as was the possibility of impairment to Seashore resources and values.

### **Alternatives Considered but Dismissed**

As noted, the planning team considered five management options for each reserved property. These potential future uses were evaluated using the CBA process, and a preferred management option was generated for each reserved property. The preferred management alternatives were in turn rolled into an action alternative (Alternative B) for analysis in the EA. Those management options not included in Alternative B were either not feasible or offered fewer advantages to NPS or the public than the option carried forward for EA analysis. All potential future uses that were evaluated but not included in the action alternative constitute alternatives considered but dismissed.

### **Selected Alternative**

After review of the alternatives and consideration of comments received from the public, various agencies, and interested stakeholders, the NPS has chosen Alternative B as the selected alternative. The NPS has selected Alternative B for implementation because it is consistent with the congressional mandates of the Seashore's enabling legislation (Public Law 92-536), while providing certain important advantages, including:

- Increased visitor access to certain cultural resources of CUIS, which until now has been limited by the private property rights of reserved-estate holders;
- Improved housing management; and
- Increased primitive and wilderness character.

## **Avoidance, Mitigation, and Minimization of Potential Adverse Effects of the Selected Alternative**

For all action alternatives, best management practices and mitigation measures would be used to prevent or minimize potential adverse effects associated with the project. These practices and measures would be incorporated into the project implementation documents and plans.

Resource protection measures undertaken during project implementation would include, but would not be limited to those listed in Appendix A. The impact analyses in the “Environmental Consequences” section were performed assuming that these best management practices and mitigation measures would be implemented as part of the action alternative.

## **Environmentally Preferable Alternative**

Of the two original alternatives described above, Alternative B was identified as environmentally preferred in the EA. In light of the mitigation and best management practices listed in Appendix A and required by this FONSI, the NPS hereby determines that the selected alternative (Alternative B) is the environmentally preferred alternative.

The environmentally preferred alternative is determined by applying criteria set forth in NEPA, as guided by regulations issued by the CEQ. The CEQ regulations provide direction that “[t]he environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA’s Section 101(b). Generally this means the alternative which causes the least damage to the biological and physical environment. It also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources.” This includes alternatives that:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life’s amenities; and
- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Alternative B is the alternative that best achieves consistency with the above six bulleted values of Sections 101 and 102(1) of NEPA. Alternative B would allow maximum public access to The Grange, and would create important new opportunities for interpretation and environmental and cultural education. Alternative B would also improve overall management of the Seashore by moving employee housing to more appropriate areas. Relocating housing would open up historic

structures to visitation by the public, allow the removal of non-historic structures and activities from historic areas, and/or dispose of facilities not suitable for housing. Alternative B would also allow for the enhancement of wilderness character in the Seashore's designated wilderness area by removing permanent structures from wilderness. Both alternatives A and B would fully protect historic structures on the former reserved properties. The principal environmental benefit of Alternative A is that it would have the fewest impacts to soils, vegetation, wildlife, and water quality because it calls for no demolition and removal of structures.

In summary, Alternative B attains the widest range of beneficial uses of the environment. It would also preserve diversity and variety of individual choice, a sharing of life's amenities, and healthful and pleasing surroundings. Therefore, Alternative B (selected alternative) is also the environmentally preferable alternative.

### **Why the Selected Alternative Will Not Have a Significant Effect on the Human Environment**

Consideration of the effects described in the EA, and a finding that they are not significant, is a necessary and critical part of this FONSI, as required by 40 CFR §1508.13. Significance criteria are defined in 40 CFR § 1508.27. These criteria direct NPS to consider direct, indirect, and cumulative impacts of the proposed action, as well as the context and intensity of impacts:

**Context.** This measure of significance considers the setting within which an impact was analyzed in the EA, such as the affected region, society as a whole, affected interest, and/or a locality. The selected alternative affects only the immediate local area, in terms of resources, employees, and/or visitors. Therefore, any possible impact is limited to this level of least significance.

**Intensity.** This measure of significance refers to the severity of impacts, which may be both beneficial and adverse, and considers measures that will be applied to minimize or avoid impacts. As directed by 40 CFR § 1508.27, intensity is evaluated by considering the following factors:

#### *Impacts that may be both Beneficial and Adverse*

Under the selected alternative, the NPS would re-use The Grange, Beach Creek Dock House, and Stafford Beach House and undertake a more active maintenance and repair program, resulting in impacts to historic structures that would be direct and indirect, long-term, and beneficial. Removal of non-historic structures at The Grange and elsewhere in the Dungeness Historic District would result in long-term, direct and beneficial impacts to the cultural landscape. Any impacts to archeological resources under Alternative B would be negligible to minor, direct, long term, and adverse. Impacts to soils, vegetation and wildlife, water quality, wilderness, and visitor use and experience would be long-term and beneficial. Impacts to the visitor use and experience, education and interpretation, and public health and safety (including accessibility) would likewise be long-term and beneficial. Impacts to CUIS operations are likely to be direct and indirect, long-term, moderate and adverse. Based on the EA analysis, most of the impacts of the

selected alternative would be beneficial. The selected alternative would not result in significant impacts on the human environment.

*Degree of Effect on Public Health and Safety*

Under the selected alternative, four of the former reserved properties would be re-used, and NPS would undertake a more active maintenance and repair program for associated structures than under Alternative A. The structures would also be made accessible to the public and/or NPS staff. The resulting impacts to public health and safety, including accessibility, would be direct, long-term, and beneficial.

*Unique Characteristics of the Geographic Area such as Proximity to Historic or Cultural Resources, Park Lands, Prime Farmlands, Wetlands, Wild and Scenic Rivers, or Ecologically Critical Areas*

The selected alternative would involve the re-use of various historic structures, including The Grange, Beach Creek Dock House, and Stafford Beach House. The Grange and Beach Creek Dock House would be used for visitor service/education/recreation purposes and the Stafford Beach House would be occupied by NPS employees or other persons engaged in activities on behalf of the Seashore. These structures would benefit from being occupied and used on a daily basis. Because they would be occupied and used, both structures would be subject to regular repairs, maintenance, and upgrades. As noted above, the exact method of interpreting The Grange and implementing a potential visitor service/education/recreation function on the site will be determined at a later time. As appropriate, the NPS could enter into partnership agreements, cooperative agreements, or historic leases (36 CFR Part 18) to ensure long-term protection of historic resources.

Based on the EA findings, it has been determined that there will be no significant impacts to unique characteristics in the immediate vicinity or regionally. There are no other unique characteristics of the geographic area that are affected by the selected alternative.

*Degree to which Effects on the Quality of the Human Environment are Likely to be Highly Controversial*

Department of the Interior regulations implementing NEPA provide that the term “controversial” refers to “circumstances where a substantial dispute exists as to the environmental consequences of the proposed action and does not refer to the existence of opposition to a proposed action, the effect of which is relatively undisputed.” 46 CFR § 46.30.

There is no substantial dispute as to what the effects of the selected alternative are likely to be assuming adequate funding is secured to implement the alternative. Therefore, the effects from the selected alternative are not likely to be highly controversial.

*Degree to which the Possible Effects on the Human Environment are Highly Uncertain or Involve Unique or Unknown Risks*

The effects of the selected alternative are relatively straightforward and easily predicted. Non-historic structures will either be removed or adapted to employee, volunteer, and/or cooperator housing. Historic structures will be maintained and re-used for either visitor service/education/recreation purposes (The Grange and Beach Creek Dock House) or for employee, volunteer, and/or cooperator housing (Stafford Beach House). The NPS has determined that with respect to these actions, the extent and degree of uncertainty regarding impacts or unique or unknown risks is not significant.

*Degree to which the Action Establishes a Precedent for Future Actions with Significant Effects or Represents a Decision in a Principle about a Future Consideration*

Nothing in the proposed action establishes a precedent that would result in significant effects in the management of CUIS or any other areas in the National Park System. The selected alternative contains provisions allowing and governing the removal or re-use structures on former reserved properties that have passed to the United States. This is entirely consistent with NPS practice at other parks having former reserved properties.

*Whether the Action is Related to Other Actions with Individually Insignificant but Cumulatively Significant Impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact to the environment.*

The selected alternative will increase the number of historic structures at the Seashore that NPS is required to maintain, with corresponding increases in NPS' financial commitment for repair and maintenance. Recent efforts to obtain funding for repair and maintenance of historic structures at the Seashore have enjoyed substantial success. However, if future efforts are less successful, or if funding through governmental sources is not adequate, the NPS is committed to partnering with private sources to help protect the Seashore's historic structures. The FRPMP specifically calls for such partnerships, including the possibility of entering into historic leases, where feasible and appropriate to achieve NPS objectives. Thus, there are no significant cumulative adverse impacts associated with the selected alternative.

*Degree to which the Action may Adversely Affect Districts, Sites, Highways, Structures, or Objects Listed or Eligible for Listing in the National Register of Historic Places (NRHP) or may Cause Loss or Destruction of Significant Scientific, Cultural or Historic Resources*

Under Section 110 of the NHPA, the NPS, as a Federal land-holding agency, is required to identify, inventory, and nominate properties to the National Register of Historic Places, and to exercise caution to protect such properties (16 U.S.C. § 470). Section 106 of the NHPA requires the agency to consider the effects of its actions on National Register-listed or eligible properties. The sites of the proposed action have been surveyed and several historic and archaeological

resources eligible for listing on the National Register have been identified on the island, although none of the sites have been completely surveyed for archeological resources.

In compliance with Section 106 of NHPA, the NPS has determined that the conceptual preferred management alternatives identified in the FRPMP will have no adverse effects on historic properties, as defined in 36 CFR Part 800.5(d)(1). By letter dated August 3, 2011 (see Appendix B), the Georgia SHPO has concurred with this determination. Specific design considerations and construction plans for the historic properties proposed for reuse under this alternative are beyond the scope of the FRPMP. However, future Section 106 compliance will be completed prior to any action that might have an effect on historic properties subject to this plan, including structures, landscapes, and archeological sites. With respect to The Grange, further consultation will be conducted with the Georgia SHPO, NTHP, PIP, and others as appropriate as more specific action/reuse plans are developed. Should the NPS, within five years of the signature date of this FONSI, be unable to develop and initiate a phased plan that will facilitate achievement of the preferred management option for The Grange, an historic property listed in the National Register of Historic Places, the NPS will reevaluate management plan(s) for the property and examine other feasible uses in accordance with approved NPS planning processes and guidelines.

PIP and the NTHP initially disagreed with the National Park Service's finding of no adverse effect to historic properties, which was determined by the NPS through a National Historic Preservation Act Section 106 assessment. (The Georgia SHPO concurred with the NPS finding of no adverse effect.) PIP and NTHP subsequently requested consulting party status in the Section 106 process. Based on 36 CFR Part 800 guidelines, the NPS granted both entities consulting party status. After several exchanges of letters and e-mails outlining the respective positions of the parties, a meeting was held on February 2, 2012, at the office of the Georgia SHPO in Atlanta. At that meeting key NPS staff met with leaders from the two organizations to answer their concerns and resolve differences. After further written comments were received by the NPS from the two organizations, the NPS agreed to various changes to the wording of the FRPMP. These changes principally involve clarifying that NPS will actively consider historic leasing as a tool for achieving the goals of the selected alternative. The agreed-upon changes are reflected in this document. Based on the changes agreed to among the parties, PIP and the NTHP have withdrawn their assertion of adverse effect.

#### *Degree to which the Action May Affect a T&E Species or Critical Habitat*

Historical review and field observations were performed to identify the presence of T&E species or potential habitat for these species. Fourteen (14) federally listed species are known to exist on and around Cumberland Island. Management actions taken with respect to the former reserved properties would not affect any of the listed special status species. Proposed actions relating to the former reserved properties would not occur near any breeding, foraging, or resting grounds for any special status species. These actions would not alter behavior of special status species, and would not alter their habitat. Therefore, the NPS dismissed this impact topic from detailed consideration in the EA. The specific finding under Section 7 of the Endangered Species Act is "no effect."

*Whether the Action Threatens a Violation of Federal, State, or Local Law or Requirements Imposed for the Protection of the Environment*

The selected alternative for the CUIS FRPMP (Alternative 2) does not threaten a violation of any Federal, State, or local law or requirement imposed for the protection of the environment.

### **Impairment**

In addition to reviewing the list of significance criteria, the NPS has determined that implementation of the selected alternative will not constitute an impairment to the CUIS's resources and values. An impairment analysis is attached hereto as Appendix C.

### **Public Involvement**

Seashore and regional staff conducted internal scoping starting in early 2009 to identify issues and concerns arising out of the proposed action. Dedicated internal scoping workshops were held at CUIS in August and October 2009. External scoping was also conducted in 2009-10, including public meetings, to solicit public input on the future disposition of the reserved properties.

The EA was released for public review in July 2011. The availability of the EA was announced through local and regional news media, targeted mailings to stakeholders and through the NPS Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/cuis>. A public meeting was held on July 27, 2011, in St. Marys, Georgia. During the meeting, an overview of the plan was presented and attendees were able to submit oral and written comments. A total of 32 persons attended the meeting. Two comment cards were generated from the meetings, and ten persons provided testimony to the court reporter.

A total of 2,225 comments were received by the NPS during the EA comment period, including the comments received at the public meeting. (Note: this figure is approximate, as some individuals commented multiple times and it is unlikely that every instance of this was detected by the compiler.) Comments were received for and against Alternative B (NPS' preferred alternative). The vast majority of comments dealt with the proposed treatment of The Grange as set forth in the preferred alternative. A total of 1,754 commenters favored Alternative B's use of The Grange as a NPS visitor contact station and/or environmental education center. The majority of these comments were submitted by members of a national environmental advocacy organization. A total of 164 commenters expressed opposition to this proposal. Most persons expressing opposition favored preservation of The Grange using a historic lease with a private entity. An additional 307 commenters submitted general comments favoring preservation of the Seashore's resources, with "Keep it wild" being a common sentiment.

The majority of comments were from individual citizens, but comments were also submitted by the National Trust for Historic Preservation, Partners in Preservation, Inc., the Georgia Trust for Historic Preservation, the Georgia Conservancy, the Georgia Chapter of the Sierra Club, and Friends of Georgia.

Substantive comments outlined objections to Alternative B and set forth alleged deficiencies in the analysis supporting Alternative B as the NPS' preferred alternative. Responses to substantive comments are found in the Errata Sheets for the EA attached to this FONSI as Appendix D.

## **Conclusion**

The selected alternative for the CUIS FRPMP (Alternative B) does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The CUIS FRPMP will not have a significant effect on the human environment. Some long-term adverse environmental impacts will likely occur, but will be negligible to moderate. Most impacts will be long-term and beneficial. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the NRHP or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects or elements of precedent were identified. Implementation of the CUIS FRPMP will not violate any Federal, State or local environmental protection laws. Based on the forgoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

# **APPENDIX A**

## **MITIGATION**

## MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES

<b>Potential Adverse Effect on:</b>	<b>Mitigation Measure or Best Management Practice</b>
<b>Cultural Resources</b>	<p>All treatment of The Grange, Beach Creek Dock House, and Stafford Beach House will be in accordance with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> (NPS 1995b)</p> <p>Historic Structure Reports will be developed for The Grange, Beach Creek Dock House, and Stafford Beach House to guide rehabilitation of the structures. Documentary evidence from period plans, maps, drawings, photographs and other sources along with investigation of the existing buildings will be used to ensure accurate repair, rehabilitation, and restoration of these structures.</p> <p>To minimize ground disturbance, all staging areas, materials stockpiling, vehicle storage, and other construction-related facilities and areas would be located in a previously disturbed area determined to be clear of archeological resources or on hardened surfaces such as existing parking areas. Mortar would be mixed at the staging areas and transported to the part of the structure under restoration, rehabilitation, or repair.</p> <p>The Cultural Landscape Report for the Dungeness Historic District will be amended to include the grounds of The Grange and will include recommendations for appropriate treatment and use.</p> <p>Areas around the exterior of Stafford Beach House disturbed by restoration or rehabilitation would be revegetated with native grass and landscape plantings and other landscape elements as appropriate.</p> <p>Potential ground-disturbing activities such as removal of existing walks or full demolition would be carefully planned because these areas may harbor presently unknown archeological resources. Construction documents would include stop-work provisions should archeological resources be uncovered and the contractor would be apprised of these protective measures during the pre-construction conference.</p> <p>Work limits would be established and clearly marked to protect resources, and all protection measures would be clearly stated in any construction/demolition specifications. Workers would be instructed to avoid conducting activities beyond the construction/demolition zone and their compliance monitored by the project Contracting Officer's Technical Representative.</p>

	<p>Archeological monitoring of any ground disturbance in currently unsurveyed areas, including inaccessible paved areas or areas beneath and adjacent to existing structures (walkways, steps, flooring, etc.) will help ensure that all cultural resources are identified and documented during the construction/demolition process.</p> <p>If previously unknown archeological resources are discovered, work will be stopped in the area of any discovery, protective measures will be implemented, and procedures outlined in 36 <i>Code of Federal Regulations</i> 800 will be followed. In consultation with a qualified archeologist, resources will be evaluated for their National Register of Historic Places eligibility, and in consultation with appropriate agencies, adjustment of the project design would take place to avoid or limit any adverse effects on resources.</p> <p>To reduce unauthorized collecting, construction/demolition personnel would be educated about cultural resources in general and the need to protect any cultural resources encountered. Work crews would be instructed regarding the illegality of collecting artifacts on federal lands to avoid any potential Archeological Resources Protection Act violations. This would include instructions for notifying appropriate personnel if human remains are discovered.</p>
<b>Construction-related effects on soils</b>	<p>Standard best management practices to limit erosion and control sediment release would be employed during any ground-disturbing activities. Such measures include use of silt fencing, limiting the area of vegetative disturbance, use of erosion mats, and covering banked soils to protect them until they are reused.</p>
<b>Public Health and Safety</b>	<p>An accident prevention program would be a required submittal. This plan would include job hazard analyses associated with each major phase of the proposed project and would emphasize both worker and public safety. It would include planning for emergency situations, including fires, tornados, building collapse, explosions, power outages, and rainstorms.</p> <p>The plan would also take into consideration the nature of the construction, site conditions, including seasonal weather conditions and the degree of risk or exposure associated with the proposed activity. Regular project inspections and safety meetings would ensure the safety of the premises both to construction staff and visitors.</p> <p>A defined work area perimeter would be maintained to keep all work-related impacts within the affected area. All areas that are subject to vehicular and pedestrian traffic would be kept clean of construction</p>

	<p>debris and soils. Sweeping of these areas would be implemented as necessary.</p> <p>Visitor safety would be ensured both day and night by fencing of the construction/demolition limits of the proposed action. Areas not safe for public entry would be marked and signed for avoidance. Unsafe conditions would be inspected for and corrected as soon as practicable to minimize the potential for staff or visitor injury.</p> <p>To the degree possible, impacts would be mitigated by the use of best management practices to reduce generation of dust and by limits on the types of chemicals (e.g., ones with high VOC ratings) used in new construction and rehabilitation.</p>
<b>Visitor Experience</b>	<p>Specific provisions would ensure that the majority of material deliveries were made during the week, rather than on weekends or holidays.</p> <p>All construction equipment would be equipped with mufflers kept in proper operating conditions, and when possible, equipment would be shut-off rather than allowed to idle. Standard noise abatement measures would include the following elements: a schedule that minimizes impacts to adjacent noise-sensitive areas, use of the best available noise control techniques wherever feasible, use of hydraulically or electrically powered impact tools when feasible, and location of stationary noise sources as far from sensitive public use areas as possible.</p>
<b>Sustainability and Conservation Potential</b>	<p>Shipment of materials in full loads would be encouraged, and vehicles and equipment would be maintained to minimize pollution generation.</p> <p>Restoration and rehabilitation work would incorporate energy efficient and sustainable design to minimize energy consumption where such design considerations would not compromise the integrity of historic properties.</p>

**APPENDIX B**

**CORRESPONDENCE  
FROM  
GEORGIA DEPARTMENT OF NATURAL RESOURCES  
HISTORIC PRESERVATION DIVISION**



HISTORIC PRESERVATION DIVISION

MARK WILLIAMS  
COMMISSIONER

DR. DAVID CRASS  
DIVISION DIRECTOR

August 3, 2011

Fred Boyles, Superintendent  
Cumberland Island National Seashore  
101 Wheeler Street  
St. Marys, Georgia 31558  
Attn: John Fry, [john\\_fry@nps.gov](mailto:john_fry@nps.gov)

**RE: Cumberland Island: Former Reserve Properties Management Plan  
Camden County, Georgia  
HP-110713-001**

Dear Mr. Boyles:

The Historic Preservation Division (HPD) has received the Former Reserve Properties Management Plan (FRPMP) and Environmental Assessment prepared June 8, 2011. Our comments are offered to assist the National Park Service (NPS) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

Based on the information provided, HPD agrees with the NPS that the Grange and Beach Creek Dock House are contributing to the National Register of Historic Places (NRHP)-listed Dungeness Historic District and that Stafford Beach House, which is outside of the NRHP-listed Stafford Historic District, is eligible for inclusion in the NRHP. HPD also agrees that the structures located on the Phillips, Goodsell, Swartz-Jenkins, Nancy's Fancy and Toonahowie Tracts are not eligible for inclusion in the NRHP. Furthermore, HPD agrees with the NPS that the preferred management alternatives identified in the FRPMP will have **no adverse effect** to historic properties, as defined in 36 CFR Part 800.5(d)(1).

HPD understands that the management alternatives in the plan are conceptual in nature and that specific action plans for each property as developed will undergo further review in coordination with our office prior to implementation. We look forward to working with the NPS as additional information is available. If you have any questions, please do not hesitate to contact Elizabeth Shirk, Environmental Review Coordinator, at (404) 651-6624.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Anderson-Cordova".

Karen Anderson-Cordova, Program Manager  
Environmental Review & Preservation Planning

KAC/ECS

cc: Tommy Jones, NPS  
Lupita McClenning, Coastal Regional Commission of Georgia  
Nancy Tinker, National Trust for Historic Preservation, [nancy\\_tinker@nthp.org](mailto:nancy_tinker@nthp.org)

254 WASHINGTON STREET, SW | GROUND LEVEL | ATLANTA, GEORGIA 30334  
404.656.2840 | FAX 404.657.1368 | [WWW.GASHPO.ORG](http://WWW.GASHPO.ORG)

## **APPENDIX C**

### **IMPAIRMENT ANALYSIS**

## IMPAIRMENT DETERMINATION

### **The Prohibition on Impairment of Park Resources and Values**

NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the Nation Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

### **What is Impairment?**

NPS *Management Policies 2006*, Section 1.4.5, *What Constitutes Impairment of Park Resources and Values*, and Section 1.4.6, *What Constitutes Park Resources and Values*, provide an explanation of impairment.

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, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

Section 1.4.5 of *Management Policies 2006* states:

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects 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 to opportunities for enjoyment of the park, or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Per Section 1.4.6 of *Management Policies 2006*, park resources and values that may be impaired include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act unless the NPS was in some way responsible for the action.

### **How is an Impairment Determination Made?**

Section 1.4.7 of *Management Policies 2006* states, "[i]n making a determination of whether there would be an impairment, an NPS decision-maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); consultations required under Section 106 of the National Historic Preservation Act (NHPA); relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

*Management Policies 2006* further defines "professional judgment" as "a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities relative to the decision.

### **Impairment Determination for the Preferred Alternative**

This determination on impairment has been prepared for the preferred alternative described in Section 2.4 of this FRPMP. An impairment determination is made for all resource impact topics

analyzed for the preferred alternative. An impairment determination is not made for visitor use and experience, park operations and facilities, and public health and safety because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

### ***Findings on Impairment for Archeological Resources***

Under the preferred alternative (Alternative B), removal of specified non-historic structures from five former reserved properties could result in injury or destruction to archeological resources (assuming such resources exist, which they may not). Mitigation actions would ensure that any impacts to archeological resources under Alternative B would be negligible to minor, direct, long term, and adverse. Cumulative impacts to archeological resources from past and reasonably foreseeable future actions would be moderate to major, long-term, and adverse. Alternative B would contribute a negligible to minor increment to this cumulative impact.

The preferred alternative would **not impair** archeological resources because any impacts, should they occur, would be negligible to minor, would be mitigated, and would only take place after consultation with the Georgia SHPO.

### ***Findings on Impairment for Historic Structures***

Under Alternative B, The Grange, Beach Creek Dock House, and Stafford Beach House would be re-used and NPS would undertake an active maintenance and repair program for both structures. Impacts to historic structures would be direct and indirect, long-term, and beneficial. Cumulative impacts to historic structures from past and reasonably foreseeable future actions would be long-term, minor to major, and adverse. The actions in Alternative B would offset adverse cumulative impacts to a minor degree.

The preferred alternative would **not impair** historic structures because impacts to historic structures under this alternative would be beneficial.

### ***Findings on Impairment for Cultural Landscapes***

This alternative envisions the removal of non-historic structures at The Grange and elsewhere in the Dungeness Historic District. These removals would result in long-term, direct and beneficial impacts to the cultural landscape. Overall cumulative impacts to cultural resources from past and reasonably foreseeable future actions would be long-term, minor to moderate and adverse. Alternative B would offset these cumulative impacts to a minor degree.

The preferred alternative would **not impair** cultural landscapes because impacts to cultural landscapes under this alternative would be beneficial.

### ***Findings on Impairment for Soils***

Under Alternative B, specified non-historic structures would be removed from five former reserved properties, necessarily entailing impacts to soils. However, the long-term diminution of

human disturbance resulting from the removals could eventually result in revegetation and other direct and indirect, long-term, and beneficial impacts to soils. Cumulative impacts to soils from past and reasonably foreseeable future actions would be direct, long-term, minor to moderate, and adverse. Alternative B would offset these cumulative impacts to a negligible degree.

The preferred alternative would **not impair** soils because impacts to soils under this alternative would be beneficial in the long term.

### ***Findings on Impairment for Water Quality***

Potential adverse impacts to water quality from the removal of structures and attendant erosion would be more than offset by discontinued use of septic systems, resulting in impacts to water quality that were direct, long-term, and beneficial. Cumulative impacts to water quality from past and reasonably foreseeable future actions would be direct, long-term, minor to moderate, and adverse. Alternative B would offset these cumulative impacts to a minor degree.

The preferred alternative would **not impair** water quality because impacts to water quality under this alternative would be beneficial.

### ***Findings on Impairment for Vegetation***

Removal of non-historic structures under this alternative would have impacts to vegetation that were direct and indirect, short- and long-term, and both beneficial and adverse. However, adverse impacts would be short-term and generally limited to ground disturbance associated with removal. The long-term impacts of revegetation and habitat restoration would be direct and indirect and beneficial. Cumulative impacts to vegetation from past and reasonably foreseeable future actions would be direct and indirect, short- and long-term, minor, and adverse. Alternative B would offset these cumulative impacts to a negligible degree.

The preferred alternative would **not impair** vegetation because impacts to vegetation under this alternative would be beneficial over the long term.

### ***Findings on Impairment for Wildlife***

Removal of non-historic structures under this alternative would have impacts to wildlife that were direct and indirect, short- and long-term, and both beneficial and adverse. Adverse impacts would be short-term and would be primarily related to noise impacts arising from demolition and removal activities. The long-term impacts of habitat restoration would be direct and indirect and beneficial. Cumulative impacts to wildlife from past and reasonably foreseeable future actions would be direct and indirect, short- and long-term, minor, and adverse. Alternative B would offset these cumulative impacts to a negligible degree.

The preferred alternative would **not impair** wildlife resources because impacts to these resources under this alternative would be beneficial over the long term.

### *Findings on Impairment for Wilderness Character*

Alternative B would result in the removal of structures at Toonahowie, thereby enhancing the wilderness character of the Cumberland Island Wilderness. Impacts to wilderness character would be long-term, direct, and beneficial. Cumulative impacts from past and reasonably foreseeable future actions would be long-term, moderate to major, and adverse. Alternative B would offset these cumulative impacts to a moderate degree.

The preferred alternative would **not impair** wilderness character because impacts to wilderness character under this alternative would be long-term and beneficial.

## **APPENDIX D**

# **ENVIRONMENTAL ASSESSMENT ERRATA SHEETS and RESPONSE TO PUBLIC COMMENTS**

**CUMBERLAND ISLAND NATIONAL SEASHORE**  
**ENVIRONMENTAL ASSESSMENT**

**FORMER RESERVED PROPERTIES MANAGEMENT PLAN**

**ERRATA**

The following changes are made to the Former Reserved Properties Management Plan and Environmental Assessment in response to public comment:

**Page 6**

Insert at line 11 from the bottom, after “owner”:

(Note: Certain landowners concluded RPAs with the National Park Foundation before establishment of the Seashore. These RPAs had varying terms, including terms of 36 and 40 years.)

**Page 17**

Insert at line 11 from the bottom, after “generations.”:

In furtherance of these acts, the NPS works to protect all resources in its care, without privileging one set of resources over another except as required by specific law or policy.

Insert at line 5 from the bottom, after “prevailing.”:

Congress further protected the northern part of the island in 1982 by establishing the Cumberland Island Wilderness (see P.L. 97-250). This area is to be managed in accordance with the Wilderness Act of 1964, 16 U.S.C. 1131-1136.

**Page 18**

Insert at line 11 from the bottom, after “values.”:

Section 111 of the NHPA authorizes federal agencies to lease to any person or organization historic structures that are not needed for current or projected agency purposes. The agency must determine that any such lease will adequately insure the preservation of the historic property. NPS Director’s Order # 38 (Real Property Leasing) sets forth guidance for the leasing of historic structures in the National Park System.

**Page 22**

Insert at line 8, after “Act;”:

Section 111 of the National Historic Preservation Act (16 U.S.C. 470 et seq.);

At line 12, replace “National Park Service Director’s Order 28” with:

National Park Service Director’s Orders 24, 28, and 38

**Page 30**

Insert at line 17, after “Reuse for”:

Exclusive Private

Insert in heading 2.2.1, after “Reuse for”:

Exclusive Private

At line 11 from the bottom, after “holders to,” replace “occupy” with “use”

Insert at line 11 from the bottom, after “properties”:

for private residential purposes

Insert at line 9 from the bottom, after “option of”:

private

Delete “The NPS manages” at line 7 from the bottom and replace with:

Exclusive, private residential use has the potential to provide definite benefits to the Seashore. As the manager of

Insert at 2 lines from the bottom, after “similar arrangements”:

that allow private residential use

**Page 31**

At line 6, delete “36 CFR § 18.4” after “accordance with” and replace with:

federal regulations

Delete the bulleted list after line 8 and replace with the following:

- The lease will not result in the degradation of the purposes and values of the park area;
- The lease will not deprive the park area of property necessary for appropriate park protection, interpretation, visitor enjoyment, or administration of the park area;
- The lease contains such terms and conditions as will assure the leased property will be used for activity and in a manner that are consistent with the purposes established by law for the park area in which the property is located;
- The lease is compatible with the programs of the NPS;
- The lease is for rent at least equal to the fair market value rent of the leased property as described in 36 CFR § 18.5;
- The proposed activities under the lease are not subject to authorization through a concession contract, commercial use authorization or similar instrument; and
- If the lease is to include historic property, the lease will adequately insure the preservation of the historic property.

36 CFR §18.4.

At line 16, delete “In addition” and replace with:

In appropriate circumstances, the NPS may enter into a historic lease with a non-profit organization or unit of government without going through a public solicitation process. 36 CFR §18.9. To enter into such a lease, the NPS must determine that the non-profit or governmental use of the property will contribute to the purposes and programs of the park area. All other requirements of 36 CFR Part 18 are applicable to leases with non-profits or governmental units.

It should be noted that

At line 18, replace “any future lease agreement” with:

any future historic lease agreement or other similar agreement

Insert at line 20, after “potential”:

private

Insert at line 22, after “allowing”:

private

Insert in fifth bullet point, after “affected by the”:

exclusive, private

Insert in eighth bullet point, after “effect of”:

private

Insert in ninth bullet point, after “administration of”:

Private

Insert in tenth bullet point, after “compatibility of”:

exclusive, private

### **Page 33**

Delete the following text from line 22, after “legislation.”:

The current absence of overnight lodging services for Seashore visitors stems from the congressional mandate to permanently preserve the Seashore in a primitive state.

### **Page 34**

Delete first full paragraph on page and replace with:

Implementation of this management option does not preclude, but rather encourages, engaging in historic leases, partnerships and/or other arrangements to achieve its interpretive, educational, and recreational goals in ways that lower NPS costs and reduce maintenance responsibilities. Historic leasing could be an important tool for pursuing these arrangements in the future. Negotiation of the terms and conditions of any future leases or other agreements is beyond the scope of this planning document.

### **Page 35**

Insert at last line on the page, after “CBA analysis.”:

For the purpose of the analysis, it was assumed that each management alternative would be the predominant or exclusive use of the structure being analyzed. This assumption was made in order to highlight the relative advantages among management alternatives for each structure. However, in practice, it would be possible for some mixture of uses to occur as long as the primary reuse goals are achieved in the context of the specific reuse management option identified for each property in the overall preferred alternative. For example, it is possible that some residential occupancy could be a component of a plan for use that primarily involved reuse for park operations or reuse for visitor service/education/recreation purposes.

**Page 36**

Insert at line 10 from the bottom , after “importance value”:

(numerical value of 100)

Insert at line 10 from the bottom , after “importance values”:

(numerical value from 0 to <100)

Insert at line 5 from the bottom, after “repair and rehabilitation”:

for a given

Insert at line 4 from the bottom, after “to be demolished”:

For some alternatives, such as reuse for visitor services/education/recreation, costs were included that would be necessary to make the structure distinctively functional (exhibits, lighting, furnishings, etc.).

Insert at last line on the page, after “Reuse for”:

Exclusive Private

**Page 37**

At line 12, replace “activities” with:

service/education/recreation purposes

Insert at line 13, after “reused for,” insert:

exclusive private

At line 14, replace “activities” with:

service/education/recreation purposes

Insert at line 19, after “reuse for”:

exclusive private

At line 21, replace “services” with:

service/education/recreation

At line 22, replace “use” with:

service/education/recreation

Insert at line 22, after “option and the”:

exclusive private

Insert at line 24, after “structure for”:

exclusive private

### **Page 38**

At end of first full paragraph, add:

One possible mechanism for achieving this objective is a historic lease.

At line 12, after “”When evaluating the,” add:

exclusive private

At lines 13- 14, after “looking at other factors,” add:

exclusive private

At line 16, after “these advantages would be offset by the,” replace “incompatible uses residential use at the Seashore inherently generates” with:

exclusivity of residential use,

At line 19, after “commercial overnight accommodations,” add:

(see p. 34 above), exclusive private

At line 20, replace “In the Seashore” with:

at The Grange

At line 21, replace “A particularly noteworthy” with:

One

At line 22, after “increased residential use is,” add:

likely to be

At line 24, after “In addition,” add:

exclusive

At line 27, delete:

(See “Private Use of Public Lands,” Report of the Office of Inspector General, United States Department of the Interior (2007), treating exclusive private use of public assets pursuant to special use permits.)

At line 29, after “the circumstances of,” add:

Exclusive private

At line 33, after “cooperative agreements, and,” replace “Part 18 leases” with:

historic leases (36 CFR Part 18). Any of these could include provisions for part-time residential occupancy if such occupancy were determined to further the reuse for visitor service/education/recreation function and be compatible with historic preservation goals for The Grange.

### **Page 39**

At line 10 from the bottom, after “values were associated with removal and,” add:

exclusive private

At last line on the page, after “the cultural landscape restored.”, add:

(Historic structures in the district no longer used for housing would be occupied periodically by persons using the proposed environmental/heritage education facility at The Grange.)

### **Page 43**

At first bullet point, second line, replace “minor” with:

secondary

At sixth bullet point, second line, replace “elements” with:

additions

**Page 57**

At line 18, after “other buildings from the Carnegie era.”, add:

The latter include the Ice House Museum and the Dungeness Dock House.

**Page 70**

At six lines from the bottom, after “Impacts to historic structures would thus be,” replace “negligible to minor” with:

minor to moderate

**Page 71**

At line two, after “When the potential,” replace “negligible to minor” with:

minor to moderate

At line three, replace “effects” with:

Impacts

At line six, after “Alternative A would contribute a.” delete:

negligible to

At line seven, after “minor increment to these cumulative impacts.”, add:

In other words, the results of past and ongoing adverse impacts would still remain, and the management actions in Alternative A would add to them in a minor way. As a result, adverse cumulative impacts would have no “adverse effect” (within the meaning of Section 106 of the NHPA) to any historic structure under consideration in this plan.

At line 19 replace “Neither structure would be modified except after” with:

NPS treatment and use of all three structures will be subject to

After line 22, before “cumulative impacts are generally the same”, insert:

Past and ongoing adverse

At line 22, after “under Alternative A.”, replace “The beneficial impacts of Alternative B would offset adverse cumulative impacts” with:

These impacts would still remain under Alternative B, but they would be offset to a minor degree by the beneficial impacts of the actions in Alternative B. As a result, the cumulative impacts of Alternative B would have no “adverse effect” (within the meaning of Section 106 of the NHPA) to any historic structure under consideration in this plan.

At line 27, replace “Cumulative impacts would be long-term, minor to major, and adverse. The actions in Alternative B would offset adverse cumulative impacts to a minor degree.” with:

Adverse cumulative impacts would be offset to a minor degree by the beneficial impacts of the actions in Alternative B. As a result, the cumulative impacts of Alternative B would have no “adverse effect” (within the meaning of Section 106 of the NHPA) to any historic structure under consideration in this plan.

At line 34, after “will consult with the Georgia SHPO,” replace “prior to making modifications to either” with:

on its treatment and use of

## **Page 72**

At seven lines from the bottom, after “by removing”, replace “an intruding modern use” with:

Intruding modern elements such as vehicles, grills, and recreational equipment.

## **Page 81**

At 12 lines from the bottom, after “by the development of partnerships” add:

, a historic lease,

## **Page 82**

At four lines from the bottom, after “These obligations could be offset through partnerships”, add:

, a historic lease,

## RESPONSE TO COMMENTS

As required by the National Park Service (NPS) Director's Order No. 12, the following errata sheets respond to all substantive comments submitted on the document entitled "Former Reserved Properties Management Plan/Environmental Assessment" (FRPMP/EA).

Substantive comments from various individuals and organizations have been consolidated in this document. Director's Order No. 12 defines a "substantive" comment as one that does one or more of the following:

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

For purposes of this document, the actual wording of the commenter has been used wherever feasible. Some comments have been paraphrased for brevity. Where the same or similar comment has been raised by multiple commenters, NPS has responded only once.

The comments, with NPS' response, are set forth below.

### **Comments from the National Trust for Historic Preservation:**

1. *The preferred alternative is based on unrealistic assumptions. Given the current economic climate and NPS' budgetary constraints, it appears unrealistic that NPS could expand its capacity sufficiently to undertake using The Grange as a visitor center and educational facility. The continuing poor condition of the Plum Orchard barn and the collapse of the Dungeness Pool House reinforce our concerns that NPS is ill-equipped to repurpose The Grange for public use.*

NPS acknowledges that budgets will be very tight for the foreseeable future. The costs cited in the plan are comprehensive, including costs for repair/rehabilitation, furnishings, exhibits, and long-term preservation of The Grange, as well as for operation of The Grange as an education center. These costs would not be incurred all at once, and certainly not in a single year. While some annual base operating funds would be used in carrying-out the preferred alternative, much of the repairs, restoration, and rehabilitation would be accomplished through NPS project funding, which is distributed among NPS units annually above and beyond annual base operational funding. Funding sources include the repair/rehab program, the cyclic maintenance program, and recreational fees. Many projects have been successfully completed at Cumberland Island using these funding sources. The park has developed a project funding strategy for preservation planning, structural repair, and remediation work at The Grange. Project funding of approximately \$249,000 has been programmed for these activities in Fiscal Year 2012. NPS offices in Washington, the Southeast Region, and the Seashore are committed to the long-term preservation of The Grange, as well as its success as an interpretive and environmental/heritage education facility.

The “barn” (actually a carriage house) and pool house were consciously allowed to deteriorate by Park Service officials after it was determined that the structures were already too far gone when they came into NPS ownership. This decision was made after the structures’ conditions had been thoroughly evaluated by NPS subject matter experts.

The plan evaluated seven former reserved properties at the Seashore. In light of funding concerns as well as other issues, the NPS has proposed the removal of all structures on three of those properties (all non-historic) as well as the removal of selected non-historic structures on two other properties. This will alleviate the need for long-term maintenance funding for those structures.

*2. Although The Grange is central to the Dungeness Historic District, it is not central to the Dungeness Dock, and would require visitors to travel approximately one mile from the island’s primary point of public access. In the event that funding for such a visitor center could be identified, the National Trust strongly recommends that the NPS consider housing the facility in adjacent NPS-managed properties whose location is better suited to pedestrian traffic and ferry transportation.*

The Grange is actually only a half a mile from the Dungeness Dock. Every day the Seashore’s Footsteps Tour passes directly by The Grange. Many if not most visitors take the Footsteps Tour. Other than the Ice House Museum and the Captain’s House, which both have well established park functions, all other facilities in the Dungeness area are equidistant to the “primary point of public access” as The Grange. Because of The Grange’s proximity to the dock, the Footsteps Tour route, and the Dungeness Historic District, it is ideally situated for visitor activities, including interpretation and use as an environmental/heritage education center. We envision The Grange serving as the center for the environmental education and visitor services programs.

NPS has never proposed that The Grange be developed as a full-fledged “visitor center.” A visitor center is generally a centralized facility that includes multiple visitor and administrative functions and is the major point of visitor arrival, orientation, and service. They are intended to serve the public by providing information and interpretation, and includes programming elements such as interpretive displays, space for programs, visitor contact, restrooms, ticket and merchandise sales, and other services. This is not the preferred alternative for The Grange. The visitor center function will continue to be fulfilled at the visitor debarkation site in St. Marys.

*3. The Plan and EA do not adequately consider the use of historic leasing. The National Trust is especially concerned about the recommendation against the use of historic leasing as a strategy for creative partnership. At Cumberland Island, historic leasing would help to compensate for the lack of NPS funding and capacity.*

The purpose of the FRPMP and EA was to identify future uses, if any, for the structures on the former reserved properties. Mechanisms for achieving those uses, such as leasing, were beyond the scope of the plan. However, historic leasing and other mechanisms were discussed as possible methods to carry out the various “use” alternatives. The FRPMP does not include any recommendations against the use of historic leasing as a strategy for creative partnership. The

EA specifically notes that historic leasing is a possibility for operating The Grange as an environmental/heritage education facility and for interpretation.

4. *The National Trust strongly disagrees with the NPS finding of “no adverse effect” on historic properties. Adoption of the Preferred Alternative would in fact place the historic properties completely in limbo, until such time in the distant future as funding can be identified and obtained. During this period of preservation purgatory, the historic properties would be likely to deteriorate considerably. The plan makes absolutely no provision for this. Applying the criteria from Section 106 of the National Historic Preservation Act, there would be an “adverse effect” due to (a) a “change in the character of the property’s use” (i.e., it would be left vacant and unmaintained for the foreseeable future), (b) “[n]eglect of a property which causes its deterioration” (because no funding has been identified for maintenance and reuse and the local climate could bring rapid deterioration), and (c) cumulative impacts on historic properties that, as the EA explicitly acknowledges, will be “adverse.”*

Nothing in the plan per se as a federal undertaking would result in an adverse effect to historic properties. As described previously, it is the intention of the NPS to complete the FRPMP planning process to identify a preferred long-term use for each of the former reserved properties. Upon completion, the NPS will engage in a subsequent process to secure specific public/private funding sources, which could include partnerships or historic leases, necessary to implement this vision. Timetables are dependent on funding, and most agency funding sources are not made available, if at all, until after plans have received final approval. It is anticipated that a mixture of federal and private funding will be needed to fully implement the selected alternative. However, to ensure that deterioration does not occur and to mitigate pre-existing problems, NPS has developed and programmed funding for additional preservation planning, repair, and restoration at The Grange in Fiscal Year 2012. (This would include such activities as repairing termite damage.) In addition, The Grange will be opened to the public using local park accounts should a Finding of No Significant Impact be signed. The Grange will not sit empty indefinitely. It will not be left unmaintained.

Regular monitoring of structures and grounds are being conducted by Seashore visitor protection and maintenance staff. An assessment of historic features has been completed for The Grange by the NPS Southeast Regional Office. It appears that the National Trust’s assertion of adverse effect is based solely on the assumption that funding will not be forthcoming, not on any action NPS proposes to take with respect to historic structures. NPS acknowledges that it is unlikely to be able to achieve the environmental/heritage education plans for The Grange without the assistance of third parties. As noted above, NPS is committed to supplementing funding of The Grange through partnership with one or more other organizations. Use of a historic lease is a possible tool for achieving those objectives.

5. *The EA fails to evaluate alternatives that would be less harmful to historic properties. The NPS has essentially created a straw-man alternative, by assuming that any historic leasing option would automatically include provisions that represent serious disadvantages.*

The alternatives considered in the Choosing by Advantages (CBA) process were based in large part on input received from the public during the public scoping process. One suggestion put

forward was that NPS lease the structures back to the former owners for residential purposes. In the past, The Grange has been leased out to paying guests, with the resulting impacts described in the plan. In the absence of information to the contrary, NPS assumed this practice would continue in the future to offset the costs of long-term maintenance. During the CBA process, the NPS considered that this type of residential use would effectively foreclose reasonable public access. It was also felt that use of The Grange as a public structure would effectively prevent its use as a residence. The CBA analysis thus proceeded on the assumption that under the specific circumstances existing at The Grange, residential use and visitor/educational services are not compatible. However, since publication of the draft Plan/EA, Partners in Preservation has suggested a non-commercial, non-exclusive residential lease arrangement. The wording of the final plan has been changed in places to clarify that a non-commercial, non-exclusive residential lease is a possible tool to help implement the preferred alternative.

*6. The choosing by advantages/value analysis/report is arbitrary and formulaic. It is based on arbitrary and highly subjective assumptions plugged into a formulaic approach that appears to reflect a bias against historic leasing, and is fundamentally flawed.*

The CBA process is not an objective process, nor is it intended to be. CBA is intended to identify and document the alternative that, in the judgment of park staff, has the greatest advantages for the park and the public. Panel members saw Reuse for Visitor Services, Education, or Recreational Purposes as a “moderate” attribute for historic preservation, whereas Exclusive Residential Use was seen as a “minor” attribute. Both would have the long-term preservation of The Grange as a contributing factor. However, visitor activities has the additional benefit of fully incorporating The Grange into the historic setting and story of the Dungeness Historic District, providing the public a better appreciation for the resource, and providing a center to further educate and inspire them on the importance of our cultural heritage. These differences gave that action alternative a “small” advantage over the other management options. Although the advantage was small, the panel placed a high importance value on it because they placed a high value on the preservation of historic structures and landscapes.

The NPS is not biased against historic leasing. Again, the plan mentions leasing as a possible tool for implementing the preferred alternative. Historic leasing is one tool among others that could be used to allow The Grange to operate as a visitor contact station/environmental education facility.

*7. The plan is not consistent with the stewardship responsibilities of the National Park Service under Section 110(a) of the National Historic Preservation Act. It will allow historic properties that are currently used, occupied, and maintained to become vacant and neglected, with no prospects for funding the future plan.*

For the reasons noted above, we do not believe that historic structures will become vacant and neglected under the plan. No major structural changes to The Grange are anticipated. Any classrooms will utilize the existing floor plan and layout. Existing restroom facilities in the structure will be used.

Adaptive reuse of historic structures is encouraged under the NHPA. Adaptive reuse would be especially appropriate for the Grange, which is listed as having statewide significance. Any structural repairs, rehabilitation, and/or restoration will be made in consultation with the Georgia SHPO. A historic structures report is being prepared to address appropriate treatments for the structure. No substantive changes will be proposed until that document is complete.

The NPS takes seriously its responsibilities under Section 110 of the National Historic Preservation Act. We believe it is possible to fulfill these responsibilities while using The Grange for visitor services and education.

### **Comments from Partners in Preservation, Inc.:**

1. *The money spent on converting the Goodsell and Phillips houses for employee housing would be better spent on preserving the Seashore's nearly 100 individual historic structures and 47 known archeological sites. Relocating NPS employees from historic structures in the Dungeness Historic District would leave these structures empty and unused and thus prone to deterioration.*

Providing adequate, cost-effective employee housing is important for attracting and retaining employees for the Seashore. For various reasons, including the cost of utilities, rental cost, and size, the historic structures in the Dungeness Historic District are far from ideal in meeting the need for good employee housing. Moving employees to the Goodsell and Phillips houses would thus meet a pressing park need, while making those historic structures more available to the public.

The historic structures in the Dungeness District vacated by NPS employees would be used for purposes more in line with the visitor experience, including interpretation and incorporation into the operational needs of the proposed environmental/heritage education center. They would not be left empty and unused. The park realizes the need for a holistic, comprehensive strategy for the use of all historic and non-historic assets under NPS management on the island. As that strategy is developed, the preservation of historic structures will obviously be a top priority.

2. *The plan quotes selectively from both the legislative history of the Seashore and applicable law and policy in a misleading manner that emphasizes natural resource protection at the expense of other resource values. For example, on page 22, the recitation of applicable law fails to include the law and regulations relating to historic leases including Section 111 of the National Historic Preservation Act and 36 Code of Federal Regulations (CFR) Part 18. On page 31, the plan fails to cite in full the provisions of 36 CFR part 18.4 relating to the applicable factors for considering whether to grant a historic lease. These omissions skew the plan's analysis and undermine its credibility.*

NPS policy is to protect both cultural and natural resources at Cumberland Island National Seashore. Additional text from applicable law and policy will be included in the final FRPMP to avoid any implication that protection of natural resources trumps protection of cultural resources. The FRPMP specifically acknowledges the potential usefulness of historic leases. This tool remains available as one possible way of achieving the plan's objectives. If the NPS chooses to

pursue an historic lease, 36 CFR Part 18 will be followed in full to comply with all aspects of these regulations.

*3. The cost of the plan's preferred alternative for The Grange is 98% of the Seashore's annual operating budget and is not financially feasible. The Superintendent has admitted publicly that the Seashore does not have the funds to convert the Grange into a visitor center.*

The costs cited in the plan are comprehensive, including costs for repair/rehabilitation, furnishings, exhibits, and long-term preservation of The Grange, as well as for operation of The Grange as an education center. These costs would not be incurred all at once, and certainly not in a single year. While some annual base operating funds would be used in carrying-out the preferred alternative, much of the repairs, restoration, and rehabilitation would be accomplished through NPS project funding, which is distributed among NPS units annually above and beyond annual base operational funding. Funding sources include the repair/rehab program, the cyclic maintenance program, and recreational fees. Many projects have been successfully completed at Cumberland Island using these funding sources. The park has developed a project funding strategy for preservation planning, structural repair, and remediation work at The Grange. Project funding of approximately \$249,000 has been programmed for these activities in Fiscal Year 2012.

The Grange would be used for interpretation and education. Some visitor contact functions could be carried out at the structure, but the NPS has no plans to convert this structure into a full-fledged "visitor center." No major structural conversion of The Grange is contemplated.

The Superintendent's statement regarding funding was not meant to suggest that financial resources are unlikely to be forthcoming. Rather, the statement reflects the fact that under standard NPS procedures, planning is completed before specific program funds are sought for implementation. It is anticipated that operation of The Grange would entail a mixture of federal and partner-contributed funding. As noted above, some funding is already on hand to begin structural repairs (e.g., repair termite damage) to The Grange.

*4. The plan does not include an action plan or timetable for implementation. In all likelihood, if the Seashore pursues the preferred alternative as currently proposed, The Grange will sit empty for years and deteriorate.*

As described previously, it is the intention of the NPS to complete the FRPMP planning process to identify a preferred long-term use for each of the former reserved properties. Upon completion, the NPS will engage in a subsequent process to secure specific public/private funding sources, which could include partnerships or historic leases, necessary to implement this vision. Timetables are dependent on funding, and most agency funding sources are not made available, if at all, until after plans have received final approval. It is anticipated that a mixture of federal and private funding will be needed to fully implement the selected alternative. However, to ensure that deterioration does not occur and to mitigate pre-existing problems, NPS has developed a project funding plan for additional preservation planning, repair, and remediation at The Grange in Fiscal Year 2012. In addition, The Grange will be opened to the public using local

park accounts should a Finding of No Significant Impact be signed. The Grange will not sit empty indefinitely. It will not be left unmaintained.

*5. The plan fails to give adequate consideration to the advantages of a historic lease that would permit residential use while providing visitor and educational services. The CBA analysis focuses too narrowly on “exclusive residential” use versus re-use as a public visitor center. The plan should have included a separate alternative for a combined form of lease, one that provides residential use for historic preservation purposes and an appropriate level of noncommercial visitor services. The draft EA/FRPMP cannot be the basis for final action without accounting for this alternative. Failing to do so would be contrary to the requirements of the National Environmental Policy Act to consider the reasonable alternatives under the purpose and need.*

The planning process and CBA analysis considered five distinct alternatives for reuse of each property. Combined/hybrid alternatives were not developed so as to better focus the planning process on specific long-term uses. For example, at no point in the planning process did the NPS consider a residential use alternative that would also provide visitor and educational services. At the time of the CBA workshop, an alternative of this nature was highly speculative and lacked any kind of specificity for consideration as a viable alternative. Furthermore, a “historic lease” was not considered as a separate alternative, but rather considered one mechanism among others for implementing whatever use was selected as the preferred alternative.

Specific to The Grange, the NPS did not pursue a combined alternative of the type outlined in the comment because it was not deemed reasonable by the planning team. The NPS assumed that a private entity investing large sums of money for private residential use was unlikely to be willing to: (a) open the home to the public on an extended basis; and (b) reside in a structure that has been adapted to a site for interpretation and education. During the CBA process, the NPS considered that use as a residence would effectively foreclose reasonable public access for the foregoing reasons. Conversely, the NPS considered that use of The Grange as a public structure would effectively foreclose its use as a residence. It was not thought practical, for example, to require NPS to disassemble and reassemble the education center to accommodate periodic residential use. The CBA analysis thus proceeded on the assumption that under the specific circumstances existing at The Grange, exclusive, private residential use and visitor/educational services are not compatible.

*6. The CBA Analysis Summary Table for the Grange Tract on page 115 gives no points for “enhances the preservation of a historic structure/landscape” for the historic lease alternative. This failure skews the calculation by 90 points or more and undermines the credibility of the plan’s analysis and its preferred alternative for The Grange.*

Panel members saw Reuse for Visitor Services, Education, or Recreational Purposes as a “moderate” attribute for historic preservation, whereas Exclusive Residential Use was seen as a “minor” attribute. Both would have the long-term preservation of The Grange as a contributing factor. However, visitor activities has the additional benefit of fully incorporating The Grange into the historic setting and story of the Dungeness Historic District, providing the public a better appreciation for the resource, and providing a center to further educate and inspire them on the importance of our cultural heritage. These differences gave that action alternative a “small”

advantage over the other management options. Although the advantage was small, the panel placed a high importance value on it because they placed a high value on the preservation of historic structures and landscapes.

*7. The regulations indicate that a historic lease is appropriate when a historic structure needs to be preserved and when the public use of the particular historic structure is not necessary for the public to enjoy the use of the park. Both of these criteria are met here. The Grange has been used privately for the first 38 years of the Seashore without adversely impacting visitor enjoyment of the Seashore. It is not reasonable for Seashore management to now argue that it is essential for the public to have full access to The Grange to enjoy the 18-mile long Seashore.*

While it is true that The Grange is just one of many important resources at the Seashore, it is nevertheless highly important in its own right. The primary visitor destination on the island includes the Dungeness Historic District, and The Grange is a central feature of the district. Most first-time visitors take the Footsteps Tour and would want to have access to The Grange to learn about the historic district. Public access to The Grange is thus necessary for NPS interpretation of park resources and for overall visitor enjoyment. The fact that the Seashore has a relatively large land base does not diminish the inherent importance of The Grange to visitor use and enjoyment. The average visitor has limited access to the full scope of the island for a variety of reasons, including access points and transportation limits.

*8. Public access is often required under a historic lease. The Footsteps Tour has paused at the entrance of the Grange property since the tour's inception. Incorporating The Grange further in the Footsteps Tour is possible under a historic lease for residential purposes or the proposed visitor center. In fact, many historic leases include terms that require public access to the leased structure for educational and interpretation purposes. Examples include the Higgins House Lease at Cape Cod National Seashore, the Cooper House Lease at Chesapeake and Ohio Canal National Historical Park, and historic leases for the Carl Dixon House, the McWilliams Dixon House, and the Jesse Babb House, Cape Lookout National Seashore.*

We have investigated the examples cited above and in no instance was public access granted to the interior of a private residential structure. At most, as at Cape Lookout National Seashore, the public had access to the grounds surrounding the structure(s). Historic leases were entered into in the above instances because the structures were historic and needed to be preserved, but were not otherwise necessary for protection, interpretation, visitor enjoyment, or administration of the park area. Because these structures were not necessary for park purposes, particularly interpretation and visitor enjoyment, there was no need to include a provision in the lease requiring public access. It is not NPS practice to require or even ask private residential leaseholders to provide public access. In those instances where public access to a structure is deemed to be appropriate, the route we have typically taken is to enter into a historic lease with a non-profit organization. However, the mission of the non-profit organization has had to dovetail with the goals established by NPS for the individual structure and the non-profit has had to make a material contribution to park programs related to that structure. Once the FRPMP planning process is concluded, the NPS intends to pursue such arrangements for The Grange with appropriate providers.

9. *A combined residential historic lease with visitor services is authorized by 36 CFR Part 18. But while a solicitation process could be used to issue a historic lease (see 36 CFR §§ 18.7, 18.8), the more appropriate leasing mechanism is 36 CFR § 18.9, which allows for leases to be entered into directly with a qualified non-profit organization that will contribute to the purposes and the programs of the park area (subject to comments from the Advisory Council on Historic Preservation).*

A lease under 36 CFR § 18.9 is one possible mechanism for meeting NPS' objectives under the FRPMP. The NPS has identified The Grange for interpretation and educational purposes and it may be appropriate for NPS to enter into an agreement with a non-profit organization to further the park's objectives with respect to educational programming. Upon completion of the planning process, we will immediately begin discussions with potential partners, which could include Partners in Preservation, to identify mechanisms to provide this use.

10. *The NPS was wrong to rely on the U.S. Department of the Interior Inspector General's 2007 report when identifying the preferred alternative. That report dealt with special use permits, not historic leases. The uses in question under the permits were exclusively private and precluded public access or benefit. Partners in Preservation has proposed to allow public access under a historic lease. Therefore, the concerns outlined in the IG report would be addressed through a historic lease.*

The intent of citing the Interior Inspector General's 2007 report was to point up the importance of providing public access to The Grange. Partners in Preservation has not been clear about the extent of public access that it would be willing to grant the public under a residential historic lease. In an e-mail message to the Director of NPS (May 4, 2011), Partners indicated that it would be "willing to open the house to the public on a limited basis." The example it cited from Indiana Dunes National Lakeshore involved leases requiring houses to be opened to the public one day per year. Given the position of The Grange within the Dungeness Historic District, such (or similarly) limited public access would not be adequate.

11. *The Plan fails to consider public and congressional input. The overwhelming majority of public comments received by the NPS during the scoping process were in favor of a historic lease. Partners in Preservation's historic lease proposal has received support from 20 members of the U.S. House of Representatives and from Georgia's two senators.*

The NPS acknowledges that political support exists for a historic lease. A historic lease remains a possible tool for implementing the selected alternative. Based on comments received on the FRPMP, the public is overwhelmingly against any lease (residential or otherwise) that restricts full public access to The Grange and other historic structures. Approximately 1,754 commenters expressed support for full public access to The Grange via use as an NPS visitor contact station and/or environmental education center. Approximately 164 commenters expressed opposition to this proposal. Most persons expressing opposition favored preservation of The Grange using a historic lease with a private entity.

12. *A new visitor center is not needed given the visitor center and museum in St. Marys, the visitor center at Sea Camp, and the three existing visitor contact stations within the Dungeness*

*Historic District that currently provide a variety of visitor services. Furthermore, the NPS owns a host of other historic buildings within the Dungeness Historic District that could be converted more cost-effectively into a visitor/education center such as the Captain's House near the Dungeness Dock or the Tabby House, adjacent to the ruins of Dungeness. Both of these structures are more convenient for park visitors who travel by foot.*

The preferred alternative for The Grange is to open the site up for interpretation and use as a center for environmental and heritage education. (As noted above, there are no plans to use the structure as a "visitor center.") The NPS believes that The Grange is ideally suited to provide these services to due to its size, location, and proximity to a variety of cultural and natural resources. Other historic buildings in the district are already being used to support park operations, while others would be used to support operations of the education center and its programs. With respect to convenience on foot, the Captain's House and the Ice House Museum are the only two structures that are significantly closer to the Dungeness Dock when compared to The Grange or other structures in the district. However, the Captain's House currently serves as the primary island Ranger Station and has been adapted for that purpose. Moving that operation would incur additional costs to the park. With respect to the Tabby House, this is the only National Register structure on Cumberland Island listed as Nationally Significant. Adapting that structure for environmental/ heritage education would probably not be appropriate, not to mention potentially harmful to the structure. The Tabby House is too small for even a minor education center and is not as well suited as The Grange for the overall plans of the preferred alternative.

*13. We question how much of the historic fabric of The Grange will be lost if the historic residence is converted into classrooms and public restrooms.*

No major structural changes to The Grange are anticipated. Any classrooms will utilize the existing floor plan and layout. Existing restroom facilities in the structure will be used.

Adaptive reuse of historic structures is encouraged under the NHPA. Adaptive reuse would be especially appropriate for the Grange, which is listed as having statewide significance. Any structural repairs, rehabilitation, and/or restoration will be made in consultation with the Georgia SHPO. A historic structures report is being prepared to address appropriate treatments for the structure. No substantive changes will be proposed until that document is complete.

*14. The planning team was not impartial. Four of the seven "contributors" to the plan report directly to the Superintendent and may have been unwilling to express independent opinions in debating alternatives. At least 2 of the contributors have actively solicited a proposal from Driftwood Education Center for reuse of The Grange prior to the conclusion of the FRPMP planning process. These facts call into question the impartiality of the planning team's local contributors and undermine the credibility of the plan.*

Contributors to the CBA process were selected to represent a cross section of park disciplines. A frank exchange of views is encouraged in the CBA process. Seashore staff members were encouraged to express their independent ideas and opinions on the alternatives under consideration. Scores are arrived at by consensus, after considering the viewpoints of all

participants. Contact with the Driftwood Education Center was primarily for the purpose of determining if any interest was likely to exist in the private sector for partnering on an environmental education center. Two other educational organizations have been consulted. None of these conversations were a factor in the deliberations of the CBA team, which focused on the advantages of the alternatives relative to each other.

### **Comments from the Georgia Conservancy:**

1. *Recently the Coastal Georgia Land Conservation initiative discovered the majority of Cumberland Island contains rare “G2” or “Imperiled” habitat, meaning at high risk of extinction or elimination due to very restricted range, very few populations, steep declines, or other factors. In fact, the majority of Cumberland Island is characterized as G2 Maritime Forests under the State Wildlife Action Plan. We strongly support any plan that calls for the removal of man-made structures from this imperiled habitat so that it can flourish and return to its natural and primitive state.*

The NPS acknowledges that the island’s maritime forest is a rare and important resource. Accordingly, the plan provides that the only structures to be maintained from the seven former reserved properties are those that are either historic (The Grange, Stafford Beach House) or located in an area already dedicated long-term to park housing (Davisville).

2. *Cumberland Island is a National Seashore and belongs to the people of the United States. The people of the United States, through their representatives, committed an extraordinary amount of resources to ensure that Cumberland Island come under the protection of the NPS for the benefit of all citizens. Therefore, we support Alternative B as its proposal most closely aligns with the commitment to create a National Seashore. However, we believe the decision-making process, Choosing by Advantages, is problematic and does not set a clear precedent for future management plans. The process appears to be somewhat arbitrary and subjective, leaving the NPS exposed to criticism over the treatment of retained estates. Instead, we propose a bright line rule of removal of all retained estates not listed on the National Register of Historic Places and all retained estates located in the Wilderness Area – historic or not.*

As noted previously, the CBA process makes no claim to being objective. All decisions will reflect the values and priorities of the individuals making the decision. The CBA process provides a mechanism for (a) documenting the basis for the NPS’ decision in a given instance, and (b) ensuring that a standard set of factors is considered during the decision-making process. One purpose of public comment is to help ensure that decisions made by the NPS are not made in isolation, but take into account the insights, suggestions, and concerns of the public. By policy, NPS must balance preservation and enhancement of wilderness character with protection of cultural resources. *NPS Management Policies (2006)* 6.3.8. Therefore, a bright-line rule of the kind proposed is not feasible.

## Comments from Individuals:

1. *The Lexington School recently purchased the farm and childhood residence of Kentucky's first poet laureate, James Allen Lane. After considerable investigation about turning the residence into classroom space, specifically reports and bids from engineers and contractors, The Lexington School came to the conclusion that converting a residence into classroom/visitor space is very expensive and cost prohibitive. I think it would be in the best interest of the Park Service to keep a historic lease for seasonal residential use with the opportunity for public education and enjoyment.*

Plans for The Grange are conceptual at this point, but no major alterations of the structure are anticipated for establishing visitor contact or education services. The costs described in the plan short and long-term repairs and maintenance as well as development as an education center. The costs would be spread out over many years.

2. *The case for retaining Stafford Beach House is very weak, so the structure should be removed. The contention that this house has "potential" historic value lacks any evidence or rational argument in the EA.*

The NPS has not made a determination of eligibility for the Stafford Beach House or prepared a nomination for listing on the National Register of Historic Places. Some of the beach house structures meet one of the basic parameters for eligibility, namely, being 50 years old or more. Further determinations need to be made with respect to whether the structure meets at least one of the four criteria for listing, as well as its significance (local, state, or national) and integrity. The structure is the last intact beach house remaining from the island's Carnegie era. If the beach house is not placed on the National Register, then the option of removal/disposal can be re-examined.

3. *The EA fails to make a compelling case that NPS staff will continue to increase and thus that the Stafford Beach House is needed for housing. On the contrary, staffing and budgets are likely to decline in coming years. As for its potential use for NPS employees, volunteers or cooperators, NPS already has ample housing available on the island for such purposes.*

Should it turn out that the Stafford Beach House is eligible for listing in the National Register of Historic Places, preservation of the structure will be significantly enhanced by the preferred use identified in the FRPMP, i.e., reuse as employee, volunteer, and/or cooperator housing. As noted above, if the beach house is not placed on the National Register, then the option of removal/disposal can be re-examined.

4. *The Stafford Beach House is so close to the Stafford Beach Campground that vehicle access as well as noise from the house can intrude on a camper's experience.*

While occasional vehicle access past the campground will occur, as it does now, there is alternative beach house access available to minimize intrusion. The bathrooms at the campground are cleaned daily by an NPS employee traveling in a pick-up truck. The Stafford

Beach House is 0.4 straight-line miles away from the campground through dense maritime oak/palmetto forest established partially on a remnant dune network. It is highly improbable that sounds associated with park housing will reach the campground.

5. *The EA's list of existing legal mandates and the companion table of policy requirements fail to mention Public Law 97-250, the legislation that designated the Cumberland Island Wilderness and potential wilderness in 1982.*

Response: Wording has been added to the text of the FRPMP to correct this oversight.

6. *The Plan points out that commercial overnight facilities "would likely increase impacts to cultural and natural resources, not only in the vicinity of the property, but elsewhere on the island as well." However, this same concern would seem to apply equally to other visitor use of RPAs as well as NPS use of RPAs for operational purposes.*

Commercial overnight facilities provide visitors more of an opportunity (greater time and mobility) to access the natural and cultural resources throughout the island. More visitation means more potential for impacts. NPS use of former RPA properties would involve staff and cooperators who are trained or versed in cultural and natural resource stewardship, and should produce fewer impacts.

7. *It is one thing to increase housing on the island to meet the needs of those having a legitimate need for housing, it is quite another to sacrifice the island (in terms of resource protection and the Seashore's overall budget) to add housing to accommodate personnel and others whom the NPS has no real obligation to accommodate. Current NPS housing stock on the island is between 61 and 48 beds. There has been no substantive analysis in the EA to justify the NPS foundational premise that structures on the RPAs are needed for additional NPS housing.*

The park will have a Housing Needs Assessment (HNA) done in 2012. Due to the non-availability of personnel qualified to carry out the assessment, it could not be done prior to the FRPMP. Concerns such as those noted above will be addressed during the HNA. The park is looking at removing some structures currently on the housing inventory, with either removal/disposal of the structure or, in the case of historic structures specifically, establishing a more appropriate use, especially as it relates to the visitor experience.

8. *The CBA process is fatally flawed in two key respects. First, the factors and subfactors applied by the evaluating committee are weighed heavily in favor of the operational interests of NPS rather than focusing specifically on the overall well-being and purposes of the Seashore. Second, the team of evaluators applying the factors were all NPS employees, and hence biased in favor of retaining structures for NPS or visitor use. The outcomes produced by this process are contrary to the purposes of the Seashore and are not otherwise supported by the EA. It is therefore unlawful.*

The factors used in the CBA analysis were the five standard factors used by NPS system-wide for most CBA analyses. The subfactors related to NPS operations were supplemented by ones specifically related to resource protection. Granted that there is a wide range of factors and

subfactors related to infrastructure, operational efficiency, and visitor services, the CBA team nevertheless could have scored the advantages associated with these factors and subfactors “low” if it felt that such was appropriate. The CBA team consisted solely of NPS employees because this is standard agency practice. The decisions to be made are NPS decisions, with input and review by the public.

9. *The comment offered in the introduction: “Alternative B would preserve and protect historic structures ... as required by applicable law and policy” is not quite accurate and is otherwise misleading. The NHPA does not require that all properties listed on the National Register be protected, i.e. not be removed or allowed to deteriorate.*

By policy, NPS’ default position is to ensure that historic structures are preserved and protected, receive appropriate treatments (including maintenance) to achieve desired conditions, and are made available for public understanding and enjoyment. NPS Policy 5.0. NHPA, Executive Order 13006 (Locating Federal Facilities on Historic Properties), and NPS Policy 5.3.5.4.7 require NPS to use, to the maximum extent feasible, historic properties available to it whenever operationally appropriate and economically prudent. These provisions together require preservation of The Grange, Beach Creek Dock House, and the Stafford Beach House.

10. *The alternatives analysis falls short of that required by NEPA. The range of alternatives was impermissibly constrained through the CBA process resulting in the Preferred Management Alternative for each of the properties. The selected alternative was predetermined and is therefore invalid under NEPA.*

Through the CBA process, each of the seven former reserved properties was assessed with respect to five potential future uses. This range of potential future uses provided the “hard look” required by NEPA and gave the public an opportunity to understand and comment on NPS’ preferred course of action. It was simply not feasible to analyze a range of alternatives covering every possible combination of future uses for the properties. The range of possible alternatives would be unreasonably high.

11. *The impairment analysis failed to adequately address how the proposed action(s) would affect the Seashore’s resources and values especially the opportunities which would otherwise exist if such actions had not been taken. For example, the action to convert the Goodsell house and Phillips house to NPS housing removed the opportunity to remove these structures from the island and to allow the island to revert back to its primitive state in keeping with the enabling legislation. The plan does not sufficiently minimize impairments to vegetation, wildlife, water resources, and wilderness by removing all non-historic structures including the beach house. It thereby severely restricts the opportunities for the Seashore to attain the status intended in the enabling legislation and thus is deficient and improper.*

Even while managing the island to preserve it in a primitive state, the NPS must, by policy, maintain adequate administrative infrastructure to ensure protection of visitors and the island’s resources. *NPS Management Policies (2006)* Chapter 9. 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, including the opportunities that otherwise would be present

for the enjoyment of those resources or values. Not every adverse impact rises to the level of “unacceptable impact,” much less “impairment.” NPS Policy 1.4.7.1. Allowing structures to remain in place would not result in “impairment,” as NPS uses the term. Adverse impacts to vegetation, wildlife, water resources, and wilderness would be minor.

*12. While housing for NPS management personnel at Davisville is logical and mentioned in the General Management Plan, many structures outside the area have come to be used as housing for discretionary personnel or those peripherally associated with the park. There are presently two dormitories which can house over 30 people, “staff quarters” with 3 large bedrooms, 5 houses (3 with more than 1 bedroom), and 4 separate apartment, which together hold over 60 people, conservatively 50. How many people does the NPS envision being able to simultaneously accommodate on the island? The GMP directs that the number of staff living on the island be restricted to the number needed for “operational effectiveness and capability of immediate response to emergencies.” At the present that number is 5.*

Housing on Cumberland Island must meet various needs. Housing is needed for required-occupancy employees, which can involve families, couples, and singles; all of whom may require diverse accommodations. Volunteer and cooperator housing requires diverse needs to include overnight accommodations for groups and long-term accommodations for individuals or couples. Therefore, housing must be flexible. The park has become more dependent than ever on volunteers and cooperators.

*13. It can be safely assumed that the more housing space available, the more overnight people there will be. This has been a perennial problem in this park and is not in keeping with reducing human impact and maintaining a “primitive state.”*

Please see previous responses with respect to Housing Needs Assessment, need for flexibility, etc.

*14. Maintaining an NPS community at Davisville, while suitably out of the public eye, may have a negative impact the surrounding gopher tortoise colony, a threatened species. Landowners visited only periodically, whereas full-time residents or even semi-full time people, will have an effect on these animals which needs to be acknowledged in the EA, instead of being “dismissed.” There have been road fatalities.*

The gopher tortoise is listed by the state of Georgia as “threatened.” Although it is federally listed as threatened in other parts of its range, it is not on the Federal Endangered Species List in Georgia. Current Davisville residents and NPS employees are aware of the Davisville tortoise population and take care to not adversely impact them. Future NPS staff and cooperators using the Davisville area can be trained to be vigilant for gopher tortoise activity. Impacts would be minor.

15. *The FRPMP should not have dismissed the socioeconomic environment as an impact topic. The Seashore is the biggest tourist attraction in the St. Marys area, and everything the Seashore does affects the socioeconomic environment of the area.*

“Socioeconomic environment” was dismissed as an impact topic because nothing specific to the FRPMP would result in a more than negligible impact to the local or regional economy. To the extent that the plan affected visitation, visitation levels would still be capped at the 300 person per day limit. The NPS acknowledges that Cumberland Island National Seashore has a positive impact on the economy, and specifically tourism, in the southeast Georgia region. Payment for demolition of structures could have some measurable impact, but it would be quite minor.

16. *The Park Service improperly emphasizes permanently preserving the island in a primitive state, when the Seashore’s enabling legislation specifically calls for development of recreational facilities.*

The Seashore’s enabling legislation call for both recreational development and preservation of the island in a primitive state. According to the Seashore’s administrative history (Dilsaver 2004), considerable debate existed in the early 1970s regarding the appropriate level of development on the prospective Seashore. St. Marys and Camden County sought extensive development in order to benefit the local economy. Various specific proposals were put forward. However, after extensive debate, Congress declined to enact these proposals and instead approved specific language calling for the preservation of the island in its primitive state. The NPS therefore reads the Seashore’s enabling legislation to mean that recreational development is to take place only to the extent that the island’s primitive character is not compromised. Re-using structures on the former reserved properties for recreational purposes is not the type of activity envisioned in the Seashore’s enabling legislation. Also, as noted in the plan, such re-use would adversely affect the Seashore’s primitive character.

17. *The island needs more campgrounds and Toonahowie could be used for this purpose after the house has been removed.*

Providing new campgrounds is beyond the scope of the plan. However, the possibility of establishing a campground at Toonahowie is currently under consideration. Formal visitor surveys, visitor comments, and incidental feedback have not shown a demand for additional backcountry camping.

18. *Adapting The Grange for classrooms and labs, adding bathrooms, and especially making it ADA compliant would destroy its historic character as a home.*

Any adaptation of the facility for visitor services would be done in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. The Secretary’s standards permit adaptive re-use of historic structures. The Seashore’s administration building is a former residence. The historic character of the house is intact. Any adaptation, preservation, rehabilitation, and/or restoration will be made in consultation with the Georgia SHPO.