

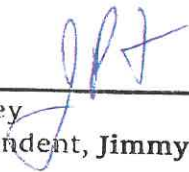
National Park Service
U.S. Department of the Interior

Jimmy Carter National Historic Site
Georgia

FINDING OF NO SIGNIFICANT IMPACT

Development Concept Plan/Environmental Assessment for
The Carter Home and Garden

Recommended:

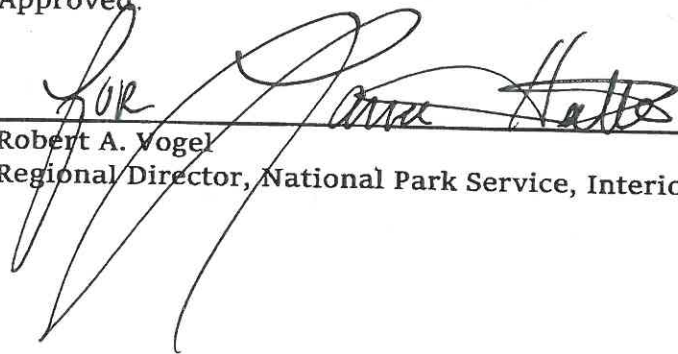


Jill Stuckey
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12/17/19

Date

Approved:



Robert A. Vogel
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12/23/19

Date

INTRODUCTION

In June 2019, the National Park Service (NPS) issued an environmental assessment (EA) describing the effects associated with the Development Concept Plan (the plan) for The Carter Home and Garden, a property under jurisdiction of the Jimmy Carter National Historic Site. The EA, through the selected alternative, outlines actions associated with visitor opportunities and safety; resource management; and management indicators, thresholds, and visitor capacity.

The purpose of the federal action is to develop a strategy for public access and preservation of The Carter Home and Garden. The plan will interpret for future visitors the Carters' lives in the Plains community and the home's specific role in their social and political legacy both locally and globally. The plan provides direction to transition The Carter Home and Garden from private use to public access, preserve the property, protect the site's natural and cultural resources, and convey the Carter's vision of their lives in Plains to visitors.

This Finding of No Significant Impact (FONSI) has been prepared in accordance with the requirements of the National Environmental Policy Act of 1969, as amended (NEPA), its implementing regulations (40 CFR 1500-1508), the Department of Interior NEPA regulations (43 CFR 46), and NPS Director's Order 12, Conservation Planning, Environmental Impact Analysis and Decision-Making, and the NPS NEPA Handbook.

The statements and conclusions reached in this FONSI are based on documentation and analysis provided in the EA and the associated decision file. To the extent necessary, relevant sections of the EA, which is available at <https://parkplanning.nps.gov/jica>, are incorporated by reference below.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

The National Park Service has selected the action alternative (the preferred alternative and proposed action identified in the EA; hereinafter referred to as the "selected alternative"), which was developed based on input from President and Mrs. Carter, public listening sessions, NPS staff expertise, and knowledge and understanding of strategies that have proven successful at addressing similar issues at other parks throughout the national park system. A summary of the selected alternative is below (see Chapter 2 of the EA for a full description). Desired conditions--statements of aspiration that describe resource conditions, visitor experiences and opportunities, and facilities and services that help guide management decisions--were outlined as part of the plan and are included in FONSI Attachment A.

Carter Residence

Under the selected alternative, the park will open the Carters' residence to guided tours. Management actions include:

- Install new interpretive elements to share and interpret the Carters' lives and their connection to the residence and Plains community.

- Enter the contents of the Carter Residence into the park museum collections and relocate them to an expanded curatorial facility at Plains High School during repairs and construction at the residence. After repairs are made, return some of these objects to the residence, replace others with replicas, and retain some in storage.
- Consider other actions to preserve and protect the Carter property, including retaining two U.S. Secret Service guard shacks and other security equipment.
- Develop a guided tour of the Carters' residence to include the tennis court, house, garage woodshop, back patio, and pool. Monitor visitation and assess resource damage once per week and continuously via observation to determine when additional management actions and protection measures need to be undertaken.

Gnann Property (Post-Acquisition of Jones Sprinkler Property)

Under the selected alternative, the park will take ownership of the Gnann House property and renovate it to become the primary visitor contact station and embarking point for tours, as well as the main office setting for park staff. Management actions include:

- Receive the Gnann House property from the General Services Administration.
- Pursue acquisition of the adjacent "Jones Sprinkler" property to the west of the Gnann property (revise the park boundary as needed) and, on the property, develop an expanded parking lot to serve personal vehicles and buses. If purchase of this property is not reasonably feasible, parking would be developed on-site at the Gnann property by reconfiguring the existing Gnann House employee parking area.
- Develop a new staff parking lot to the north of the Gnann House as well as walkways connecting facilities on site.
- Convert the Gnann House into a visitor center and staff offices.
- Renovate the Gnann Carriage House for storage and as a maintenance area for park staff.
- Provide picnicking opportunities for visitors outside of the Gnann House.

Memorial Garden

Under the selected alternative, the park will fully realize the original 2007 design plans for the Memorial Garden and open it to self-guided tours. Management actions include:

- Protect the cultural landscape and define visitor circulation.
- Define the memorial area by adding a small amount of new paving and protect and preserve a sense of respect by minimizing signs.
- Add a new meandering path north of the butterfly garden along the west edge of the pond, and benches in key locations, to provide for fishing during special events. Stabilize the pond edge using appropriate materials to protect the cultural landscape.
- Provide for self-guided tours of the garden and monitor visitation and assess resource damage once per week and continuously via observation to determine when additional management actions and protection measures need to be undertaken.

Other Related Actions

Under the selected alternative, the park will pursue related actions to protect resources and improve operations and maintenance. Management actions include:

- Expand the museum collections space at Plains High School to accommodate curatorial support of the new collections of the Carters' belongings.
- Inventory cultural artifacts each year, with a daily visual check mornings and evenings.
- Explore acquisition of Woodland Drive and Paschal Street (dividing the house and grounds) and the utility right-of-way interior to the property.

Rationale for the Decision

The action alternative was selected because it best meets the plan purpose and need for action by opening up the Carters' home for public access and interpreting the Carters' lives for visitors. It provides a comprehensive approach to managing visitor use, establishing tour capacities, providing desired future conditions, and addressing resource protection issues.

The selected alternative provides a consistent and comprehensive framework for managing the site's resources, with considerations for cultural resources, natural resources, and visitor safety and experience. It fulfills the proposals put forth in the 1993 Jimmy Carter National Historic Site General Management Plan which proposed opening The Carter Home and Garden for tours after the property is vacated by the Carters and opening the Gnann House to hold exhibits after the property is vacated by the U.S. Secret Service. It also satisfies the wishes of President Carter and Rosalynn Carter that the property is opened for visitor access and respectfully interprets their lives in the Plains community. In addition, the selected alternative utilizes mitigation measures to further protect natural resources, cultural resources, and visitor safety during implementation.

MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES

The National Park Service places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of cultural and natural resources and visitors, the mitigation measures and best management practices included in Attachment B: *Mitigation Measures and Best Management Practices* will be implemented as part of the selected alternative.

PUBLIC AND AGENCY INVOLVEMENT

Civic engagement for the plan occurred in November and December, 2018, which included two public open houses at Plains High School in Plains, GA (November 7 and 8, 2018).

In accordance with Section 106 of the National Historic Preservation Act, as amended, the park notified the Georgia Department of Natural Resources,

Historic Preservation Division (HPD), the State Historic Preservation Office (SHPO), of this project as a federal undertaking in a letter dated July 15, 2019. The SHPO confirmed receipt of the notification on August 7, 2019. On September 24, 2019, the park submitted the Development Concept Plan to the SHPO for review. In a letter dated October 23, 2019, the SHPO states “Based on the information contained in the concept plan, HPD concurs with the reports and surveys proposed, the monitoring and management strategies identified, and the best management practices and mitigation measures outlined.” In a letter dated November 21, 2019, the park submitted NPS Section 106 documentation, Assessment of Actions Having an Effect on Historic Properties, to the SHPO, and in a letter dated December 10, 2019, the SHPO concurred with the park that this project will have no adverse effect on historic properties. As subsequent, related undertakings are developed—including historic baseline documentation, treatment reports, and construction drawings—the park will initiate compliance with the 2008 Nationwide Programmatic Agreement among the National Park Service, Advisory Council on Historic Preservation, and the National Conference of SHPOs for Compliance with Section 106 of the National Historic Preservation Act.

The public was made aware of the Development Concept Plan/Environmental Assessment for The Carter Home and Garden through flyers that were distributed to local residents. The plan was made available for public review and comment through the project NPS Planning, Environment, and Public Comment (PEPC) website at: <http://parkplanning.nps.gov/jica> during a 30-day period from September 23 through October 23, 2019.

One correspondence was received from an individual and documented in the project PEPC website. The comment was not substantive and no changes to the plan were made. Attachment C provides a summary of the public comment received and the NPS response to the comment.

FINDING OF NO SIGNIFICANT IMPACT

No potential for significant adverse impacts to park resources as a result of implementation of the plan have been identified. The conclusion of no significant impact was determined based on analysis compiled from a combination of scientific data and professional judgement from NPS staff and documented in the EA. As defined by 40 CFR 1508.27, significance, as used in NEPA, requires consideration of context and intensity. The follow considerations, included in 40 CFR 1508.27, are relevant to this finding of no significant impact.

Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.

No significant impacts to resources were identified that will require analysis in an environmental impact statement. Mitigation measures and best management practices described in Attachment B will be implemented to minimize any

potential adverse impacts. Additional details on impacts to resources can be found in chapter 3 of the EA.

The degree to which the Proposed Action affects public health and safety.

There will be no significant impacts to public health or public safety. There may be temporary adverse impacts to the visitor experience and visitor safety during development and construction of the parking lot expansion, although these will be minimal and are addressed in the mitigation measures in Attachment B. The selected alternative includes opening up the site to Ranger-led and self-guided tours, requiring ticketing and defining the visitor capacities for the site and tours. Park visitation is expected to grow when the site is opened to the public, so tour group sizes will be capped to enhance the visitors' experience and safety. In addition, visitor safety is addressed through the retention of some U.S. Secret Service cameras, lights, and the security fence around The Carter Home and Garden, which will provide added security for the protection of the property and help deter vandalism. Park rangers, during guided tours and regular maintenance, will monitor and assess the site to identify visitor safety concerns and potential impactful behavior to the resources, thereby minimizing potential adverse visitor use impacts. These effects, when considered with other past, present, and reasonably foreseeable future projects, will have long-term, beneficial cumulative impacts to visitor experience and safety.

Unique characteristics of the area such as proximity to historic and cultural resources, ecological critical areas, wetlands, or floodplains, etc.

The entire project area is a cultural landscape, and the Carter Residence, Gnann House, and Gnann Carriage House are historic properties. The environmental assessment includes analysis of potential impacts to the cultural landscape and structures (see EA chapter 3). The selected alternative will likely result in temporary, small to negligible, and localized adverse impacts to the cultural landscape and visitor use during development and construction. See mitigation measures and Attachment B. Overall, actions included in the selected alternative will have long-term beneficial impacts to the cultural resources and museum collections, with ongoing preservation of the historic properties and protection and curating of museum collections.

The degree to which the effects on the quality of the human environment are likely to be highly controversial.

No highly controversial impacts on the quality of the human environment were identified under the selected alternative for the plan / environmental assessment.

The degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

No highly uncertain or controversial impacts, unique or unknown risks, or significant cumulative effects were identified in the EA. Resource conditions in the project area

are well known and anticipated impacts from implementing the selected alternative are understood based on NPS staff professional judgement.

The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

In the selected alternative, there are no reasonably foreseeable future actions with significant effects on visitors and park resources. Visitor use numbers and patterns will change when The Carter Home and Garden is opened to visitors, and the park will monitor site resources and evaluate tour processes to prevent adverse impacts (e.g., assessing whether a ticketing system would better manage the pacing and flow of visitation into the Carter Residence).

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

With regard to NPS projects and actions, and other non-NPS projects and actions affecting the project area, the original construction of The Carter Home and Garden and the Gnann House and Gnann Carriage House are the only actions in the recent past that affected this part of the Plains community. Aside from the improvements being proposed in this plan, no current or reasonably foreseeable NPS projects or actions, or non-NPS projects or actions, are expected to affect the project area. The selected alternative includes strengthening pedestrian connections between The Carter Home and Garden and other park units, resulting in long-term and beneficial cumulative impacts to the visitor experience through new opportunities within the park and enhanced connectivity throughout the park and the community of Plains.

The degree to which the action may adversely affect historic properties in or eligible for listing on the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

The entire project area is a cultural landscape, and the Carter Residence, Gnann House, and Gnann Carriage House are listed in the National Register of Historic Places, so damage to any of these structures would be a concern. Preservation of the Carter Residence is a goal of this project. A forthcoming Cultural Landscape Report for the project area is underway (anticipated draft document completion in the spring of 2020), in addition to a Historic Structure Report, a Historic Furnishings Report, and a Historic Furnishings Plan for the Carter Residence and a Historic Structure Report for the Gnann House and Gnann Carriage House. Qualified archeologists from the Southeast Archeological Center conducted an archeological survey to identify potential archeological sites and did not identify any significant archeological resources.

The selected alternative is anticipated to have no adverse effects on historic buildings, archeological resources, and cultural landscapes. In a letter dated December 10, 2019, the SHPO concurred with the park that this project will have no adverse effect on historic properties. Any adverse effects related to actions included in the selected alternative will be limited by the mitigation measures outlined in this plan or included in the scheduled Cultural Landscape Report, Historic Structures Reports, Historic Furnishings Report, or Historic Furnishings Plan. Adherence to measures intended to protect and preserve The Carter Home and Garden will not disturb or alter the character-defining features of the site's contributing buildings, archeological resources, and cultural landscapes, resulting primarily in beneficial impacts with only limited or minimal potential for adverse impacts on historic properties. The park will follow treatment recommendations in the (to be completed) Cultural Landscape Report and initiate Section 106 consultation for related undertakings.

The degree to which the action may adversely affect an endangered or threatened species or habitat.

No endangered or threatened species or habitat exists within the project area.

Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102 (2) (c) of NEPA. Attachment C contains the non-impairment determination for the selected alternative.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared. The Development Concept Plan/EA for The Carter Home and Garden will be implemented as soon as practical when funding becomes available.

ATTACHMENTS:

A: Desired Conditions

B: Mitigation Measures and Best Management Practices

C: Public Comment Summary

D: Non-Impairment Determination

ATTACHMENT A: DESIRED CONDITIONS

Desired conditions are defined as statements of aspiration that describe resource conditions, visitor experiences and opportunities, and facilities and services that an agency strives to achieve and maintain in a particular area. Within the Visitor Use Management (VUM) framework, desired conditions are a crucial element that help guide management decisions. The desired conditions for The Carter Home and Garden, which are linked to the fundamental resources and values and based on prior planning and guidance as well as the purpose and enabling legislation, were developed by park staff to help guide the plan alternatives and provide a foundation for this plan.

Plains Community. Through The Carter Home and Garden and other local sites, visitors from near and far, no matter their background, have the opportunity to experience the community-oriented lives of the Carters in Plains. The community itself has a clear understanding of The Carter Home and Garden and its role in the broader Plains story that is being told by multiple organizations and people.

Carter Home and Garden. Features on the property remain in keeping with how the Carters designed the site—as a place for both refuge and recreation. Visitors gain a sense of what life on the Carter property looked and felt like and an appreciation for the natural world as experienced by the Carters. Infrastructure added to accommodate visitation is done in a way that does not compromise the design intent of the cultural landscape or the Carter Residence.

Carter Residence. The fullness of the Carters' lives is apparent in the prolific work they have done, their love for and commitment to the Plains community, and the energy and passion that the Carters brought to everything they did and everyone they met. Objects within the residence retain their integrity, and their meanings are understood so that through them, visitors have the opportunity to learn about the Carters' lives. This would include their experiences before, during, and after the presidency; the friends, family, and distinguished guests who were welcomed to their Plains residence; and the body of work that the Carters coordinated and conducted from their residence, such as working with The Carter Center, humanitarian work around the world, writing, woodworking, painting, recreation, and much more.

Memorial Garden. The garden is managed sustainably using principles of environmental stewardship valued by the Carters, specifically Mrs. Carter's commitment to pollinators. Visitors are able to learn about the native plants and species in the garden, gain a sense of serenity when visiting the garden, and have opportunities for meaningful commemoration of the Carters.

ATTACHMENT B: MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES

The National Park Service places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. In order to help ensure the protection of natural and cultural resources, protect visitors, and promote natural cave environments, the following mitigation measures and best management practices will be implemented as part of the selected alternative. For the selected alternative, best management practices and mitigation measures will be used to prevent or minimize potential adverse effects associated with activities proposed in this plan. Mitigation measures undertaken during project implementation will include, but will not be limited to, those listed below.

General

- A project orientation will be provided to all staff and construction workers to increase their understanding of and sensitivity to the environment and minimize their impacts.
- All environmental compliance will be completed and documented prior to beginning construction projects.
- The project area will be monitored to ensure that impacts stay within the parameters of the project area and do not escalate beyond the scope of the environmental assessment.
- Construction limits will be flagged and fenced to protect cultural landscape features.
- The project contractors will be required to conform to all applicable permits or project conditions. All construction equipment will be stored within the delineated work limits.
- All tools, equipment, barricades, signs, surplus materials, and rubbish will be removed from the project site upon project completion.
- Nonvegetation construction debris will be placed at least daily in refuse containers and disposed of at least weekly. No refuse burying or burning will be allowed.
- Contractors will comply with applicable federal regulations on the storage, handling, and disposal of all hazardous materials and waste. Provisions will be made for storage, containment, and disposal of hazardous materials used on-site.
- To minimize the possibility that construction equipment could leak fluids, introduce noise pollution, or emit pollutants, equipment will be frequently checked to identify and repair any leaks, mufflers will be checked for proper operation, and only equipment that is within proper operating specifications will be used.

Vegetation

- Temporary barriers will be installed to protect the natural surroundings (including trees, plants, and root zones). Any native vegetation to be preserved within the project area and will be clearly identified by marking, fencing, or another appropriate technique prior to any construction activities.

- Prior to entry into the park, heavy equipment will be steam cleaned to prevent importation of nonnative plant species and inspected to ensure that hydraulic fittings are tight, hydraulic hoses are in good condition and replaced if damaged, and there are no petroleum leaks.
- Removal of vegetation will be done in a manner that will not affect vegetation not proposed for removal.
- A contractor damage clause for impacts to trees/vegetation not within the project area will be part of the construction contract.
- Salvage of topsoil and duff will occur in and adjacent to the project area, and salvage of vegetation will occur to the degree possible, staff time and need permitting.

Soils

- A grading and erosion and sediment control plan will be prepared by the contractor to minimize erosion during construction.
- Any imported soils, fills, or aggregates will be checked prior to delivery to ensure they are free of deleterious materials. Sources of imported materials will be compiled by construction contractor and submitted for park review and approval prior to construction.
- If needed, weed-free clean fill and topsoil will be used.
- Erosion control measures, including approved siltation control devices, will be used in construction areas to reduce erosion and capture eroding soils.

Water Quality

- A stormwater pollution prevention plan will be prepared by the construction contractor and implemented for construction activities to control surface runoff, reduce erosion, and prevent sedimentation from entering water bodies during construction. In addition, this plan will address hazardous materials storage, spill prevention, and response. The plan will be submitted for park review and approval prior to construction.
- Best management practices will be followed to stabilize the site, prevent erosion, and convey stormwater runoff to existing drainage systems, keeping contaminants and sediments on-site. Best management practices include silt fences and hay bales placed at the foot of slopes and at other locations to contain excavated material and to filter sediment from stormwater runoff, and temporary seeding of slopes for short-term stabilization.
- A comprehensive spill prevention/response plan will be developed that complies with federal and state regulations and addresses all aspects of spill prevention, notification, emergency spill response strategies for spills, reporting requirements, monitoring requirements, personnel responsibilities, response equipment type and location, and drills and training requirements. The spill prevention/response plan will be submitted to the park for review/approval prior to commencement of construction activities.

- Temporary sediment control devices will be employed as needed, such as filter fabric fences, sediment traps, or check dams.
- Stockpiled soil will be covered throughout the duration of the project with semipermeable matting or plastic or another type of erosion control material.
- Silt fencing or biodegradable sediment logs will be retained in disturbed areas until stabilization (by revegetation).

Air Quality

- All construction equipment, diesel trucks, and generators will be equipped with best available control technology for emission reduction of nitrogen oxides and particulate matter.
- Idling of construction and personal vehicles will be reduced or eliminated whenever possible.

Acoustic Environment/Soundscape

- Standard noise abatement measures will be followed during construction. All construction equipment will have functional exhaust/muffler systems. Other measures may include: the use of best available noise control techniques wherever feasible; the use of hydraulically or electrically powered impact tools when feasible; or the use of hand tools when feasible.
- The idling of motors will be limited except as necessary.
- To the extent possible, all on-site noisy work above 76-A weighted decibels (dBA) (such as the operation of heavy equipment) will be performed between the hours of 8:30 a.m. and 5:00 p.m. to minimize disturbance to nearby neighbors.

Health and Safety

- Measures will be implemented to ensure employee and visitor health and safety. Measures may include, but are not limited to, noise abatement, visual screening, and directional signs that aid visitors in avoiding construction activities.
- An emergency notification plan will be developed that complies with park and federal requirements and allows contractors to properly notify park, federal, and/or territorial personnel in the event of an emergency during construction activities. The plan will address notification requirements related to such events as fire, personnel and/or visitor injury, and releases of spilled materials. The plan will be submitted for park review and approval prior to construction.

Historic Structures/Cultural Landscape/Archeological Sites

- In general, all reasonable measures will be taken to avoid, minimize, or mitigate adverse effects on cultural resources in consultation with the Georgia State Historic Preservation Officer and other concerned parties as appropriate.

- All areas selected for construction (e.g., new trails, parking areas) will be surveyed for cultural resources to ensure that resources, if identified in the area of potential effects, are adequately protected by avoidance or, if necessary, that appropriate mitigation measures are completed prior to construction disturbance.
- If previously unknown archeological resources were discovered during construction, all work will cease in the immediate vicinity of the discovery until the resources are assessed and documented. If the resources could not be avoided or preserved in situ, an appropriate mitigation strategy will be developed, following prompt notification and consultation with the state historic preservation officer, and other concerned parties, as necessary.
- Undertake the preservation and rehabilitation of cultural landscapes in accordance with The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes, and other applicable law and policy (e.g., Architectural Barriers Act).
- Whenever possible, modify project design elements to avoid adversely affecting cultural landscapes. Careful design will ensure that new construction will minimally affect the scale and visual relationships among significant landscape features. The topography, vegetation, circulation features, and land use patterns of the cultural landscape will be minimally affected. If necessary, vegetative screening will be used, as appropriate, to minimize visual impacts on cultural landscapes.
- Undertake the preservation and rehabilitation of National Register listed or eligible structures in accordance with The Secretary of the Interior's Standards for the Treatment of Historic Properties (1995) to ensure that the character-defining features and integrity of the structures are minimally affected. Other law and policy will be adhered to as applicable (e.g., Architectural Barriers Act).
- Evaluate any materials removed from historic structures during rehabilitation efforts to determine their value to the park's museum collections and/or for their comparative use in future preservation work at the site.
- Protect historic furnishings and other objects and collections items in accordance with all approved NPS curatorial policies and guidelines. Collections items will be professionally and securely handled and packaged for curatorial storage.

ATTACHMENT C: PUBLIC COMMENT SUMMARY

Jimmy Carter National Historic Site released the Development Concept Plan/Environmental Assessment for The Carter Home and Garden to the public on September 23, 2019 and announced its release through a press release, posts to the park's website, local distribution of flyers, and an announcement on the NPS PEPC website. To ensure that a variety of stakeholders and visitors could participate in this public scoping, the park elected to accept comments between September 23, 2019 and October 23, 2019.

One correspondence was received and documented in the project NPS PEPC website from an individual. The commenter generally supported the selected alternative, the opening of the Carter property to visitor use and interpretation of the Carters' lives; however, the commenter questioned the adequacy of the document, believed more could be done to protect park resources, and disagreed with the order of some of the actions. No comments were substantive to warrant changes to the plan.

Concern 1. The commenter expressed concern that the "museum collections" topic was removed from consideration of impacts to be analyzed in the plan considering the importance of the artifacts to the experience of the site, especially inside the Carter Residence.

Response. Removal of the Carter Residence furnishings and other collections are an important aspect of the transition from the Carters' home to the Carter Residence and it being available for public visitation. The National Park Service will follow standard NPS policies and guidelines and staff will continue to manage, protect, and appropriately curate the park's collection items. Because of these protection measures and ongoing efforts to monitor the condition of collection items on exhibit or in storage and prevent potential adverse impacts occurring from visitor use or other factors, there will be little to no impact to these furnishings. Therefore, the topic was dismissed from detailed NEPA analysis.

Concern 2. The commenter expressed concern that releasing the plan without a previously completed Cultural Landscape Report, Historic Structures Report, and Historic Furnishings Report is premature.

Response. A draft Cultural Landscape Report is to be completed in the spring of 2020. Due to the age of the Carters and their desire to be involved in this planning effort, the immediate need for the park was to develop this plan. The remaining reports will be completed at the appropriate times.

Concern 3. The commenter requested explanation of the term "few, if any photographs" referring to the limitation of photographs that visitors would be allowed to take while visiting the property.

Response. Photographs of certain parts of the property may be allowed, such as of the Gnann House, while in other areas (e.g., Carter Residence) photographs may be prohibited in order to conserve specific museum collection items.

Concern 4. The commenter expressed an opinion that the existing security system on site should remain after the U.S. Secret Service departs from the property.

Response. On page 10 of the plan it states, “Upon the passing of the Carters, the U.S. Secret Service would vacate the Gnann House (currently owned by the General Services Administration [GSA]), potentially taking with them security features from the property.” The U.S. Secret Service has the discretion to decide what remains and what is removed of the existing security system. The park will work with them to determine what is appropriate.

Concern 5. The commenter wondered whether the Carters approved of the new pathways proposed in the selected alternative.

Response. Pathways will be added to the garden to guide visitors and protect resources. Most of the paths fully realize the original 2007 design plans for the garden, while the path added along the west edge of the pond will define visitor circulation and protect the pond edge during fishing activities. The Carters have the final approval of the location of details such as pathways.

Concern 6. The commenter expressed concern that picnicking be allowed on site, particularly in historic areas.

Response. Picnicking will take place in previously-disturbed, non-historic, designated areas outside of the Gnann House.

Concern 7. The commenter requested additional details of the special events that may take place at the site and expressed concern for the impacts the events could cause.

Response. Details of special events are not included in the scope of this plan. Parking, if necessary for large crowds, will be split between the site, Plains High School, and within town, with visitors walking between sites.

Concern 8. The commenter wondered whether a Natural Resource Evaluation had been completed for the site.

Response. Impacts to natural resources were initially evaluated during the internal scoping process. The National Park Service determined that there would be minimal impacts to natural resources. In addition, visitor use management and mitigation measures would ensure that impacts would remain minimal; therefore, natural resource impacts were dismissed from detailed analysis.

Concern 9. The commenter wondered whether the park had considered shuttle service between park sites.

Response. A shuttle service was discussed early in the planning process and was determined not to be feasible. This does not preclude any shuttle studies in the future.

Concern 10. The commenter wondered what the date of significance was for the Carters' home.

Response. The date of significance of the Carter Residence began when the Carters initially inhabited the house and is currently ongoing. Additional details of significance will be covered in the forthcoming Cultural Landscape Report.

Concern 11. The commenter expressed concern that Mrs. Carter's childhood home and a structure known as the Pond House are not addressed in the plan. In addition, the experiences, stories, and site features important to the Carters' daughter Amy and the "nanny" are not included.

Response. The scope of this plan centers on The Carter Home and Garden. Details regarding other properties or life experiences of the Carters and others who lived and/or worked on the property are out of the scope of this plan. A Development Concept Plan typically does not address programmatic details that do not have the potential to impact the human environment.

Concern 12. The commenter asked whether the Memorial Garden is a euphemism for the Carter gravesite and expressed concern that, if so, the plan, and in particular alternative 1, does not appropriately cover the reality of visitation a presidential gravesite would incur and potential impacts the gravesite and Memorial Garden may sustain.

Response. The garden is known as the Memorial Garden to park staff. The Carters' gravesites will potentially be located within the garden but do not encompass the entirety of it, only in the "butterfly garden." Monitoring of and potential impacts to the gravesite are addressed on page 36 of the EA in Appendix A: Visitor Use Management Monitoring Strategy for Indicators, Thresholds, and Visitor Capacity.

Concern 13. The commenter expressed concern that the free tours of The Carter Home and Garden would at some point be changed to a fee-only activity, and that a ticketing system in vogue incurs a fee.

Response. At this time tours will be free. A free ticketing system could be implemented to allow for smaller tour sizes and improved, more efficient tour processes. There are no specific policies in place to prevent fee collection in the future.

Concern 14. The commenter wondered whether the Southeast Regional Office was supportive of the plan.

Response. The Interior Region 2 office is supportive of this plan.

ATTACHMENT D: NON IMPAIRMENT DETERMINATION

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (16 United States Code [USC] 1). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that the National Park Service must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (16 USC 1a -1). 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.

The National Park Service has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park (NPS 2006: Section 1.4.3). However, the National Park Service cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006: Section 1.4.3). An action constitutes an impairment when its impacts “harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (NPS 2006: Section 1.4.5). To determine impairment, the National Park Service must evaluate “the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (NPS 2006: Section 1.4.5).

This determination on impairment has been prepared for the selected alternative described in this FONSI. An impairment determination is made for all resource impact topics (i.e., cultural landscapes, archaeological resources, historic structures, and visitor use and experience) analyzed in detail in the EA for the selected alternative.

Cultural Resources

Proposed preservation actions and planned opening of The Carter Home and Garden for public visitation are anticipated to have no significant impacts on historic buildings, archeological resources, and cultural landscapes. Visitation would be monitored and managed as necessary to minimize adverse visitor use impacts. All proposed actions will be carried out in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, including the *Guidelines for the Treatment of Cultural Landscapes*, along with a scheduled Historic Structures Report, Historic Furnishings Report, and Historic Furnishings Plan for the Carter Residence. Adherence to measures

intended to protect and preserve The Carter Home and Garden will not disturb or alter the character-defining features of the site's contributing buildings, archeological resources, and cultural landscapes, resulting primarily in beneficial impacts with only limited or minimal potential for adverse impacts on historic properties. The National Park Service will follow treatment recommendations in the (to be completed) Cultural Landscape Report, conduct archeological monitoring as needed, and continue Section 106 consultation with the Georgia State Historic Preservation Officer as detailed designs for related project undertakings are developed. Because the actions presented under the selected alternative will result in no significant impacts to historic properties at The Carter Home and Garden, and the park will carry out all reasonable measures to protect and preserve their condition and integrity, there will be no impairment of the historic site's cultural resources.

Summary

In conclusion, as guided by the expected outcomes noted above, implementing the selected alternatives does not constitute impairment of any resource or park value whose conservation is: (1) necessary to fulfill specific purposes identified in establishing legislation or proclamation of the park; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as the goal in the park's general management plan or other relevant NPS planning documents as being of significance.