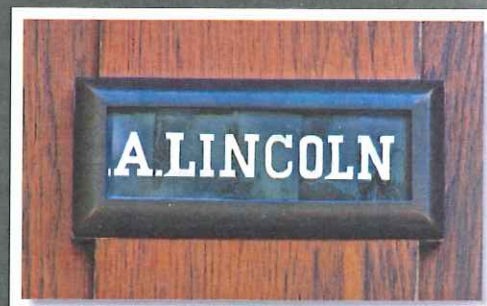
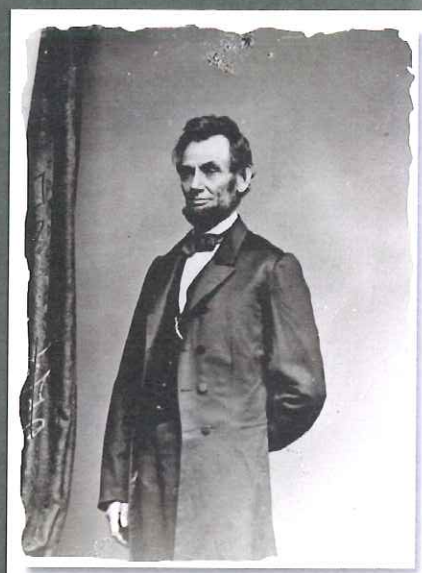




# LINCOLN HOME NATIONAL HISTORIC SITE



ABBREVIATED FINAL  
GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

FES-11-40





0 100 YARDS 250 YARDS 500 YARDS

NORTH



## VICINITY

### LINCOLN HOME NATIONAL HISTORIC SITE

U.S. Department of the Interior • National Park Service  
DSC • December 2009 • 449/101895

# ABBREVIATED FINAL GENERAL MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

## LINCOLN HOME NATIONAL HISTORIC SITE SANGAMON COUNTY, SPRINGFIELD, ILLINOIS

Lincoln Home National Historic Site was authorized by an act of Congress, Public Law 92-128, on August 18, 1971 (85 Stat. 347). The national historic site's current *Master Plan* was completed more than 35 years ago and has reached the limit of its effective life span. Most of the master plan's directives have been addressed or accomplished by the national historic site staff. The ongoing evolution of the national historic site, along with its surrounding area and other outside factors have resulted in new issues and challenges that are beyond the scope of the 1970 *Master Plan*.

The *Draft General Management Plan / Environmental Impact Statement* examines four alternatives for managing the national historic site for the next 15 to 20 years. It also analyzes the impacts of implementing each of the alternatives. The "no action" alternative, alternative 1, describes the existing national historic site management and serves as a basis for comparison in evaluating the other alternatives. "Alternative 2, A Retreat from Modern Life in the Heart of the City," the NPS preferred alternative, focuses on rehabilitating the historic landscape to offer visitors a strong sense of the neighborhood as Lincoln knew it. This goal would be accomplished by extensive rehabilitation at the core of the site, but less extensive rehabilitation away from the core. The Lincoln lot would be restored to the greatest degree possible.

"Alternative 3, Life and Work in a Rehabilitated Lincoln-era Urban Landscape," focuses on interpreting and rehabilitating the neighborhood as Lincoln knew it along the entire length of Eighth Street. The historic landscape would be extensively rehabilitated to reflect the diverse and active quality of the neighborhood in the heart of Springfield. The Lincoln lot would be included in the historic landscape rehabilitation. "Alternative 4, Self-discovery of the Lincoln-era Landscape," would focus on rehabilitating the landscape to provide visual cues of what was present during Lincoln's time, offering visitors a sense of self-discovery. The Lincoln lot would be restored to the greatest degree possible.

The *Draft General Management Plan / Environmental Impact Statement* was distributed to other agencies and interested organizations and individuals for review and comment. This abbreviated *Final General Management Plan / Environmental Impact Statement* presents the public and agency comments and the responses from the National Park Service. The draft and abbreviated final constitute a full final document and environmental impact statement. Because there were no changes made to the draft document as a result of public comments, the National Park Service is authorized to print this abbreviated final document.

For further information on the *General Management Plan*, please contact the Superintendent, Lincoln Home National Historic Site, 413 South Eighth Street, Springfield, Illinois, 62701-1905.



*Abraham Lincoln*

## INTRODUCTION

This is an abbreviated *Final General Management Plan / Environmental Impact Statement* for Lincoln Home National Historic Site. The material included here is to be combined with the *Draft General Management Plan / Environmental Impact Statement*, which was distributed for public review on June 18, 2010.

The 60-day review period for the draft document began on June 20, 2010 and ended August 18, 2010. This abbreviated format is being used because the review did not result in any substantive changes to the draft document and did not result in any modifications to the analysis provided in the *Draft General Management Plan / Environmental Impact Statement*.

Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 Code of Federal Regulations 1503.4 (c)). The draft document with the comments received and responses to those comments constitutes the full *Final General Management Plan / Environmental Impact Statement*.

Following the announced release of this *Final General Management Plan / Environmental Impact Statement* in the *Federal Register*, there will be a 30-day no-action period. A "Record of Decision" of the approved final plan will then be signed by the regional director, Midwest Region, National Park Service, and copies will be made available to the public.

For further information, please contact the superintendent, Lincoln Home National Historic Site, Springfield, Illinois.

## COMMENTS RECEIVED

This section summarizes the agency and public comments received on the *Draft General Management Plan / Environmental Impact Statement*. These comments allow interested parties (including NPS decision makers) to review and assess how other agencies, organizations, and individuals have responded to the proposed actions and alternatives and their proposed impacts. The National Park Service provides responses to those comments considered substantive or when responses are helpful for clarification or other purposes.

Substantive comments are those that (1) question, with reasonable basis, the accuracy of information in the environmental impact statement, (2) question, with reasonable basis, the adequacy of environmental analysis, (3) present reasonable alternatives other than those presented in the environmental impact statement, or (4) cause changes or revisions in the proposal. There were no substantive comments received.



## PUBLIC REVIEW

A notice of availability of the *Draft General Management Plan / Environmental Impact Statement* was published in the Federal Register on June 18, 2010. The draft document was distributed June 18, 2010 to a mailing list of 1,020. The official review and comment period was from June 20 to August 18, 2010. These individuals received information about the dates and times of four public meetings to be held at the national historic site visitor center in Springfield, Illinois. The availability of the document and information about the public meetings was also announced in the local media.

Four public meetings were held: on Tuesday, July 20, 2010, and on Wednesday, July 21, 2010. There were two presentations each day, at 5:00 p.m. and 6:30 p.m. The meetings were held at the national historic site's visitor center. A total of 45 individuals attended the meetings. Public comments were recorded by members of the planning team.

## COMMENT SUMMARY

Thirty-nine comments were received from the public; 35 were recorded at the public meetings and an additional four were submitted through the National Park Service planning website. Three comment letters were received from agencies and are reproduced in this document. The Environmental Protection Agency responded with a "Lack of Objection" to the National Park Service's identification of alternative 2 as the preferred alternative.

The Springfield-Sangamon County Regional Planning Commission raised questions about the design elements that would guide new construction in the national historic district and urged the National Park Service to consider its impact on the surrounding neighborhood and expand its management zones outside the boundaries of the national historic site.

The Illinois Historic Preservation Agency expressed concerns about the compatibility of proposed new construction on the lots surrounding the Lincoln Home. In response to these concerns, Lincoln Home National Historic Site and the Illinois Historic Agency, with the assistance of the Advisory Council on Historic Preservation (ACHP), prepared and signed an agreement outlining the Section 106 compliance procedures that the two agencies would observe in the future.

The comments included expressions of support for components of the preferred alternative and other action alternatives. Some comments suggested additional actions to be considered. Others were questions requesting clarification of proposed actions, the planning process, or current park operations. One comment expressed concern that the preferred alternative was not ambitious enough and that the National Park Service should be dedicating more funds to the site. It was also recommended that the National Park Service should consider relocating historic structures dating to the Lincoln era from other locations in Springfield to the national historic site.

The public's comments have been considered by the National Park Service in preparing this abbreviated *Final General Management Plan / Environmental Impact Statement*, consistent with the requirements of 40 CFR 1503. The following section





contains NPS responses to some general questions/comments. The National Park Service responses clarify or provide new information or explain why the public comments do not warrant further agency response.

## COMMENTS AND RESPONSES

**COMMENT:** One commenter inquired about the selection process for the preferred alternative. Specifically, how was the preferred alternative determined, and who made the final decision?

**NPS RESPONSE:** The National Park Service chooses the preferred alternative after receiving input on the range of alternatives from reviewers within the Park Service and the public. The selection of the preferred alternative is made after evaluating all the alternatives against criteria based on the legislation authorizing the national historic site, NPS management policies, desired visitor experiences, operational efficiency, resource preservation, and costs.

**COMMENT:** One commenter recommended that the National Park Service should think in bigger terms. The following remarks were made: "The vision and passion are not big enough. The neighborhood should be denser, as Lincoln saw it. It should be less pristine. There should be more costumed interpreters and more African-American participation. The National Park Service is not spending enough. The preferred alternative is a 'puny' vision."

**NPS RESPONSE:** The overall vision for the general management plan was developed with resource managers, planners, historical architects, cultural landscape architects, historians, and other specialists within the National Park Service. The costs for implementation of the plan underwent rigorous scrutiny to ensure that the level of development was appropriate for the site.

The neighborhood density will be increased through the rehabilitation treatments described in the plan. The designs for structures proposed in the rehabilitation treatment would undergo a separate compliance process with additional public involvement, including the opportunity to review and comment on design proposals for the structures. The overall intent of the designs would be a focus on structures that would be compatible with the character, scale, and sense of place of the national historic site.

The site's interpretive programs will be expanded to include a more comprehensive picture of African-Americans in Springfield and Mr. Lincoln's interaction with that community.

**COMMENT:** One commenter asked if the final plan would be "organic", i.e., could be modified in 10 years, or at some other point in the future.

**NPS RESPONSE:** General management plans can be amended to address issues that were unforeseen in the original planning process, or to provide more detailed guidance for actions that were described conceptually in the original general management plan.



*A. Lincoln*

**COMMENT:** One commenter expressed concerns about the condition of the neighborhood to the south of the park and whether the National Park Service planned any actions there.

**NPS RESPONSE:** The National Park Service has no jurisdiction outside the site boundary. However, Lincoln Home staff members have in the past consulted with property owners in the neighborhood on issues related to historic preservation. The National Park Service will continue to do so once the general management plan is implemented.

**COMMENT:** A comment was made that the National Park Service should not rule out reconstruction of missing structures, on the assumption that we might learn more in the future.

**NPS RESPONSE:** The exhaustive research conducted for the historic structure reports for the Burch and Carrigan lots indicates that it is extremely unlikely that additional data on these structures will be uncovered.

**COMMENT:** Comments were submitted expressing support for the expanded living history program. It was suggested that the national historic site do even more of this.

**NPS RESPONSE:** Interpretive programs, including living history programs, will be further expanded under the preferred alternative.

**COMMENT:** One comment raised concern about construction on the Carrigan lot. Specifically, the comment focused on the risk of fire from a structure so close to the Lincoln home and about the appropriateness of bathrooms so close to the Lincoln home.

**NPS RESPONSE:** The construction of bathrooms in the structure on the Carrigan lot was proposed in response to the need for more restrooms on site, coupled with the need to direct visitor flow to a facility near the Lincoln Home. Construction of this facility would require state of the art fire suppression systems, fire retardant construction materials, and other life, health, and safety measures.

**COMMENT:** One commenter raised concern about increasing lessee parking and the overall appropriateness of cars in the historic landscape.

**NPS RESPONSE:** Employee parking currently located in the historic district would move off-site so there would be no net increase in parking. Also, lessee parking spaces would be screened by fences and other landscape features.

**COMMENT:** One commenter asked the National Park Service to identify the long-range plan for the site. The commenter wished to know if the general management plan would be the ultimate plan or just a phase of a longer range plan.

**NPS RESPONSE:** A general management plan is the long-range plan for any unit of the national park system. It is expected to guide management for a minimum of 15-20 years.



*Abraham Lincoln*

**COMMENT:** One commenter asked if anything would happen to the buffer area along Ninth Street.

**NPS RESPONSE:** The landscape in this area would be rehabilitated to include picnic tables, walking paths, interpretive displays, and, potentially, temporary structures for special programs.

**COMMENT:** One commenter asked if the visitor center represented an example of an in-fill structure as proposed for the historic zone.

**NPS RESPONSE:** No. The visitor center is outside the historic zone and the national register district; it was built solely to provide for visitor services and site operations.

**COMMENT:** One commenter expressed support for a concept reported in a local television broadcast. This report focused on a suggestion of making the neighborhood more of a village with the addition of a church and school.

**NPS RESPONSE:** National historic site staff reported that according to historical records, there was neither a school nor church present within the historic neighborhood during the time that Mr. Lincoln lived in Springfield. The National Park Service would avoid any actions that suggest a false historic character for the site.

**COMMENT:** One commenter asked if the (Jameson) Jenkins lot would have some sort of interpretation in any of the alternatives.

**NPS RESPONSE:** National historic site staff replied that the story of Jameson Jenkins and his association with Mr. Lincoln would be included in future interpretive programs.

**COMMENT:** One commenter asked what it meant to “lease” homes. The commenter also asked if the houses in the leasing program were currently being interpreted as historic homes. The commenter also inquired whether it would be possible for a Museum of African-American history to lease a house. Finally, the commenter asked what types of businesses would be allowed.

**NPS RESPONSE:** National historic site staff explained that the leasing program refers to the leasing of historic structures at the site. These structures are leased to governmental and non-governmental lessees. This program is managed by the General Services Administration. All the historic homes in the leasing program have some level of interpretation. Determinations of appropriate functions within the leased properties, such as a private museum, would be by the General Services Administration.

**COMMENT:** One commenter asked if the houses in the proposed expansion area had already been closed and if they were available for purchase.

**NPS RESPONSE:** National historic site staff replied that no houses are located in the proposed expansion area. There are a few commercial sites and some vacant lots.



*Abraham Lincoln*



**COMMENT:** One commenter inquired about the location of the current curatorial facilities on site.

**NPS RESPONSE:** National historic site staff reported that the curatorial facilities are currently dispersed among a number of structures onsite.

**COMMENT:** One written comment expressed concern that the general management plan did not provide any detailed information on the design of the maintenance facility and employee parking within the boundary expansion area to the southeast of the national historic site. Specifically, these concerns addressed the size of the facility, and the landscape design that will screen the facility and proposed parking area.

**NPS RESPONSE:** The scale and design elements of the proposed development in the boundary area, including landscape design, will be undertaken in a subsequent planning and design effort that includes a formal consultation and compliance process. Design alternatives for the facility will be developed and presented in a separate public process. The impacts of these alternatives will be analyzed in a compliance document. Agencies, organizations, and members of the public will have the opportunity to comment on the development alternatives and the environmental compliance document.

**COMMENT:** One written comment suggested that existing Lincoln-era structures in Springfield should be moved onto vacant lots in the national historic site.

**NPS RESPONSE:** Given that these structures were not original to the site, the National Park Service cannot consider relocating historic structures to the site, in order to avoid misleading the public about the site's historic character and integrity.

**COMMENT:** It was suggested that the National Park Service should develop an additional management zone and apply it to neighborhoods and areas adjacent to Lincoln Home National Historic Site.

**NPS RESPONSE:** National Park Service policy does not allow the National Park Service to zone areas outside their jurisdiction.

**COMMENT:** It was recommended that the National Park Service consider other regional planning efforts in the implementation of the final general management plan.

**NPS RESPONSE:** Implementation of the final general management plan will consider the recommendations of other regional plans, insofar as they are consistent with the national historic site's enabling legislation, National Park Service policy, and the overall objectives for resource protection, visitor use and enjoyment, and sustainable management of the site. Staff at the national historic site will continue to consult and cooperate with regional planners in the future.



*Abraham Lincoln*

# COMMENT LETTERS



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AUG 16 2010

REPLY TO THE ATTENTION OF:

E-19J

Mr. Nick Chevance  
Regional Environmental Coordinator  
National Park Service  
Midwest Region  
601 Riverfront Drive  
Omaha, Nebraska 68102-4226

**Re: Draft Environmental Impact Statement / Draft General Management Plan for the Lincoln Home National Historic Site, Springfield, Illinois CEQ#: 20100221**

Dear Mr. Chevance:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan (GMP) and Draft Environmental Impact Statement (DEIS), issued by the National Park Service (NPS), for the project listed above.

The DEIS/GMP presents 4 alternatives for managing the Lincoln Home National Historic Site (National Historic Site) for the next 15 to 20 years. The no-action alternative, alternative 1, describes the existing National Historic Site management and serves as a basis for comparison in evaluating the other alternatives. Alternative 2 is the NPS preferred alternative and focuses on rehabilitating the historic landscape to offer visitors a strong sense of the neighborhood as Lincoln knew it. Alternative 3 focuses on interpreting and rehabilitating the neighborhood as Lincoln knew it along the entire length of 8th St. Alternative 4 focuses on rehabilitating the landscape to provide visual cues of what was present during Lincoln's time, offering visitors a sense of self-discovery.

U.S. EPA rates the DEIS preferred alternative, alternative 2, as **LO (Lack of Objection)**. However, we do have comments about wetlands and some voluntary measures such as clean diesel initiatives and green building and sustainable design initiatives. We have enclosed the "Summary of Rating Definitions and Followup Action" to aid in your understanding of our rating system.

### Wetlands

Although this project is in an urban area, there are vacant lots present at the National Historic Site. These lots could contain wetlands. Since the preferred alternative includes some

construction of buildings on the vacant lots, wetlands could be affected. However, we understand that the funding may not materialize for the buildings to be built. Therefore, in the Final Environmental Impact Statement (FEIS), we suggest committing to analyzing wetlands in detail as part of the "Implementation Plans" discussed on page 16 of the DEIS. When any portion of the GMP is going to be implemented that involves building on vacant land, the land should be delineated for wetlands and any state or federal permits should be sought then.

### Green Building and Sustainable Design

We commend the NPS for committing to avoiding using fossil-fuel powered energy in the National Historic Site buildings. The practice of purchasing wind-produced energy from the local utility company and starting to employ geothermal systems in existing buildings is a great stride towards sustainable design.

In the FEIS, we suggest committing to building to Leadership in Energy and Environmental Design (LEED) standards or to E.O. 13423, "Strengthening Federal Environmental, Energy, and Transportation Management" standards.

We have also enclosed the "NEPA Stormwater Green Sheet" and the "NEPA Sustainable Materials Management Green Sheet," which can aid in your sustainable design efforts.

### Clean Diesel Initiatives

In addition to the air-quality mitigation measures discussed on pages 20 and 21 of the DEIS, please also consider adding:

- construction equipment and tour buses will be shut down when not in use,
- how anti-idling measures will be enforced, and
- retrofitting all diesel powered construction equipment with diesel oxidation catalysts or diesel particulate filters.

The additional mitigation measures will further protect the health of construction workers and tourists.

### Background Information

The National Historic Site was established to preserve the site associated with the home of President Abraham Lincoln in Springfield, Illinois, the only home Mr. Lincoln ever owned. The National Historic Site is located in Sangamon County in west-central Illinois, in an urban area in the City of Springfield. The National Historic Site is bordered by E. Capitol Ave on the north, East Edwards St. on the south, S. 7th St. on the west, and S. 9th St. on the east. The



National Historic Site contains a visitor center, parking, bus drop-off, leased buildings, vacant lots, and buildings containing interpretive displays.

If you have any questions please contact Julie Guenther at (312) 886-3172 or email her at [guenther.julia@epa.gov](mailto:guenther.julia@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", written over a horizontal line.

Kenneth A. Westlake  
Chief, NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

Enclosures (3)

Cc: Lincoln Home National Historic Site  
413 South Eighth St.  
Springfield, IL 62701-1905

## **\*SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\***

### **Environmental Impact of the Action**

#### **LO-Lack of Objections**

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

#### **EC-Environmental Concerns**

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

#### **EO-Environmental Objections**

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

#### **EU-Environmentally Unsatisfactory**

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

### **Adequacy of the Impact Statement**

#### **Category 1-Adequate**

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

#### **Category 2-Insufficient Information**

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

#### **Category 3-Inadequate**

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

\*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

## NEPA Stormwater Green Sheet

### **Stormwater section of NEPA documents should discuss/include (at a minimum):**

- ✓ Compliance with NPDES construction and post-construction requirements (project larger than one acre has to comply by writing a pollution prevention plan)
- ✓ Compliance with local ordinances
- ✓ Compliance with the Energy Independence and Security Act of 2007

"Energy Independence and Security Act of 2007" Title IV ("Energy Savings in Building and Industry"), Subtitle C "(High Performance Federal Buildings)". Here is the entire provision:

#### **SEC. 438. STORM WATER RUNOFF REQUIREMENTS FOR FEDERAL DEVELOPMENT PROJECTS.**

*The sponsor of any development or redevelopment project involving a Federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.*

This provision is quite significant. It will require Federal sites to achieve/maintain the predevelopment hydrology to the "maximum extent technically feasible". Sites will need to include things like rain gardens and permeable pavements in order to do this.

### **Stormwater measures beyond the bare minimum:**

- ✓ Mimic natural hydrology. Does the project decrease the recharge of the upper aquifer system?
- ✓ Sensitive areas should be given treatment beyond the bare minimum
- ✓ Keep native vegetation during construction and replant ASAP
- ✓ What types of salt/chemicals are being used for deicing? Latest BMP's used for deicing?  
[http://www.upperdesplainesriver.org/bbb\\_roadsalt.htm](http://www.upperdesplainesriver.org/bbb_roadsalt.htm)
- ✓ Sprawl is bad! Smart growth is good! Are there ways that the development can be implemented in a more compact area? [www.epa.gov/ebtpages/pollsmartgrowth.htm](http://www.epa.gov/ebtpages/pollsmartgrowth.htm) -select "pollution prevention programs" and "sustainability" for more info.
- ✓ Rain gardens, and permeable parking surfaces. Rain gardens and permeable parking surfaces increase the amount of water filtering into the ground and recharge aquifers, prevent community flooding and drainage problems, help protect waterbodies from pollutants carried by urban stormwater, and provide valuable wildlife habitat in an urban setting.
- ✓ Commitment to creating a Sustainable Buildings Implementation Plan (per Executive Order 13423) prior to construction.
- ✓ Green roofs, created wetlands, vegetated swales, native plant landscapes, and rain barrels
- ✓ Websites that can help with Stormwater Pollution Prevention and Sustainable Design:
  - Menu of stormwater BMP's: <http://cfpub1.epa.gov/npdes/stormwater/menuofbmps/>
  - Medium and small-sized model stormwater pollution prevention guides for construction sites: [www.epa.gov/npdes/swpppguide](http://www.epa.gov/npdes/swpppguide)
  - Green infrastructure practices (e.g. rain gardens): <http://www.epa.gov/npdes/greeninfrastructure/>
  - Some standards, including standards for individual sites: <http://www.sustainablesites.org/>
  - Standards for neighborhoods (LEED for Neighborhood Development): <http://www.usgbc.org/DisplayPage.aspx?CMSPageID=148>
  - Center for Watershed Protection: [www.cwp.org](http://www.cwp.org)
  - Low impact Development Center: [www.lowimpactdevelopment.org](http://www.lowimpactdevelopment.org)
  - Green Alley Handbook: <http://egov.cityofchicago.org/city/webportal/home.do> -at top of page City Departments, choose Transportation, under CDOT Programs choose Green Alleys, choose Green Alleys again and scroll down for the [Green Alley Handbook](#)
  - Menu of Stormwater Best Management Practices (compost-based fact sheets, etc.): <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>



## NEPA Sustainable Materials Management Green Sheet

Using recycled materials reduces the need to extract and process natural resources, which leads to significant energy savings and greenhouse gas reductions. EPA has developed emission factors that can be used to translate tons of recycled materials used into greenhouse gas savings. EPA recommends that projects track their recycled material use so that greenhouse gas savings can be quantified. Using recycled materials can save money and provide equivalent and often enhanced performance when compared to virgin materials.

### Minimum Required:

Section 6002 of the Resource Conservation and Recovery Act directs procuring agencies to purchase recycled-content products designated by EPA. Procuring agencies include all federal agencies and any state or local agency or government contractor that uses appropriated federal funds and spends more than \$10,000 a year on designated items. Once a product is designated (see list of products at [www.epa.gov/cpg](http://www.epa.gov/cpg)), procuring agencies are required to purchase it with the highest recovered material content level practicable. Comprehensive Procurement Guidelines (CPG) items relevant to NEPA projects include compost made from organic waste materials; cement and concrete made with fly ash and other byproducts; flowable fill made with foundry sand; traffic barricades and cones made from recycled plastic.

### Resources

#### Recycling of Construction and Demolition (C&D) Materials

- The *Federal Green Construction Guide for Specifiers* includes a construction waste management specification: [http://www.wbdg.org/design/greenspec\\_msl.php?s=017419](http://www.wbdg.org/design/greenspec_msl.php?s=017419).
- WasteCap Wisconsin has case studies, training materials, specifications, and other resources for recycling C&D materials. See: <http://www.wastecapwi.org/candd.htm>

#### Using Recycled Materials in Construction

- The Recycled Materials Resource Center has user guidelines for many industrial byproducts and recycled materials and compiled existing national specifications. <http://www.recycledmaterials.org/tools/uguidelines/index.asp>  
<http://www.recycledmaterials.org/tools/uguidelines/standards.asp>
- Case studies and additional resources are available at: [www.epa.gov/industrialmaterials](http://www.epa.gov/industrialmaterials)

#### Landscaping Materials with Recycled Content

- *Compost Use on State Highway Applications* provides examples and documents benefits of using compost: ([www.epa.gov/epawaste/conserve/rrr/composting/highway/index.htm](http://www.epa.gov/epawaste/conserve/rrr/composting/highway/index.htm))
- Compost can be used as a best management practice to control run-off at a construction site: [www.epa.gov/epawaste/conserve/rrr/composting/pubs/index.htm](http://www.epa.gov/epawaste/conserve/rrr/composting/pubs/index.htm)). Region 5 webinars on the use of compost to control stormwater and reduce erosion (<http://www.epa.gov/reg5rcra/wptdiv/solidwaste/recycle/compost/webinars.html>)
- EPA's GreenScapes program has information that will help to increase the purchase of recycled content landscaping materials for both the construction and maintenance phases of a project <http://www.epa.gov/epawaste/conserve/rrr/greenscapes/index.htm>

#### 2010 Region 5 "Build for the Future" Campaign

- Region 5 will recognize organizations that use recycled materials in construction or recycle materials generated during construction when they join WasteWise, an EPA partnership program ([www.epa.gov/wastewise](http://www.epa.gov/wastewise)), as part of our "Build for the Future" Campaign.
- WasteWise partners have free access to RETRAC, an online database which makes tracking progress easy. WasteWise provides a climate profile to reporting partners, translating their waste reduction results into greenhouse gas reductions. Contact: Susan Mooney at 312-886-3585 or [mooney.susan@epa.gov](mailto:mooney.susan@epa.gov) for more information.



Springfield-Sangamon County  
Regional Planning Commission

July 29, 2010

Mr. James Hummel  
Acting Superintendent  
Lincoln Home National Historic Site  
413 South Eighth Street  
Springfield, IL 62701

Also to:

✓ Lincoln Home National Historic Site  
General Management Plan  
National Park Service  
Denver Service Center – PDS  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Hummel:

I wish to thank you and the National Park Service for offering the Springfield-Sangamon County Regional Planning Commission (SSCRPC) and the public the opportunity to comment on the draft General Management Plan and Environmental Impact Statement for the Lincoln Home National Historic Site. Just as the Lincoln Home Site is an invaluable part of Springfield and Sangamon County, we believe that the concepts and proposals offered in your plan will be invaluable to the Site, the Park Service and the residents of this region for many years to come.

After reviewing the plan, the Commission staff would like to make comment. We have focused most of our attention on Alternative 2, as it is the preferred alternative, but believe that several of the items we address below are relevant to the other options as well, and provide a more general view that can be considered in your planning.

One overall comment relates to the draft's consideration of its relationship to other planning efforts. While the draft points to several planning documents that were consulted, we believe that four others are pertinent to your efforts and should be reviewed and taken into account in the final document. These are:

- ***The Springfield Comprehensive Plan: 2020.*** This plan, adopted Dec. 18, 2000, and subsequently amended, addresses land use policy in the City of Springfield based upon a 20-year planning horizon. It is important in that it undergirds City zoning actions, and these actions can affect the Site. The Lincoln Home area and surrounding land uses are included in Sector 18 of this plan.

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Related to this, we believe that attention should be given to the fact that the Lincoln Home Site and some of the surrounding area currently lie within one of Springfield's historic zoning districts. We believe that it would be valuable for the Park Service to give greater attention in the draft to the impact that the Site has on the surrounding areas, and the effect that the surrounding areas might have on the Site, as the City of Springfield did in providing this special zoning designation. In this regard we would like to see a broadening of the "management zones" to include areas not within the bounds of the Site itself. This will be addressed more fully below.

- ***Springfield Strategy 2020: Guide to Springfield – Past, Present and Future.*** This visioning study was conducted by the City of Springfield in 2000 and ultimately led to the 2002 R/UDAT report referenced in the draft. The Planning Commission believes that the general themes identified in this vision are relevant to your work, including the comments in the "History, Culture and the Arts" section of the report.
- ***The Greenways and Trails Plan for Springfield and Sangamon County.*** This report, prepared by the SSCRPC in 1997, establishes the current structure for bikeway and trail corridors in the planning area. As more-and-more residents and visitors look to non-motorized modes of travel, we believe that consideration should be given in the Lincoln Home Site plan as to how the non-vehicular uses will be accommodated.

The Planning Commission recently engaged a consultant to work with us to develop an updated pedestrian and bicycle plan for the metropolitan planning area. We would be happy to provide the Park Service with information arising from this new effort as it proceeds.

- ***The 2035 Long Range Transportation Plan.*** Adopted March 11, 2010, this plan considers transportation impacts and needs foreseen over a 25-year planning horizon. As the vast majority of the visitors to the Lincoln Home Site will arrive by roadway, either by bus or personal auto, the degree to which roadway improvements and level of service will affect ingress and egress to and from the site should be considered. Though we anticipate that fewer visitors will arrive by air or train, transportation by train may change with the development of high speed passenger rail service between St. Louis and Chicago. This will be addressed further below.

Related to the preferred alternative, but we believe relevant to the other alternatives and the over-all plan for the Site as well, we offer the following suggestions:

- ***Adaptively Re-Use Existing Local Lincoln-Era Structures.*** We suggest that the Park Service consider moving existing Lincoln-era structures to the site and redevelop them for adaptive re-use when such re-use is feasible, rather than construct new structures.



As you may know, many Lincoln-era structures exist in Springfield that are likely to be lost to deterioration and redevelopment. Many of these structures are available at low or no cost, and can be easily moved to the Lincoln Home Site. For example, and thanks to assistance from the City of Springfield and others, one Lincoln-era structure of this type, which was scheduled for demolition as part of a private development, was recently moved to a site on 7<sup>th</sup> Street, immediately adjacent to the Lincoln Home Site.

Rather than constructing new, ersatz Lincoln-era structures, we would suggest that the Park Service consider the possibility of entering into partnership with the City of Springfield's Historic Sites Commission and Office of Planning and Economic Development to identify existing Lincoln-era structures, such as the one mentioned above, that could cost-effectively meet your needs, and then, to the greatest extent possible, seek to move, rehabilitate and re-use these structures rather than build new.

- **Extend the "Neighborhood" to 9<sup>th</sup> Street.** We believe that it is important to envision the Lincoln Home Site area as a "neighborhood" rather than as a "museum". After reading the draft plan, we believe that the Park Service shares this vision.

While the area is bounded to the west by parking and various Site structures, it is not to the east. We suggest that the property along 9<sup>th</sup> Street be made development-ready and set aside for the adaptive re-use of existing Lincoln-era structures, as noted above. This would: complete the feeling of a "neighborhood", extending it to the east and buffering the existing properties along 8<sup>th</sup> Street; fit well with the existing Morse House site; and still allow for the curatorial facility which could be housed in an adaptively re-used structure.

This should not affect the possible inclusion of a bus loading and unloading area, as indicated in Alternative 3, though we would note that we have some concerns about locating such a facility along a heavily traveled arterial, and suggest that other options be considered.

- **Better Specify and Buffer the Maintenance Facility and Employee Parking.** We understand the need for both the maintenance facility and employee parking, and recognize the Park Service's interest in providing a buffer at Edwards and 9<sup>th</sup> Streets. We are concerned, however, that the plan does not address how this rather large parcel will be developed, the scale and bulk of the facility, the degree to which the parcel will primarily become another surface parking lot in the city-center, and the nature of any landscaping that will be done to buffer the facility and proposed parking.

As this component of the plan is mentioned as a boundary adjustment, we recommend that the plan give special attention to laying out the details of this proposed development so that a better assessment can be made as to the impact that this use will have on the adjacent properties to the west and south. This is particularly important to the City as it attempts to encourage redevelopment in this area, which would ultimately benefit the Lincoln Home Site as well.

- **Consider the Implications of Non-Motorized Travel to and Within the Site.** As noted above, we anticipate that more-and-more residents and visitors will visit or come in contact with the Site as pedestrians or bicyclists. We would like to see particular attention given in the plan to pedestrian and bicycle movement to the Site and within it, including the establishment of bike racks and related facilities. The SSCRPC would be pleased to work with the Park Service on this aspect of the plan as we develop the updated pedestrian/bike plan for the metro planning area.

Somewhat related to this matter, we would suggest that the Park Service also consider the implications of high speed passenger rail and the proposed Springfield Mass Transit District multi-modal facility. We anticipate that high speed passenger rail service through Springfield will be developed within the next five to ten years, and that it is likely that this service will be on either the existing 3<sup>rd</sup> or 10<sup>th</sup> Street rail corridors. Both corridors are located within walking distance of the Site.

It is also likely that the proposed multi-modal facility will be developed in the city-center along whichever route is selected for passenger rail. As the advent of improved passenger train service is expected to bring more visitors to Springfield, including those who will visit the Lincoln Home Site, we encourage the Park Service to give consideration in its planning as to how these visitors will move from the multi-modal or other passenger facility to the Lincoln Home Site; most likely as pedestrians or by trolley.

- **Expand the Zones of Consideration Regarding Site Management.** We fully understand that the Park Service does not have management responsibilities for properties that lie outside of the Lincoln Home Site itself. At the same time, and as our comments above indicate, the Site affects the surrounding area and is affected by it. This is particularly true because the Site lies fully within an older, developed urban core. For this reason we suggest that a more holistic approach be taken to the consideration of site management and that additional attention be given in the plan as to how site management might become engaged in the redevelopment of areas outside of the Site in partnership with the City of Springfield.

The Lincoln Home Site is buffered with hard boundaries to its west, north and east. While neighborhood and property deterioration could occur to the west and east (particularly given that properties along 9<sup>th</sup> St. include a mix of land uses, including industrial), this is not likely to affect the Site because of the wide bounds that 7<sup>th</sup> and 9<sup>th</sup> streets create. It is even less likely to be affected by deterioration to the north because of the municipal facilities on adjacent Capitol Ave.

However it is likely to be affected by deterioration or poor land use decision-making to the south. Edwards St. does not provide the wide buffer that 7<sup>th</sup> and 9<sup>th</sup> streets do, and it does not contain the large degree of commercial and institutional uses that presently exist on the other boundaries.

And we note that even small management decisions made by the Park Service at the Site can affect the nature of development to the south. For example, while numerous attempts have been made to restore properties along Edwards St. and put them to commercial reuse as restaurants and shops catering to Lincoln Home Site visitors, we have been told that visitors seldom move beyond the barriers that the Park Service has established at the intersection of Edwards and 8<sup>th</sup> Street. We have observed visitors walking in that area and stopping at these barriers, and have asked them why they did not walk across the street. Almost invariably they have answered with some form of, "We thought that this was the end of the area", or "We thought that we were supposed to stop here." While these barriers do not *physically* limit visitors, they do create a *psychological* barrier having a singular effect on the area.

Looking for ways to open up the area and break down the disconnection between the Site and the properties to the south might go a long way toward encouraging private redevelopment along Edwards, which would offer benefits to the Site by stabilizing the neighborhood to the south.

We would encourage the planning team to add an additional "management zone" to the table shown on pages 31-34 of the draft. This zone, which we will call the Area Partnership Zone, would be intended to address the neighborhoods and areas adjacent to the Lincoln Home Site, and, in partnership with the City, identify the: desired resource conditions for these surrounding areas; what visitors to the site would expect in these areas; what might be appropriate uses in these areas; and the strategies that the Park Service and City might implement in partnership to strengthen and revitalize them.

We would hope that the end result would benefit both the Lincoln Home Site and the City, as it could stabilize surrounding areas that may be under stress, improve the visitor experience, draw more visitors to the area, and ultimately lead to a stronger commercial and residential base in the city-center.

The SSCRPC understands that taking this larger planning view would not normally be part of a management plan or the EIS associated with it. Typically such plans take a more micro view, focusing, as this plan does, just upon what is within the bounds of the site itself. But we encourage the Park Service and Lincoln Home Site management to take this broader view and attempt to include it in your planning.

We not only believe that such an approach would be to the benefit of site management over time, but find it to be consistent with the Obama Administration's desire for the development of sustainable communities and regions where planning and development center on six Livability Principles:

- The provision of additional transportation choices;
- Promotion of equitable, affordable housing;
- Enhanced economic competitiveness;
- Support for existing communities through such things as land recycling and community reinvestment;
- Coordination of Federal policies and funding to remove barriers to collaboration; and
- The valuing of communities and their neighborhoods.

We encourage the Park Service and Lincoln Home Site management to consider how these Livability Principles might be considered as part of the new General Management Plan, and seek opportunities to address them in the final document.

Again, the SSCRPC appreciates the opportunity to comment on the draft General Management Plan and Environmental Impact Statement. We have always appreciated the value that this site has for the area we serve, but especially appreciated the positive engagement that superintendents of the site have had with our community for many years. This National Park Service facility, its management and staff, have always brought credit to the Park Service and have been of tremendous value to this city.

The Springfield-Sangamon County Regional Planning Commission and its staff would be pleased to assist site management and the Park Service in any way that we can. If you have any questions concerning our comments, or believe that we can be of assistance to you in your planning in any way, please do not hesitate to contact us.

Best wishes,



Norm Sims  
Executive Director

CC: Mr. Larry Hamlin, Chairman, SSCRPC; Mr. Mike Farmer, Director, Office of Planning and Economic Development, City of Springfield; Ms. Nancy Evans, Vice Chair, Springfield Historic Sites Commission.



Illinois Historic  
Preservation Agency

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Sangamon County

Springfield

General Management Plan, Environmental Impact Statement  
Lincoln Home National Historic Site - 413 S. 8th St.

NPS

IHPA Log #001070910

August 18, 2010

Dale Phillips, Superintendent  
Lincoln Home National Historic Site  
413 S. 8th St.  
Springfield, IL 62701-1905

Dear Mr. Phillips:

Thank you for submitting the draft management plan for our review. This document is the result of several years of positive planning efforts among many partners, including our office. Our comments on the general management plan for the Lincoln Home are as follows:

- For Alternative 2, we are concerned with your plans for new compatible construction in the lots surrounding the Lincoln Home rather than reconstruction of historic shells. If these plans are chosen by the Park Service as the preferred option, further consultation should be conducted with this office. This option could be difficult to realize as there is a wide spectrum as to what is acceptably compatible.
- For Alternatives 2 and 3, we are concerned with establishing restrooms in a new building on the Carrigan Lot, which is directly adjacent to the Lincoln Home. We understand the desire to keep people on site and around the core of the historic area but other options are viable. Why was no thought given to putting the restrooms in the Arnold Barn like in Alternative 4 for Alternatives 2 or 3? Doing so would meet the NPS goal of keeping people in the core of the district and be out of the viewshed from the main sight lines of the Lincoln Home. Also, at the informational meeting IHPA attended, there was a lot of public concern about placing the restrooms on the Carrigan Lot.
- The new construction proposed for Alternative 3 in order to fill nearly all of the vacant lots on site would not be our preferred option. The large, connected buildings would seem out of place. With so much new construction, it would take away from the accuracy and credibility of the site.
- For the new construction of houses in Alternatives 2 and 3, especially those proposed in the Burch, Brown and Carrigan lots, we would prefer reconstructing the houses that were original to the site. At the informational meeting it was said that there was not sufficient information to accurately reconstruct these homes. However, there are photographs depicting the structures available. Has

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any thought been given to recreating the exterior of these homes (as closely as possible) and having free reign with the design of the interior and still use it for proposed visitor use (staging/exhibits/etc)?

- We would not have a problem with the curatorial facility located in the southeast portion of the site (as proposed in Alternative 2), as well as a boundary extension to the southeast to house a maintenance facility and employee parking (as proposed in Alternatives 2 and 3).
- In Alternative 2, development of the other empty lots on site is discussed. There was nothing specifically planned; only building house foundations on the lots was mentioned as a possibility in the plan. We question how this approach will be consistent with the Secretary of the Interior's Standards for Historic Preservation.

Thank you for providing us the opportunity to participate in the planning process.

Sincerely,



Anne E. Haaker  
Deputy State Historic  
Preservation Officer

AEH

Cc: Mr. Tom Thomas, Plan Coordinator, National Park Service  
Ms. Susan Haake, National Park Service



# United States Department of the Interior

## NATIONAL PARK SERVICE

Lincoln Home National Historic Site  
413 South Eighth Street  
Springfield, Illinois 62701-1905

IN REPLY REFER TO:

LIHO (D18)

February 14, 2011

Ms. Anne Haaker, Deputy SHPO  
Illinois Historic Preservation Agency  
Preservation Services  
#1 Old State Capitol Plaza  
Springfield, IL 62701-1507

Re: General Management Plan, Lincoln Home National Historic Site

Dear Ms. Haaker:

Thank you for your continued assistance and cooperation in the development of the draft general management plan (GMP) and environmental impact statement (EIS) for Lincoln Home National Historic Site. I am writing to confirm the next steps in our compliance process as outlined in the recent conference call with your office, the National Park Service, and Ms. Katry Harris representing the Advisory Council on Historic Preservation. As agreed in the call, the NPS will:

- move ahead with the abbreviated final GMP/EIS;
- use the existing NPS programmatic agreement to guide all future compliance related to the implementation of actions described in the GMP;
- assess the specific effects of actions in the GMP as these project receive funding for implementation;
- prepare NEPA and 106 documentation for each identified action;
- issue a finding of no historic properties affected in the Record of Decision (ROD) for the draft GMP/EIS.

The specific language for this finding is as follows:

*In accordance with the provisions of 36 CFR 800.8(c), the NPS used the process and documentation required for the preparation of this GMP/EIS to comply with Section 106 of the National Historic Preservation Act. Through these integrated processes, the NPS consulted with parties with an interest in historic preservation, including the Illinois State Historic Preservation Office and local governments. In consultation with these parties, the NPS identified historic properties listed in the National Register of Historic Places within the area of potential effects for the draft general management plan. However, due to the general nature of the plan and the relative uncertainty of the nature of federal undertakings which may stem from it, the NPS cannot yet assess with certainty the potential effects of these undertakings on historic properties. The general management plan is part of the "nondestructive project planning" for these prospective undertakings, and as such does not "restrict the subsequent consideration of alternatives to avoid, minimize, or mitigate a specific undertaking's adverse effects on historic properties" in accordance with 36 CFR § 800.1(c). Accordingly, the NPS finds that no historic properties will be affected by the development of the management plan in accordance with 36 CFR 800.4 (d) (1). Further, the NPS commits in this decision to complete the Section 106 review for each undertaking that may stem from the management plan in accordance with the Programmatic Agreement among the National Park Service, the*

ACHP, and the National Conference of State Historic Preservation Office for Compliance with Section 106 of the National Historic Preservation Act (2008) and the ACHP's regulations.

I look forward to working with you during the final stages of the planning process for Lincoln Home, as well as the future implementation of the actions described in the general management plan. If you have any questions, please call me at (217) 391-3222 or e-mail me at Dale\_Phillips.nps.gov.

Again, thank you for your assistance in planning for the future of Lincoln Home NHS.

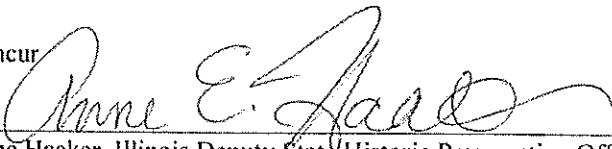
Sincerely,



Dale Phillips  
Superintendent  
Lincoln Home National Historic Site

Cc: Mr. John M. Fowler, Executive Director, Advisory Council on Historic Preservation

Concur



Anne Haaker, Illinois Deputy State Historic Preservation Officer





As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.



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LINCOLN HOME NATIONAL HISTORIC SITE • SPRINGFIELD, ILLINOIS  
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